MEMBER:
COMMITTEE ON ETHICS
RANKING MEMBER
COMMITTEE ON
WAYS AND MEANS
SUBCOMMITTEE ON SELECT REVENUE MEASURES
SUBCOMMITTEE ON OVERSIGHT

SENIOR WHIP

Linda T. Sánchez
38TH DISTRICT, CALIFORNIA

Congress of the United States
House of Representatives
Washington, DC 20515

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(202) 225-6676

DISTRICT OFFICE:
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SUITE 100
CERRITOS, CA 90703
(562) 860-5051
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14008387

FEDERAL TRADE COMMISSION
2013 JUN -7 AM 8: 32
CONG. CORRES. BRANCH

Edith Ramirez, Chairwomans
Federal Trade Comission
600 Pennsylvania Avenue, NW
Washington, DC 20580

June 5, 2013

Dear Chairwoman Ramirez:

I am writing to express my concern about the marketing and business practices of Herbalife, Ltd. In particular, I am troubled by allegations that this company may be harming consumers – especially those from our country's most vulnerable populations.

There have been extensive media reports and allegations about Herbalife's business practices. On March 12, 2013, the National Consumers League wrote a letter urging the FTC to conduct an investigation into the possibility that Herbalife is a complex pyramid scheme.[1] More recently, on May 17, 2013, the Hispanic Federation also wrote a letter urging an FTC investigation.[2] Both groups have voiced concerns over whether Herbalife's distributors are primarily incentivized by recruiting others, or by selling the Herbalife product. Additionally, as the National Consumers League letter states, "Low-income consumers, as well as African-Americans and Hispanics, were found to be especially vulnerable to pyramid-schemes masquerading as legitimate home-based business opportunities."[3]

As I have learned more about this issue from my constituents and from outside groups, I believe it is the Federal Trade Commission's (FTC) responsibility to examine these allegations. Given the FTC's mission to investigate claims of fraud and potential pyramid schemes, I encourage you to investigate this matter. I have confidence that such an investigation will provide clarity to consumers and I expect you will aggressively pursue it in a timely manner.

---

[1] Sally Greenberg, National Consumers League to Edith Ramirez, Federal Trade Commission, 13 March 2013, http://www.nclnet.org/images/PDF/FTC%20Letter%20on%20Herbalife.pdf
[2] Jose Calderon, Hispanic Federation to Edith Ramirez, Federal Trade Commission, 17 May 2013, http://www.scribd.com/doc/142602752/The-Honorable-Edith-Ramirez-FTC
[3] Sally Greenberg, National Consumers League to Edith Ramirez, Federal Trade Commission, 13 March 2013, http://www.nclnet.org/images/PDF/FTC%20Letter%20on%20Herbalife.pdf

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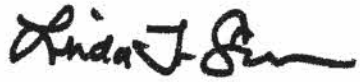
If I can be of additional assistance, please do not hesitate to contact Mike McGourty of my staff at 202-225-6676 or michael.mcgourty@mail.house.gov.

Thank you for your attention to this important matter.

Sincerely,



Congresswoman Linda T. Sánchez
Member of Congress (CA-38)

LORETTA SANCHEZ
46TH DISTRICT, CALIFORNIA

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Loretta@mail.house.gov

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Congress of the United States
House of Representatives
Washington, DC 20515

COMMITTEE ON ARMED SERVICES
SUBCOMMITTEES:
RANKING MEMBER, TACTICAL AIR AND LAND FORCES
STRATEGIC FORCES

COMMITTEE ON HOMELAND SECURITY
SUBCOMMITTEES:
BORDER AND MARITIME SECURITY
COUNTERTERRORISM AND INTELLIGENCE

JOINT ECONOMIC COMMITTEE

July 26, 2013

Chairwoman Edith Ramirez
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Chairwoman Ramirez:

We write to you today as the substantial concerns surrounding the business practices of Herbalife, Ltd. continue to increase. As you may be aware, a number of outside groups including the Hispanic Federation, League of United Latin American Citizens (LULAC), National Consumers League, Consumer Action and Consumers Union have raised concerns about these business practices, as have a number of media outlets.

After careful consideration, we would like to request that the Federal Trade Commission (FTC) look into Herbalife's business practices, specifically whether Herbalife's participants are deceived by exaggerated earnings claims, and whether profits are derived primarily from selling to outside consumers or from recruiting others. We believe the FTC is best suited to determine whether Herbalife business model is structured in a way that is in agreement with federal regulations. Ensuring the fair treatment of consumers, many of whom reside in our districts, is a matter of utmost importance and the FTC's expertise is appropriate for this matter.

As members of Congress, we take our duty to represent our constituents very seriously. In their best interest, we have met with groups representing both sides of this issue and we have reviewed countless reports about the concerns surrounding Herbalife. It is our general consensus that the FTC is best positioned to investigate this matter and provide a factual response. We are fully confident that your resources will offer the most accurate assessment of the business practices that are in question.

We thank you for your attention on this important manner.

Sincerely,

Loretta Sanchez
Member of Congress

Michelle Lujan Grisham
Member of Congress

PRINTED ON RECYCLED PAPER

hispanicfederation

55 Exchange Place. 5th Floor
New York, NY 10005
T. 212 233 8955 F. 212 233 8996

1133 19th Street N.W., Suite 1035
Washington, DC 20036
T. 202 887 4977 F. 202 833 6135

www.hispanicfederation.org

May 17,2013

FederalTrade Commission
Received
MAY 28 2013
Chairwoman Ramirez

The Honorable Edith Ramirez
Chairwoman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Chairwoman Ramirez:

Since its inception in 1990, Hispanic Federation, has as its core mission to empower and advance the Hispanic community. It provides grants to a board network of Latino non-profit agencies serving the most vulnerable members of the Hispanic community and advocates nationally with respect to the vital issues of education, health, immigration, economic empowerment, civic engagement and the environment.

As part of our work on economic empowerment we have worked with small businesses to make them viable and prosperous. We have worked with member agencies that provide loans to entrepreneurs who otherwise would not have the needed capital to jump start their business dreams. We have offered seminars on mortgage assistance, development of credit and warned our community about a myriad of schemes created to defraud Latinos, especially the most vulnerable in our community.

Through our financial literacy workshops, leaders in our network and some of our elected officials we have learned about the proliferation of get rich quick schemes that focus on Latinos and especially our immigrants.

We write to you to urge the Federal Trade Commission to conduct an investigation of the multi-level marketing company known as Herbalife. It is our understanding that the company's marketing materials promise richness for a few hours of work from home. You can imagine that for immigrants, particularly those who are underemployed or have no papers, this promise can seem like their ticket to achieving the American Dream. We understand, however, that when you add expenses to acquire the product, lists and marketing materials, most distributors appear to actually lose money.

A particular concern to us about Herbalife is whether distributors make money selling products or recruiting others to sell products: The latter is an indicator of a pyramid scheme. Reading the recent debate on this issue; Herbalife's statements to explain its compensation structure are contradictory. We urge you to focus on this issue: are distributors incentivized to sell product or to recruit new distributors into a pyramid.

Through our work over 23 years we have learned that most multi-level marketing companies are legitimate businesses. They in fact compensate distributors for selling products. In fact, many of these companies have provided new immigrants and other Latinos a real opportunity to move forward and earn a decent living for them and their families. From what we have learned about Herbalife, anecdotally and through our work, we have serious concerns about their business practices and we urge you to look into this matter.

Thank you for your attention.

Sincerely,

Jose Calderon
President

STEVE STIVERS
15TH DISTRICT, OHIO

FINANCIAL SERVICES COMMITTEE

Congress of the United States
House of Representatives

July 30, 2013

Ms. Jeanne Bumpus
Director, Office of Congressional Relations
Federal Trade Commission
600 Pennsylvania Ave NW Rm 404
Washington, DC 20580-0001

Dear Ms. Bumpus:

The attached communication concerns a problem my constituent is experiencing with Herbalife and eHome Business Networks Inc. regarding a complaint he has filed with the Federal Trade Commission.

Please address the concerns brought forward by constituent, Mr. (b)(6) Your response can be directed to my caseworker, Adam Slane, regarding this inquiry.

If you have any additional questions, please contact Adam in my district office at 614-771-3969. My constituents are a top priority and I appreciate your time and attention to this matter.

Respectfully,

STEVE STIVERS
Member of Congress

SS/as
Enclosed

WASHINGTON OFFICE:
1022 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
PH: (202) 225-2015
FAX: (202) 225-3529

CENTRAL OHIO DISTRICT OFFICE:
3790 MUNICIPAL WAY
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PH: (614) 771-4988
FAX: (614) 771-3990

SOUTHEAST OHIO DISTRICT OFFICE:
123 S. BROAD STREET, SUITE 235
LANCASTER, OH 43130
PH: (740) 654-2654
FAX: (740) 654-2482

SOUTHWEST OHIO DISTRICT OFFICE:
69 N. SOUTH STREET, SUITE 178
WILMINGTON, OH 45177
PH: (937) 283-7049
FAX: (937) 283-7052

UNITED STATES CONGRESS ♦ OHIO

Congressman Steve Stivers

CONSENT FOR RELEASE OF INFORMATION

To begin processing your case, please complete the following information. **Please Print:**

Name: (b)(6)
Address: (b)(6)
City: Columbus State: Ohio Zip: (b)(6)
Phone: Home: (b)(6) Cell: (b)(6) Work:
Email: (b)(6) Fax:
Social Security Number: (b)(6) Date of Birth (mm/dd/yyyy): (b)(6)

Complete following fields only if applic... your case.

Petitioner	**Beneficiary**
Name:	Name:
Alien Registration Number:	Alien Registration Number:
Date of Birth:	Date of Birth:
Country of Birth:	Country of Birth:
Form Type:	Receipt Number:
BWC Claim Number:	Loan/Account Number:
Passport Number:	Confirmation Number:

Briefly explain your problem and/or desired information (*Include additional pages if needed or copies of any documentation that you may have which would help expedite your inquiry. Please do not send original documents*).
Please Print:

I invested over $20,000 with Herbalife and eHome Business Networks, Inc., which is wholly owned by Anthony Powell, Herbalife Chairman's Club Original Founder, and motivational speaker. I did everything I was asked to do by (b)(6) Herbalife President's Club Original, to accomplish a monthly income of $5000. Not only did they take all the above money under false pretenses but at the last minute the entire Anthony Powell Upline moved its people and systems (which Herbalife can not provide) to another MLM called VEMMA. Now at VEMMA they want me to invest another $20,000 to start over. I CAN NOT DO IT AND AS FAR AS I CAN UNDERSTAND THEY DON'T CARE. I HAVE OFFERED TO SETTLE AND THEY WOULD NOT SETTLE UNLESS I RETRACTED AND REFUTED ALL THE COMPLAINTS THAT I FILED WITH THE FTC, SEC, ATTORNEY GENERALS OF OHIO, CALIFORNIA, ARIZONA, MASSECHUSETTES AND NEW YORK. THEY STOLE THIS MONEY FROM ME AND I CAN NOT FIND SOMEONE TOUGH ENOUGH TO REPRESENT ME TO GET MY MONEY BACK. I SOLD MY CAR AND I AM FINANCIALLY BROKE

I am aware that provisions of the Privacy Act of 1974 (Public Law 93-579) prohibits the release of information in my file without my approval. I hereby authorize the above mentioned agency (agencies) to provide information regarding my case or claim to the Office of United States Congressman Steve Stivers.

Signature: (b)(6) Date: July 23, 2013

Please Return Completed Form and Documents To:

By Mail:
Office of Congressman Stivers
C/O Adam Slane
3790 Municipal Way
Hilliard, OH 43026

By Fax:
Fax: (614) 771-3990
Attn: Adam Slane

Questions:
Telephone: (614) 771-4968

eHome Business Networks, Inc. & Herbalife Information Notes

Prepared by (b)(6) on
April 18, 2013

(b)(6) Contact Information: Mailing Address: (b)(6) Hilliard, Ohio (b)(6)
Home Phone: (b)(6) Cell Phone: (b)(6)
Email: (b)(6)

I became a Herbalife Distributor on June 6, 2012. I became a Herbalife Supervisor on July 1, 2012. I as a Herbalife Supervisor became a Herbalife World Team Member on November 1, 2012. Since June 6, 2012 I have spent over $21,000 on Herbalife Product Inventory, Bridge to Business (Chairman's Club Owned) Recruiting Leads ($159.95 each) & Marketing Materials, Other Marketing Materials and IOffice/Connecting Point/Merchant Account Systems (Chairman's Club Owned) $385.00 in monthly fees and total system set up fees of $958.00. I also spent an additional $5,000 on a back up generator for my home so I would never lose internet or phone availability as a direct result of being told by my President Team Member (b)(6) to do so. As of this date I have received $684 in Wholesale Earnings and $200 in Royalties for a total of $864.

Points of Interest:

1. On August 1, 2012 I created and submitted to (b)(6) a marketing program based on committing to spending 70 hours per week and purchasing 20 Recruiting Leads per month, which based on (b)(6) (b)(6) verbal commentary, would create an income of $5,000 per month and get me to World Team within six months. This program ultimately cost me $3,500 per month in marketing expense. I spent an additional $4,600 on Retailing the Product over the 6 months, June 6, 2012 through November 30, 2012.
2. eHome Business Networks, Inc. System which is owned by Anthony Powell was designed for Training new distributors and manage recruiting and retailing leads. In general it cost in excess of $1000 per month but the killer point was that in the training process you had to join: the Telephone System: $199 set up fee and $89 per month; the Management System $259 set up and $99 per month; (4) Websites $69 each set up x 4 and 30 per month; Lead Tracker/Call System $224 set up and $89 per month.
3. Minimum of 30% Efficiency in converting Purchased Recruiting Leads to Distributors/Supervisors or Purchased Leads would not be released to Supervisor by Bridge to Business (Needs Presidents Club Member Approval for Release). Combined with point 7 below this made my situation highly stressed and unfair taking into account that I was spending more than 70 hours per week to accomplish my goals and it still could not please the Upline.
4. IOffice Conversion Created Huge Problems for Distributor's Websites, which became dysfunctional with each system problem (8 different times) with No Notification from IOffice.

5. Stacking vs. Front Lining Distributors and why Stacking (Sharing Volume to Incentivize more product purchases from the entire Downline re: Supervisor Level) is so much more valuable to Royalty Earners and not to Distributors earning wholesale discounts.
6. Email Volume in excess of 30 per day and Google Calendar Setup to Schedule 10 to 12 hour days including Trainings, Interviews, DAC Calls and Seminars. Upline Sponsor and Upline PTM insisted on having access to Google Calendar, IOffice and Track My Dials. All in the interest of controlling all Downline members through intimidation.
7. First Interview with prospective Recruit completed by Myself (Must be Supervisor) & Immediate Upline Sponsor (b)(6). Second Interview with prospective Recruit completed by Myself & Upline Presidents Team Member (b)(6) I experienced great success in my interviews to the extent that my Upline Sponsor and PTM did not have the time necessary to do interviews on a timely basis. When I started doing First Interviews and Second Interviews (Out of Necessity) on my own the PTM threatened to discontinue doing my Second Interviews. I was continually reminded of this by (b)(6) (b)(6)
8. Extreme Pressure to Purchase Marketing Materials, Shake Customer Leads and Recruiting Leads from Bridge to Business which I am sure is owned by Chairman and Presidents Team Members.
9. DAC Calls were daily and the setting was to exert extreme pier pressure on participants progress of daily recruiting and product sales (pushed marketing materials was the purpose) conversions.
10. Training Program includes forced enrollment into Connecting Point and IOffice System use to the tune of $300 per month in fees.
11. Purchased Recruiting Lead Return/Replacement Policy is Favorable to Bridge to Business. They would replace paid leads with unsubstantiated leads on a regular basis without any choice by distributor.
12. Royalty Sales Contact Statement is sent each month to Herbalife as a requirement for Royalty Payment at each Royalty Level: World Team, Global Expansion Team and so on. I did not send my Royalty Sales Contact Statement for my first and only check. Funny thing is that regarding my only Royalty Payment Amount as mentioned above ($200.) the Herbalife Home Office said they would make an exception to the "Rule" because I was such an outstanding Supervising Distributor and World Team Member.
13. In conclusion, I must admit that Herbalife, eHome Business Networks, Inc. and Anthony Powell and his cronies have designed the total Program to take advantage of distributors by preaching that each distributor has a huge opportunity to make money as an independent business distributor but the reality is that they control and profit from all elements of the Program through Royalty Income from Recruiting Distributors and Distributor TURNOVER and Not Retail Sells of the Products by Distributors.
14. Then to top all the arrogance and inconsistencies the entire Anthony Powell Organization and all the so called system use benefits that eHome Business Networks, Inc. provided was kicked out of Herbalife with prejudice in January 2013 and immediately moved its 16,000 distributors to VEMMA another MLM Organization selling health supplements.

15. So, I now am being asked to invest another $21,000 into VEMMA and the new Anthony Powell Organization and eHome Business Networks, Inc. of Arizona with no support to continue with Herbalife from Herbalife of California.

Bill Ackman & Herbalife Information Notes

Prepared by (b)(6) on
December 23, 2012

(b)(6) Contact Information: Mailing Address: (b)(6) Hilliard, Ohio (b)(6)
Home Phone: (b)(6) Cell Phone: (b)(6)
Email: (b)(6)

I became a Herbalife Distributor on June 6, 2012. I became a Herbalife Supervisor on July 1, 2012. I as a Herbalife Supervisor became a Herbalife World Team Member on November 1, 2012. Since June 6, 2012 I have spent over $14,000 on Herbalife Product Inventory, Bridge to Business (Chairman's Club Owned) Recruiting Leads & Marketing Materials, Other Marketing Materials and IOffice/Connecting Point/Merchant Account Systems (Chairman's Club Owned) monthly fees. I also spent an additional $5,000 on a back up generator for my home so I would never lose internet or phone availability as a direct result of being told by my President Team Member (b)(6) to do so. As of this date I have received $684 in Wholesale Earnings and $200 in Royalties for a total of $864.

Points of Interest:

1. Minimum of 30% Efficiency in converting Purchased Recruiting Leads to Distributors/Supervisors or Purchased Leads would not be released to Supervisor by Bridge to Business (Needs Presidents Club Member Approval for Release).
2. IOffice Conversion Created Huge Problems for Distributor's Websites with No Notification from IOffice.
3. Stacking vs. Front Lining Distributors and why Stacking (Sharing Volume to Incentivize more product purchases from the entire Downline re: Supervisor Level) is so much more valuable to Royalty Earners and not to Distributors earning wholesale discounts.
4. Email Volume in excess of 30 per day and Google Calendar Setup to Schedule 10 to 12 hour days including Trainings, Interviews, DAC Calls and Seminars. Upline Sponsor and Upline PTM insisted on having access to Google Calendar, IOffice and Track My Dials. All in the interest of controlling all Downline members through intimidation.
5. First Interview with prospective Recruit completed by Supervisor & Immediate Upline Sponsor. Second Interview with prospective Recruit completed by Supervisor & Upline Presidents Team Member. I experienced great success in my interviews to the extent that my Upline Sponsor and PTM did not have the time necessary to do interviews on a timely basis. When I started doing First Interviews and Second Interviews (Out of Necessity) on my own the PTM threatened to discontinue doing my Second Interviews.
6. Extreme Pressure to Purchase Marketing Materials, Shake Customer Leads and Recruiting Leads from Bridge to Business which I am sure is owned by Chairman and Presidents Team Members.
7. DAC Calls were daily and the setting was to exert extreme pier pressure on participants progress of daily recruiting and product sales (pushed marketing materials was the purpose) conversions.
8. Training Program includes forced enrollment into Connecting Point and IOffice System use to the tune of $500 per month in fees.
9. Purchased Recruiting Lead Return/Replacement Policy is Favorable to Bridge to Business.

10. Royalty Sales Contact Statement is sent each month to Herbalife as a requirement for Royalty Payment at each Royalty Level: World Team, Global Expansion Team and so on. I did not send my Royalty Sales Contact Statement for my first and only check. Funny thing is that regarding my only Royalty Payment Amount as mentioned above ($200.) the Herbalife Home Office said they would make an exception to the "Rule" because I was such an outstanding Supervising Distributor and World Team Member.

Confidential Memo

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

DATE: January 22, 2013

TO: Jon Leibowitz, Chairman of Commissioners

FROM: (b)(6) Herbalife Distributor & Herbalife World Team Member

Dear Sir,

On June 6, 2012 I became a Herbalife Distributor as a result of spending $199.00 for a Herbalife training package and product assortment. I became a Herbalife Distributor Supervisor on July 1, 2012 as a result of purchasing $2,000 worth of Herbalife products. I became a Distributor Supervisor, World Team Member on November 1, 2012 as a result of recruiting distributors that cumulatively bought over $10,000 through my distributorship in the month of October 2012.

As of this date I have spent in excess of $20,300: Including Herbalife Product Inventory ($3,200), Bridge to Business (Owned by Herbalife Chairman's Club and President's Club Members) Recruiting Leads & Marketing Materials ($8,500), Other Marketing Materials ($1,200), IOffice/Connecting Point/Merchant Account Systems/Website Development (Owned by Herbalife Chairman's Club and President's Club Members) ($3,400).

Additionally, I spent over $4,000 on a backup electrical generator and phone/internet system for my home so I would never be without power, phone and internet, which was a complaint from my sponsor, (b)(6) and President's Club Upline Member, Mr. (b)(6)

As of this date I have sold product only to recruited distributors and have received only one check in the amount of $864, which included $684 for wholesale earnings and $200 in Royalties.

The following example is just one of thirteen reasons that I have documented, which all thirteen are evidence that I was ripped off by Herbalife and in fact if all Herbalife Distributors lose control of their own distributorship like me then the only thing remaining within Herbalife is a Pyramid Scheme:

Example One:

Please review the attached Points of Interest dated on December 23, 2013.
Please review the attached Points of Interest updated on April 18, 2013.

PRINT

238 Search Results

Search Criteria: Primary Subject Name:"herbalife"; Primary Subject Company Name:"herbalife"; Created Date:<8/7/2013; Selected Complaint Types:Identity Theft, Do Not Call, Fraud and Other Complaints, and All Other Record Types ; Name Variations Included

Print Date:8/8/2013 8:21:45 AM

Rank	Subject Name	Count
1	Herbalife	77
2	Herbalife International Of America, Inc.	57
3	Herbalife International	16
4	The Online Business Systems Herbalife	7
5	Herbalife International Of America	6
6	Herbalife International Of America Inc	5
7	Online Business Systems / herbalife	5
8	Herbalife Ltd	4
9	Herbalife International Inc.	3
10	Herbalife Online Business Systems	3
11	Daphne Morris; Herbalife: Independent Distributor	2
12	Herbalife Distributor	2
13	Herbalife Ind. Dist / patricia Molina	2
14	Herbalife Of Canada Ltd.	2
15	Mainstream Nutrition Club - Herbalife	2
16	E Home	1
17	E-team Online Fulfillment--herbalife, Agustin Pascual	1
18	Global Media Solutions	1
19	H I	1
20	Helen Garland - Herbalife	1
	Total	**198**

CONSUMER SENTINEL NETWORK
Law enforcement's source for consumer complaints

CIS COMPLAINT

Record 1 of 102	
Reference Number	43158548
Created Date	01/28/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	01/28/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	01/28/2013
Transaction Date	12/12/2011
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Breckenridge
Consumer Address, State Code	MI
Consumer Address, State Name	Michigan
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	

Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	

Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Phone
Complaint Info Initial Contact Date	12/12/2011
Complaint Info Initial Response Method	Other
Complaint Info Initial Response Date	12/12/2011
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$500.00
Complaint Info Amount Paid Method	Bank Account Debit
Complaint Info Amount Paid Value	$500.00
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	I seen where you were going to check this company out for fraud. I was supposed to work for them processing orders. However, they had me send them $500.00 to start and then it was selling and cold calling. I told them from the

Complaint Info Comments	beginning that if it was selling or cold calling, I did not want to do it. I was only interested in processing their orders. They assured me that I would not be selling or cold calling. They told me that that was what I would be doing, then I received all of these vitamins, etc. to start selling. They wouldnt refund my money after I told them I didnt want to sell.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 2 of 102	
Reference Number	43248278
Created Date	02/01/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	02/01/2013
Updated By	CRSS\lkilpratrick
Updated Date	02/04/2013
Agency Contact	Internet
Complaint Date	02/01/2013
Transaction Date	
Member of armed forces or dependant?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	

Consumer Address, Line 3	
Consumer Address, City	Temecula
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	40 - 49
Consumer Military Status	Military Retiree/Veteran
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	U.S. Navy
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	800 W. Olympic
Company Address, Line 2	Suite 406
Company Address, Line 3	
Company Address, City	Los Angeles
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA

Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90015
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Social Network
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	In Person
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$2000.00
Complaint Info Amount Paid Method	Credit Card
Complaint Info Amount Paid Value	$1400.00
Complaint Info Product Service Code	4007
Complaint Info Product Service Description	Franchises\Distributorships
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation	

Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife is a scam. I bought lots of product to qualify as a Supervisor(1K). Bought into a Nutrient Club(3K) and worked it for three months for free and did not make a dime. Spent more money on marketing material. Unemployed veteran. PS9000: Herbalife Other-Other Update
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 3 of 102	
Reference Number	43265462
Created Date	01/28/2013
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Comments
Data Source	Consumer
DNC?	N
Entered By	SPARRISH
Entered Date	01/28/2013
Updated By	SSNOWDEN
Updated Date	01/28/2013
Agency Contact	Phone
Complaint Date	01/28/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)

Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Ormond Beach
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	30 - 39
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	HerbaLife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	

Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	9000

Complaint Info Product Service Description	Other (Note in Comments)
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer has questions about HerbaLife. Transferred to supervisor. UPDATE_01.28.2013: Consumer was transferred to a supervisor upon request. Consumer feels that the FTC needs to be specific on their website postings because he has lost thousands of dollars based on speculation on the news release that the FTC would be taking action based on a pyramid scheme was against a certain company. Consumer wants to be contacted back with a response on this. SSnowden
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 4 of 102	
Reference Number	43310772
Created Date	02/05/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	02/05/2013
Updated By	

Updated Date	
Agency Contact	Internet
Complaint Date	02/05/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	
Consumer Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining	

Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I have a friend involved in Herbalife. In discussing this with another friend, she mentioned that her parents had lost a large amount of money investing in Herbalife, and that all the products they purchased chasing the dream of making money had to be consumed by the family after the business failed. I am writing because I am concerned about the friend currently involved, but I have larger questions about the legality of the Herbalife business model. 1) How is Herbalife (or an "independent" branch of the Herbalife distrubutor chain) able to get around labor laws? Arent they basically getting entry-level sales people to work for free or below minimum wage to peddle their products? 2) Or are these people end-level consumers, as the company sometimes claims? If they are, then why are they being classified as distributors? 3) Or are they independent business investors? Why isnt their "investment capital" better regulated? How in the world are they able to loose millions of dollars a year investing in being entry-level sales people, without a serious look

	from regulators? How can they write off these "business losses" on their tax returns? And how is Herbalife able to book their same investment losses as retail sales? Its crazy! Please crack down on this and other MLM organizations.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 5 of 102	
Reference Number	43310917
Created Date	02/05/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	02/05/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	02/05/2013
Transaction Date	08/20/2011
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Boynton Beach
Consumer Address, State Code	FL

Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	P.O. Box 80210
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Los Angeles
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90080

Company Address, ZIP Code Extension	0210
Company Phone, Country Code	
Company Phone, Area Code	866
Company Phone, Number	8664744
Company Phone, Extension	
Company Email	
Company Website	www.herbalifeinternational.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	Connie
Company Rep Middle Name	
Company Rep Last Name	Skelton
Company Rep Salutation	
Company Rep Comments	Mentor upline
Complaint Info Initial Contact Method	I Initiated Contact
Complaint Info Initial Contact Date	08/20/2011
Complaint Info Initial Response Method	Phone: other
Complaint Info Initial Response Date	08/20/2011
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$200.00
Complaint Info Amount Paid Method	Cash Advance - Credit Card
Complaint Info Amount Paid Value	$69000.00
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P

Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife presents itself as a multi-level marketing Company. That could not be further from the truth. For an original $200, I came in as a supervisor and then spent $2500 in product that I was told to sell. The next goal for me was to bring in more supervisors or distributors. It was up to me to bring in supervisors like myself and place them under me in the marketing plan and coax them to buy as much product as they could afford, and in some cases, they couldnt afford the product. That was the only way I would make real money. I brought in many distributors for $200 each but they bought no product so I made no money because they also did not bring in any people under them. I lost most of my money buying their leads. One lead, is one name, one person who put down their credit card who, at the time said they would be interested in a call from a supervisor. At $129.95 each, that added up quickly and there was no guarantee that the person would even answer the phone. I was totally misled by Herbalife and by all their marketing plans, none of which work except for the already rich ones at the top. Its like it always happens when the rich get rich and the poor get poorer. I have lost all my retirement money and now I am in the process of having to find a job.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 6 of 102

Reference Number	43342573
Created Date	01/31/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	01/31/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	01/31/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Lake Elsinore
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	herbalife
Company Address, Line 1	990 west 190th street
Company Address, Line 2	650
Company Address, Line 3	
Company Address, City	torrance
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com/
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing	

Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	I Initiated Contact
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Answer cold call
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$399.00
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I have seen this company come and go in regards to my friends losing money and them trying to recruit me, I cant stand the way they try and pressure people into investing in this company business opportunity and then in the end walking away from it bc of the recruiting that is necessary to be profitable
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 7 of 102	
Reference Number	43345862
Created Date	02/07/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	02/07/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	02/07/2013
Transaction Date	01/10/2008
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Huntley
Consumer Address, State Code	IL
Consumer Address, State Name	Illinois
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)

Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	60 - 64
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	TX
Company Address, State Name	Texas
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	214
Company Phone, Number	8687878
Company Phone, Extension	
Company Email	
Company Website	herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	

Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	Renee
Company Rep Middle Name	
Company Rep Last Name	Barker
Company Rep Salutation	
Company Rep Comments	Manager
Complaint Info Initial Contact Method	TV/Radio
Complaint Info Initial Contact Date	01/10/2008
Complaint Info Initial Response Method	Phone: 800/888 number
Complaint Info Initial Response Date	01/10/2008
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$1200.00
Complaint Info Amount Paid Method	Credit Card
Complaint Info Amount Paid Value	$8000.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I fell for the Herbalife hype, I joined I believe in 2008. Everyday Renee called to ask how my selling was going. If not good (which it wasnt) she would say maybe you need more leads or keep calling. She would always say I was doing a great job. They offered advertisement leaflets, car placard, all at a high cost. Everyday there was a call keep going, you are

	doing great, all hype to get you to buy more products. On the initial dvd they showed how you would make lots of big money, and they kept selling you every day. Im not positive about the $8000. but it was at least that much if not more. Please help me to get some of my money back. Thank you
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 8 of 102	
Reference Number	43359979
Created Date	01/31/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	01/31/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	01/31/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	

Consumer Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	

Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P

Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I hope for the pride of your organization you take the presentation about the pyramid scheme Herbalife very seriously. This company has undoubtedly taken thousands of dollars from millions of people selling false hope. They target the most uneducated, desperate and most gullible among the population and the fact that this company has not been investigated yet is saddening. Thank God for short sellers. Please help, Patrick ps - I dont know anyone who has ever used Herbalife products, I just felt compelled to write in because this is such an egregious example of a Pyramid Scheme, it makes me sick to think of all the people they have hurt. http:factsaboutherbalife.com
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 9 of 102	
Reference Number	43392022
Created Date	02/04/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	02/04/2013
Updated By	
Updated Date	

Agency Contact	Internet
Complaint Date	02/04/2013
Transaction Date	10/01/1992
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Haverhill
Consumer Address, State Code	MA
Consumer Address, State Name	Massachusetts
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	

Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	866
Company Phone, Number	8664744
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	In Person
Complaint Info Initial Contact Date	10/01/1992
Complaint Info Initial Response Method	Other
Complaint Info Initial Response Date	10/01/1992
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Cash
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	I want to stand up and say that I have been involved with Herbalife for 20+ years. I have bonot otten rich. Far from it, as a matter of fact. I DO want to register a POSITIVE sentiment towards HeHeritablend its mission. Of the millions and millions of people that take the products and get involved with the opportunity, there have been some that believed everything that was said to them. For those people, I feel badly, but the company itself is lelegitimatelTHOUT QUESTION. It is hard work to get up every day and go out to try and help people, get them to try the shakes,... and get them to avoid the nightmare of the Great American Diet. In tetheast year, our group has helped people lose over 2,279 in a support group at our local library. It is a generic based competition, and people are not pressured into buying anything. There are many, many, many good Herbalife distributors that are going to be harmed beyond imagination if all the cut throat hedge fund managers have their way. I have survived 20 years in the MLM industry. Like any business, people are going to fail. Of course there are peddlers out there promising riches.

Complaint Info Comments	There used to be a lot of front loading schemes. NOT anymore. The only problem I see is the internet has created a tool where people operate companies within Herbalife, using them as a tool. It is all inInternetased, front loading. THAT I would like to see stopped. Possible the company could filter this activity out and filter out the "easily led" people before they commit to a DREAM lilifestyleithout knowing what or how to achieve it. There are people who are very gullible, but to come down very hard on Herbalife for 100, or even 1,000 people out of 2.7 million distributors is a miscarriage of justice. I love the mission of the company, and although it is not perfect, it is a company involved with answers to problems. Most people have a very very positive feeling about Herbalife. I hope they get a chance to speak their mind too. I personally know a good # of the Herbalife distributors that Ackman has involved on his website. These are the very people who were the front loaders, the system players, who would sign someone up and "throw them into the system" (b)(6) and (b)(6) to name a few. There are many many more. I am glad to see them go. Herbalife is a much better company with them gone. I am afraid there is too much of a spotlight being shown on the bad, and nothing being shed on the good people working everyday. Millions of pepeopleill suffer if a drastic action is taken by the FTC. Please gentlemen, listen to someone who has a good understanding of the situation. Herbalife does not DESERVE to be shut down. I would like to speak to someone in your department if there is ever a need for further clarification. At this point, I am worried the FTC will make one of tetheargest mistakes it could make. There are mimillionsf people who

	love Herbalife, who use their products and have been helped. There are many people araroundhe world that will suffer. That is all I can say. I thank you for listening. (b)(6) No one in the company knows I am sedning out this letter. I could even get into trouble for speaking out, even in this positive manner. It is my feelings. I am college educated. I am making these statements of my own volition. The company does not deserve to be shut down. Do NOT make this mistake. It is a real company and this is real work. Thank you for your time.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 10 of 102	
Reference Number	43422956
Created Date	02/05/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	02/05/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	02/05/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)

Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	London
Consumer Address, State Code	ON
Consumer Address, State Name	Ontario, Canada
Consumer Address, Country Code	CAN
Consumer Address, Country Name	CANADA
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	N/A
Company Address, Line 2	

Company Address, Line 3	
Company Address, City	Los Angeles
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	

Complaint Info Product Service Code	4007
Complaint Info Product Service Description	Franchises\Distributorships
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I am nearly certain that the US company Herbalife is a marketing scheme that makes its profits from taking advantage of the less fortunate, and unemployed globally. The business model is similar to that of a drug dealer, where they sell product to unlicensed distributors so they can make a profit. I am completely amazed the FTC hasnt launched an investigation yet. We learn about these marketing scams in business school. Dont be fooled by it.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 11 of 102	
Reference Number	43476909
Created Date	02/07/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	02/07/2013

Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	02/07/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	
Consumer Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	

Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	Herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response	

Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife is doing economic harm to the country. Shut it down.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 12 of 102	
Reference Number	43576516
Created Date	02/19/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	02/19/2013
Updated By	
Updated Date	

Agency Contact	Internet
Complaint Date	02/19/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	
Consumer Salutation	
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	
Consumer Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	

Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.herbalife.com/
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife is a pyramid scheme that actually recieves more than 50 of its income from recruitment and rips off hard working peoples "American Dream." They misrepresent their numbers in their annual reports and lie to their own salespeople.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 13 of 102	
Reference Number	43639595
Created Date	02/21/2013
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	CJONES1
Entered Date	02/21/2013
Updated By	CJONES1

Updated Date	02/21/2013
Agency Contact	Mail
Complaint Date	02/21/2013
Transaction Date	01/01/2004
Member of armed forces or dependant?	N
Consumer First Name	b(6)|b(6)
Consumer Middle Name	|
Consumer Last Name	b(6)|b(6)
Consumer Salutation	|
Consumer Address, Line 1	|
Consumer Address, Line 2	|
Consumer Address, Line 3	|
Consumer Address, City	|
Consumer Address, State Code	|
Consumer Address, State Name	|
Consumer Address, Country Code	USA|USA
Consumer Address, Country Name	UNITED STATES|UNITED STATES
Consumer Address, ZIP Code	|
Consumer Address, ZIP Code Extension	|
Consumer Home Phone, Country Code	|
Consumer Home Phone, Area Code	|
Consumer Home Phone, Number	|
Consumer Work Phone, Country Code	|
Consumer Work Phone, Area Code	|
Consumer Work Phone, Number	|
Consumer Work Phone, Extension	|
Consumer Fax, Country Code	|
Consumer Fax, Area Code	|
Consumer Fax, Number	|
Consumer Cell Phone, Country Code	|
Consumer Cell Phone, Area Code	|
Consumer Cell Phone, Number	|
Consumer Email	b(6)|b(6)
Consumer Age range	|
Consumer Military Status	|
Consumer Military Station	|

Consumer Complaining Company/Org	|
Consumer Military Service Branch	|
Consumer Consent for volunteer group contact?	|
Company Name	Herbalife
Company Address, Line 1	950 W 190th St
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Torrance
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	905021001
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	I Initiated Contact
Complaint Info Initial Contact Date	01/01/2004
Complaint Info Initial Response Method	Mail
Complaint Info Initial Response	

Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$15000.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	4007
Complaint Info Product Service Description	Franchises\Distributorships
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	MAIL: Consumer is complaining about Herbalife, on behalf of his wife. Consumer reports that they became distributors for the company but, in 2004, learned that the a second line distributor in the organization was rigging the company's marketing plan. Consumer reports that they were losing $15,000/monthly as a result. Consumer contacted Herbalife regarding this issue and was informed that they would look into but, a month later he was informed that they would not correct anything. Herbalife now fails to respond to their calls and letters.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 14 of 102	
Reference Number	43697285

Created Date	02/16/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	02/16/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	02/16/2013
Transaction Date	10/28/2011
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Muscle Shoals
Consumer Address, State Code	AL
Consumer Address, State Name	Alabama
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Torrance
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	9600
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	

Company Rep First Name	Sandra
Company Rep Middle Name	
Company Rep Last Name	Milligan
Company Rep Salutation	
Company Rep Comments	Supervisor
Complaint Info Initial Contact Method	Phone Call: Landline
Complaint Info Initial Contact Date	10/28/2011
Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	10/28/2011
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$3460.00
Complaint Info Amount Paid Method	Bank Account Debit
Complaint Info Amount Paid Value	$5000.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	I contacted a web site after listening to Shawn Hannity on Fox News describe how you could successfully make a good income with this home based business. I would never have made contact without this endorsement. After receiving the initial info in the mail, which sounded wonderful, and then making contact through web based email, I was contacted by my a person who was to be my "mentor". I received the information. I initially paid them, $20 for the initial packet, then around $220 for a sample of the product with more information, aka upgrade. This is when I learned

Complaint Info Comments	it was Herbalife. When pressured as to what level I would start, and through encouragement from my supervisor who started as supervisor, I chose Supervisor and paid another $3200. Additional fees were ioffice, websites, equifax, First Data (credit card processing) and American Express, etc. You were not required to use all of these but was made to feel you would not be successful if you did not. By this time I had invested over $4200. In order to actually make sales, I was to purchase "leads" which were very expensive, money I just did not have. I sent two emails through ioffice requesting help from Herbalife at the end of December 2011 and never heard from Herbalife. I never heard from my "mentor" after December 11, 2011.So, after months of not being able to sell the product, having no help, and the continued monthly charges of at least $100, I decided to try to re-coop some of my money selling the product on Ebay. There were hundreds of ads some of which were other unsuccessful distributors. After a couple of weeks of selling, I received notice around the first of April, 2012, from Ebay that two of my listings had been removed for violations. I though it was the way I had possibly worded my descriptions because they left the remaining listings. Then, during the first week of May, 2012, I received a voice message on my home phone from a senior associate in the Distributor Business Practices & Compliance Dept. requesting a call back concerning Ebay and referring to two letters dated April 12, 2012 and April 30, 2012 from Herbalife that I never received. I contacted her immediately and promptly removed my remaining listings of Herbalife products. She requested a letter stating why I had listed the products as it was a violation of Rule 26-J and Rule 21-B. I also agreed to not

	sale any further production related to Herbalife on Ebay. I honestly did not think I was doing anything wrong selling on Ebay. As of today, February 16, 2013, there are hundreds of ads listed on Ebay for Herbalife products.My husband and I are both 58 years old. He is on Social Security Disability. I was looking for a way to retire and have a home business. This was a huge investment for us. Herbalife did not provide me with a person that knew how to "mentor". She had only joined Herbalife just a few weeks before I did. I feel I was unable to ever get any real help that was promised to me.When I attempted to get some of my money back through Ebay at much less than I paid, I was threatened with the consequences of violating the rules above. I am stuck with the remaining inventory. Herbalife would have purchased my products back at a low rate and I would have had to pay shipping to which I say, no, thank you.After continued monthly losses and an inability to receive help from Herbalife or my "mentor", I resigned from Herbalife on October 7, 2012.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 15 of 102	
Reference Number	43731550
Created Date	02/19/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N

Entered By	FTCCIS-FTCUSER
Entered Date	02/19/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	02/19/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	
Consumer Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area	

Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife Independent Distributor Debi Blanco|Herbalife Independent Distributor Evie Blanco
Company Address, Line 1	https://www.facebook.com/LovingReti|
Company Address, Line 2	|
Company Address, Line 3	|
Company Address, City	Topeka|Topeka
Company Address, State Code	KS|KS
Company Address, State Name	Kansas|Kansas
Company Address, Country Code	USA|USA
Company Address, Country Name	UNITED STATES|UNITED STATES
Company Address, ZIP Code	|
Company Address, ZIP Code Extension	|
Company Phone, Country Code	|
Company Phone, Area Code	|
Company Phone, Number	|
Company Phone, Extension	|
Company Email	|
Company Website	|
Company Subject ID Type Code	|
Company Subject ID Type Name	|
Company Subject ID Issuing State Code	|
Company Subject ID Issuing State Name	|
Company Subject ID Issuing Country Code	|
Company Subject ID Issuing Country Name	|

Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	The Blanco distributors in Topeka Kansas (Debi and Evie Blanco) have posted on Facebook that Herbalife is responsible for Larry Blancos diabetes improvement. Debi Blanco and Evie Blanco have both stated that Larry Blanco is no longer taking insulin injections and other medications as a direct result of Herbalife products. Furthermore, Debi Blanco has claimed on Facebook that Herbalife products helped her lose over 100 pounds when in reality her weight loss is due to gastric bypass

Complaint Info Comments	surgery.Read on Facebook, on Evie Blancos personal facebook page, also on Debi Blancos personal facebook page, and on Debi Blancos business facebook page, also on Evie Blancos business facebook page.Debi Blanco is also wearing a lapel pin around town that says "I lost over 100 pounds Ask me how" She is telling people that Herbalife is responsible for her dramatic weight loss. In reality she had gastric bypass surgery about 3 years ago. This is clearly false advertising and false medical claims.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 16 of 102	
Reference Number	44203840
Created Date	03/13/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	03/13/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	03/13/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	

Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Lynnwood
Consumer Address, State Code	WA
Consumer Address, State Name	Washington
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	

Company Address, City	Los Angeles
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service	0304

Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I am a relative of a current 2 diamond presidents team member with Herbalife Intl and I am the son of a millionaire team member with Herbalife Intl. I have significant documents of checks and reports to suggest a pyramid scheme from those distributorships.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 17 of 102	
Reference Number	44743183
Created Date	03/25/2013
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	NLITTLE
Entered Date	03/25/2013
Updated By	
Updated Date	
Agency Contact	Phone
Complaint Date	03/25/2013
Transaction Date	03/25/2013
Member of armed forces or dependant?	N

Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Philadelphia
Consumer Address, State Code	PA
Consumer Address, State Name	Pennsylvania
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	20 - 29
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	

Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	954
Company Phone, Number	3572618
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Phone Call: Mobile/Cell
Complaint Info Initial Contact Date	03/25/2013
Complaint Info Initial Response Method	Phone: other
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown

Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	2142
Complaint Info Product Service Description	Prizes\Sweepstakes\Gifts
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer got a call from Herbalife saying that he had won a prize. They did not ask for any money. He found on the internet that others who have been contacted about this where charged a fee when they tried to pick up the package. Consumer is afraid it is a scam. He called and canceled the order.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 18 of 102	
Reference Number	45377167
Created Date	02/21/2013
Complaint Source	Oregon, Department of Justice
Originator Reference Number	FF1097-13
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	OR01-USER
Entered Date	02/21/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	02/21/2013

Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PORTLAND
Consumer Address, State Code	OR
Consumer Address, State Name	Oregon
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer	

group contact?	
Company Name	HERBALIFE INTERNATIONAL OF AMERICA, INC.
Company Address, Line 1	1800 CENTURY PARK EAST
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90067
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	5329638
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	

Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	--- Oregon DOJ comments: Information Only --- Consumer description: Invited participation in pyramid --- Case closed --- Case closed date: 2013-02-21 00:00
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 19 of 102	
Reference Number	45534322
Created Date	03/18/2013
Complaint Source	BBB CA Los Angeles
Originator Reference Number	13000020000811
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCALA-USER
Entered Date	03/18/2013
Updated By	BBBCALA-USER
Updated Date	07/30/2013
Agency Contact	External Agency

Complaint Date	03/18/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LEANDER
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	

Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$199.95
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Around October 14, 2012, I inquired to the website 'Work-At-Home.com'. On October 15, 2012, I was contacted by Paul Housch about this company. After receiving 2 training packages in less than a week for a possible sales position on-line, I thought, and after careful determination, I realized that I did not want to purchase or become a sales person for Herbalife, also known as 'work-at-home.com'. This is the cover name they use for Herbalife. I made it known to Paul Housh, my so-called point of contact and distributor, and also known to me as my 'Mentor' from Herbalife, that I no longer wanted to continue with the program. At that time I was instructed to return the training packages that were sent to me in the mail. I followed his instructions and returned both to the respective addresses he gave me on the 19th of October and was told that I would have a refund within 30-60 days. Two months went by and I neither heard or received anything from Paul Housch or a refund from Herbalife. I then started contacting by email and phone about once every two weeks and got the run around about you need to send this email or you need to

	call this person, but needless to say, 6 months later, no results except for one email from the Herbalife company stating they were going to return 25% of what I paid to them. After that email, Paul sent me a follow-up email for me to send him my name and address so that he could send me a check to reimburse me the full 100% of what I paid to get into the company. Then another 2 weeks went by and still nothing. I feel the Better Business Bureau is my last resort to try to get reimbursed for my monies I was cheated out of and some compensation for the aggravation I have gone through with this scam company for the past 6 months! Please help in any way that you can to expose this business, so that no one else can be affected the way I was. Thank you!Product_Or_Service: Work From Home Training Package (1 of 2)Order_Number: Transaction ID (b)(6) --- Additional Comments: DesiredSettlementID: Refund$220.00 reimbursement check for two training packages that were returned to 'Herbalife'. One package was for $200 and the other was $20.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	Yes
Complaint Info Fair Resolution Description	RESOLVED. The consumer has verified that the complaint has been settled to his/her satisfaction.

Record 20 of 102	
Reference Number	45777903
Created Date	04/15/2013
Complaint Source	BBB CA Los Angeles
Originator Reference Number	13000020007761
Language	English
Contact Type	Complaint

Data Source	Organization
DNC?	N
Entered By	BBBCALA-USER
Entered Date	04/15/2013
Updated By	BBBCALA-USER
Updated Date	07/30/2013
Agency Contact	External Agency
Complaint Date	04/15/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LELAND
Consumer Address, State Code	NC
Consumer Address, State Name	North Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	

Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$399.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I WAS TOLD THAT IF I WAS NOT SATIFIED THAT MY MONEY WOULD BE REFUNDED , I PAID THEM $399.00 ,I SENT MY REFUND REQUEST BEFORE THE 90 DAYS ,THAT WAS IN FEBUARY, IHAVE HEARD NOTHING FROM THEM. ALL I WANT IS MY MONEY BACK. THANK YOU --- Additional Comments: DesiredSettlementID: Refund$399.00 AND THE $49.95
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	Yes
Complaint Info Fair Resolution Description	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional

	BBB assistance.

Record 21 of 102	
Reference Number	45889951
Created Date	05/23/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	Spanish
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	05/23/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	05/23/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Bogota
Consumer Address, State Code	
Consumer Address, State Name	Cundinamarca
Consumer Address, Country Code	COL
Consumer Address, Country Name	COLOMBIA
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	

Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	

Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$7.00
Complaint Info Amount Paid Method	Credit Card
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife tiene un producto que se llama Bizworks, es una suscripción online que se paga mensual, llevo 4 meses intentando desafiliarme y me siguen cobrando. Es totalmente anti ético porque no hay forma de desafiliarse ni de borrar el número de tarjeta de crédito de su sistema. Me siento totalmente estafado. Espero que me puedan ayudar. Pongo esta queja porque el sistema central está en USA. Gracias por su atención.

Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 22 of 102	
Reference Number	45889956
Created Date	05/23/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	Spanish
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	05/23/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	05/23/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Bogota
Consumer Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	COL
Consumer Address, Country Name	COLOMBIA
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	

Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	30 - 39
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc
Company Address, Line 1	
Company Address, Line 2	80210
Company Address, Line 3	
Company Address, City	Los Angeles
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	

Company Email	
Company Website	myherbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$8.00
Complaint Info Amount Paid Method	Credit Card
Complaint Info Amount Paid Value	$8.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	Herbalife tiene un producto que se llama Bizworks, es una suscripción online que se paga mensual, llevo

Complaint Info Comments	4 meses intentando desafiliarme, pero aún me siguen cobrando. En la página no hay forma de desafiliarse, ni de borrar los datos de la tarjeta de crédito de sus sistema. La factura me llega con Herbalife International of America, Inc. | P.O. Box 80210 Los Angeles, CA 90080-0210 U.S.A. | Telephone: 1-310-410-9600. Por eso hago la denuncia en USA. Espero que me puedan ayudar.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 23 of 102	
Reference Number	46138511
Created Date	06/24/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	06/24/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	06/24/2013
Transaction Date	08/08/2011
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)

Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Valparaiso
Consumer Address, State Code	IN
Consumer Address, State Name	Indiana
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Torrance,
Company Address, State Code	CA

Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	2587155
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	Lissa/Mark
Company Rep Middle Name	
Company Rep Last Name	Munson
Company Rep Salutation	
Company Rep Comments	Upline Supervisor
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	08/08/2011
Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	08/08/2011
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$1500.00
Complaint Info Amount Paid Method	Credit Card
Complaint Info Amount Paid Value	$1500.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters

Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife is a scam, predicated on deliberate and misleading information without promised mentoring or appropriate business direction. Herbalife is truly the most disreputable company Ive ever encountered.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 24 of 102	
Reference Number	46222807
Created Date	08/04/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	08/04/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	08/04/2013
Transaction Date	05/01/2001
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	

Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Washington
Consumer Address, State Code	DC
Consumer Address, State Name	District of Columbia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	

Company Address, City	Los Angeles
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90015
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	In Person
Complaint Info Initial Contact Date	05/01/2001
Complaint Info Initial Response Method	In Person
Complaint Info Initial Response Date	05/01/2001
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$45000.00
Complaint Info Amount Paid Method	Credit Card
Complaint Info Amount Paid Value	$15000.00
Complaint Info Product Service	0304

Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was a former leader and trainer with Herbalife. I was a member of the prestigious Global Expansion Team, the top 2.5 of the company. The practices of this company destroyed over 9 years of my life and the lives of my family. They constantly promoted their trainings and marketing systems as ways to achieve x amount of income, all of which I did and lost. This set me back years in having to repay my credit card. It set my parents (who supported my business venture) back years in their finances. You would think that being in the top 2.5 of a company, my income would be more than $15,000 a year. But it wasnt. I was still near the poverty line, living with my parents, not able to support myself, while being in the top 2.5 of this harmful company. I have known of so many others whose families were harmed by the deceptive marketing practices of this company but are afraid to speak out. This company took advantage of me when I was desperate to find a way to live a better life. If you guys dont shut down this company, you have joined them in taking advantage of millions of desperate, good, hard-working individuals who thought they building a business.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	

Complaint Info Fair Resolution Description	

Record 25 of 102	
Reference Number	46790209
Created Date	07/07/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	07/07/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	07/07/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Babylon
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country	

Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	13 - 17
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State	

Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife is a pyramid scheme.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 26 of 102	
Reference Number	47118136
Created Date	07/24/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	07/24/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	07/24/2013
Transaction Date	07/01/2012
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Reseda
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Online Business Systems Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	

Company Subject ID Issuing Country Name	
Company Rep First Name	Connie
Company Rep Middle Name	
Company Rep Last Name	Schaefer
Company Rep Salutation	
Company Rep Comments	Supervisor
Complaint Info Initial Contact Method	Phone
Complaint Info Initial Contact Date	07/01/2012
Complaint Info Initial Response Method	Mobile: Text/Email/IM
Complaint Info Initial Response Date	07/01/2012
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	Credit Card
Complaint Info Amount Paid Value	$10000.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	I was looking for a work from job on july 2012 and I responded to a "i thought credible" job search engine. I got this decision pack which caused me $9.95 and i was willing to give it a try. After purchasing the pack i received a call congratulating me about my decision to make changes in my life. I asked for the name of the company but the person didnt disclosed it to me. So it was a waiting process with instructions about what to do when i receive the decision pack. I was really

Complaint Info Comments	enthusiastic and wants to better my life so I am open to opportunities. My upline just disclosed the name of the company after I got so hooked with all the positive information and also together with their higher persons on the call. I thought my life will get better but it got worse. I wanted to earn more so I jumped to become a supervisor and my uplines just ordered the products costing around $4000.00 without even explaining what kinds of products i will receive. When i try to return the products to the company they said I cant return or exchange the items and i should talk to my upline. But talking to them just make me give out more money. I paid for the marketing service of around $5000.00, I followed their marketing instructions but this didnt make me earn despite of my efforts. said i didnt know i cant return the items or exchange the items that werent moving. The customer service said I can return but i will no longer be a distributor. I was doomed because i still got a lot of unmoveable items and the money i have invested were from a credit cards. Now instead of me earning, I am paying a debt of roughly $10,000.00 not including the interest from the credit cards.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 27 of 102	
Reference Number	47390992
Created Date	07/29/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English

Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	07/29/2013
Updated By	STAYLORROBINS
Updated Date	07/30/2013
Agency Contact	Phone
Complaint Date	07/30/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	West Hartford
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	

Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife Ltd
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	CT
Company Address, State Name	Connecticut
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS#14008580 07/29/2013: MAIL: The consumer is writing to request the Federal Trade Commission open an investigation into the tactics of Herbalife Ltd., a multi-level marketing company. The consumer believes the company is unfairly targeting Latinos in a pyramid scheme. Herbalife practices result in the loss of funds by countless families who already live in difficult financial situations. The company attracts Latino distributors by selling itself as an easy moneymaker but, in fact, requires each distributor to lay out a significant personal investment upfront. The families cannot afford to lose these funds, and majority of them never recover their initial investment. Herbalife executives have already admitted targeting minority groups, openly boasting about the company's African

	American and Latino business initiative. Herbalife convinces new sellers to ignore the risks and high costs of their program, and promises financial freedom with only a few hours of work. Many, including the Hispanic Federation and Congresswoman Linda Sanchez, have already raised these allegations and the consumer wants to join in their effort to stop Herbalife unfair and abusive practices.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 28 of 102	
Reference Number	47391051
Created Date	07/29/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	07/29/2013
Updated By	STAYLORROBINS
Updated Date	07/30/2013
Agency Contact	Phone
Complaint Date	07/30/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)

Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Old Saybrook
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	b(6)
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	CT
Company Address, State Name	Connecticut

Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM

Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS#14008581 07/29/2013: MAIL: The consumer is writing to request the Federal Trade Commission open an investigation into the tactics of Herbalife Ltd., a multi-level marketing company. The allegations suggest that Herbalife unfairly targets minority groups and falsely markets itself as an easy business opportunity. Instead of selling nutrition products, Herbalife sells these opportunities to people in vulnerable communities. Herbalife has stretched the rules to benefit themselves at the expense of some who are trying to make a living. Herbalife executives have already admitted targeting minority groups, openly boasting about the company's African American and Latino business initiative. Herbalife convinces new sellers to ignore the risks and high costs of their program, and promises financial freedom with only a few hours of work. Due to Herbalife's crushing, above-average costs, it is hard for these people to sell enough of the product in order to realize a significant return investment.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 29 of 102	
Reference Number	47397318
Created Date	07/29/2013
Complaint Source	Federal Trade Commission

Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	07/29/2013
Updated By	STAYLORROBINS
Updated Date	07/30/2013
Agency Contact	Phone
Complaint Date	07/30/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Wethersfield
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country	

Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	CT
Company Address, State Name	Connecticut
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	

Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS#14008618 07/29/2013: MAIL: The consumer is writing to request the Federal Trade Commission open an investigation into the tactics of Herbalife Ltd., a multi-level marketing company. These allegations – which have already been raised by many, including Congresswoman Linda Sanchez and the Hispanic Federation – suggest that Herbalife unfairly targets minority groups and falsely markets itself as an easy business opportunity. Instead of selling nutrition products, Herbalife sells these opportunities to people in vulnerable communities. Herbalife executives have already admitted targeting minority groups, openly boasting about the company's African American and Latino business initiative. Herbalife

	convinces new sellers to ignore the risks and high costs of their program, and promises financial freedom with only a few hours of work. Due to Herbalife's crushing, above-average costs, it is hard for these people to sell enough of the product in order to realize a significant return investment.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 30 of 102	
Reference Number	47397340
Created Date	07/29/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	07/29/2013
Updated By	STAYLORROBINS
Updated Date	07/30/2013
Agency Contact	Phone
Complaint Date	07/30/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Hartford

Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	CT
Company Address, State Name	Connecticut
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	

Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P

Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS#14008630 07/29/2013: MAIL: The consumer is writing to request the Federal Trade Commission open an investigation into the tactics of Herbalife Ltd., a multi-level marketing company. These allegations – which have already been raised by many, including Congresswoman Linda Sanchez and the Hispanic Federation – suggest that Herbalife unfairly targets minority groups and falsely markets itself as an easy business opportunity. Instead of selling nutrition products, Herbalife sells these opportunities to people in vulnerable communities. Herbalife executives have already admitted targeting minority groups, openly boasting about the company's African American and Latino business initiative. Herbalife convinces new sellers to ignore the risks and high costs of their program, and promises financial freedom with only a few hours of work. Due to Herbalife's crushing, above-average costs, it is hard for these people to sell enough of the product in order to realize a significant return investment.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 31 of 102	
Reference Number	47397428
Created Date	07/29/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English

Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	07/29/2013
Updated By	STAYLORROBINS
Updated Date	07/30/2013
Agency Contact	Phone
Complaint Date	07/30/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	New Britain
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	

Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	CT
Company Address, State Name	Connecticut
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS#14008638 07/29/2013: MAIL: The consumer immigrated to this country and was fortunate enough to become a US citizen. The consumer is concerned and hopes the Commission will look into the rampant abuse by Herbalife, which promotes itself as a way for people to make easy money selling supplements. Herbalife is a complex and abusive pyramid scheme. Numerous independent reports suggest that Herbalife makes illegal and false income claims in order to recruit new sellers and causes significant harm among people in vulnerable communities. Herbalife representatives promise financial success for only a few hours of work. Herbalife's direct sellers most often end up in signification debt, not financial freedom. The consumer states according to an expert analysis of

	Herbalife's "Statement of Average Gross Compensation" form 2012, the top 1% of Herbalife distributors receives 66% of all commission payments. And even worse, 96% of Herbalife's Sales Leaders receive compensation less than half the equivalent to a minimum wage job. If these allegations are true and, as the evidence suggest, Herbalife makes grossly false income claims to recruit new sellers.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 32 of 102	
Reference Number	47551610
Created Date	08/06/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	08/06/2013
Updated By	STAYLORROBINS
Updated Date	08/14/2013
Agency Contact	Phone
Complaint Date	08/14/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	

Consumer Address, Line 3	
Consumer Address, City	Manchester
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	b(6)
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife LTD
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA

Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation	

Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS#14008656 08/06/2013: MAIL: The consumer is writing to request the Federal Trade Commission open an investigation into the tactics of Herbalife Ltd., a multi-level marketing company. These allegations – which have already been raised by many, suggest that Herbalife unfairly targets minority groups and falsely markets itself as an easy business opportunity. Instead of selling nutrition products, Herbalife sells these opportunities to people in vulnerable communities. The consumer is small business owner and understands how difficult it is to be effective in retail sales. This is way, what Herbalife id doing needs to be investigated. Herbalife executives have already admitted targeting minority groups, openly boasting about the company's African American and Latino business initiative. Herbalife convinces new sellers to ignore the risks and high costs of their program, and promises financial freedom with only a few hours of work. Due to Herbalife's crushing, above-average costs, it is hard for these people to sell enough of the product in order to realize a significant return investment. CMS#14008685 08/09/2013: MAIL: The consumer sent in another copy of their complaint regarding Herbalife. SROBINSON
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 33 of 102	
Reference Number	47551647
Created Date	08/06/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	08/06/2013
Updated By	STAYLORROBINS
Updated Date	08/07/2013
Agency Contact	Phone
Complaint Date	08/07/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Enfield
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife Ltd
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing	

Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	CMS#14008651 08/06/2013: MAIL: The consumer is writing to request the Federal Trade Commission open an investigation into the tactics of Herbalife Ltd., a multi-level marketing company. These allegations – which have already been raised by many, suggest that Herbalife unfairly targets minority groups and falsely markets itself as an easy business opportunity. Instead of selling nutrition products, Herbalife sells these opportunities to people in vulnerable

Complaint Info Comments	communities. The consumer is small business owner and understands how difficult it is to be effective in retail sales. This is way, what Herbalife id doing needs to be investigated. Herbalife executives have already admitted targeting minority groups, openly boasting about the company's African American and Latino business initiative. Herbalife convinces new sellers to ignore the risks and high costs of their program, and promises financial freedom with only a few hours of work. Due to Herbalife's crushing, above-average costs, it is hard for these people to sell enough of the product in order to realize a significant return investment.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 34 of 102	
Reference Number	47688824
Created Date	08/09/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	08/09/2013
Updated By	STAYLORROBINS
Updated Date	08/14/2013
Agency Contact	Phone
Complaint Date	08/14/2013
Transaction Date	
Member of armed forces or dependant?	N

Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Rocky Hill
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	

Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown

Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS#14008686 08/09/2013: MAIL: The consumer is reporting abusive marketing techniques of Herbalife, the diet supplement company. From what one reads in the media, it is clear Herbalife has been selling a bill of goods to those it seeks to contract as its prime sales force. The sellers get the goods but are unable to pay the bill. Meanwhile, Herbalife continues to stay one-step ahead in paying others from the exorbitant sales fees it charges new prospects. It appears the company focuses on the Hispanic community to move its products. Many of these citizens don't have the skills or training to make the initial sales necessary to pay off their startup debt and this is why Herbalife needs to be investigated. Herbalife executives have already admitted to targeting minority groups, openly boasting about the company's African American initiative and Latino business. By recruiting vulnerable people in these communities with little to no business experience, Herbalife convinces new sellers to ignore the risks and high costs of their program. Due to Herbalife's crushing, above average costs, it is hard for these people to sell enough of the product in order to realize a significant sustained weight loss.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N

Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 35 of 102	
Reference Number	47689079
Created Date	08/09/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	08/09/2013
Updated By	STAYLORROBINS
Updated Date	08/14/2013
Agency Contact	Phone
Complaint Date	08/14/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Hartford
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	

Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Hartford City Council
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife Ltd
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State	

Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	CMS#14008683 08/09/2013: MAIL: The consumer is an elected official in a city with a large minority population and burdened with high rate of unemployment. The consumer is writing to urge the Federal Trade Commission to open investigation into allegations of an abusive pyramid scheme.

Complaint Info Comments	Allegations regarding the company Herbalife Ltd, which have already been raised by many, including Congresswoman Linda Sanchez and the Hispanic Federation marketing – suggest that Herbalife unfairly targets minority groups and falsely markets itself as an easy business opportunity. Apparently, instead of selling nutrition products, Herbalife sells these opportunities to people in vulnerable communities. The consumer has been personally approached to buy product in the fashion. As a physician and public health researcher, often including established drugs and medications as well as health products such as those sold by Herbalife. Just like certain cigarette brands, it can be shown that there are schemes for targeting minority groups, openly boasting about the company's African American initiative and Latino business. By recruiting vulnerable people in these communities with little or no business experience, Herbalife convinces new sellers to ignore risks and high costs of their program. Herbalife's recruitment techniques promise financial freedom to immigrants and others struggling to find a job.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 36 of 102	
Reference Number	47706849
Created Date	07/24/2013
Complaint Source	California, Attorney General
Originator Reference Number	539596
Language	English

Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	CA04-USER
Entered Date	07/24/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	07/24/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	RESEDA
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	b(6)
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	

Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	P. O. Box 80210
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90080
Company Address, ZIP Code Extension	0210
Company Phone, Country Code	
Company Phone, Area Code	866
Company Phone, Number	8664744
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	

Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$5000.00
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0318
Complaint Info Product Service Description	Shop-at-Home\Catalog Sales
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	I was looking for a work from job on july 2012 and I responded to a "i thought credible" job search engine (careerbuilders.com) I got this decision pack which caused me $9.95 and i was willing to give it a try. After purchasing the pack i received a call congratulating me about my decision to make changes in my life. I asked for the name of the company but the person didnt disclosed it to me. So it was a waiting process with instructions about what to do when i receive the decision pack. I was really enthusiastic and wants to better my life so I am open to opportunities. My upline just disclosed the name of the company after I got so hooked with all the positive information and also together with their higher persons on the call. I thought my life will get better but it

Complaint Info Comments	got worse. I wanted to earn more so I jumped to become a supervisor and my uplines just ordered the products costing around $4000.00 for me to become a supervisor and to maximize my earnings, but my uplines ordered the initial products without even telling me what kinds of products i will receive. When i try to return the products to the company they said I cant return or exchange the items and i should talk to my upline. But talking to them just make me give out more money. I said i didn't know i cant return the items or exchange the items that weren't moving. The customer service said I can return but i will no longer be a distributor. On top of the actual product costs I paid for the marketing system which cost me roughly around $5,000.00 all from my credit cards. Now I am paying these amounts together with the interests. I was doomed because i still got a lot of unmoveable items and the money i have invested were from a credit card. --- CA Source: Web Form --- CA Status: Waiting for Response
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 37 of 102	
Reference Number	47765215
Created Date	08/07/2013
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260009653466
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER

Entered Date	08/07/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/07/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PHOENIX
Consumer Address, State Code	AZ
Consumer Address, State Name	Arizona
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	

Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International Inc.
Company Address, Line 1	1800 Century Park East
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CENTURY CITY
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90067
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	Stephen
Company Rep Middle Name	
Company Rep Last Name	Whittington
Company Rep Salutation	
Company Rep Comments	Contact
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	The owner of Plaza Kora LLC rents out a small location to a lady called (b)(6) Who advertises to put nails and sells herba life shakes to the public. Within the location were she does the procedure to put nails there no certificate from the state that allows her to do that service, the tools she uses are not sterilizes because I have witness it. She also sells shakes, she blends them there she serves them there and charges $$ for that service. The location its self does not the the room tempature and does not have the proper equipment to keep it santitary. She has no light installed, she wired a cable to other busy across (zumba class) and the wire is very visable. She has no certificate on the wall that shows anything for food handler, because there is times were food is sold there. This may not be important buy she has no documents is he with a traveling passaport, pays no taxes. To a future citizen she needs the law applied and owes her dues to paying taxes in the state. Her business has been running for

	almost one year. --- Additional Comments: To have the location to which (b)(6) has been renting feom Plaza Kora LLC shut down.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	No
Complaint Info Fair Resolution Description	TRANSFERRED TO ANOTHER BBB. This complaint is about a business that is located in another BBB's service area.

Record 38 of 102	
Reference Number	47776186
Created Date	08/07/2013
Complaint Source	BBB CA Los Angeles
Originator Reference Number	13000020033718
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCALA-USER
Entered Date	08/07/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/07/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PHOENIX
Consumer Address, State Code	AZ
Consumer Address, State Name	Arizona

Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	

Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	

Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	The owner of Plaza Kora LLC rents out a small location to a lady called (b)(6) Who advertises to put nails and sells herba life shakes to the public. Within the location were she does the procedure to put nails there no certificate from the state that allows her to do that service, the tools she uses are not sterilizes because I have witness it. She also sells shakes, she blends them there she serves them there and charges $$ for that service. The location its self does not the the room tempature and does not have the proper equipment to keep it santitary. She has no light installed, she wired a cable to other busy across (zumba class) and the wire is very visable. She has no certificate on the wall that shows anything for food handler, because there is times were food is sold there. This may not be important buy she has no documents is he with a traveling passaport, pays no taxes. To a future citizen she needs the law applied and owes her dues to paying taxes in the state. Her business has been running for almost one year.Product_Or_Service: Nails, Herba Life Shakes --- Additional Comments: DesiredSettlementID: Other (requires explanation)To have the location to which (b)(6) (b)(6) has been renting feom Plaza Kora LLC shut down.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	No
Complaint Info Fair Resolution Description	INVALID. The consumer complaint is incomplete or unintelligble and the consumer cannot be reached, or the consumer and the business did not have a marketplace transaction.

Record 39 of 102	
Reference Number	47885068
Created Date	08/20/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	08/20/2013
Updated By	STAYLORROBINS
Updated Date	08/23/2013
Agency Contact	Phone
Complaint Date	08/23/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)|b(6)
Consumer Middle Name	|
Consumer Last Name	b(6)|b(6)
Consumer Salutation	|
Consumer Address, Line 1	b(6)|b(6)
Consumer Address, Line 2	b(6)|
Consumer Address, Line 3	|
Consumer Address, City	Washington|Washington
Consumer Address, State Code	DC|DC
Consumer Address, State Name	District of Columbia|District of Columbia
Consumer Address, Country Code	USA|USA
Consumer Address, Country Name	UNITED STATES|UNITED STATES
Consumer Address, ZIP Code	b(6)|b(6)
Consumer Address, ZIP Code Extension	|
Consumer Home Phone, Country Code	|
Consumer Home Phone, Area Code	b(6)|b(6)
Consumer Home Phone, Number	b(6)|b(6)
Consumer Work Phone, Country Code	|
Consumer Work Phone, Area Code	|

Consumer Work Phone, Number	|
Consumer Work Phone, Extension	|
Consumer Fax, Country Code	|
Consumer Fax, Area Code	b(6)|
Consumer Fax, Number	b(6)|
Consumer Cell Phone, Country Code	|
Consumer Cell Phone, Area Code	|
Consumer Cell Phone, Number	|
Consumer Email	|b(6)
Consumer Age range	|
Consumer Military Status	|
Consumer Military Station	|
Consumer Complaining Company/Org	National Consumers League|National Consumers League
Consumer Military Service Branch	|
Consumer Consent for volunteer group contact?	|
Company Name	Herbalife Ltd
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	

Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	The reported by submitted the letter on behalf of the consumer's organization, National Consumers League (NCL) regarding Herbalife Ltd. The consumer is writing to urge the Federal Trade Commission (FTC) to open an investigation into allegations by Pershing Square Capital Management L.P. (Pershing) and others that the multi-level marketing company Herbalife is in fact a complex pyramid scheme. In December 2012, after

Complaint Info Comments	an eighteen-month investigation, Pershing published a report alleging a range of potential violations of federal and state consumer protection and anti-pyramiding laws, including Section 5 of the FTC Act. Since the publication of the Pershing report, numerous charges and counter-charges have been publicly leveled against Pershing and Herbalife by supporters of both companies. The NCL has meet with Pershing, Direct Selling Association and Herbalife, has heard their arguments, and feels that the FTC is the only one with the expertise and resources to investigate these claims and determine whether Herbalife is, in fact, an illegal pyramid scheme rather than a legitimate multi-level marketing business. The letter included information regarding NCL's Anti-Pyramid Scheme Advocacy, and Pershing Square's Allegations and NCL's Pyramid Scheme "Red Flags". NCL also posted a public statement on their website at www.nclnet.org.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 40 of 102	
Reference Number	48239368
Created Date	07/26/2013
Complaint Source	BBB CA Los Angeles
Originator Reference Number	13000020030782
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCALA-USER
Entered Date	07/26/2013

Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	07/26/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	NORTH HILLS
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	

Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$80.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	I contacted Herbalife regarding their 30 day money gurantee promise on all products. I purchased 3 bottles of Herbalife supplements from one of their Herbalife distributors: (b)(6) (b)(6) 6/25/13 after seeing no results from the Herbalife tea and shakes she was selling to me daily for $5.00 each, she strongly recommended I purchase 1 month supply (1 bottle of each) of the following Herbalife dietary supplements: CELL ACTIVATOR, CELL U LOSS, and MULTI VITAMINA. She said taking these products will gurantee I lose the weight I wasn't losing from the Herbalife tea and shake. She sold me all 3 bottles for $80.00 As previously mentioned I was buying shakes from her daily everyday for weeks before buying the pills and cash was the only form of payment as she has no cash register or receipt system in place at her place of business used to sell Herbalife products. I never received a receipt for any purchases, shakes or pills. When I returned the bottles to my distributor requesting my money

Complaint Info Comments	back on 7/18/13 because I had lost no weight and products were no good, she said could not refund me because I had used the products. I told her I need a copy of the receipt so I could contact Herbalife directly about their 30 day money back gurantee. She said she ran out of receipt paper and could not give me one. I contacted Herbalife same day 7/18/13 via email regarding the issue I was having getting my refund from distributor. Herbalife refunds dept Marquita Mclaren emailed me back with all necessary documents I needed to send her back within 5 days to process my refund. I since have left her countless voice messages and emails without any reply back. I sent all documents via fax to her for my refund on 7/22/13 (copy of fax confirmation can be provided) I have yet heard back from anyone. Leading to believe this company is a pyramid scam and the company is avoiding my calls/emails. I want my full refund as im within my rights to ask for one as I'm within the companys 30 Day Money Back Gurantee promise.Product_Or_Service: Herbalife dietary supplements (3 bottles) --- Additional Comments: DesiredSettlementID: RefundFull refund of $80.00 paid to (b)(6) (b)(6) - Herbalife distributor. Paid on: 06/25/13 Refund request made: 07/18/13
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	Yes
Complaint Info Fair Resolution Description	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.

Record 41 of 102	
Reference Number	48411879
Created Date	09/11/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	09/11/2013
Updated By	STAYLORROBINS
Updated Date	09/12/2013
Agency Contact	Phone
Complaint Date	09/12/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Hartford
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife Ltd.
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing	

Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	CMS#14008794 09/11//2013: MAIL: The consumer is writing to request the Federal Trade Commission open an investigation into the tactics of Herbalife Ltd., a multi-level marketing company. These allegations – which have already been raised by many, suggest that Herbalife unfairly targets minority groups and falsely markets itself as an easy business opportunity. Instead of selling nutrition products, Herbalife sells these opportunities to people in vulnerable communities. The consumer is small business owner and understands how difficult it is to be

Complaint Info Comments	understands how difficult it is to be effective in retail sales. This is way, what Herbalife id doing needs to be investigated. Herbalife executives have already admitted targeting minority groups, openly boasting about the company's African American and Latino business initiative. Herbalife convinces new sellers to ignore the risks and high costs of their program, and promises financial freedom with only a few hours of work. Due to Herbalife's crushing, above-average costs, it is hard for these people to sell enough of the product in order to realize a significant return investment.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 42 of 102	
Reference Number	48505507
Created Date	06/14/2013
Complaint Source	BBB CA Los Angeles
Originator Reference Number	13000020021389
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCALA-USER
Entered Date	06/14/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	06/14/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	

Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	BROOKLYN
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	

Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	

Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	A few months ago, I received a letter and ID card saying that I am now a distributor for Herbalife. Having not at all heard of Herbalife nor signed up to be a distributor, I disregarded the letter. About a month later, I was delivered 7 large boxes of Herbalife through FedEx to my address. The name addressed on the box is extremely close to mine in spelling. I turned the delivery woman away with the 7 large boxes of supplements since I placed no such order. When I called Herbalife, I was told that that was not the first order placed to my address, and that more were to come. I related my issue to the manager, (b)(6) to whom I spoke with, and demanded to be given the name of the 'sponsor' who hired me as distributor. However, even with my pressing suspicion of identity theft, they would not provide me with means to contact this sponsor. They did say they would notify this sponsor that I was trying to get a hold of him/her. Weeks later, I have yet to receive contact from this 'sponsor' of mine. I have strong reason to believe that Herbalife's employment policies involve fraudulent processes and their lack of assistance in this issue leads me to believe that their business practices are dishonest. Due to their lack of investigation in this matter, I have also taken measures to report them to FTC and local police. --- Additional Comments: DesiredSettlementID: Other

	(requires explanation)Herbalife needs to conduct a thorough investigation on:- Who this 'sponsor' is.- How he stole my information.- What other information about me he has.- Remove me from their system.Also: revise their employment policies to prevent other similar situations from happening as reviewed and approved by a licensed lawyer. Herbalife needs to provide evidence of investigation and changes or be subject to pressed charges.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	Yes
Complaint Info Fair Resolution Description	ADMINISTRATIVELY CLOSED. The response from the business addresses the complaint to the BBB's satisfaction.

Record 43 of 102	
Reference Number	48588326
Created Date	09/19/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	09/19/2013
Updated By	STAYLORROBINS
Updated Date	09/24/2013
Agency Contact	Phone
Complaint Date	09/24/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)

Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Weatogue
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	

Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service	0304

Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14008832: MAIL 09/19/2013: The consumer supports the free enterprise system and believes people have the right to purse their economic goals without needless interference by federal government. The government should look into Herbalife questionable marketing practices, as several published reports have indicated that Herbalife targets minority groups, including many whom no experience in retail sales, and falsely markets itself as an easy business opportunity. Instead of selling nutrition products, Herbalife sells these opportunities to people in vulnerable communities. Herbalife convinces new sellers to ignore the risks and high costs of their program.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 44 of 102	
Reference Number	48604172
Created Date	09/19/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint

Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	09/19/2013
Updated By	STAYLORROBINS
Updated Date	09/24/2013
Agency Contact	Phone
Complaint Date	09/24/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Glastonbury
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	

Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact	Unknown

Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14008814: MAIL 09/19/2013: After the consumer has read several news accounts about Herbalife abusive practices, the consumer is asking the FTC to investigate this multi-level marketing company. Stories written in major newspapers indicate the company unfairly targets minority groups and falsely markets itself as an easy business opportunity. Instead of selling nutrition products, the company sells these opportunities to people in vulnerable communities. The consumer is a small business owner and understands how difficult it is to be effective in retail sales. Herbalife executive have already admitted to targeting minority groups, openly boasting about the company's African American initiative and Latino business. The company recruitment techniques promise financial

	freedom with only a few hours of work, an enticing offer to immigrants and others struggling to find a job.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 45 of 102	
Reference Number	48604216
Created Date	09/19/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	09/19/2013
Updated By	STAYLORROBINS
Updated Date	09/24/2013
Agency Contact	Phone
Complaint Date	09/24/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Middletown
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)

Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	

Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	CMS# 14008816: MAIL 09/19/2013: The recent reports of the marketing

Complaint Info Comments	practices for Herbalife, the vitamin and diet supplement company, indicates the company has been using powerful techniques to enlist certain minority groups to resell products. In many cases these inexperienced resellers, the promises often evaporate into thin air and unintended debt. The company sells these opportunities to people in vulnerable communities, takes large upfront payments and doesn't offer proper support. By recruiting vulnerable people in these communities with little or no business experience, Herbalife convinces new sellers to ignore the risks and high costs of their program. Herbalife's recruitment techniques promise financial freedom with only a few hours of work, an enticing offer to immigrants and others struggling to find a job. Due to Herbalife's high, above-average costs, it is hard for these people to sell enough of the product in order to realize a significant return on investment.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 46 of 102	
Reference Number	48688734
Created Date	09/30/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	09/30/2013
Updated By	STAYLORROBINS

Updated Date	09/30/2013
Agency Contact	Phone
Complaint Date	09/30/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	East Hampton
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining	

Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14008877: MAIL 09/30/2013: The consumer has discovered from newspaper reports that Herbalife has engaged in ruthless marketing practices, particularly with minority groups. People who engage in selling Herbalife often do not have the experience to sell the product. Without guidance, many people are left holding the bag. From a fairness perspective, the actions of this company have clearly crossed the line when it comes toward transparency. In many cases with these green resellers, the promises often result in crushing debt. Instead of having a transparent operation Herbalife sells these opportunities to people in vulnerable communities, takes large upfront payments and doesn't offer proper support. Due to the company's high above-average costs, it is hard for these people to sell enough of the product in order to realize a significant return on investment.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute	N

Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 47 of 102	
Reference Number	48688749
Created Date	09/30/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	09/30/2013
Updated By	STAYLORROBINS
Updated Date	09/30/2013
Agency Contact	Phone
Complaint Date	09/30/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Hartford
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	

Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Cesar's Foreign Car
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	

Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	CMS# 14008878: MAIL 09/30/2013: The consumer is a merchant located in Hartford and has come in contact with many people from the Hispanic community. The residents of this neighborhood, also known as Frog Hollow, are trying to do their best to provide for their families while serving as good citizens. The recent stories regarding Herbalife have been very

Complaint Info Comments	regarding Herbalife have been very disturbing. One of the consumer employees almost enlisted in Herbalife because they were promised easy money. Many of the reseller are from the Hispanic and African American communities. The company demands a very high upfront financial commitment from its resellers, who are then left to their own to cover those upfront cost.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 48 of 102	
Reference Number	48688763
Created Date	09/30/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	09/30/2013
Updated By	STAYLORROBINS
Updated Date	09/30/2013
Agency Contact	Phone
Complaint Date	09/30/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	

Consumer Address, Line 3	
Consumer Address, City	Middlefield
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA

Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation	

Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14008873: MAIL 09/30/2013: The consumer is a skilled craftsman, and if very sympathetic to hard work. Retail sales are very difficult and take time and support. The consumer is concern about the reports surrounding Herbalife. Based on what the consumer has heard from the media, management of this company has been pushing their products to people to act as resellers. From a fairness perspective, the actions of this company have clearly crossed the line when it comes toward transparency. In many cases with these green resellers, the promises often result in crushing debt. Instead of having a transparent operation Herbalife sells these opportunities to people in vulnerable communities, takes large upfront payments and doesn't offer proper support. Due to the company's high above-average costs, it is hard for these people to sell enough of the product in order to realize a significant return on investment.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 49 of 102	
Reference Number	48766693
Created Date	10/17/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	

Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	10/17/2013
Updated By	STAYLORROBINS
Updated Date	10/22/2013
Agency Contact	Phone
Complaint Date	10/22/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Marlborough
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	

Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	

Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14008902: MAIL 10/17/2013: The consumer offers professional services to his patients, and he understands the risks and rewards of his practice on a daily basis. It took him many years of education, mentoring and hard work to build this opportunity. Many people who are not fortunate to have these assets are often the ones to fall prey to rich quick gimmick or someone who offers them an easy way toward prosperity. Based on what the consumer has heard through the media and Internet, the management of this company has been aggressively pushing their products to people to act as resellers. This is not the consumer's area of expertise, but from a humanitarian perspective, the action of this company has clearly crossed the line when it comes

	toward transparency. Herbalife has been using powerful techniques to enlist certain minority groups to resell their products. For green resells, the promises often result in crushing debt. Herbalife sells these opportunities to people in vulnerable communities, takes large up-front payments and doesn't offer the proper support. The high, above-average costs, makes it hard for these people to sell enough of the product in order to realize a significant return on the investment.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 50 of 102	
Reference Number	48766755
Created Date	10/17/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	10/17/2013
Updated By	STAYLORROBINS
Updated Date	10/22/2013
Agency Contact	Phone
Complaint Date	10/22/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)

Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Newington
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	

Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters

Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14008911: MAIL 10/17/2013: The consumer wanted to share her personal story regarding Herbalife and its sales practices. The consumer has used the Herbalife products and brought them at a local storefront in Connecticut. While speaking with the sales person, it took a few minutes before the Herbalife sales person was showing me that I could also became a retail agent and earn great riches. At one point, the sales person was showing the consumer cancel checks in denominations of $400, $600 and $2,000 and implied those checks could easily be obtained through a regular sales program The sales person was very persistent but the consumer did not fall for it. Any company that is eager to share their business model with underserved communities troubles the consumer. The consumer has heard numerous news reports regarding Herbalife and how they have been targeting the Hispanic community. Many consumers are ashamed they have invested in Hearbalife retail operations, committing themselves to large sums of money and being unable to make a go of it.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 51 of 102	

Reference Number	48930587
Created Date	08/30/2013
Complaint Source	BBB CA Oakland
Originator Reference Number	11160057266628
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBOACA-USER
Entered Date	08/30/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/30/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ALEXANDRIA
Consumer Address, State Code	VA
Consumer Address, State Name	Virginia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Daphne Morris; Herbalife: Independent Distributor
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	BENICIA
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	94510
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	707
Company Phone, Number	7450535
Company Phone, Extension	
Company Email	daph-shawn@comcast.net
Company Website	www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing	

Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Service Rep 'Betty' simply advised that products cannot be return or exchanged regardless of purchase date.Attempted to return item purchased on August 26, 2013 product # 0004 product nane Herbal Aloe Gallon.Service Rep 'Betty' simply advised that products cannot be return or exchanged regardless of purchase date. --- Additional Comments: I need a quart of the same product and difference be refunded.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	

Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	No
Complaint Info Fair Resolution Description	NO RESPONSE. The business failed to respond to the BBB or the complainant.

Record 52 of 102	
Reference Number	49084845
Created Date	09/18/2013
Complaint Source	BBB CA Los Angeles
Originator Reference Number	13000020043637
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCALA-USER
Entered Date	09/18/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/18/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	RISING SUN
Consumer Address, State Code	MD
Consumer Address, State Name	Maryland
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area	

Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	

Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Purchased product that had cocoa powder in it unknowingly, do not and can not consume products with cocoa powder.Purchased product with cocoa powder in it unknowingly. Caffeine or any cocoa related products make me sick.

Complaint Info Comments	Been trying to see if I could get refund or exchange. When I call I get transferred around and ultimately get hung up on. --- Additional Comments: I would like either product refunded or exchanged for another product.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	Yes
Complaint Info Fair Resolution Description	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.

Record 53 of 102	
Reference Number	49114593
Created Date	10/29/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	10/29/2013
Updated By	STAYLORROBINS
Updated Date	11/04/2013
Agency Contact	Phone
Complaint Date	11/04/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	

Consumer Address, City	Chester
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation

Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	MAIL: 10/29/2013: The consumer is asking the Federal Trade Commission to investigate Herbalife's business practices. The consumer recently reviewed some publications, and there have been some troubling accusations and reports concerning Herbalife, and how it sells its products and recruits re-sellers to do the same. Herbalife claims to be a multi-level marketing company, but really they appear to be a pyramid scheme. Reports show that Herbalife recruits talk about the company as a great 'business opportunity'. But for most people who join, it's a losing proposition. These reports indicate that the company has a revolving door workforce – a 90 percent turnover that undermines the company's claims that it is just like Costco. Many who do sign up make large up-front cost without the skills, experience or support to make a successful run of the project. Most people don't make a profit and end up losing money. Many of the people in my community are forced into recruiting more people to join. The company offers nice rewards to participants who recruit lots of people and everyone needs money. The company execs have publically boasted about their "African American imitative" and "Latino business". They open up nutrition clubs, which seems to be a recruitment tool, in minority communities and they distribute lots of materials in Spanish. But in the end, the resellers are left holding the bag.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 54 of 102	
Reference Number	49151853
Created Date	10/30/2013
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	10/30/2013
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	10/30/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	
Consumer Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	

Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	

Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	This is company really does look like a fraud.. Don't let this be another Allied Capital just because some hedge fund manager who stands to make money from exposing Herbalife is the one who brought it to light. Yes, Ackman is self interested and has brought this fraud into the spotlight to make money. But the company still is a fraud and not investigating it

	destroys faith in the American government and lets the despicable corporate management of the company get away with their con game when they belong behind bars.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 55 of 102	
Reference Number	49328054
Created Date	11/05/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	11/05/2013
Updated By	STAYLORROBINS
Updated Date	11/07/2013
Agency Contact	Phone
Complaint Date	11/07/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Bloomfield
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA

Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	

Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	

Complaint Info Comments	CMS# 14008963: MAIL 11/05/2013: The consumer wants the FTC to get answers for Herbalife so the free market is a fair market. The company claims to be a multi-level marketing company, but really appear to be a pyramid scheme. Reports show that the representatives call the company a great 'business opportunity' but, for most people who join, it's an unpleasant experience. The reports indicate that the company has a revolving door workforce that undermines the company's claims that it is just like Costco. Many who do sign up make large up-front cost without the skills, experience or support to make a successful run of the project. Most people don't make a profit and end up losing money. Many of the people in my community are forced into recruiting more people to join. The company offers nice rewards to participants who recruit lots of people, and everyone needs the money. The company's business executives have publically boasted about their initiatives in the minority communities, but in the end, the resellers are left holding the bag.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 56 of 102	
Reference Number	49328117
Created Date	11/05/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer

DNC?	N
Entered By	STAYLORROBINS
Entered Date	11/05/2013
Updated By	STAYLORROBINS
Updated Date	11/07/2013
Agency Contact	Phone
Complaint Date	11/07/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Los Angeles
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	

Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Vamos Unidos USA
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown

Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14008994: MAIL 11/05/2013: The FTC received a letter signed by multiple organization regarding Herbalife. They see a growing issue in their communities. Herbalife's pyramid scheme, supposedly offering an 'excellent business opportunity,' is costing families thousands of hard-earned dollars. In 1986, the California Attorney General successfully brought a case against Herbalife in which the Supreme Court of California issued an injunction. The injunction requires Herbalife to verify retail sales and other documentation to prove the company's sales to distributors and customers. They believe Herbalife is in direct violation of this injunction. Based on the company's public records and statements, the company does not collect the necessary documentation that the injunction requires. This information is very important for regulators and consumers trying to determine if

	Herbalife is an illegal pyramid scheme. Right now Herbalife's distributors make claims about the health benefits of their products without the science to back it up. The injunction also requires that the company stop making claims about the extreme health benefit of its products. The company has false claims in advertising and unfair targeting of Ethnic minorities.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 57 of 102	
Reference Number	49500774
Created Date	10/10/2013
Complaint Source	BBB CA Los Angeles
Originator Reference Number	13000020048571
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCALA-USER
Entered Date	10/10/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	10/10/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)

Consumer Address, Line 3	
Consumer Address, City	TAMPA
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	

Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I ordered my product almost 2 weeks ago I have yet to receive them. On the web page it clearly states product will be delivered the following day... It's day 10 still I have nothing... I tried calling and got the company voice mail but never receive a call yet... I have been scammed!!!I want my money back...Order_Number: ORDER ID : (b)(6) --- Additional Comments: DesiredSettlementID: RefundI still have not received my products...Why? Please call me (b)(6) Date: Tue, 1 Oct 2013 21:14:45 -0600To: (b)(6) From: support@herbalproductshop.comSubject: Payment ConfirmationDear (b)(6) (b)(6) This is confirmation of your payment to Herbal Product Shop

	(support@herbalproductshop.com).ORDER AMOUNT : 34.66ORDER ID : (b)(6) ORDER DATE : 1 October 2013If you have questions about this order, please respond directly to this email or click on the link b
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	Yes
Complaint Info Fair Resolution Description	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.

Record 58 of 102	
Reference Number	49534238
Created Date	10/04/2013
Complaint Source	BBB CA Los Angeles
Originator Reference Number	13000020047257
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCALA-USER
Entered Date	10/04/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	10/04/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	

Consumer Address, City	WENATCHEE WA
Consumer Address, State Code	WA
Consumer Address, State Name	Washington
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA

Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation	

Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I have asked numerous times to not be called by this number: 503-849-5865 regarding Metabolife. I warned them that I would contact you to stop this and nothing has helped. I do not know if it is a legit business or not but I do not need to be harassed 15x throughout the day and night! --- Additional Comments: DesiredSettlementID: Other (requires explanation)To not be called ever again and for them to be investigated to see if this number should even be harassing people.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	No
Complaint Info Fair Resolution Description	INVALID. The consumer complaint is incomplete or unintelligble and the consumer cannot be reached, or the consumer and the business did not have a marketplace transaction.

Record 59 of 102	
Reference Number	49580543
Created Date	11/18/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	11/18/2013
Updated By	STAYLORROBINS
Updated Date	11/18/2013
Agency Contact	Phone
Complaint Date	11/18/2013

Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	New York
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Audubon Partnership for Economic Development
Consumer Military Service Branch	
Consumer Consent for volunteer	

group contact?	
Company Name	Herbalife Ltd
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested	

Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14009061: MAIL 11/18/2013: The consumer sent a copy of their letter address to the AG's office. The consumer is writing on behalf of their organization. The organization is committed to increasing opportunities for local residents and small businesses in the communities of Washington Heights and Inwood in New York City. The organization works to increase access to small business and consumer loans and help community business attract capital. People are looking for viable opportunities for financial growth and new businesses. Herbalife claims to be one such opportunity but, in our experience, they do not. Herbalife takes advantage of low-income and minority people in the community by convincing them to take part in a losing business deal. The company makes false promises about the money people can make by joining the program, but never delivers. In the end, almost all the people who join Herbalife lose their money and end up in debt.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute	N

Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 60 of 102	
Reference Number	49580589
Created Date	11/18/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	11/18/2013
Updated By	STAYLORROBINS
Updated Date	11/18/2013
Agency Contact	Phone
Complaint Date	11/18/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Los Angeles
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	

Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Councel of Bi-national Community Organizations
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	

Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	CMS# 14009093: MAIL 11/18/2013: The consumer sent a copy of their letter address to the AG's office. The consumer is writing on behalf of their organization. Since 2008, the organization has provided a myriad of services to the Spanish speaking community of the City of Los Angeles. The organization is committed to protecting the

Complaint Info Comments	members in our mission, which is why, they are requesting an investigation of Herbalife. Herbalife operates as a pyramid scheme, unfairly targeting ethnic minorities. Herbalife's pyramid scheme is illegal, because members are incentivized to recruit rather than sell product, leaving those at the bottom with no way to succeed selling the product. Herbalife unfairly targets minorities and is in violation of the 1986 injunction. The injunction requires Herbalife to verify retail sales and other documentation to prove the company's sales to distributors and customers. They are urging the Santa Cruz District Attorney to enforce the 1986 injunction against Herbalife and demand release of these records.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 61 of 102	
Reference Number	49580613
Created Date	11/18/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	11/18/2013
Updated By	STAYLORROBINS
Updated Date	11/18/2013
Agency Contact	Phone
Complaint Date	11/18/2013
Transaction Date	

Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Los Angeles
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Vamos Unidos USA
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	

Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00

Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14009097: MAIL 11/18/2013: The consumer sent a copy of their letter address to the AG's office. The consumer is writing on behalf of their organization. The consumer has been working on behalf of the immigrant community in Southern California for more than thirty years. They provide legal and educational services and are located in the city of Los Angeles. The organization is committed to protecting the members in our mission, which is why; they are requesting an investigation of Herbalife. Herbalife operates as a pyramid scheme, unfairly targeting ethnic minorities. Herbalife's pyramid scheme is illegal, because members are incentivized to recruit rather than sell product, leaving those at the bottom with no way to succeed selling the product. Herbalife unfairly targets minorities and is in violation of the 1986 injunction. The injunction requires Herbalife to verify retail sales and other documentation to prove the company's sales to distributors and customers. They are urging the Santa Cruz District Attorney to enforce the 1986 injunction against Herbalife and demand release of these records.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute	N

Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 62 of 102	
Reference Number	49580626
Created Date	11/18/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	11/18/2013
Updated By	STAYLORROBINS
Updated Date	11/18/2013
Agency Contact	Phone
Complaint Date	11/18/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Long Beach
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area	

Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Federacion de Clubes Unidos Por Guerrero
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	

Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	CMS# 14009095: MAIL 11/18/2013: The consumer sent a copy of their letter address to the AG's office. The consumer is writing on behalf of their organization. The organization is located in the City of Long Beach, California. They are a not for profit-community based

Complaint Info Comments	organization providing civics and educational services to the residents of Los Angeles county. The organization is committed to protecting the members in our mission, which is why; they are requesting an investigation of Herbalife. Herbalife operates as a pyramid scheme, unfairly targeting ethnic minorities. Herbalife's pyramid scheme is illegal, because members are incentivized to recruit rather than sell product, leaving those at the bottom with no way to succeed selling the product. Herbalife unfairly targets minorities and is in violation of the 1986 injunction. The injunction requires Herbalife to verify retail sales and other documentation to prove the company's sales to distributors and customers. They are urging the Santa Cruz District Attorney to enforce the 1986 injunction against Herbalife and demand release of these records.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 63 of 102	
Reference Number	49580646
Created Date	11/18/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	11/18/2013
Updated By	STAYLORROBINS
Updated Date	11/18/2013

Agency Contact	Phone
Complaint Date	11/18/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Coachella
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Binational Union of Ex-braceros

Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14009098: MAIL 11/18/2013: The consumer sent a copy of their letter address to the AG's office. The consumer is writing on behalf of their organization. The organization's focus remains winning justice for the almost four million Mexican workers who came to work to the US in agriculture, mining and railroad industries from 1942 through 1964. Thus far, the Mexican Government has compensated about 200,000 ex-braceros with almost a billion dollars. The organization is committed to protecting the members in our mission, which is why; they are requesting an investigation of Herbalife. Herbalife operates as a pyramid scheme, unfairly targeting ethnic minorities. Herbalife's pyramid scheme is illegal, because members are incentivized to recruit rather than sell product, leaving those at the bottom with no way to succeed selling the product. Herbalife unfairly targets minorities and is in violation of the 1986 injunction. The injunction requires Herbalife to verify retail sales and other documentation to prove the company's sales to distributors and

	customers. They are urging the Santa Cruz District Attorney to enforce the 1986 injunction against Herbalife and demand release of these records.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 64 of 102	
Reference Number	49580662
Created Date	11/18/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	11/18/2013
Updated By	STAYLORROBINS
Updated Date	11/18/2013
Agency Contact	Phone
Complaint Date	11/18/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Compton
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA

Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Club Unidos Por Copala
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	

Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	

Complaint Info Comments	CMS# 14009096: MAIL 11/18/2013: The consumer sent a copy of their letter address to the AG's office. The consumer is writing on behalf of their organization. The organizations main focus of work is advocating for the working towards the complete integration of our members, and of the community at large, into the American mainstream. That is why they promote comprehensive immigration reform, education and Obamacare. The organization is committed to protecting the members in our mission, which is why; they are requesting an investigation of Herbalife. Herbalife operates as a pyramid scheme, unfairly targeting ethnic minorities. Herbalife's pyramid scheme is illegal, because members are incentivized to recruit rather than sell product, leaving those at the bottom with no way to succeed selling the product. Herbalife unfairly targets minorities and is in violation of the 1986 injunction. The injunction requires Herbalife to verify retail sales and other documentation to prove the company's sales to distributors and customers. They are urging the Santa Cruz District Attorney to enforce the 1986 injunction against Herbalife and demand release of these records.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 65 of 102	
Reference Number	49580670
Created Date	11/18/2013
Complaint Source	Federal Trade Commission

Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	11/18/2013
Updated By	STAYLORROBINS
Updated Date	11/18/2013
Agency Contact	Phone
Complaint Date	11/18/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Los Alamitos
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country	

Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Club Rio Balsa
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	

Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14009099: MAIL 11/18/2013: The consumer sent a copy of their letter address to the AG's office. The consumer is writing on behalf of their organization. The organizations main focus of work is advocating for the working towards the complete integration of our members, and of the community at large, into the American mainstream. That is why they promote comprehensive immigration reform, education and Obamacare. The organization is committed to protecting the members in our mission, which is why; they are requesting an investigation of Herbalife. Herbalife operates as a pyramid scheme, unfairly targeting ethnic minorities. Herbalife's pyramid scheme is illegal, because members are

	incentivized to recruit rather than sell product, leaving those at the bottom with no way to succeed selling the product. Herbalife unfairly targets minorities and is in violation of the 1986 injunction. The injunction requires Herbalife to verify retail sales and other documentation to prove the company's sales to distributors and customers. They are urging the Santa Cruz District Attorney to enforce the 1986 injunction against Herbalife and demand release of these records.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 66 of 102	
Reference Number	49703316
Created Date	08/07/2013
Complaint Source	BBB CA San Jose
Originator Reference Number	12160020033718
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSANCA-USER
Entered Date	08/07/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/07/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	

Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PHOENIX
Consumer Address, State Code	AZ
Consumer Address, State Name	Arizona
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES

Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304

Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	The owner of Plaza Kora LLC rents out a small location to a lady called (b)(6) Who advertises to put nails and sells herba life shakes to the public. Within the location were she does the procedure to put nails there no certificate from the state that allows her to do that service, the tools she uses are not sterilizes because I have witness it. She also sells shakes, she blends them there she serves them there and charges $$ for that service. The location its self does not the the room tempature and does not have the proper equipment to keep it santitary. She has no light installed, she wired a cable to other busy across (zumba class) and the wire is very visable. She has no certificate on the wall that shows anything for food handler, because there is times were food is sold there. This may not be important buy she has no documents is he with a traveling passaport, pays no taxes. To a future citizen she needs the law applied and owes her dues to paying taxes in the state. Her business has been running for almost one year.Product_Or_Service: Nails, Herba Life Shakes --- Additional Comments: DesiredSettlementID: Other (requires explanation)To have the location to which (b)(6) (b)(6) has been renting feom Plaza Kora LLC shut down.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute	

Resolved	
Complaint Info Fair Resolution Flag	No
Complaint Info Fair Resolution Description	INVALID. The consumer complaint is incomplete or unintelligble and the consumer cannot be reached, or the consumer and the business did not have a marketplace transaction.

Record 67 of 102	
Reference Number	49703333
Created Date	06/14/2013
Complaint Source	BBB CA San Jose
Originator Reference Number	12160020021389
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSANCA-USER
Entered Date	06/14/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	06/14/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	BROOKLYN
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	

Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com

Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	A few months ago, I received a letter and ID card saying that I am now a distributor for Herbalife. Having not at all heard of Herbalife nor signed up to be a distributor, I disregarded the letter. About a

Complaint Info Comments	month later, I was delivered 7 large boxes of Herbalife through FedEx to my address. The name addressed on the box is extremely close to mine in spelling. I turned the delivery woman away with the 7 large boxes of supplements since I placed no such order. When I called Herbalife, I was told that that was not the first order placed to my address, and that more were to come. I related my issue to the manager, (b)(6) to whom I spoke with, and demanded to be given the name of the 'sponsor' who hired me as distributor. However, even with my pressing suspicion of identity theft, they would not provide me with means to contact this sponsor. They did say they would notify this sponsor that I was trying to get a hold of him/her. Weeks later, I have yet to receive contact from this 'sponsor' of mine. I have strong reason to believe that Herbalife's employment policies involve fraudulent processes and their lack of assistance in this issue leads me to believe that their business practices are dishonest. Due to their lack of investigation in this matter, I have also taken measures to report them to FTC and local police. --- Additional Comments: DesiredSettlementID: Other (requires explanation)Herbalife needs to conduct a thorough investigation on:- Who this 'sponsor' is.- How he stole my information.- What other information about me he has.- Remove me from their system.Also: revise their employment policies to prevent other similar situations from happening as reviewed and approved by a licensed lawyer. Herbalife needs to provide evidence of investigation and changes or be subject to pressed charges.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	

Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	Yes
Complaint Info Fair Resolution Description	ADMINISTRATIVELY CLOSED. The response from the business addresses the complaint to the BBB's satisfaction.

Record 68 of 102	
Reference Number	49703334
Created Date	09/18/2013
Complaint Source	BBB CA San Jose
Originator Reference Number	12160020043637
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSANCA-USER
Entered Date	09/18/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/18/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	RISING SUN
Consumer Address, State Code	MD
Consumer Address, State Name	Maryland
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	

Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com

Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	Purchased product that had cocoa powder in it unknowingly, do not and can not consume products with cocoa powder.Purchased product with cocoa powder in it unknowingly. Caffeine or any cocoa

Complaint Info Comments	related products make me sick. Been trying to see if I could get refund or exchange. When I call I get transferred around and ultimately get hung up on. --- Additional Comments: I would like either product refunded or exchanged for another product.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	Yes
Complaint Info Fair Resolution Description	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.

Record 69 of 102	
Reference Number	49703335
Created Date	07/26/2013
Complaint Source	BBB CA San Jose
Originator Reference Number	12160020030782
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSANCA-USER
Entered Date	07/26/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	07/26/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)

Consumer Address, Line 3	
Consumer Address, City	NORTH HILLS
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California

Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$80.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	

Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I contacted Herbalife regarding their 30 day money gurantee promise on all products. I purchased 3 bottles of Herbalife supplements from one of their Herbalife distributors: (b)(6) (b)(6) 6/25/13 after seeing no results from the Herbalife tea and shakes she was selling to me daily for $5.00 each, she strongly recommended I purchase 1 month supply (1 bottle of each) of the following Herbalife dietary supplements: CELL ACTIVATOR, CELL U LOSS, and MULTI VITAMINA. She said taking these products will gurantee I lose the weight I wasn't losing from the Herbalife tea and shake. She sold me all 3 bottles for $80.00 As previously mentioned I was buying shakes from her daily everyday for weeks before buying the pills and cash was the only form of payment as she has no cash register or receipt system in place at her place of business used to sell Herbalife products. I never received a receipt for any purchases, shakes or pills. When I returned the bottles to my distributor requesting my money back on 7/18/13 because I had lost no weight and products were no good, she said could not refund me because I had used the products. I told her I need a copy of the receipt so I could contact Herbalife directly about their 30 day money back gurantee. She said she ran out of receipt paper and could not give me one. I contacted Herbalife same day 7/18/13 via email regarding the issue I was having getting my refund from distributor. Herbalife refunds dept Marquita Mclaren emailed me back with all necessary documents I needed to send her

	back within 5 days to process my refund. I since have left her countless voice messages and emails without any reply back. I sent all documents via fax to her for my refund on 7/22/13 (copy of fax confirmation can be provided) I have yet heard back from anyone. Leading to believe this company is a pyramid scam and the company is avoiding my calls/emails. I want my full refund as im within my rights to ask for one as I'm within the companys 30 Day Money Back Gurantee promise.Product_Or_Service: Herbalife dietary supplements (3 bottles) --- Additional Comments: DesiredSettlementID: RefundFull refund of $80.00 paid to (b)(6) (b)(6) - Herbalife distributor. Paid on: 06/25/13 Refund request made: 07/18/13
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	Yes
Complaint Info Fair Resolution Description	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.

Record 70 of 102	
Reference Number	49703779
Created Date	10/04/2013
Complaint Source	BBB CA San Jose
Originator Reference Number	12160020047257
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSANCA-USER
Entered Date	10/04/2013
Updated By	

Updated Date	
Agency Contact	External Agency
Complaint Date	10/04/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WENATCHEE WA
Consumer Address, State Code	WA
Consumer Address, State Name	Washington
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining	

Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response	

Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I have asked numerous times to not be called by this number: 503-849-5865 regarding Metabolife. I warned them that I would contact you to stop this and nothing has helped. I do not know if it is a legit business or not but I do not need to be harassed 15x throughout the day and night! --- Additional Comments: DesiredSettlementID: Other (requires explanation)To not be called ever again and for them to be investigated to see if this number should even be harassing people.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	No
Complaint Info Fair Resolution Description	INVALID. The consumer complaint is incomplete or unintelligble and the consumer cannot be reached, or the consumer and the business did not have a marketplace transaction.

Record 71 of 102	
Reference Number	49703783

Created Date	10/10/2013
Complaint Source	BBB CA San Jose
Originator Reference Number	12160020048571
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSANCA-USER
Entered Date	10/10/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	10/10/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	TAMPA
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone,	

Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country	

Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law	

Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I ordered my product almost 2 weeks ago I have yet to receive them. On the web page it clearly states product will be delivered the following day... It's day 10 still I have nothing... I tried calling and got the company voice mail but never receive a call yet... I have been scammed!!!I want my money back...Order_Number: ORDER ID : (b)(6) - Additional Comments: DesiredSettlementID: RefundI still have not received my products. Why? Please call me (b)(6) Date: Tue, 1 Oct 2013 21:14:45 -0600To: (b)(6) From: support@herbalproductshop.comSubject: Payment ConfirmationDear (b)(6) (b)(6) This is confirmation of your payment to Herbal Product Shop (support@herbalproductshop.com).ORDER AMOUNT : 34.66ORDER ID : (b)(6) ORDER DATE : 1 October 2013If you have questions about this order, please respond directly to this email or click on the link b
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	Yes
Complaint Info Fair Resolution Description	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.

Record 72 of 102	
Reference Number	49703877

Created Date	03/18/2013
Complaint Source	BBB CA San Jose
Originator Reference Number	12160020000811
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSANCA-USER
Entered Date	03/18/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/18/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LEANDER
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	

Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	

Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$199.95
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	Around October 14, 2012, I inquired to the website 'Work-At-Home.com'. On October 15, 2012, I was contacted by Paul Housch about this company. After receiving 2 training packages in less than a week for a possible sales position on-line, I thought, and after careful determination, I realized that I did not want to purchase or become a sales person for Herbalife, also known as 'work-at-home.com'. This is the cover name they use for Herbalife. I made it known to Paul Housh, my so-called point of contact and distributor, and also known to me as my 'Mentor' from Herbalife, that I no longer wanted to

Complaint Info Comments	continue with the program. At that time I was instructed to return the training packages that were sent to me in the mail. I followed his instructions and returned both to the respective addresses he gave me on the 19th of October and was told that I would have a refund within 30-60 days. Two months went by and I neither heard or received anything from Paul Housch or a refund from Herbalife. I then started contacting by email and phone about once every two weeks and got the run around about you need to send this email or you need to call this person, but needless to say, 6 months later, no results except for one email from the Herbalife company stating they were going to return 25% of what I paid to them. After that email, Paul sent me a follow-up email for me to send him my name and address so that he could send me a check to reimburse me the full 100% of what I paid to get into the company. Then another 2 weeks went by and still nothing. I feel the Better Business Bureau is my last resort to try to get reimbursed for my monies I was cheated out of and some compensation for the aggravation I have gone through with this scam company for the past 6 months! Please help in any way that you can to expose this business, so that no one else can be affected the way I was. Thank you!Product_Or_Service: Work From Home Training Package (1 of 2)Order_Number: Transaction ID #(b)(6) --- Additional Comments: DesiredSettlementID: Refund$220.00 reimbursement check for two training packages that were returned to 'Herbalife'. One package was for $200 and the other was $20.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute	

Resolved	
Complaint Info Fair Resolution Flag	Yes
Complaint Info Fair Resolution Description	RESOLVED. The consumer has verified that the complaint has been settled to his/her satisfaction.

Record 73 of 102	
Reference Number	49703878
Created Date	04/15/2013
Complaint Source	BBB CA San Jose
Originator Reference Number	12160020007761
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSANCA-USER
Entered Date	04/15/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	04/15/2013
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LELAND
Consumer Address, State Code	NC
Consumer Address, State Name	North Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)

Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	800 W Olympic Blvd Ste 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Subject ID Type Code	
Company Subject ID Type Name	

Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$399.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I WAS TOLD THAT IF I WAS NOT SATIFIED THAT MY MONEY WOULD BE REFUNDED , I PAID THEM $399.00 ,I SENT MY REFUND REQUEST BEFORE THE 90 DAYS ,THAT WAS IN FEBUARY, IHAVE HEARD NOTHING FROM THEM. ALL I

	WANT IS MY MONEY BACK. THANK YOU --- Additional Comments: DesiredSettlementID: Refund$399.00 AND THE $49.95
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	
Complaint Info Fair Resolution Flag	Yes
Complaint Info Fair Resolution Description	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.

Record 74 of 102	
Reference Number	49768209
Created Date	11/26/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	11/26/2013
Updated By	JRUANO
Updated Date	12/02/2013
Agency Contact	Phone
Complaint Date	12/02/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Cudahy
Consumer Address, State Code	CA

Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	b(6)
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	City of Cudahy California
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code	

Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)

Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14009110: MAIL 11/26/2013: The consumer is writing on behalf of the nearly 23,000 Latino residents of Cudahy, Ca. reiterating their earlier request to investigate Herbalife. There have been alarming reports recently that highlight Herbalife's practices and suggest that they may in fact coincide with a pyramid scheme. Furthermore, Herbalife unfairly targets ethnic minorities; specifically the Latino community who are Spanish speaking, have little to no education and have no ability to assess risk management. The majority demographics in the consumer's community are Latino and they have a high concentration of immigrants, consequently, this is not the first time that we have spoken out against Herbalife. On October 18, the consumer joined a coalition of several Latino, community and faith-based organizations to speak out about the damage Herbalife is having on their families. The consumer is supported by national organizations such MANA, National Consumers League (NCL), … Just last year, Herbalife reported net sales of more than $4 billion and a net income of $477.19 million. 99 per cent of Herbalife distributors barely make a living wage and have had no voice and no protection from the law.CMS#14009168 UPDATE 12/02/2013 MAIL:Consumer sent in additional material regarding the complaint against Herbalife JRUANO
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 75 of 102	
Reference Number	49768235
Created Date	11/26/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	11/26/2013
Updated By	STAYLORROBINS
Updated Date	12/12/2013
Agency Contact	Phone
Complaint Date	12/12/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Los Angeles
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	b(6)
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Congress of Racial Equality - CA
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing	

Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	CMS# 14009134: MAIL 11/26/2013 The consumer's organization is committed to protecting our members and our community in many ways. One of these ways in the pursuit of our mission to protect the little person from the big person, which is why they are calling on the AG's Office with a request to initiate an investigation of Herbalife. It is a particular concern that Herbalife operates as a pyramid scheme, unfairly targeting ethnic minorities. Herbalife's pyramid scheme is

Complaint Info Comments	illegal, because members are incentivized to recruit rather than sell product, leaving those at the bottom with no way to succeed selling the product. Herbalife unfairly targets minorities and is in violation of the 1986 injunction. The injunction requires Herbalife to verify retail sales and other documentation to prove the company's sales to distributors and customers. They are urging the Santa Cruz District Attorney to enforce the 1986 injunction against Herbalife and demand release of these records. CMS# 14009214: UPDATE: MAIL 12/09/2013: The consumer sent in another copy of the Herbalife complaint. SROBINSON
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 76 of 102	
Reference Number	49768270
Created Date	11/26/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	11/26/2013
Updated By	STAYLORROBINS
Updated Date	12/09/2013
Agency Contact	Phone
Complaint Date	12/09/2013
Transaction Date	
Member of armed forces or dependant?	N

Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Lynwood
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	City of Lynwood
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	

Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown

Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14009135: MAIL 11/26/2013 The consumer's organization is writing to request that the Attorney General Office enforce the 1986 injunction against Herbalife that was initiated by the District Attorney. Herbalife operates as a pyramid scheme and unfairly targets ethnic minorities, specifically the Latino community. Herbalife's pyramid scheme is illegal, because members are incentivized to recruit rather than sell product, leaving those at the bottom with no way to succeed selling the product. Herbalife unfairly targets minorities and is in violation of the 1986 injunction. The injunction requires Herbalife to verify retail sales and other documentation to prove the company's sales to distributors and customers. They are urging the Santa Cruz District Attorney to enforce the 1986 injunction against Herbalife and demand release of these records
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 77 of 102

Reference Number	49832077
Created Date	12/02/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	SMORGANBAILEY
Entered Date	12/02/2013
Updated By	SMORGANBAILEY
Updated Date	12/04/2013
Agency Contact	Phone
Complaint Date	12/04/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Los Angeles
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	True Way Missionary Baptist Church
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	

Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	MAIL: Consumer is writing on behalf of his church requesting that the FTC investigate the deceptive practice of a multi-leveling marketing company - Herbalife. Details are attached.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 78 of 102

Reference Number	49832093
Created Date	12/02/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	SMORGANBAILEY
Entered Date	12/02/2013
Updated By	SMORGANBAILEY
Updated Date	12/04/2013
Agency Contact	Phone
Complaint Date	12/04/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Los Angeles
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Operation HOPE, The Global Leader for Financial Dignity
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing	

Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	MAIL: Consumer is writing on behalf of an organization requesting that the FTC investigate the deceptive practice of a multi-leveling marketing company - Herbalife. MAIL: Consumer sent a duplicate letter regarding the same thing. Details are attached.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution	

Description	

Record 79 of 102	
Reference Number	49832792
Created Date	12/02/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	12/02/2013
Updated By	STAYLORROBINS
Updated Date	12/05/2013
Agency Contact	Phone
Complaint Date	12/05/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	South Gate
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	b(6)
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	City of South Gate
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing	

Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	CMS# 14009161: MAIL 12/02/2013: The consumer an elected representative of the City of South Gate, which is 95% Latinos. Herbalife operates as a pyramid scheme and unfairly targets ethnic minorities, specifically the Latino community. The company predatory practices offer an “excellent business opportunity” but in fact cost their families thousands of hard-earned dollars. The company’s recruitment practices targets ethnic minorities, like those

Complaint Info Comments	living in South Gate, with little to no business experience or ability to asses risk. And clearly, the effort is paying off – for Herbalife only. Sales within the Latino community are responsible for more than 60% of Herbalife's billions in sales nationwide; however, 80 percent of distributors are making nothing. Repeatedly, former Herbalife distributors explain how they were "just trying to earn a living" or "supplement their retirement or limited income" when they signed on, but in the end, they lose thousands.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 80 of 102	
Reference Number	49832806
Created Date	12/02/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	12/02/2013
Updated By	STAYLORROBINS
Updated Date	12/05/2013
Agency Contact	Phone
Complaint Date	12/05/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)

Consumer Salutation	
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Los Angeles
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	African Methodist Espiscopal Church
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	

Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304

Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14009157: MAIL 12/02/2013: The organization became aware of the very troubling business practice by Herbalife while working in the community. Herbalife operates as a pyramid scheme and deceitfully targets ethnic minorities. Herbalife pyramid schemes are illegal because members are incentivized to recruit rather than sell products. Most of the members of Herbalife are at the bottom and struggling to earn anything, if at all. Herbalife reported net sales in 2012 were more than $4 billion and a net income of $477.19 million, yet the median income for sales leaders are almost zero. The CEO made $10 million last year; more than 99 percent of the distributors make less than living wage. In fact, many end up losing thousands in the process.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 81 of 102	
Reference Number	49894651
Created Date	12/04/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer

DNC?	N
Entered By	JCHASE1
Entered Date	12/04/2013
Updated By	JCHASE1
Updated Date	12/12/2013
Agency Contact	Phone
Complaint Date	12/12/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	
Consumer Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	

Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown

Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14009152 Consumer states Herbalife operates as a pyramid scheme and deceitfully targets ethnic minorities and their "get rich" promise is a threat to the well being of hardworking families. Consumer states members are incentivized to recruit rather than sell the product and virtually do not earn anything. UPDATE 12/12/2013 See attached letter for full details JCHASE
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 82 of 102	
Reference Number	49895035
Created Date	12/04/2013

Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	JCHASE1
Entered Date	12/04/2013
Updated By	JCHASE1
Updated Date	12/12/2013
Agency Contact	Phone
Complaint Date	12/12/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	
Consumer Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	

Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Ruach Christian Fellowship
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	

Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS#14009159 Consumer is writing on behalf of his church community. They have a complaint about the company Herbalife, who they say is a "get rich" quick pyramid scheme. They found the details of Herbalife's illegal pyramid astounding, with a reported net sales of $4 billion and a net income of $47 million, yet over 99% of people who were lured into Herbalife's pyramid scheme made less than living wage last year. Consumer is requesting the FTC initiate an investigation into Herbalife and their illegal business practices. UPDATE 12/12/2013 See attached letter for full details JCHASE.
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 83 of 102	
Reference Number	49926489
Created Date	12/05/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	CJAUREGUI
Entered Date	12/05/2013
Updated By	STAYLORROBINS
Updated Date	12/09/2013
Agency Contact	Mail
Complaint Date	12/09/2013
Transaction Date	10/29/2013
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Lynwood
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	

Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	City of Lynwood
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	

Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	10/29/2013
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS#14009179 12/05/2013 MAIL: Consumer mailed in a complaint requesting that we investigate Herbalife as pyramids schemes are illegal, due to their unfair targeting of ethnic minorities, and false claims in advertising.

Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 84 of 102	
Reference Number	49926507
Created Date	12/05/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	CJAUREGUI
Entered Date	12/05/2013
Updated By	ABANKS
Updated Date	12/06/2013
Agency Contact	Phone
Complaint Date	12/06/2013
Transaction Date	11/11/2013
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Los Angeles
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country	

Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Christ Liberation Ministries
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	

Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	11/11/2013
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS#14009160 12/05/2013 MAIL:Consumer mailed in a complaint against Herbalife for recrutiting vulnerable members of his community into their pyramid scheme. He explains they are

	targeting ethnic minorities.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 85 of 102	
Reference Number	49926528
Created Date	12/05/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	CJAUREGUI
Entered Date	12/05/2013
Updated By	
Updated Date	
Agency Contact	Mail
Complaint Date	12/05/2013
Transaction Date	11/18/2013
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Jackson Heights
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	

Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Queens Communit House
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	

Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	11/18/2013
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	CMS#14009180 12/05/2013 MAIL: Consumer mailed in a complaint against Herbalife as they take advantage of people in her

Complaint Info Comments	community by targeting minorities and immigrants. According to consumer the company makes false promises about the money people can make.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 86 of 102	
Reference Number	49927003
Created Date	12/06/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	JRUANO
Entered Date	12/06/2013
Updated By	LSENIOR
Updated Date	12/09/2013
Agency Contact	Phone
Complaint Date	12/09/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Los Angeles
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA

Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	National Action Network Los Angeles
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	

Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	

Complaint Info Comments	CMS# 14009181 12/06/2013 MAIL: Consumer mailed in a complaint against Herbalife for recruiting vulnerable members of his community into their pyramid scheme. He explains they are targeting ethnic minorities.Fullfillment was sent to consumer JRUANO
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 87 of 102	
Reference Number	49943089
Created Date	12/06/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	ABANKS
Entered Date	12/06/2013
Updated By	
Updated Date	
Agency Contact	Phone
Complaint Date	12/06/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	

Consumer Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Rauch Christian Fellowship
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	

Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P

Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Mail: Consumer is writing on behalf of their company Ruach Christian Fellowship, regarding their complaint against Herbalife. Complaintant states that people in their community, which includes all over Los Angeles area, have expressed their concern with Herbalife's get rich-quick Pyramid scheme. Complaintant is hoping the FTC will open an investigation regarding this matter. the details of Herbalife's pyramid scheme are astounding. Last year Herbalife reported net sales of more than $4 billion and a net income of $477.19 million, yet 40% of Herbalife employees are supervisors, who earned an average compensation of $637. Over 99% of people who were lured into Herbalife's Pyramid Scheme last year made less than a living wage. Members are encouraged to recruit instead of selling the products and that leaves those at the bottom with no recruits.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 88 of 102	
Reference Number	49969439
Created Date	12/09/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	LSENIOR

Entered Date	12/09/2013
Updated By	LSENIOR
Updated Date	12/12/2013
Agency Contact	Phone
Complaint Date	12/12/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	South Gate
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	

Consumer Military Station	
Consumer Complaining Company/Org	City of South Gate City Council
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS: 14009156. Mail: Consumer reports the he is an elective representative of a city comprised of nearly 95 percent Latino and that Herbalife operates as a pyramid scheme and unfairly targets ethnic minorities. Consumer indicates Herbalife targets those with no business experience or ability to asses risk and 80% of distributors make nothing.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 89 of 102	
Reference Number	49969445
Created Date	12/09/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English

Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	STAYLORROBINS
Entered Date	12/09/2013
Updated By	STAYLORROBINS
Updated Date	12/12/2013
Agency Contact	Phone
Complaint Date	12/12/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Los Angeles
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	

Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	Greater True Light Missionary Baptist
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	CMS# 14009212: MAIL 12/09/2013: The consumer sent in a copy of the letter to CA Attorney General Office. It has come to the consumer's attention that Herbalife has illegally targeted ethnic minorities to keep their pyramid scheme in business. The company is using false advertising techniques. The company goes after those with little to no business experience or ability to assess risk. Sales within the Latino community are responsible for more than 60% of Herbalife's nationwide sales, according to the company's last disclosure on this issue. The 1986 injunction was brought in a case by the Santa Cruz district Attorney against Herbalife, requiring the company to verify retails sales and other documentations to prove the company's sales to distributors and customers. Since the injunction, 27

	years ago, the company has failed to collect any of the necessary documentation.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

Record 90 of 102	
Reference Number	49969630
Created Date	12/09/2013
Complaint Source	Federal Trade Commission
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	LSENIOR
Entered Date	12/09/2013
Updated By	LSENIOR
Updated Date	12/12/2013
Agency Contact	Phone
Complaint Date	12/12/2013
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Los Angeles
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)

Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	National Action Network Los Angeles
Consumer Military Service Branch	
Consumer Consent for volunteer group contact?	
Company Name	HerbaLife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	

Company Phone, Extension	
Company Email	
Company Website	
Company Subject ID Type Code	
Company Subject ID Type Name	
Company Subject ID Issuing State Code	
Company Subject ID Issuing State Name	
Company Subject ID Issuing Country Code	
Company Subject ID Issuing Country Name	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	CMS:14009184. Mail: Consumer reports HerbaLife as having not

Complaint Info Comments	complied with 1986 injunction where in they had to produce the necessay documents verifying retail sales, sales to distributors and custormers. Consumer reasons that Herbalife is victimizing minorities with a pyramid scheme wherein only the top positions make a profit and the bottom make almost nothing.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N
Complaint Info Fair Resolution Flag	
Complaint Info Fair Resolution Description	

IDT COMPLAINT

Record 91 of 102	
Reference Number	46500441
Originator Reference Number	
Language	English
Complaint Source	FTC Online Complaint Assistant (IDT)
Contact Type	Complaint
Data Source	
Agency Contact Method	Internet
Entered By	FTCCIS-FTCUSER
Entered Date	06/13/2013
Updated By	
Updated Date	
Theft Via Internet?	Y
Member of armed forces or dependant?	N
Consumer Business Name	
Consumer First Name	b(6)
Consumer Middle name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Brooklyn
Consumer Address, State Code	NY

Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Lived Here Since	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Email	b(6)
Consumer Date Of Birth	b(6)
Consumer Driver License / ID Issued State	NY, New York
Consumer Soldier Status	
Consumer Soldier Station	
Consumer Military Service Branch	
Consumer At Time of Fraud First Name	
Consumer At Time of Fraud Middle Name	
Consumer At Time of Fraud Last Name	
Consumer At Time of Fraud Address, Line 1	
Consumer At Time of Fraud Address, Line 2	
Consumer At Time of Fraud Address, City	
Consumer At Time of Fraud Address, State Code	
Consumer At Time of Fraud Address, State Name	
Consumer At Time of Fraud Address, Country Code	
Consumer At Time of Fraud Address, Country Name	
Consumer At Time of Fraud	

Address, ZIP Code	
Consumer At Time of Fraud Address, ZIP Code Extension	
Consumer At Time of Fraud Phone, Area Code	
Consumer At Time of Fraud Phone, Number	
Consumer At Time of Fraud Lived Here Since	
Consumer At Time of Fraud Lived Here Until	
Reported By Company Name	
Reported By First Name	
Reported By Middle Name	
Reported By Last Name	
Reported By Address, Line 1	
Reported By Address, Line 2	
Reported By Address, City	
Reported By Address, State Code	
Reported By Address, State Name	
Reported By Address, Country Code	
Reported By Address, Country Name	
Reported By Address, ZIP Code	
Reported By Address, ZIP Code Extension	
Reported By Home Phone, Area Code	
Reported By Home Phone, Number	
Reported By Work Phone, Area Code	
Reported By Work Phone, Number	
Reported By Work Phone, Extension	
Reported By Cell Phone, Area Code	
Reported By Cell Phone, Number	
Reported By Fax, Area Code	
Reported By Fax, Number	
Reported By Email	
Theft Activity First Noticed Date	02/13/2013
Theft Activity First Occurred Date	02/13/2013
Theft Activity Number of Misuses (#	

Accounts Affected)	
Theft Activity Total Amount Obtained Value (by Subject)	
Theft Activity Total Amount Lost Value (by Victim)	
Theft Activity Did You Authorize Anyone To Use Your ID?	
Theft Activity Did You Receive Benefits?	
Theft Activity Are You Willing To Press Charges?	
Theft Activity Inaccurate Personal Information 1	
Theft Activity Inaccurate Personal Information 2	
Theft Activity Inaccurate Personal Information 3	
Theft Activity Credit Inquiries – Company 1	
Theft Activity Credit Inquiries – Company 2	
Theft Activity Credit Inquiries – Company 3	
Theft Activity NonMonetary Harm, Harm Code	106|47
Theft Activity NonMonetary Harm, Harm Description	Other (describe in comment field)|Time Lost to Resolve Problems (specify amount in comment)
Theft Activity NonMonetary Harm, Comments	7 boxes of supplements delivered to my door that I have not ordered.|5
	A few months ago, I received a letter and ID card saying that I am now a distributor for Herbalife. Having not at all heard of Herbalife nor signed up to be a distributor, I disregarded the letter. About a month later, I was delivered 7 large boxes of Herbalife through FedEx to my address. The name addressed on the box is extremely close to mine in spelling. I turned the delivery woman away with the 7 large boxes of supplements since I placed no such order. When I called Herbalife, I was told that that was not the first order placed to my address, and that more were to come. I related my issue to the manager, Urenia to whom I spoke

Theft Activity Comments	with, and demanded to be given the name of the "sponsor" who hired me as distributor. However, even with my pressing suspicion of identity theft, they would not provide me with means to contact this sponsor. They did say they would notify this sponsor that I was trying to get a hold of him/her. Weeks later, I have yet to receive contact from this "sponsor" of mine. I have strong reason to believe that Herbalife's employment policies involve fraudulent processes and their lack of assistance in this issue leads me to believe that their business practices are dishonest. Due to their lack of investigation in this matter, I have also taken measures to report them to BBB and plan to file a report with my local police.
Theft Activity Additional Comments	
Theft Incident Theft Type Code	8
Theft Incident Theft Type Description	Other Identity Theft
Theft Incident SubType Code	27
Theft Incident SubType Description	Employment
Theft Incident Incident - Date of Theft	Feb 13 2013
Theft Incident Incident - Amount Obtained	
Associated Institution Institution Type	Other
Associated Institution Institution Name	Herbalife
Associated Institution Contact Person	Urenia
Associated Institution Address, Line 1	950 West 190th
Associated Institution Address, Line 2	
Associated Institution Address, City	Torrance
Associated Institution Address, State Code	CA
Associated Institution Address, State Name	California
Associated Institution Address, Country Code	USA

Associated Institution Address, Country Name	UNITED STATES
Associated Institution Address, ZIP Code	90502
Associated Institution Address, ZIP Code Extension	
Associated Institution Phone, Area Code	866
Associated Institution Phone, Number	8664744
Associated Institution Phone, Extension	4
Associated Institution Notified?	
Associated Institution Written Notified?	
Associated Institution Have Dispute?	
Associated Institution Product Service Code	
Associated Institution Product Service Description	
Associated Institution Statute Code	
Associated Institution Statute Description	
Associated Institution Violation Code	
Associated Institution Violation Description	
Associated Institution Email	
Associated Institution Web URL	www.herbalife.com
Suspect Alias, First Name	b(6)
Suspect Alias, Middle Name	
Suspect Alias, Last Name	b(6)
Suspect Alias, Company Name	Herbalife
Suspect Contact Address, Line 1	b(6)
Suspect Contact Address, Line 2	
Suspect Contact Address, City	
Suspect Contact Address, State Code	
Suspect Contact Address, State Name	
Suspect Contact Address, Country Code	USA
Suspect Contact Address, Country Name	UNITED STATES

Suspect Contact Address, ZIP Code	
Suspect Contact Address, ZIP Code Extension	
Suspect Contact Phone, Area Code	
Suspect Contact Phone, Number	
Suspect Contact Phone, Extension	
Suspect Contact, Email	
Suspect Victim Relationship	
Suspect Method of Obtainment Code	31
Suspect Method of Obtainment Description	Mail theft or fraudulent address change
Suspect Suspect Additional Information	Sponsored me as distributor and ordered 7 boxes to be delivered to my address - all of which were done without my approval or knowledge.
Credit Bureaus Credit Bureau Name	
Credit Bureaus Credit Bureau Notified?	
Credit Bureaus Credit Bureau Fraud Alert?	
Credit Bureaus Credit Bureau Report Ordered?	
Credit Bureaus Credit Bureau Have Dispute?	
Credit Bureaus Credit Bureau Law Violation Codes	
Credit Bureaus Credit Bureau Law Violation Description	
Law Enforcement Entities Department Name	
Law Enforcement Entities Contact Person	
Law Enforcement Entities Address, State Code	
Law Enforcement Entities Address, State Name	
Law Enforcement Entities Phone, Area Code	
Law Enforcement Entities Phone, Number	
Law Enforcement Entities Notified Local Law Enforcement?	N
Law Enforcement Entities Report Taken?	

Law Enforcement Entities Report Number	
Law Enforcement Entities Report Taken Date	
Law Enforcement Entities Verified Report?	N

DNC COMPLAINT

Record 92 of 102	
Reference Number	47779199
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	HIALEAH
Consumer Address, State	FL
Consumer Address, State Name	Florida
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife
Company State	FL
Company Phone, Country Code	1
Company Phone, Area Code	786
Company Phone, Number	2854401
Other Information Created Date	08/11/2013
Other Information Complaint Date	08/11/2013
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	08/11/2013
Other Information Transaction Time	08:00:00
Other Information Comments	THEY ARE CONSTANTLY SENDING TEXT MESSAGES, DAY AND NIGHT. I asked them PLEASE removed me from the list BUT they HAVE CONTINUED.
Other Information Existing Business	Yes

Relationship	Yes
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 93 of 102	
Reference Number	44018030
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, City	
Consumer Address, State	HI
Consumer Address, State Name	Hawaii
Consumer Address, ZIP Code	
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife International
Company State	AZ
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	3265653
Other Information Created Date	02/25/2013
Other Information Complaint Date	02/25/2013
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	02/25/2013
Other Information Transaction Time	12:00:00
Other Information Comments	Unsolicited Call and Text Message Received.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	No

Record 94 of 102	
Reference Number	49483072
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	fairfax
Consumer Address, State	VA
Consumer Address, State Name	Virginia
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	herbalife
Company State	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Other Information Created Date	11/07/2013
Other Information Complaint Date	11/07/2013
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	11/06/2013
Other Information Transaction Time	23:00:00
Other Information Comments	A man called my house at almost midnight last night from Herbalife. I asked them to stop calling me and take me off their calling list. They called again this morning at 9:36. I have done absolutely no business with Herbalife. No phone number showed up, just their name. Today, there was nobody on the other line.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 95 of 102	
Reference Number	48716892
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Culver City
Consumer Address, State	CA
Consumer Address, State Name	California
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Somebody "not from Herbalife"
Company State	TF
Company Phone, Country Code	
Company Phone, Area Code	800
Company Phone, Number	6449064
Other Information Created Date	09/21/2013
Other Information Complaint Date	09/21/2013
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	09/21/2013
Other Information Transaction Time	14:00:00
Other Information Comments	Claimed to be doing marketing research. I have only one question, "What do you think of Herbalife." Seemed pretty put out that we didn't believe he wasn't working for Herbalife.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 96 of 102

Reference Number	47038520
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	huntington park
Consumer Address, State	CA
Consumer Address, State Name	California
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	herbalife
Company State	TF
Company Phone, Country Code	
Company Phone, Area Code	877
Company Phone, Number	5658456
Other Information Created Date	07/08/2013
Other Information Complaint Date	07/08/2013
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	07/08/2013
Other Information Transaction Time	18:00:00
Other Information Comments	They call every day and there is no option to remove my number from their list its so annoying to listen to that person is consuming my phone time
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	Yes
Other Information Requested Entity to Stop Calling	Yes

Record 97 of 102	
Reference Number	47973134
Complaint Source	National Do Not Call Registry

Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	EDGEWOOD
Consumer Address, State	KY
Consumer Address, State Name	Kentucky
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	HERBALIFE
Company State	TF
Company Phone, Country Code	
Company Phone, Area Code	800
Company Phone, Number	2515850
Other Information Created Date	08/20/2013
Other Information Complaint Date	08/20/2013
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	08/20/2013
Other Information Transaction Time	18:00:00
Other Information Comments	WHY CAN'T THE FCC STOP ROBO CALLS?
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	Yes
Other Information Requested Entity to Stop Calling	No

Record 98 of 102	
Reference Number	48274216
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	

Consumer Address, Line 2	
Consumer Address, City	
Consumer Address, State	NV
Consumer Address, State Name	Nevada
Consumer Address, ZIP Code	
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife
Company State	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Other Information Created Date	09/03/2013
Other Information Complaint Date	09/03/2013
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	09/03/2013
Other Information Transaction Time	19:00:00
Other Information Comments	Automated Fake opinion survey, actually an herbalife ponzi scheme
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	Yes
Other Information Requested Entity to Stop Calling	No

Record 99 of 102	
Reference Number	48830865
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, City	
Consumer Address, State	IL
Consumer Address, State Name	Illinois
Consumer Address, ZIP Code	

Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife
Company State	DC
Company Phone, Country Code	
Company Phone, Area Code	202
Company Phone, Number	6880778
Other Information Created Date	09/26/2013
Other Information Complaint Date	09/26/2013
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	09/26/2013
Other Information Transaction Time	16:00:00
Other Information Comments	
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	Yes
Other Information Requested Entity to Stop Calling	No

Record 100 of 102	
Reference Number	49763703
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, City	
Consumer Address, State	CA
Consumer Address, State Name	California
Consumer Address, ZIP Code	
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife Inete
Company State	CA
Company Phone, Country Code	
Company Phone, Area Code	310

Company Phone, Number	5573902
Other Information Created Date	11/20/2013
Other Information Complaint Date	11/20/2013
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	11/20/2013
Other Information Transaction Time	00:00:00
Other Information Comments	This company has called multiple times a day for the past few days. They call about every 1/2 hour, so perhaps 20 times a day. We have not picked up the phone and they do not leave a message
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	Yes
Other Information Requested Entity to Stop Calling	No

As a Consumer Sentinel Network member, you must properly protect any information printed, downloaded, or otherwise removed from the Network as stated in OMB Memo M-06-16. Please delete or destroy this information within 90 days unless its use is still required for law enforcement purposes. When destroying the information you should burn, pulverize, or shred the information saved in paper format and destroy or erase information that has been saved electronically so that it cannot practicably be read or reconstructed. Proper erasure of electronic information must include the overwriting or "wiping" of the information from the electronic media on which it is stored.

Provided by the Federal Trade Commission

CONSUMER SENTINEL NETWORK
Law enforcement's source for consumer complaints

DNC COMPLAINT

Record 101 of 102	
Reference Number	46855741
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, City	
Consumer Address, State	CA
Consumer Address, State Name	California
Consumer Address, ZIP Code	
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife
Company State	CA
Company Phone, Country Code	
Company Phone, Area Code	213
Company Phone, Number	8141382
Other Information Created Date	06/28/2013
Other Information Complaint Date	06/28/2013
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	06/21/2013
Other Information Transaction Time	12:00:00
Other Information Comments	Caller was asked to stop calling, yet she continues to call and has made 6 additional calls since them.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity	Yes

to Stop Calling	Yes

Record 102 of 102	
Reference Number	47779209
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	HIALEAH
Consumer Address, State	FL
Consumer Address, State Name	Florida
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife
Company State	FL
Company Phone, Country Code	1
Company Phone, Area Code	305
Company Phone, Number	3182656
Other Information Created Date	08/11/2013
Other Information Complaint Date	08/11/2013
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	08/11/2013
Other Information Transaction Time	00:00:00
Other Information Comments	THEY ARE CONSTANTLY SENDING TEXT MESSAGES, DAY AND NIGHT. I asked them PLEASE removed me from the list BUT they HAVE CONTINUED.
Other Information Existing Business Relationship	Yes
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

As a Consumer Sentinel Network member, you must properly protect any information printed, downloaded, or otherwise removed from the Network as stated in OMB Memo M-06-16. Please delete or destroy this information within 90 days unless its use is still required for law enforcement purposes. When destroying the information you should burn, pulverize, or shred the information saved in paper format and destroy or erase information that has been saved electronically so that it cannot practicably be read or reconstructed. Proper erasure of electronic information must include the overwriting or "wiping" of the information from the electronic media on which it is stored.

Provided by the Federal Trade Commission

Chender, Julian M. FOIA - 2013-01148

From: Apache server <apache@hq1-webdmz-s4.ftc.gov>
Sent: Friday, July 19, 2013 10:45 AM

FEDERAL TRADE COMMISSION
RECEIVED
JUL 19 2013
FOIA BRANCH
GENERAL COUNSEL

name = Sandy Chin
staddr = 888 Seventh Avenue
city = New York
state = NY
zipcode = 10019
telno = 212.484.2716
faxno =
email = schin@visiumfunds.com
coinfo = Dear sir or madam, I would like to request a copy of any investigatory records of Herbalife specifically between the period of January 1, 2013 to July 19, 2013.
EdSciName =
describe = Private Corporation or Law Firm
privatelawname = Visium Asset Management
medianame =
money = Up to $100
B13 = Submit

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Sandy Chin
Visium Asset Management
888 Seventh Avenue,
New York, NY 10019

JUL 23 2013

Re: FOIA-2013-01147
Herbalife

Dear Ms. Chin:

This is in response to your request dated July 19, 2013 under the Freedom of Information Act seeking access to all investigative records pertaining to Herbalife between January 1, 2013 and July 19, 2013. In accordance with the FOIA and agency policy, we have searched our records as of July 19, 2013, the date we received your request in our FOIA office. Our search of the FTC's records did not identify any record that would respond to your request.

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington D.C. 20580, or by facsimile at (202) 326-2477 within 30 days of the date of this letter. Please enclose a copy of your original request and a copy of this response.

If you have any questions about the way we have handled your request or about the FOIA regulations or procedures, please contact James Witherington at 202-326-3661.

Sincerely,

Dione J. Stearns
Assistant General Counsel

Peterson, Mark D. FOIA - 2013-01228

From: Apache server <apache@hq1-webdmz-s3.ftc.gov>
Sent: Tuesday, August 06, 2013 1:55 PM

FEDERAL TRADE COMMISSION
RECEIVED

AUG 06 2013

FOIA BRANCH
GENERAL COUNSEL

name = Henry Becker
staddr = (b)(6)
city = Southlake
state = TX
zipcode = (b)(6)
telno =
faxno =
email = (b)(6)
coinfo = Herbalife-I would like a list or simply the number of complaints filed against this company in the past 5 years. I would also like to know the number of support letters you have received on Herbalife's behalf. Thank you very much for your time.

describe = Individual
EdSciName =
privatelawname =
medianame =
money = Contact me if above $200
B13 = Submit

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Henry Becker
(b)(6)
Southlake, TX (b)(6)

AUG 16 2013

Re: FOIA-2013-01228
Herbalife

Dear Mr. Becker:

This is in response to your request dated August 06, 2013 under the Freedom of Information Act seeking access to the number of complaints filed against Herbalife along with the number of support letters received on Herbalife's behalf in the last 5 years. In accordance with the FOIA and agency policy, we have searched our records, as of August 06, 2013, the date we received your request in our FOIA office.

We have located 1 responsive records. You are granted full access to the responsive records, which are enclosed.

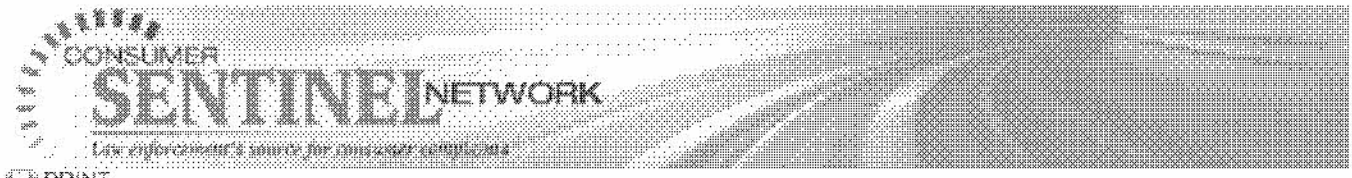
Based on the fee provisions of the FOIA, 5 U.S.C. § 552(a)(4)(A), and the Commission's Rules of Practice, 16 CFR § 4.8 et seq., as amended, I am also enclosing an invoice for the charges we incurred for this partial response to your request. Failure to pay this bill promptly will result in our refusal to provide copies of accessible documents in response to future requests. If not paid within 30 days, this bill will accrue interest penalties as provided by Federal Claims Collection Standards, 31 C.F.R. § 900-904, as amended.

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington D.C. 20580 or by facsimile at (202) 326-2477, within 30 days of the date of this letter. Please enclose a copy of your original request and a copy of this response.

If you have any questions about the way we are handling your request or about the FOIA regulations or procedures, please contact James Witherington at 202-326-3661.

Sincerely,

Dione J. Stearns
Assistant General Counsel



PRINT

238 Search Results

Search Criteria: Primary Subject Name:"herbalife"; Primary Subject Company Name:"herbalife"; Created Date:<8/7/2013; Selected Complaint Types:Identity Theft, Do Not Call, Fraud and Other Complaints, and All Other Record Types ; Name Variations Included

Print Date:8/8/2013 8:21:45 AM

Rank	Subject Name	Count
1	Herbalife	77
2	Herbalife International Of America, Inc.	57
3	Herbalife International	16
4	The Online Business Systems Herbalife	7
5	Herbalife International Of America	6
6	Herbalife International Of America Inc	5
7	Online Business Systems / herbalife	5
8	Herbalife Ltd	4
9	Herbalife International Inc.	3
10	Herbalife Online Business Systems	3
11	Daphne Morris; Herbalife: Independent Distributor	2
12	Herbalife Distributor	2
13	Herbalife Ind. Dist / patricia Molina	2
14	Herbalife Of Canada Ltd.	2
15	Mainstream Nutrition Club - Herbalife	2
16	E Home	1
17	E-team Online Fulfillment--herbalife, Agustin Pascual	1
18	Global Media Solutions	1
19	H I	1
20	Helen Garland - Herbalife	1
	Total	**198**

Provided by the Federal Trade Commission

Kelly, Andrea

From: Apache httpd <apache@hq1-webdmz-s1.ftc.gov>
Sent: Monday, August 12, 2013 1:56 PM

FOIA-2013-01247

FEDERAL TRADE COMMISSION
RECEIVED

AUG 12 2013

FOIA BRANCH
GENERAL COUNSEL

name = Atossa
staddr = 3 times square
city = new york
state = ny
zipcode = 10036
telno = Abrahamian
faxno =
email = atossa.abrahamian@thomsonreuters.com
coinfo = Dear FOIA officer,I'm writing to request records of all communication (emails, letters, call logs, text messages, etc) on the subject of the direct-selling nutritional company Herbalife between the FTC and the following groups or individuals:a. New York hedge fund manager William Ackman and all individuals working for or associated with his firm, Pershing Square Capitalb. Representative Linda Sanchez (D-IL)and anyone working for her or with herc. The National Consumer's Leagued. The Hispanic Federatione. Herbalife or any firms or individuals acting on behalf of Herbalife. This includes the P.R. firm Joele Frank, the company's Board of Directors, any major shareholders in the company, and investor Carl Icahn.Kindly expedite this request for news purposes. Given all the noise and uncertainty in the media about Herbalife's products and business model, as well as the infighting among investors, we believe a greater understanding of the FTC's actions with regard to the company are of great public interest.Call anytime if you have questions.Thanks,Atossa Abrahamian
EdSciName =
privatelawname = 3 times square
describe = News Media
medianame = Thomson Reuters
money = Contact me if above $100
B13 = Submit

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Atossa Abrahamian
Thomson Reuters
3 Times Square,
New York, NY 10036

AUG 16 2013

Re: FOIA-2013-01247
Herbalife

Dear Ms. Abrahamian:

This is in response to your request dated August 12, 2013, under the Freedom of Information Act seeking access to FTC correspondence relating to Herbalife that was released in FOIA 2013-01138.

We have located 269 pages of responsive records. I am granting partial access to the accessible records. Portions of these pages fall within the exemptions to the FOIA's disclosure requirements, as explained below.

Some responsive records contain staff analyses, opinions, and recommendations. Those portions are deliberative and pre-decisional and are an integral part of the agency's decision making process. They are exempt from the FOIA's disclosure requirements by FOIA Exemption 5.5 U.S.C. § 552(b)(5). *See NLRB v. Sears, Roebuck & Co.,* 421 U.S. 132 (1975).

If you have any questions about the way we handled your request or about the FOIA regulations or procedures, please contact James Witherington at 202-326-3661.

Sincerely,

Dione J. Stearns
Assistant General Counsel

Enclosed: CD Rom

Organization Logo

Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, DC 20580

Report Date :07/22/2013
Time :11:40:08 AM

Requests Report
Received between 01/01/2012 and 07/17/2013

Select Options
Group By : -
Sort By : Request ID (Ascending)

Filter By
Received Mode : All
Review Status : All
Description/Sub Request : *Herbalife*
Requests handled by (Action Office) : HQ
Action Office (Request) : All

Select Fields
Request ID
Received Date
Requester Name
Requester Category
Organization
Request Description

Request ID	Received Date	Requester Name	Requester Category	Organization	Request Description
FOIA-2012-00806	04/18/2012	Frayter, Karina	News Media	CNBC	Herbalife
FOIA-2012-01131	07/16/2012	(b)(6)	Private Individual	-	Herbalife International, Inc.
FOIA-2012-01252	08/17/2012	(b)(6)	Private Individual	-	Herbalife
FOIA-2013-00280	12/26/2012	Celarier, Michelle	News Media	New York Post	Herbalife
FOIA-2013-00321	01/09/2013	(b)(6)	Private Individual	-	Consumer Complaints re: Herbalife
FOIA-2013-00339	01/14/2013	Jacobovitz, Yitzchak	Commercial Organization	Capstone LLC	Herbalife
FOIA-2013-00341	01/14/2013	(b)(6)	Private Individual	-	Herbalife
FOIA-2013-00376	01/17/2013	(b)(6)	Private Individual	-	Herbalife International
FOIA-2013-00398	01/25/2013	Muchanic, Christine	Law Firm	Height Analytics	Herbalife, etc.
FOIA-2013-00416	01/29/2013	Sole, Andrew	Commercial Organization	Esopus Creek Advisors	Herbalife
FOIA-2013-00417	01/29/2013	Daftary, Krish	Commercial Organization	New Mountain Capital	Herbalife
FOIA-2013-00426	01/30/2013	Eavis, Peter	News Media	The New York Times	Herbalife
FOIA-2013-00429	01/30/2013	Tang, Carol	News Media	dealReporter	Herbalife
FOIA-2013-00434	01/31/2013	Celarier, Michelle	News Media	New York Post	Herbalife
FOIA-2013-00436	01/31/2013	Wise, Aubrey	Commercial Organization	One East Partners	Herbalife

FOIA-2013-00456	02/04/2013	Miller, Jason	Commercial Organization	Ionic Capital	Herbalife, Avon, and GNC
FOIA-2013-00484	02/07/2013	Celarier, Michelle	News Media	New York Post	Herbalife Investigations
FOIA-2013-00568	02/27/2013	Holley, Steven	Law Firm	Sullivan & Cromwell LLP	Herbalife Lead Generation Firms
FOIA-2013-00740	04/09/2013	Wise, Aubrey	Commercial Organization	One East Partners	Herbalife
FOIA-2013-00741	04/10/2013	Eavis, Peter	News Media	The New York Times	Herbalife records from FOIA-2013-00568
FOIA-2013-00752	04/15/2013	Muchanic, Christine	Law Firm	Height Analytics	Herbalife
FOIA-2013-00764	04/16/2013	Holley, Steven	Law Firm	Sullivan & Cromwell LLP	Herbalife Lead Generation Firms
FOIA-2013-00821	04/29/2013	Sampson, Kyle	Law Firm	Hunton & Williams	Herbalife International Inc., Melaleuca, Inc., Puritan's Pride, Inc., et al
FOIA-2013-00849	05/06/2013	Levine, Marshall	Commercial Organization	Soros Fund Management	Herbalife
FOIA-2013-01002	06/11/2013	Celarier, Michelle	News Media	New York Post	Herbalife Letter
FOIA-2013-01086	07/02/2013	Holley, Steven	Law Firm	Sullivan & Cromwell LLP	Herbalife distributors, et al
FOIA-2013-01138	07/17/2013	(b)(6)	Private Individual	-	Herbalife, et al.

Total No of Requests : 27

hispanicfederation

55 Exchange Place. 5th Floor
New York, NY 10005
T. 212 233 8955 F. 212 233 8996

1133 19th Street N.W., Suite 1035
Washington, DC 20036
T. 202 887 4977 F. 202 833 6135

www.hispanicfederation.org

May 17,2013

FederalTrade Commission
Received
MAY 28 2013
Chairwoman Ramirez

The Honorable Edith Ramirez
Chairwoman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Chairwoman Ramirez:

Since its inception in 1990, Hispanic Federation, has as its core mission to empower and advance the Hispanic community. It provides grants to a board network of Latino non-profit agencies serving the most vulnerable members of the Hispanic community and advocates nationally with respect to the vital issues of education, health, immigration, economic empowerment, civic engagement and the environment.

As part of our work on economic empowerment we have worked with small businesses to make them viable and prosperous. We have worked with member agencies that provide loans to entrepreneurs who otherwise would not have the needed capital to jump start their business dreams. We have offered seminars on mortgage assistance, development of credit and warned our community about a myriad of schemes created to defraud Latinos, especially the most vulnerable in our community.

Through our financial literacy workshops, leaders in our network and some of our elected officials we have learned about the proliferation of get rich quick schemes that focus on Latinos and especially our immigrants.

We write to you to urge the Federal Trade Commission to conduct an investigation of the multi-level marketing company known as Herbalife. It is our understanding that the company's marketing materials promise richness for a few hours of work from home. You can imagine that for immigrants, particularly those who are underemployed or have no papers, this promise can seem like their ticket to achieving the American Dream. We understand, however, that when you add expenses to acquire the product, lists and marketing materials, most distributors appear to actually lose money.

A particular concern to us about Herbalife is whether distributors make money selling products or recruiting others to sell products: The latter is an indicator of a pyramid scheme. Reading the recent debate on this issue; Herbalife's statements to explain its compensation structure are contradictory. We urge you to focus on this issue: are distributors incentivized to sell product or to recruit new distributors into a pyramid.

Through our work over 23 years we have learned that most multi-level marketing companies are legitimate businesses. They in fact compensate distributors for selling products. In fact, many of these companies have provided new immigrants and other Latinos a real opportunity to move forward and earn a decent living for them and their families. From what we have learned about Herbalife, anecdotally and through our work, we have serious concerns about their business practices and we urge you to look into this matter.

Thank you for your attention.

Sincerely,

Jose Calderon
President

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

EDITH RAMIREZ
CHAIRWOMAN

June 20, 2013

The Honorable Linda T. Sánchez
House of Representatives
Washington, DC 20515

Dear Representative Sánchez:

Thank you for your recent letter regarding your concerns about Herbalife, Ltd.'s business practices. You noted the allegations raised by the National Consumers League and the Hispanic Federation that Herbalife is an illegal pyramid scheme, and requested that the Federal Trade Commission ("FTC" or "Commission") investigate the company.

As you know, the Commission has been directed by Congress to act in the interest of all consumers to prevent deceptive or unfair acts or practices, pursuant to the Federal Trade Commission Act, 15 U.S.C. §§ 41-58. In interpreting Section 5 of that statute, 15 U.S.C. § 45, the Commission has determined that a representation, omission, or practice is deceptive if (1) it is likely to mislead consumers acting reasonably under the circumstances; and (2) it is material; that is, likely to affect consumers' conduct or decisions with respect to the product at issue.

The Commission takes seriously the harm illegal pyramid schemes have on consumers and has used its authority under Section 5 of the FTC Act in appropriate cases. For example, since 1996, the FTC has brought 15 cases alleging that purportedly legitimate multi-level marketing companies were in fact pyramid schemes in masquerade. Most recently, the FTC filed a case against Fortune Hi-Tech Marketing, Inc. and related entities. *See FTC v. Fortune Hi-Tech Marketing, Inc. et al.*, 13-CV-578 (N.D. Ill. Jan. 24, 2013). The FTC alleged, among other things, that the defendants operated an illegal pyramid scheme and falsely claimed consumers would earn significant income for selling various products and services. In reality, the FTC charged that nearly all consumers who signed up with the scheme lost more money than they ever made. The FTC further alleged that to the extent consumers could make any income, it was mainly for recruiting other consumers.

In addition, just last year, the FTC won a victory in another case: *FTC v. BurnLounge, Inc. et al.*, No. 2:07-03654 (C.D. Cal. June 6, 2007). The FTC sued BurnLounge, Inc. and its top promoters for operating a deceptive pyramid scheme, making deceptive earnings claims, and failing to disclose that most consumers who participated in the pyramid scheme would not

receive substantial income, but instead would lose money. More than 56,000 consumers fell victim to the scheme. In March 2012, a judge for the Central District of California entered a final judgment and order against BurnLounge, Inc. and several of its promoters. The final order requires the defendants to pay close to $17 million for consumer redress. The final order also prohibits the defendants from engaging in pyramid, Ponzi, or chain letter schemes or any schemes in which compensation for recruitment is unrelated to the sale of product to customers who are not participants. Among other things, the order also bars misrepresentations about multi-level marketing operations or business ventures. The case is currently on appeal to the United States Court of Appeals for the Ninth Circuit.

I have forwarded your letter to the appropriate staff in the FTC's Bureau of Consumer Protection. In determining whether to take enforcement or other action in any particular situation, the Commission may consider a number of factors, including the type of violation alleged; the likelihood of preventing future unlawful conduct and securing redress or other relief; and the nature and amount of consumer injury at issue and the number of consumers affected. However, a number of statutory provisions and the Commission Rules of Practice prevent me from discussing what action, if any, the Commission may take in any particular situation.

Complaints from consumers can provide valuable information that we frequently use to identify deceptive and unfair practices in the marketplace. Therefore, please encourage your constituents to file their complaints with the FTC, in English or in Spanish, by visiting the FTC's online Complaint Assistant, available at https://ftccomplaintassistant.gov/ or by calling 1-877-FTC-HELP (1-877-382-4357).

I appreciate your concerns about this matter and your commitment to protecting all consumers, especially the most vulnerable in our population. If you or your staff has additional questions or comments, please feel free to contact me or have your staff contact Jeanne Bumpus, the Director of our Office of Congressional Relations, at (202) 326-2946.

Sincerely,

Edith Ramirez

MEMBER:
COMMITTEE ON ETHICS
RANKING MEMBER
COMMITTEE ON
WAYS AND MEANS
SUBCOMMITTEE ON SELECT REVENUE MEASURES
SUBCOMMITTEE ON OVERSIGHT

SENIOR WHIP

Linda T. Sánchez
38TH DISTRICT, CALIFORNIA

Congress of the United States
House of Representatives
Washington, DC 20515

DC OFFICE:
2423 RAYBURN BUILDING
WASHINGTON, DC 20515
(202) 225-6676

DISTRICT OFFICE:
17906 CRUSADER AVENUE
SUITE 100
CERRITOS, CA 90703
(562) 860-5051
www.lindasanchez.house.gov

14008387

FEDERAL TRADE COMMISSION
2013 JUN -7 AM 8: 32
CONG. CORRES. BRANCH

Edith Ramirez, Chairwomans
Federal Trade Comission
600 Pennsylvania Avenue, NW
Washington, DC 20580

June 5, 2013

Dear Chairwoman Ramirez:

I am writing to express my concern about the marketing and business practices of Herbalife, Ltd. In particular, I am troubled by allegations that this company may be harming consumers – especially those from our country's most vulnerable populations.

There have been extensive media reports and allegations about Herbalife's business practices. On March 12, 2013, the National Consumers League wrote a letter urging the FTC to conduct an investigation into the possibility that Herbalife is a complex pyramid scheme.[1] More recently, on May 17, 2013, the Hispanic Federation also wrote a letter urging an FTC investigation.[2] Both groups have voiced concerns over whether Herbalife's distributors are primarily incentivized by recruiting others, or by selling the Herbalife product. Additionally, as the National Consumers League letter states, "Low-income consumers, as well as African-Americans and Hispanics, were found to be especially vulnerable to pyramid-schemes masquerading as legitimate home-based business opportunities."[3]

As I have learned more about this issue from my constituents and from outside groups, I believe it is the Federal Trade Commission's (FTC) responsibility to examine these allegations. Given the FTC's mission to investigate claims of fraud and potential pyramid schemes, I encourage you to investigate this matter. I have confidence that such an investigation will provide clarity to consumers and I expect you will aggressively pursue it in a timely manner.

---

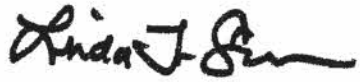
[1] Sally Greenberg, National Consumers League to Edith Ramirez, Federal Trade Commission, 13 March 2013, http://www.nclnet.org/images/PDF/FTC%20Letter%20on%20Herbalife.pdf
[2] Jose Calderon, Hispanic Federation to Edith Ramirez, Federal Trade Commission, 17 May 2013, http://www.scribd.com/doc/142602752/The-Honorable-Edith-Ramirez-FTC
[3] Sally Greenberg, National Consumers League to Edith Ramirez, Federal Trade Commission, 13 March 2013, http://www.nclnet.org/images/PDF/FTC%20Letter%20on%20Herbalife.pdf

PRINTED ON RECYCLED PAPER

If I can be of additional assistance, please do not hesitate to contact Mike McGourty of my staff at 202-225-6676 or michael.mcgourty@mail.house.gov.

Thank you for your attention to this important matter.

Sincerely,



Congresswoman Linda T. Sánchez
Member of Congress (CA-38)

February 18, 2013 - February 24, 2013

February 2013

Su	Mo	Tu	We	Th	Fr	Sa
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28		

March 2013

Su	Mo	Tu	We	Th	Fr	Sa
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

Monday, February 18

(b)(6),Non Responsive

Tuesday, February 19

Non Responsive

Wednesday, February 20

Non Responsive

Thursday, February 21

Non Responsive

Friday, February 22

10:00am - 12:00pm Herbalife Meeting (294) - Greisman, Lois C.

Not Responsive

Saturday, February 23

Non Responsive

Sunday, February 24

March 04, 2013 - March 10, 2013

March 2013

Su	Mo	Tu	We	Th	Fr	Sa
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

April 2013

Su	Mo	Tu	We	Th	Fr	Sa
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

Monday, March 04

Non Responsive

2:00pm - 4:00pm Sullivan & Cromwell represents Pershing Square; Ackman et al want to meet with us -- call Christine at # below
(Meeting will be held in 294) - Greisman, Lois C.

Non Responsive

Tuesday, March 05

Non Responsive

Wednesday, March 06

Non Responsive

Thursday, March 07

Non Responsive

Friday, March 08

Non Responsive

Saturday, March 09

Sunday, March 10

Non Responsive

March 11, 2013 - March 17, 2013

March 2013

Su	Mo	Tu	We	Th	Fr	Sa
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

April 2013

Su	Mo	Tu	We	Th	Fr	Sa
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

Monday, March 11

Not Responsive

Tuesday, March 12

Non Responsive

Wednesday, March 13

Non Responsive

10:00am - 11:00am Herbalife (Conference Call) - Todaro, Christine

Non Responsive

Thursday, March 14

Not Responsive

4:15pm - 5:15pm Meeting: Herbalife (Chuck's Office) - Harwood, Charles A.

Friday, March 15

Non Responsive

Saturday, March 16

Sunday, March 17

Vera, Elena R.

From: Greisman, Lois C.
Sent: Tuesday, February 05, 2013 11:59 AM
To: Ammerman, Janet; Todaro, Christine; Vander Nat, Peter J.; Vaca, Monica E.
Subject: FW: Herbalife
Attachments: Herbalife.pdf

(b)(5)

From: Baker, Steven
Sent: Thursday, January 10, 2013 2:23 PM
To: Greisman, Lois C.; Vaca, Monica E.
Cc: Kossow, Todd M.; Atleson, Michael; O'Toole, David A.
Subject: RE: Herbalife

(b)(5)

Steve

From: Greisman, Lois C.
Sent: Thursday, January 10, 2013 1:21 PM
To: Baker, Steven; Vaca, Monica E.
Cc: Kossow, Todd M.; Atleson, Michael; O'Toole, David A.
Subject: RE: Herbalife

(b)(5)

From: Baker, Steven
Sent: Thursday, January 10, 2013 11:00 AM
To: Greisman, Lois C.; Vaca, Monica E.
Cc: Kossow, Todd M.; Atleson, Michael; O'Toole, David A.
Subject: Herbalife

(b)(5)

Steve

C. Steven Baker
Director, Midwest Region

Federal Trade Commission
55 West Monroe, Suite 1825
Chicago, IL 60603
(312)960-5628

Vera, Elena R.

From: Vander Nat, Peter J.
Sent: Tuesday, January 15, 2013 1:04 PM
To: Ippolito, Pauline M.
Subject: RE: Herbalife

Tracking:

Recipient	Delivery
Ippolito, Pauline M.	Delivered: 1/15/2013 1:04 PM

We do what we can. Thanks too.

From: Ippolito, Pauline M.
Sent: Tuesday, January 15, 2013 12:00 PM
To: Vander Nat, Peter J.
Subject: RE: Herbalife

Peter, Thanks for the quick response.

Pauline

From: Vander Nat, Peter J.
Sent: Thursday, January 10, 2013 9:31 PM
To: Greisman, Lois C.
Cc: Ippolito, Pauline M.
Subject: Herbalife

Lois,

(b)(5)

(b)(5)

Peter

(Pauline, I am cc'ing you on this since the query to me was passed on through your email.)

Vera, Elena R.

From: Vander Nat, Peter J.
Sent: Thursday, January 10, 2013 11:26 AM
To: Ippolito, Pauline M.
Cc: Pappalardo, Janis K.
Subject: Re: Wall Street Erupts Over Charges of Multi-level Marketing Fraud

(b)(5)

From: Ippolito, Pauline M.
Sent: Thursday, January 10, 2013 10:58 AM
To: Vander Nat, Peter J.
Cc: Pappalardo, Janis K.
Subject: FW: Wall Street Erupts Over Charges of Multi-level Marketing Fraud

Peter,

(b)(5)

Pauline

From: Greisman, Lois C.
Sent: Thursday, January 10, 2013 10:28 AM
To: Ippolito, Pauline M.
Subject: FW: Wall Street Erupts Over Charges of Multi-level Marketing Fraud

I stopped by before but you were not in. Can you give me a call when you return re below?

From: PyramidSchemeAlert.org [mailto:info@pyramidschemealert.org]
Sent: Wednesday, January 09, 2013 11:10 PM
To: Greisman, Lois C.
Subject: Wall Street Erupts Over Charges of Multi-level Marketing Fraud

This Update is Available as a Webpage for Linking Webpage Version of this Update

Like

International Association to Expose, Study and Prevent Pyramid Schemes

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Pyramid Scheme Alert

Pyramid Scheme Alert is a non-partisan, non-profit, all-volunteer consumer education group.
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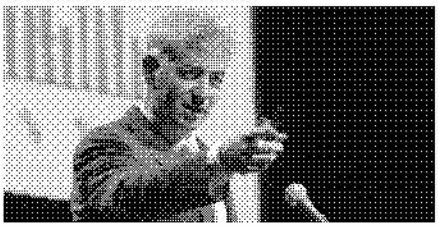
Herbalife Is Focus

Wall Street Erupts Over Claims of MLM Fraud

After years of willful ignorance or neglect about a business sector worth $17 billion in stock value and that has solicited money from virtually every household in America, Wall Street has suddenly taken notice of multi-level marketing (MLM). One major hedge fund manager, William Ackman of Pershing Square Capital, has blown the whistle on one iconic member of the MLM field. Ackman charged that Herbalife International is not a business, but a harmful fraud. He charged that its true stock value is zero. Herbalife's stock quickly plunged into volatility in the ensuing debate.



Wall Street Leader, William Ackman, Says Herbalife Is an Illegal Pyramid Scheme

Whatever this heated controversy brings forth, finally there is a real focus on and investigation of what previously was kept in the dark. Those who had dared to raise questions were personally vilified or sued by MLM lawyers or even harrassed by government regulators. The MLM industry is one of the largest influence-buyers and lobbyists in Washington. Ackmam stated that his position against Herbalife is "patriotic" based on the enormous harm that Herbalife does to the country and the public, especially those who are financially struggling. He has purchased a "short" position (if Herbalife's stock value goes down, he makes money) and he said he will donate all personal gains to charity.

See William Ackman's in-depth analysis of Herbalife.

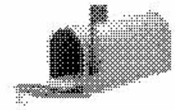
What's *Your* Herbalife Story?

Herbalife is at the center of headline news stories. Major investors are calling Herbalife a "pyramid scheme" and a money trap. The news media are investigating.

You can help regulators, attorneys, and investors better understand this controversial company by adding your experience and opinion. Please let us hear from you.

•

- Are you an Herbalife distributor? Supervisor?
- Have you ever been involved in Herbalife as a distributor in the past?
- Did you personally retail the products? Did you recruit others to join up?
- Did you try to sell or recruit and but were not successful? Why?
- Did you make a lot of money? Lose money?
- Did you buy "leads"? Go to conferences?
- Why did you join up? Make money? Retail products? Get the products yourself at a discount?
- Are you still buying the products even if you are no longer a distributor?
- Would you recommend others to join up too?



Email Us Your Herbalife Story

Email us with your story, comments, thoughts. Your voice makes a difference!

SEC Staff Reportedly Opens Investigation of Herbalife

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The business media is reporting that the staff of the U. S. Securities and Exchange Commission, the watchdog over the stock market, is opening an investigation of the multi-level marketing company, Herbalife. Hedge Fund manager, William Ackman of Pershing Squarte, publicly laid out charges against Herbalife, which may have prompted the investigation. Earlier questions, claims and complaints about deception and fraud from consumers, a Belgian court ruling that Herbalife is an illegal pyramid, two class action lawsuits against Herbalife for fraud, and the findings of other fraud investigators regarding Herbalife have been ignored by the SEC and FTC.

Among the charges made by William Ackman:

- Herbalife is an unsustainable pyramid scheme in which funds are gained by constantly recruiting salespeople
- Salespeople are the main source of Herbalife's sales, not consumers.
- Herbalife's products - diet shakes - are purchased because they are bundled with a deceptive income promise. Standing alone, the products are over-priced, unknown and unadvertised and are no different from many other less-expensive and more conveniently available products. They would not seel without the income scheme attached.
- Virtually no one who signs up under Herbalife's pay plan ever makes a profit
- The commissions on sales to the new recruits are transferred and concentrated to a tiny few at the very top.
- Most people fail and quit the Herbalife scheme in less than a year, after suffering financial losses, but are convinced that their failure is their own fault, not that of the flawed and deceptive scheme.

Business Media Investigating MLM

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PRINT

Consumer Sentinel Network Complaints

Record # 5 / Consumer Sentinel Network Complaints			
Reference Number:	44840417	**Originator Reference Number:**	
Language:	English	**Contact Type:**	Complaint
Source:	Consumer	**DNC?**	N
Comments:	I contacted a rep from herbalife to find out more about company. I told them I wanted to know more a out company .She gave me background information and asked me how I wanted to pay I told her I didnt have a credit card with me she insisted she will pat with her car and I could right her a check. She left out major details I had to find out myself such as yearly fees the cost of website she also claimed a25 discount, yet after tax and shipping eat up discount its not worth it. I called an hour after I left , i asked her to cancel and was told its non refundable . I researched the company and found similar stories to mine although I didnt invest a lot of money . I was told products are refundable so why isnt that the case. I feel she left out a great detail of cost promised a 25 prevent discount that is taking by taxes and shipping . Most importantly an hour after handing her a check I was told its non refundable . So now I wish not to deal with company at all and wish to have money returned .		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	3/28/2013
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Health Care: Dietary Supplements\Herbal Remedies
Amount Requested:	$68.00	**Amount Paid:**	$68.00
Payment Method:	Check	**Agency Contact:**	Internet
Complaint Date:	3/28/2013	**Transaction Date:**	3/27/2013
Initial Contact:	I Initiated Contact	**Initial Response:**	In Person
Statute/Rule:	Mail or Telephone Merchandise Order Rule	**Law Violation:**	Never Received Merchandise
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:	No		
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Coventry	**State:**	Rhode Island
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	30 - 39

Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject:	**Herbal Life**		
Address:			
City:		**State/Prov:**	
ZIP:		**Country:**	United States
Email:		**URL:**	Www.herbalife.com
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Jessica Williams	**Title:**	Supervisor

Record # 9 / Consumer Sentinel Network Complaints			
Reference Number:	43614109	**Originator Reference Number:**	
Language:	English	**Contact Type:**	Complaint
Source:	Consumer	**DNC?**	Y
Comments:	Consumer claims she received a telemarketing call from a **Herbal Life** representative, looking for somebody else, offering their services. Consumer has requested them to remove her number from their calling lists but the calls continue. When Consumer stayed on the line to speak to someone, they cursed at her. Consumer is registered on the DNC registry. Consumer was referred to local AG.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	DBARRIOS	**Entry Date:**	2/14/2013
Updated By:	DBARRIOS	**Updated Date:**	2/14/2013
Complaint Source:	FTC Call Center	**Product Service Code:**	Telemarketing, Other
Amount Requested:	$0.00	**Amount Paid:**	$0.00
Payment Method:	Unknown	**Agency Contact:**	Phone
Complaint Date:	2/14/2013	**Transaction Date:**	9/12/2012
Initial Contact:	Phone Call: Mobile/Cell	**Initial Response:**	Answer cold call
Statute/Rule:	Telemarketing Sales Rule	**Law Violation:**	TSR: Threats, improper language TSR: DNC: Ignoring Your Prior Request to that Specific Entity TSR: DNC: Violating the Registry
Topic:	Do Not Call	**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:	N	**Dispute with Credit Bureau - Resolved to Satisfaction?:**	N
Member of armed forces or dependent?:	No		
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Summerville	**State:**	South Carolina
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:		**Age Range:**	30 - 39
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject:	**Herbal Life**		
Address:			
City:		**State/Prov:**	
ZIP:		**Country:**	United States
Email:		**URL:**	
Area Code:	702	**Phone Number:**	3745437

Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Record # 10 / Consumer Sentinel Network Complaints			
Reference Number:	43461473	**Originator Reference Number:**	
Language:	English	**Contact Type:**	Complaint
Source:	Consumer	**DNC?**	N
Comments:	My complaint is the way that they use dubious language to advertise joining their business.There was never any mention of the fact that the company is **Herbal Life**. It is referred to as an "On Line Business System". I thought that I was going to join an on line business doing things on line.After I had paid my money, I then listened to a telephone orientation that then mentions **Herbal Life**.Had I known this up front, I never would have paid the money.Here is their web address,http:monicahyatt.theonlinebusiness.com		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	2/6/2013
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Health Care: Other Products\Supplies
Amount Requested:	$399.00	**Amount Paid:**	$411.00
Payment Method:	Credit Card	**Agency Contact:**	Internet
Complaint Date:	2/6/2013	**Transaction Date:**	12/20/2012
Initial Contact:	I Initiated Contact	**Initial Response:**	Internet/E-mail
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:	No		
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Hemet	**State:**	California
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	70 - 79
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject:	**Herbal Life** C/o Scott And Monica Hyatt		
Address:			
City:	London	**State/Prov:**	Ontario, Canada
ZIP:		**Country:**	Canada
Email:		**URL:**	
Area Code:	877	**Phone Number:**	7539234
Ext:		**Subject ID Type:**	

Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Scott Hyatt	**Title:**	Unknown

Record # 11 / Consumer Sentinel Network Complaints			
Reference Number:	43417424	**Originator Reference Number:**	
Language:	English	**Contact Type:**	General Complaint
Source:	Consumer	**DNC?**	N
Comments:	The consumer got involved in stocks, and noticed a stock called **Herbal Life** is false. The consumer did not comply.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	JCOSBY	**Entry Date:**	2/4/2013
Updated By:		**Updated Date:**	
Complaint Source:	FTC Call Center	**Product Service Code:**	Other (Note in Comments)
Amount Requested:	$0.00	**Amount Paid:**	$0.00
Payment Method:	Unknown	**Agency Contact:**	Phone
Complaint Date:	2/4/2013	**Transaction Date:**	11/1/2012
Initial Contact:	In Person	**Initial Response:**	Unknown
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Other (Note the Violation in the Comment Field)
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:	N	**Dispute with Credit Bureau - Resolved to Satisfaction?:**	N
Member of armed forces or dependent?:	No		
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:		**State:**	
Zip:		**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:		**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject:	**Herbal Life**		
Address:			
City:		**State/Prov:**	
ZIP:		**Country:**	United States
Email:		**URL:**	
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	

Representative Name:	Bill Ackman	**Title:**	

Identity Theft Complaints

Record # 8 / Identity Theft Complaints

FTC Reference Number:	44020900	**Contact Type:**	Complaint	**Originator Reference Number:**	
Complaint Source:	FTC Online Complaint Assistant (IDT)	**Source:**		**Language:**	English
Agency Contact Method:	Internet	**Entered Date:**	3/6/2013 6:49:07 AM	**Entered By:**	FTCCIS-FTCUSER
Complaint Details					
Verified IDT Complaint?:		**Updated Date:**		**Updated By:**	
Number of Accounts Affected:		**First Occurred Date:**	8/4/2012	**First Noticed Date:**	6/13/2012
Total Amount Obtained by Subject:		**Total Amount Lost by Victim:**		**Theft Via Internet?:**	Yes
Did You Authorize Anyone to Use Your ID? :		**Did You Receive Any Benefits?:**		**Are You Willing to Press Charges?:**	
Inaccurate Credit Report Info.1:	CHASE FINANCE	**Inaccurate Credit Report Info.2:**	CITIBANK	**Inaccurate Credit Report Info.3:**	UPS FEDERAL CREDIT UNION
Credit Inquiry 1:	HAIR MASTER	**Credit Inquiry 2:**	09/11/1969	**Credit Inquiry 3:**	13408 DESMOND ST, PACOIMA, CA 91331
Member of armed forces or dependent?:	No				
Non-Monetary Harm:	Denied Credit or Other Financial Services Other (describe in comment field) Harassed by Debt Collector or Creditor MY US POSTAL MAIL WAS CHANGED TO AN ADDRESS WHERE I DO NOT RESIDE. I CANNOT GET INTO MY BANK ACCOUNTS EMAIL AND ONLINE ACCOUNTS AND MY INFORMATION CHANGED. MY AOL WAS TAKEN OVER THROUGH PARENTAL RIGHTS. CABLE ACCOUNTS OPENED IN MY NAME.				
Comments:	UPS FEDERAL CREDIT UNION ACCT # (b)(6) CITIBANK ACCT # (b)(6) I WAS LIVING AT (b)(6) (b)(6) SAN GABRIEL CA (b)(6) WHEN (b)(6) HAS MY PHYSICAL ADDRESS CHANGED TO HER PHYSICAL ADDRESS @ (b)(6) , PACOIMA, CA. SHE TOOK OVER ALL MY BANK ACCOUNTS. IN JULY AUGUST AND SEPTEMBER OF 2011 SHE WROTE CHECKS IN MY NAME TO WALGREENS, SO CAL GAS CO, HOME SHOPPING NETWORK AND WELLSFARGO THAT WAS OVER 3,000.00 PLUS OVER DRAFT FEE'S. SHE ALSO HAS USED HER FAMILY MEMBERS NAMES TO MAKE FAKE ACCOUNTS TO GO ONLINE TO HARASS ME BY SENDING EMAIL MESSAGES TO AGGRIVATE ME. BY TAKING MY MAIL SHE WAS ALSO ABLE TO GO AND HAVE HERSELF ADDED TO MY AUTO INSURANCE THROUGH METLIFE AND I HAVE A BILL IN COLLECTION FOR 500.00. SHE WENT ON MY UPS FEDERAL CREDIT UNION BANK ACCOUNT AND WENT ONLINE AND RESIGISTERED MY ACCOUNT WITH HER INFORMATION OF HER PHYSICAL ADDRESS AND ALL PASSWORDS AND NOTIFICATIONS ARE FORWARDING TO HER (b)(6) AS PER CUSTOMER REPRESENTATIVE AT THE CREDIT UNION PLUS I HAVE A BANK STATEMENT WITH HER INFORMATION ON IT. I RAN A CREDIT CHECK AND A PERSONAL BACK ROUND CHECK AND IT STATED PROPERTY FOUND IN MY NAME AND (b)(6) AND HER SISTER (b)(6) S ARE REALTORS SO I AM CONCERNED AS TO HER DISTRUCTIVE ACTIONS AND HER ILLEGAL ACTIONS AS TO MY IDENTITY THEFT.				
Additional Comments:					

Consumer

First Name:	(b)(6)	**Last Name:**	(b)(6)	**Middle Name:**	
Business Name:		**Address 1:**		**Address 2:**	(b)(6)
City:	BLOOMINGTON	**State/Province:**	California	**ZIP:**	(b)(6)

Country:	UNITED STATES	**Lived Here Since:**	6/1/2012	**Driver License/State ID - Issued State:**	California
Work Number:	(b)(6)	**Work Phone Extension:**		**Home Number:**	(b)(6)
Fax Number:		**Cell Number:**	(b)(6)	**Email:**	(b)(6)
Date of Birth:	(b)(6)	**Military Service Branch:**		**Soldier Status:**	
Soldier Station:					

Subject

Suspect

Alias First Name(s):	(b)(6)	**Alias Last Name(s):**	(b)(6)	**Alias Middle Name(s):**	X
Company Name(s):	Better Homes Realtor independant **Herbal Life** Distributor				
Address 1 - Address 1:	(b)(6)	**Address 2:**		**City:**	Pacoima
State:	California	**Zip:**	(b)(6)	**Country:**	United States
Email:	(b)(6)				
Address 2 - Address 1:		**Address 2:**		**City:**	sylmar
State:	california	**Zip:**	(b)(6)	**Country:**	united States
Email:	(b)(6)				
Phone 1 - Area Code:	(b)(6)	**Number:**	(b)(6)	**Extension:**	
Phone 2 - Area Code:		**Number:**		**Extension:**	
Relationship:	Otherwise Known	**Additional Information:**	Mail theft or fraudulent address change	**Method of Obtaining Information:**	MY X-WIFE IS DESTROYING MY CREDIT. SHE HAS ILLEGALLY CHANGED MY PHYSICAL MAIL ADDRESS TO WHERE SHE RESIDES IN PACOIMA TO TAKE CONTROL OF MY BANK ACCOUNTS. RECEIVE CABLE AND PURCHASED PROPERTY IN MY NAME AS WELL A

Incidents

Incident

Theft Type:	Internet or E-Mail - Internet Account Takeover	**Date of Theft:**	8/4/2012	**Theft Amount:**	

Associated Institution

Name:	AMERICA ONLINE	**Type:**	Service Provider	**Contact Person:**	
Address 1:	22000 AOL WAY	**Address 2:**		**City:**	DULLIS
State:	Virginia	**Country:**	UNITED STATES	**ZIP:**	20166
Email:	CUSTOMERSUPPORT@AOL.COM	**URL:**	WWW.AOL.COM	**Phone Number:**	
Notified?:		**Written Notified?:**		**Have Dispute?:**	
Product(s):				**Statute(s):**	
Violation(s):					

Law Enforcement

LE 1 - Department:		**Contact Person:**		**State/Province:**	

Phone Number:		**Notified Law Enforcement?:**	No	**Report Taken?:**	
Report Number:		**Report Taken Date:**			
Credit Bureau					
CB 1 - Name:					
Notified?:		**Fraud Alert on File?:**		**Credit Report Ordered?:**	
Have Dispute?:		**Violation(s):**			

Do Not Call Complaints

Record # 1 / Do Not Call Complaints			
Reference Number:	46920137	**Is Phone in Registry?:**	Yes
Complaint Date:	7/2/2013	**Product Service Code:**	National Do Not Call Registry
Complaint Source:	National Do Not Call Registry	**Complaint Channel:**	Internet
Transaction Date:	7/2/2013	**Transaction Time:**	1:00:00 PM
Existing Business Relationship?:	No	**Pre-recorded message?:**	No
Requested entity to stop calling?:	No		
Comments:	Caller stated they were with **Herbal Life** and when advised that I have never done business with them she said well "you were selected". Advised caller that I was on the federal do not call registry and she hung up.		
Consumer			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Edmond	**State/Prov:**	Oklahoma
ZIP:	(b)(6)	**Phone Number:**	(b)(6)
Subject			
Company Name:	**Herbal Life**	**State:**	Oklahoma
Country Code:		**Phone Number:**	(405) 2954600

Record # 2 / Do Not Call Complaints			
Reference Number:	46888551	**Is Phone in Registry?:**	Yes
Complaint Date:	7/1/2013	**Product Service Code:**	National Do Not Call Registry
Complaint Source:	National Do Not Call Registry	**Complaint Channel:**	Internet
Transaction Date:	7/1/2013	**Transaction Time:**	2:00:00 PM
Existing Business Relationship?:	No	**Pre-recorded message?:**	No
Requested entity to stop calling?:	No		
Comments:	got a call, they had my name, asked if I wanted "male enhancement products" and I said no. Asked to be taken off their list, but he insisted on asking me more questions.		
Consumer			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:		**State/Prov:**	California
ZIP:		**Phone Number:**	(b)(6)
Subject			
Company Name:	**Herbal Life**	**State:**	California
Country Code:		**Phone Number:**	(916) 4680135

Record # 3 / Do Not Call Complaints			
Reference Number:	45952548	**Is Phone in Registry?:**	Yes
Complaint Date:	5/15/2013	**Product Service Code:**	National Do Not Call Registry
Complaint Source:	National Do Not Call Registry	**Complaint Channel:**	Internet
Transaction Date:	5/15/2013	**Transaction Time:**	7:00:00 PM
Existing Business Relationship?:	No	**Pre-recorded message?:**	No
Requested entity to stop calling?:	No		
Comments:	I was called and no one answered after calling me. I called the number back to find out who called and she said Susan fom Herbail Life. I asked to be removed from her list, I did not have any association with **Herbal Life**. She hung up on me with no comment. When I called back someone answered in Spanish. I communicated that Susan called and I wished to be removed from her calling list. He said okay.		
Consumer			
First Name:	(b)(6)	**Last Name:**	
Address 1:		**Address 2:**	
City:		**State/Prov:**	California
ZIP:		**Phone Number:**	(b)(6)
Subject			
Company Name:	**Herbal Life**	**State:**	California
Country Code:		**Phone Number:**	(714) 2020399

Record # 4 / Do Not Call Complaints			
Reference Number:	45263077	**Is Phone in Registry?:**	Yes
Complaint Date:	4/15/2013	**Product Service Code:**	National Do Not Call Registry
Complaint Source:	National Do Not Call Registry	**Complaint Channel:**	Internet
Transaction Date:	4/15/2013	**Transaction Time:**	10:00:00 AM
Existing Business Relationship?:	No	**Pre-recorded message?:**	No
Requested entity to stop calling?:	Yes		
Comments:	This is a business and we received a call and they hung up. I called them back and asked to be put on do not call list. They hung up. I called back and asked to be put on the do not call list and Allen just kept talking. I told him twice and hung up on them.		
Consumer			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Monroe	**State/Prov:**	Louisiana
ZIP:	(b)(6)	**Phone Number:**	(b)(6)
Subject			
Company Name:	**Herbal Life**??	**State:**	Louisiana
Country Code:		**Phone Number:**	(504) 3024505

Record # 6 / Do Not Call Complaints			
Reference Number:	44765083	**Is Phone in Registry?:**	Yes
Complaint Date:	3/22/2013	**Product Service Code:**	National Do Not Call Registry
Complaint Source:	National Do Not Call Registry	**Complaint Channel:**	Internet
Transaction Date:	3/22/2013	**Transaction Time:**	10:00:00 AM
Existing Business Relationship?:	No	**Pre-recorded message?:**	No
Requested entity to stop calling?:	Yes		
Comments:	This company is absolutely harassing me, they challenged me to come to their office personally if I wanted to stop receiving calls and antagonize me, unwilling to take me off their list or stop calling me early in the AM, or at all. I contacted the company's support line and they told me there was nothing they could do to help but agreed with me that I am being harassed. I believe this branch is located outside of Walden, CA.		
Consumer			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Santee	**State/Prov:**	California
ZIP:	(b)(6)	**Phone Number:**	(b)(6)
Subject			
Company Name:	**Herbal Life**	**State:**	California
Country Code:		**Phone Number:**	(619) 3784116

Record # 7 / Do Not Call Complaints			
Reference Number:	44733303	**Is Phone in Registry?:**	Yes
Complaint Date:	3/21/2013	**Product Service Code:**	National Do Not Call Registry
Complaint Source:	National Do Not Call Registry	**Complaint Channel:**	Internet
Transaction Date:	3/21/2013	**Transaction Time:**	1:00:00 PM
Existing Business Relationship?:	No	**Pre-recorded message?:**	No
Requested entity to stop calling?:	No		
Comments:	This number calls and never leave's a message. Its someone named Olga		
Consumer			
First Name:		**Last Name:**	Not Provided
Address 1:		**Address 2:**	
City:		**State/Prov:**	Indiana
ZIP:		**Phone Number:**	(b)(6)
Subject			
Company Name:	Olga Kirsanova **Herbal Life**	**State:**	Michigan
Country Code:		**Phone Number:**	(989) 4932558

Provided by the Federal Trade Commission

FORTUNE®
HI-TECH MARKETING

Side-By-Side:
A Comparison of Fortune Hi-Tech Marketing and Herbalife

March 14, 2013

PERSHING SQUARE

Pershing Square Capital Management, L.P.

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Introduction

- **The following comparison of Fortune Hi-Tech Marketing ("FHTM") and Herbalife ("HLF") is based upon our review of the following source documents from the FTC's recent legal action against FHTM:**
  - The transcript of the press conference announcing the legal action
  - Complaint, filed Jan. 24, 2013
  - The memorandum in support of plaintiffs' *ex parte* motion for a TRO
  - The FTC's press release
  - The Declarations of Dr. Peter J. Vander Nat, Roberto C. Menjivar, and Kaitlin A. Dohse
  - The report of temporary receiver's activities
- **All quotations applicable to FHTM in the following pages come from one of the source documents listed above**

Mission Statements

"The mission of FHTM is to enable and transform the lives of many by offering outstanding products and services through the best opportunity in direct selling"

Source: http://www.relylocal.com/asheville-north-carolina/business_listings/fortune-hi-tech-marketing-fhtm-asheville-business-opportunity.

"Herbalife's mission is to change people's lives by providing the best business opportunity in direct selling and the best nutrition and weight-management products in the world"

Source: http://company.herbalife.com

Overview

FHTM bills itself as "the business model of the 21st century" and promises its recruits vast sums of money, but it really distinguishes itself in only one important way: the overwhelming majority of recruits make nothing at all

In its decade of operation, FHTM has caused hundreds of thousands of consumers to suffer harm of hundreds of millions of dollars

Source: Memorandum for TRO (pg. 1).

Herbalife bills itself as "the best business opportunity on the face of the earth" and promises its recruits vast sums of money, but it really distinguishes itself in only one important way: 88% of distributors receive $0 in "gross compensation" (before expenses)

In its decades of operation, HLF has caused millions of consumers to suffer harm of billions of dollars

Source: http://factsabouttherbalife.com/wp-content/uploads/2013/01/Who-wants-to-be-a-Millionaire.pdf
PSCM estimates as explained in "Who wants to be a Millionaire?"

Operation of a Pyramid Scheme

"FHTM is an organization in which the participants obtain their monetary rewards primarily from recruiting new participants into the business venture and not from selling goods and services to the public"

"Upon applying the critical consideration of the *Koscot* test, there is only an incidental and *de minimis* relationship between recruitment rewards paid to participants and product sales to non-participants"

"FHTM does not enforce, nor have in place, procedures that would ensure any meaningful amount of retail sales made to people outside the organization"

"FHTM needs to continually recruit new participants in an effort to survive"

"It is foreseeable from the terms of the plan that the vast majority of the participants are destined to fail at their ostensible business venture and are thus harmed"

Source: Declaration of Vander Nat (pg. 5).

HLF is an organization in which distributors earn more than 10 times as much from Recruiting Rewards as they do by selling the company's overpriced products to *bona fide* retail customers (1)

"Herbalife's entire business model appears to incentivize primarily the payment of compensation that is 'facially unrelated to the sale of the product to the ultimate users because it is paid based on the suggested retail price of the amount ordered from [Herbalife], rather than based on actual sales to consumers" (2)

The deposition of Jacqueline Miller in *Herbalife v. Ford*, No. CV 07-2529 (C.D. Cal. 2009), shows that, between 2006 and 2009, Herbalife disciplined fewer than 25 distributors for violating the 70 percent rule (fewer than 1 out of every 100,000 distributors)

"For the latest twelve month re-qualification period ending January 2005, approximately 60% of our supervisors did not re-qualify and more than 90% of our distributors turned over" (3)

We estimate that in the 2006 – 2012 period ~1.1mm Sales Leaders failed and left the business, a ~90% failure rate (4)

1. "Who wants to be a Millionaire?" (pg. 148).
2. *Herbalife v. Ford*, No. 07-2529 (C.D. Cal.) Dkt. # 374 at 16 (quoting Omnitrition, 79 F.3d at 782).
3. HLF 2005 Annual Report. The company has stopped providing this disclosure.
4. "Who wants to be a Millionaire?" (pg. 320).

Compensation Plan

	FORTUNE HI-TECH MARKETING	HERBALIFE
Complexity	"The plan is difficult to comprehend. I believe that for a general participant it would take many hours of scrutiny to identify and understand the relevant terms of the plan and how they interrelate..." (1)	Herbalife's Distributor Agreement is extremely difficult to comprehend. It has 124 pages, 48,000 words and 215 rules
Multiple Levels	FHTM's distributor structure comprises seven primary levels: Independent Representative → Regional Sales Manager → Executive Sales Manager → National Sales Manager → Platinum Sales Manager → Presidential Ambassador	HLF's distributor structure comprises eight primary levels: Non-Sales Leaders → Supervisor → World Team → GET Team → Millionaire Team → President's Team → Chairman's Club → Founder's Circle"
Iceberg Shape	"The bottom 3 levels [not entitled to CAB] continually comprise more than 96% of participants" (2)	The bottom 2 levels, Non-Sales Leaders and Inactive Supervisors (who do not receive royalties) continually comprise ~90%+ of distributors (1)
Commissions based Predominantly on Recruitment	"CGU rewards are presented as an array of percentage commissions and overrides on the purchase/sale of products, where the commissions & overrides are related to the level of downline sponsorships" (3)	"Royalty Overrides and Production Bonus rewards are presented as an array of percentage commissions and overrides on the purchase of products (based on SRP). Production Bonus percentages increase as distributors recruit more participants into their downline organizations" (2)
	"Participants at the rank of ESM and NSM comprise ~0.5% of all Representatives; yet, for Dish, they... received [29%] of the CGU" (4)	Participants at the rank of GET/MT/PT comprise ~0.6% of all distributors; yet they received ~84% of Royalty Overrides (3)
Special Bonuses	"Upon attaining the rank of QPSM... there are special bonuses... such as... sharing company revenue" (5)	Upon attaining the rank of President's Team there are special bonuses such as the Mark Hughes Bonus (1% of company "Retail Sales") (2)

1. Declaration of Vander Nat (pg. 9).
2. Declaration of Vander Nat (pg. 24).
3. Declaration of Vander Nat (pg. 11)
4. Declaration of Vander Nat (pg. 36).
5. Declaration of Vander Nat (pg. 20).

1. "Who wants to be a Millionaire?" (pg. 180).
2. "Who wants to be a Millionaire?" (pgs. 81-82).
3. See appendix for details.

Compensation Plan (Cont'd)

Volume Quotas	"Those who hope to make it to the top likely spend more than $1,500 per year to be an FHTM representative" (1) "To qualify for sales commissions and recruiting bonuses, they had to pay an extra $130 to $400 per month" (2)	Sales Leaders must generate ~$2,600 of Personal Volume per year to maintain their downlines and Sales Leader status (1) To qualify for maximum commissions and bonuses, Sales Leaders must generate ~$1,600 to ~$3,200 of Personal Volume each month (1)
Product Purchase is Driven by Compensation Plan	"The sales data further reveal that new recruits are likely not buying products and services from FHTM for the sake of those products and services, but, rather, new recruits are purchasing the products or services in order to become eligible to receive rewards" (3) "Further, virtually no participants choose the FHTM compensation option that would maximize their product commissions... More than 95% of these transactions indicate a choice for the 2% commission and the customer points" (3)	Senior distributors purchase product to "pay-for-their-paycheck;" (2) Mid-level distributors purchase product to requalify; (3) Junior distributors purchase product to advance in the marketing plan and achieve Supervisor status (4) 25%-discount distributors could buy product cheaper and forego Herbalife's exorbitant shipping & handling charges by purchasing product online, but they opt to purchase "direct" from the company in order to obtain Volume Points (5)
Lack of Genuine Retail Sales	"In fact, few of FHTM's products and services are ever sold to anyone other than the Reps themselves. Furthermore, Reps receive minimal financial rewards from FHTM for selling the products and services to outside consumers." "The real question, as [Attorney] General Conway said, is whether the emphasis is on selling products to independent third parties[.]"	"We don't track this number and do not believe it is relevant to the business of investors."(6)

1. Declaration of Vander Nat (pg. 20).
2. Memorandum re TRO (pg. 9).
3. Declaration of Vander Nat (pg. 3).
4. Complaint in FTC v. Fortune Hi-Tech Marketing (par. 36)
5. Fortune Hi-Tech Press Conference, Jan 28, 2013

1. "Who wants to be a Millionaire?" (pgs. 72, 166).
2. "Who wants to be a Millionaire?" (pgs. 159-171).
3. "Who wants to be a Millionaire?" (pg. 172).
4. "Who wants to be a Millionaire?" (pg. 173).
5. "Who wants to be a Millionaire?" (pgs. 106-108).
6. HLF 8-K, May 1, 2012

Focus on Recruitment

	FORTUNE HI-TECH MARKETING	HERBALIFE
Incentives Favor Recruiting	"The scheme provided much larger rewards for recruiting people than for selling products, and more than 85 percent of the money consumers made was for recruitment" (1)	Herbalife provides much larger rewards for recruiting people than for selling products, and more than 90% of the money distributors make is from Recruiting Rewards (1)
	"Under add-on bonuses, it is evident that the compensation plan offers overwhelmingly greater rewards for recruitment than for selling/buying products or services" (2)	Because of the Production Bonus, Herbalife's top earners "are not really retailers... They're recruiters" (2)
	"Virtually all incentives in the compensation plan encourage more recruitment" (3)	It is impossible to get to Active World Team (median gross compensation: ~$6,000/yr) without recruiting other Sales Leaders (3)
Presentations to Prospects Encourage Recruiting	"FHTM preaches recruitment. Defendants stress recruitment, not product sales, during their presentations to prospective representatives" (4)	"If you want some money today: Retail. If you want Lifestyle money: Recruit" (4)
	"The business has to be built every day. You wanted some practical advice. Recruit, recruit. You got to build a team" (5)	"It's easier to get rich fast in Herbalife than it is to go slow... To Build Fast you need to Power Recruit" (5)
Escalating Bonuses	"Recruitment bonuses... increase as the representative rises through the ranks of the FHTM compensation plan" (6)	Bonus percentages increase as distributors rise through the ranks of the Herbalife compensation plan (6)
Measure of Success	"Paul Orbeson defines success and failure in the business as a function of how well it recruits new members" (4)	Michael Johnson defines success by lead generation. Q: "How do you measure success?" A: "There's two ways to measure. One is by lead generation... For the tour of California... One distributor had over 1000 leads generated at that event alone. That is success measurement in its most." (7)

1. FTC press release.
2. Declaration of Vander Nat (pg. 20).
3. Declaration of Vander Nat (pg. 23)
4. Memorandum re TRO (pg. 31).
5. Declaration of Menjivar (pg. 38).
6. Memorandum re TRO (pg. 12)

1. "Who wants to be a Millionaire?" (pg. 150).
2. "Who wants to be a Millionaire?" (pg. 76).
3. "Who wants to be a Millionaire?" (pgs. 74-75).
4. "Who wants to be a Millionaire?" (pg. 77).
5. OBS distributor presentation (Nov. 22, 2010).
6. "Who wants to be a Millionaire?" (pg. 81).
7. HLF Q1'07 earnings transcript.

Concentration of Rewards at the Top

"And what you expect to see in a pyramid scheme is a heavy concentration of the rewards at the top of the enrollment structure and the data exactly verifies that expectation that, for example, these data show that the top six percent of all of the [BurnLounge] moguls earned something like 85 percent of all the rewards… that's the kind of concentration, progressive concentration toward the top that you would expect to see in a pyramid scheme."

– Dr. Peter J. Vander Nat

"The top six percent of all moguls earned something like 85 percent of all the rewards"

Source: FTC v. BurnLounge transcript. Cross-examination of Dr. Peter J. Vander Nat. (12-15-2008).

The top six percent of all Sales Leaders earned approximately 89 percent of all the rewards

Source: See appendix for details. Refers to U.S. Sales Leaders for 2011. Includes inactive Sales Leaders. Rewards includes royalty overrides, production bonuses and the Mark Hughes Bonus (but excludes wholesale commissions as these were not included in Herbalife's 2011 statement of gross compensation).

Stratification of Commissions Paid

	FORTUNE HI-TECH MARKETING	HERBALIFE
Top 1% Earn Majority of Rewards	"Over half of all product bonuses actually go to a very small set of representatives at the top of the structure" (1)	The top 1% of Herbalife U.S. distributors earned ~88% of Royalty Overrides (1)
Few Participants Earn Meaningful Incomes	"Approximately 98% of the Independent Representatives received less than $1,000 of commissions per year" (2)	Approximately 98% of distributors received less than $1,000 of commissions in 2011 (1)
	"Less than 0.1%... received more than $100,000 in net commissions per year" (2)	Approximately 0.1% received more than $100,000 in commissions in 2011 (1)
	"Only a miniscule number of participants – probably less than 1% -- are making even a five-figure annual income" (3)	Only a miniscule number of participants – probably less than 0.7% -- are making even a five-figure annual income (1)
Typical Earnings are *De Minimis*	"More than 50% of regional sales managers also received fewer than $15" (4)	More than 50% of Sales Leaders received $0 of commissions in 2011 (1)
	"FHTM's Income Disclosure shows that the average Manager earned... an 'annualized income' of $440" (5)	Herbalife's Income Disclosure shows that the typical active Supervisor earned an annualized income of $475 (1) [N.B. this excludes Retail Profit, which we estimate to be $61/yr per average distributor before taxes/expenses] (2)

1. Memorandum for TRO (pgs. 30-31).
2. Report of temporary receiver (pg. 1).
3. Memorandum for TRO (pg. 3)
4. Declaration of Vander Nat (pgs. 4-5).
5. Memorandum for TRO (pg. 18).

1. See appendix for details.
2. "Who wants to be a Millionaire?" (pg. 147).

Harm

Empirical Failure Rate

"Considering two consecutive years of operation – I calculate that approximately 90.5% of participants had accrued earnings of less than $15 a year. These individuals undertook payments for their business venture that, in any event, were significantly greater than $15. Thus, as a low-side estimate, the data show a business failure rate that is at least 90.5%" (1)

We estimate that in the 2006-2012 period, approximately 90% of new Sales Leaders exited the business. The vast majority of these individuals received annual commissions of less than $475 (and many received $0). These individuals undertook payments for their business venture that were, most likely, significantly greater than $475. Thus, we estimate the data show a business failure rate that is approximately 90% (excluding Non-Sales Leaders) (1)

Dollar Harm

"Based upon the data provided by FHTM covering 2006 through June 2011... the related consumer injury over the stated period comes to approximately $169.3 million" (1)

Based on our assumptions and Herbalife's publicly disclosed data covering 1980 through 2012, we estimate conservatively, the related consumer injury over the stated period comes to approximately $3.8 billion;
This estimate does not include the harm done to the ~10mm former Non-Sales Leader distributors. As such, we think the true financial damage Herbalife has inflicted is materially higher than $3.8 billion (1)

1. Declaration of Vander Nat (pgs. 5-6).

1. "Who wants to be a Millionaire?" (pgs. 320-327).

Deceptive Income Claims

	FORTUNE HI-TECH MARKETING	HERBALIFE
Exaggerated Earnings Claims	"The recruiting system is rife with testimonials of top earners talking about incredible sums they've made" (1)	We analyzed 393 testimonials and earnings claims from Herbalife Today magazines from 1997-2004. Annual earnings claims average $178,000/yr, which only roughly 1 in 5,000 new distributors achieves (1)
	"At a Chicago-area recruiting event, one representative told an undercover FTC investigator that she made $10,000 in one month and a friend made $60,000 in one month" (2)	At a New York-area recruiting event, one representative told an undercover reporter (Herb Greenberg) that he made $20,000 in one month and a friend made $65,000 in one month (2)
Anybody Can Do It	"Top FHTM officials attempt to motivate representatives with promises of great financial success if they just do not give up" (3)	"Everything is really easy. If I can do it, you can do it as well" – Mark Hughes (1)
Change Your Lifestyle	"FHTM lures new recruits in with promises of large paychecks and extravagant lifestyles;" e.g., "[FHTM has] allowed us to live out our dreams. And you know what? It can for you too if you'll just put your effort in the right vehicle, in the right place" (3)	Doran Andry, Chairman's Club, lures new recruits with a YouTube video featuring his mansion, his Ferrari, and his lavish lifestyle: "You know, just imagine. It started with a little dream to want to have a better life... And all of you, if you just dream, you can have everything we have and much more" (3)
Who wants to be a Millionaire?	"A Platinum Manager told listeners on a team call: '[I]f you're not aware of what you have your hands on, this is a multi-million-dollar business. Darla has made millions of dollars. Scott has made millions of dollars, millions and millions of dollars. So, understand, this is a multi-million dollar organization" (2)	"Herbalife are {sic} on the way to become a USD10 billion company and thanks to that many normal people like you and I will become Millionaires;" (4) "Great product, great brand, incredible business opportunity, unlike anything that exists out there, because people can become millionaires at Herbalife" (5)
For Your Grandchildren...	"[Top representatives] promise that FHTM will provide consumers with financial security for themselves and their children and grandchildren" (4)	"[If] you want to lock in that security for life, you need to recruit. And the other thing you need to do, be prepared to roll that cash flow for straight 9 to 12 months. Because you know what, in that short space of time, by making that commitment, you are going to create a foundation for life. Absolutely. Not just for yourself, but a legacy, a legacy for your family, for your children, and their children's children." (6)

1. Press conference transcript.
2. Memorandum for TRO (pg. 16).
3. Memorandum for TRO (pgs. 13-14).
4. Memorandum for TRO (pg. 17).

1. "Who wants to be a Millionaire?" (pg. 197).
2. http://www.cnbc.com/id/100359541?__source=vty|sellingthedream|&par=vty.
3. http://www.pscmhlflibrary.com/profile-of-an-herbalife-chairmans-club-member/
4. http://factsaboutherbalife.com/wp-content/uploads/2012/12/Online-Recruiting-Training.pdf
5. Michael Johnson, CEO, December 16, 2008 investor day transcript.
6. "Who wants to be a Millionaire?" (pg. 77).

The Retail Opportunity

	FORTUNE HI-TECH MARKETING	HERBALIFE
Inflated Prices	"A price comparison of FHTM's True Essentials and Envy Organics lines shows that equivalent products can typically be purchased for substantially less" (1)	For a 200-calorie serving, Formula 1 (~30% of HLF's volume) costs nearly three times as much as Ensure or Slim-Fast, and nearly twice as much as Lean Shake. Herbalife's other products are similarly expensive. A multivitamin tablet from Herbalife supposedly retails for 26 cents, whereas Centrum (Pfizer) can be purchased for 6 cents per tablet (1)
Commodity Products	"[FHTM representatives] are selling things of dubious value. These include their own line of organic shampoos and pills" (2)	Herbalife's top-selling products are commodities that should have little to no pricing power. These include nutrition powder, herbal tea, protein powder, and its own line of organic shampoos and pills. The company says it spends "*de minimis*" amounts to advertise its products, and its GAAP R&D spending is "not material" (2)
Restrictions Placed on Retail Activity	"[Representatives] are prohibited from selling products or services on commerce sites such as Amazon, eBay, or Craigslist without obtaining prior written approval from FHTM" (3)	"Distributors may not (directly or indirectly through any intermediary or instrumentality) offer or facilitate the offering of Herbalife products for sale by soliciting or receiving open bids. This prohibition includes, but is not limited to, soliciting or receiving bids for Herbalife products on the Internet, through a commercial auction Web site such as eBay, or otherwise" (3) Herbalife Nutrition Clubs are required to abide by an onerous set of restrictions and rules, including: (i) no exterior signage at residential locations, (ii) no mention of Herbalife on the Club exterior, (iii) windows and doors must be covered, (iv) no advertising or promotion, (v) no attracting walk-in customers, and (vi) Club Operators may charge membership fee only to cover operating costs – prohibited from earning retail profit (4)

1. Memorandum for TRO (pg. 10).
2. Press conference transcript.
3. Memorandum for TRO (pg. 11).

1. "Who wants to be a Millionaire?" (pgs. 16, 18, 19).
2. "Who wants to be a Millionaire?" (pgs. 21, 24, 30).
3. Herbalife distributor memo, "Prohibitions of Auction Sales and Sales on Auction Sites and Sales to Non-Distributors for Resale," (May 4, 2005).
4. "Who wants to be a Millionaire?" (pgs. 284-287).

Anti-Pyramid Rules

	FORTUNE HI-TECH MARKETING	HERBALIFE
Buyback Policy	"Unlike Amway, FHTM charges a 10% restocking fee on the products it will even allow a representative to return, [and] requires the representative to return any compensation they earned as a result of buying the products" (1)	Until May 2012, HLF charged a 10% restocking fee on the products returned by distributors. In some countries, HLF has/had no repurchase policy. In others, it has/had an escalating restocking fee. HLF does not reimburse Shipping & Handling fees, which can be as high as ~20% of purchase price; HLF requires distributors and upline distributors to return any compensation they earned (as well as forego promotions) as a result of product returns – this has the effect of encouraging distributors to eat the cost of product returns (1)
70% Rule / Majority Rule	"From all of these considerations, it is evident that the majority rule and the 70% rule have no effective meaning and certainly do not secure any *bona fide* customer sales" (2)	"I know that Herbalife has created the Ten Retail Sales Rule and the 70 Percent Rule, but looking at the record I have serious questions as to whether or not those are not exalting form over substance and aren't just there for the purpose of creating the impression that the second element of the Koscot test has been met" (2)
	"Importantly, any products that an IR could give away as samples while also using these products for oneself – such as True Essentials and Envy Organics – may be designated as *customer orders*" (3)	Distributors are able to count sales to first line Distributors with up to 200 personally purchased Volume Points as sales per the Ten Retail Customer Rule; in addition, products given away as samples at Nutrition Clubs may be counted toward the Ten Retail Customer Rule (3)
		Distributors can include sales to other distributors toward their 70% Rule requirement, which does nothing to ensure sales to *bona fide* retail customers
		Sales Leaders do not receive their paychecks unless they certify that they have abided by the 70% Rule and Ten Retail Customer Rule

1. Memorandum for TRO (pg. 34).
2. Declaration of Vander Nat (pg. 43).
3. Declaration of Vander Nat (pg. 42).

1. "Who wants to be a Millionaire?" (pgs. 310-316) & factsaboutherbalife.com
2. *Herbalife v. Ford* (June 1, 2009 Hr'g Tr., Dkt., # 300, at 6.).
3. "Who wants to be a Millionaire?" (pg. 126).

Miscellaneous

	FORTUNE HI-TECH MARKETING	HERBALIFE
Management	Simon Davies spent the last six years at FHTM as CFO and then Chief Analytics Officer (1)	Simon Davies was the Director of Internal Audit at Herbalife from 1994 through 2005 (1)
Third-Party Credibility	"FHTM does everything it can to capitalize on the names of the third-party businesses with which it has agreements" (2)	Herbalife has cited its UCLA affiliation 440 times in SEC filings since its IPO in 2004. Including distributor presentation references to UCLA the number would likely be in the thousands; Herbalife has paid its Nobel Laureate spokesman, Dr. Louis Ignarro, and his affiliated consulting firm more than $15 million to help Herbalife promote its business opportunity to its distributors (2)
Targeting Specific Ethnic Groups	"FHTM targets its recruitment efforts at consumers who are struggling to make ends meet but have an entrepreneurial bent. Increasingly, FHTM has been targeting non-native English-speaking recruits, particularly Spanish-speakers" (3)	Herbalife targets Latinos, African-Americans, ethnic minorities, the young, and stay-at-home moms – focusing on those in financial need (3)
Responding to Pyramid Scheme Allegations	"In response to DiGrandi's question about whether FHTM is a pyramid, [FHTM's General Counsel] responds, in part, by saying, 'I could go on for this – you know, on this topic for a long – for a long time, obviously. But the bottom line is, are people compensated by FHTM solely for recruiting new people to join the business? And the answer to that question is no. Therefore, it's not a pyramid." (emphasis added) (4)	HLF's investor relations website has a link to a white paper, commissioned by the Company, and published by Professor Anne T. Coughlan entitled, "*FAQs on MLM Companies*." The paper states "an illegal pyramid scheme awards payments to participants for mere recruitment." (emphasis added); the paper also states, "A true pyramid scheme causes **all** later participants to lose money" (4)

1. http://www.sequenceinc.com/fraudfiles/2013/01/are-herbalife-and-fhtm-similar/
2. Memorandum for TRO (pg. 9).
3. Memorandum for TRO (pg. 6).
4. Declaration of Menjivar (pgs. 33-34).

1. http://www.sequenceinc.com/fraudfiles/wp-content/uploads/2013/01/simon-davies-linkedin-herbalife-fhtm.pdf
2. "Who wants to be a Millionaire?" (pgs. 39-49). See also: "Herbalife Cozies Up With UCLA," LA Times (Feb. 22, 2013). http://www.latimes.com/business/la-fi-hiltzik-20130224,0,1163343.column
3. "Who wants to be a Millionaire?" (pgs. 232 – 238).
4. Source: ir.herbalife.com. For an analysis of Anne Coughlan's paper, see: "Analysis Of Anne T. Coughlan's Herbalife Articles," http://seekingalpha.com/article/1103871-analysis-of-anne-t-coughlan-s-herbalife-articles

Appendix:
Stratification of Herbalife Commissions

Herbalife Statement of Average Gross Compensation of U.S. Supervisors – 2011 (Abridged)

STATEMENT OF AVERAGE GROSS COMPENSATION OF U.S. SUPERVISORS – 2011

Over 25% of Distributors reach the rank of Supervisor and above ("Leader"), qualifying them for additional compensation which is paid by Herbalife based upon their activities and those they have sponsored directly and indirectly. The annual gross compensation paid by Herbalife to all Leaders during 2011 averaged $2,900 (with a median level of $741). Over 39% of Supervisors are "Active" (defined as those who generated at least 2,500 points of volume in 2011 after becoming Supervisor). The annual gross compensation paid by Herbalife to Active Leaders during 2011 averaged $7,354 (with a median level of $637).

ACTIVE LEADERS				
Earning Level	% of Total Leaders	% of Active Leaders	Average Earnings Compensation (USD)	Median Compensation (USD)
President's Team	0.2 %	0.6 %	$ 514,638	$ 336,901
Millionaire Team	0.7 %	1.7 %	$ 100,195	$ 97,303
Get Team	2.6 %	6.5 %	$ 22,766	$ 19,417
World Team	2.9 %	7.3 %	$ 6,224	$ 5,659
Supervisor	33.1 %	83.9 %	$ 901	$ 475
Total	39.4 %	100 %	$ 7,354	$ 637

Source: Herbalife Statement of Average Gross Compensation of U.S. Supervisors – 2011. (Revised: 7/25/12). Available on factsaboutherbalife.com.

Stratification of U.S. Herbalife Commissions Backup

(USD in millions)	Total Distribs		Pct. of Total	Compensation		
	Amt.	Pct.	Leaders	Average	Median	Total
President's Team	207	0.04%	0.2%	$514,638	$336,901	$106.5
Millionaire Team	621	0.1%	0.7%	100,195	97,303	62.2
GET Team	2,355	0.5%	2.6%	22,766	19,417	53.6
World Team	2,639	0.5%	2.9%	6,224	5,659	16.4
Supervisor	30,255	5.9%	33.1%	901	475	27.3
Active Leaders	36,076	7.0%	39.4%	$7,354	$637	$266.0
Inactive Leaders	55,414	10.7%	60.6%	-	-	-
Total Leaders (1)	91,490	17.7%	100.0%	$2,900	$0	$266.0
Non-Sales Leaders (2)	424,106	82.3%		-	-	-
Total Distributors	515,596	100.0%		$516	$0	$266.0 (3)

Source: Herbalife Statement of Average Gross Compensation of U.S. Supervisors – 2011. (Revised: 7/25/12). Available on factsaboutherbalife.com.
Note: The table above includes Inactive Sales Leaders and Non-Sales Leaders in Total Distributors (they are excluded from the Company's Gross Compensation statement).

1. Average North America Sales Leaders were 94,423 in 2011 (Q4'10: 100,619; Q1'11: 76,150; Q2'11: 88,214; Q3'11: 98,919; Q4'11: 108,211). Source: Herbalife Regional Key Metrics supplement (unaudited).
   USA was 97% of North America Net Sales in 2011 (Source: HLF 10-K). Assumes USA Total Leaders were 97% of average North America Total Leaders in 2011.
2. North America Sales Leaders were 21.6% of total Sales Leaders (ex China) as of Q4'11. Assumes North America Non-Sales Leader distributors were 21.6% of total Non-Sales Leader distributors (ex China) as of Q4'11. Source: HLF 10-K and Herbalife Regional Key Metrics supplement (unaudited). Assumes USA was 97% of North America.
3. USA Royalty Overrides were ~$257mm in 2011 (Source: HLF 10-Qs and 10-K). Assumes USA gross margin = Herbalife consolidated gross margin. This foots roughly to the $266mm implied from the table above, which is derived from Herbalife statement of gross compensation and its distributor disclosures.

Questions for Herbalife[1]

February 7, 2013

Des Walsh and Herbalife (the "Company") executives have repeatedly committed to having a fact-based conversation and total transparency about Herbalife's business. Specifically, Des Walsh stated during a recent interview:

"Our commitment is to total transparency . . . we benefit from people understanding our company, our products, our business model, and so we will answer any and all questions in that area."

Given Mr. Walsh's comments, Pershing Square would welcome responses to the following questions:

Pyramid Scheme Questions:

- Based on Herbalife's reading of the 2004 FTC Staff Advisory Opinion, the Company appears to conclude that "the primary motivation for purchasing should be resale and / or consumption." This conclusion suggests that Herbalife believes that internal consumption is otherwise indistinguishable from independent third-party sales in the FTC's determination of a pyramid scheme. As recently as November 2012, however, the FTC published the following on its website: "One sign of a pyramid scheme is if distributors sell more product to other distributors than to the public – or if they make more money from recruiting than they do from selling."[i]
    - In light of the FTC's November 2012 statement, why does the Company continue to look to the FTC's 2004 Opinion for guidance as to whether or not internal consumption is a red flag for a pyramid scheme?
- Rather than respond to Pershing Square's argument that Herbalife distributors primarily obtain their monetary benefits from recruiting rather than retailing, the Company's presentation on January 10, 2013 seemed to focus on establishing that retail customers do, in fact, exist for Herbalife product. However, in *Webster v. Omnitrition*, 79 F.3d 776, 782 (9th Cir. 1996), the Ninth Circuit clarified that "Omnitrition cannot save itself simply by pointing to the fact that it makes some retail sales."
    - What proof can the Company provide that bona fide retail sales (defined as sales to non-distributors) at sufficient profits occur such that Herbalife's distributors obtain their monetary

[1] This document is based upon a presentation entitled "Who wants to be a Millionaire?," made by Pershing Square Capital Management, L.P. ("Pershing Square") on December 20, 2012, to which Herbalife Ltd. ("Herbalife") responded, among other things, with its own presentation at an Investor and Analyst Day on January 10, 2013. Please see full disclaimer at the end of the document.

benefits primarily from sales to independent, third-party retail customers rather than from recruiting rewards?

- In *Herbalife v. Ford*, No. 07-2529 (C.D. Cal.), Judge Feess stated that "Herbalife's entire business model appears to incentivize primarily the payment of compensation that is 'facially unrelated to the sale of the product to the ultimate users because it is paid based on the suggested retail price of the amount ordered from [Herbalife], rather than based on actual sales to consumers." (Dkt. # 374 at 16 (quoting Omnitrition, 79 F.3d at 782).) The Company's January 10, 2013 investor day presentation argued that "all compensation is directly linked to product sales."

    - What does the Company mean by "directly linked to product sales"? By this statement, is the Company referring to the fact that commissions are determined as a percentage of the Suggested Retail Price ("SRP") of product purchased from the Company? Does the Company believe that a bona fide retail sale is required (that is, a sale to someone who is not part of the marketing scheme) in order for commissions to be related to the sale of products to ultimate consumers? If not, why not?

- In *Herbalife v. Ford.*, Judge Feess looked to "federal law as articulated in *Koscot* and adopted in this Circuit in *Omnitrition* in a case that seems to me to be completely indistinguishable from the present lawsuit." (June 1, 2009 Hr'g Tr., Dkt. # 300, at 6.)

    - Yet, Herbalife's 2011 10-K states that the Company believes there are "significant differences between our marketing system and that described in the *Omnitrition* case." Please elaborate on these "significant differences."

- Can you point to any case law that would serve as a basis for the Company to argue that its royalty overrides are determined based on "the sale of product to ultimate users"?

- According to a white paper paid for by Herbalife and written by Professor Anne T. Coughlan, a non-lawyer, marketing professor: "an illegal pyramid scheme awards payments to participants for mere recruiting." (Anne T. Coughlan, *FAQs on MLM Companies*, July 2012, at 3.)

    - Can you point to any case law that defines the phrase "mere recruiting"?

- When a Supervisor recruits a new distributor who qualifies to become a Supervisor by purchasing 4,000 Volume Points of product in one month at a 42% discount (approximate cost: $2,600):

    - Isn't it true that the sponsoring Supervisor receives an 8% Wholesale Commission for this purchase of product (roughly $320)?

- Isn't it true that the upline Sales Leaders receive 5% Royalty Overrides (up to three active levels) and 7% Production Bonuses (roughly $880)?

- Are these payments in any way related to the actual retail price at which the product is resold, if it is resold, by the qualifying Supervisor?

California's Permanent Injunction Against Herbalife

- Herbalife's 2011 10K states that: "All of our officers and directors are subject to a permanent injunction issued in October 1986 pursuant to the settlement of an action instituted by the California Attorney General, the State Health Director and the Santa Cruz County District Attorney."

- The Injunction states: "The provisions of this final judgment are applicable to: (a) defendants, Herbalife, Mark Hughes, and each of them, and their respective successors in interest, whether corporate or otherwise, and (b) those officers, directors and employees of said defendants and any other entities acting under, by or on behalf of either such defendant or pursuant to their direction, who have notice of this injunction."[ii]

- Among other things, the Injunction restricts Herbalife from "establish[ing], maintain[ing], or operat[ing] a marketing plan in which… (2) Any compensation, however denominated (including but not limited to 'commissions,' 'overrides,' 'achievement bonuses,' or any term of similar import), defendants pay or participants receive is based upon anything other than the retail sale of defendants' products." (*Id.* ¶ 5(A).)

- The Injunction goes on to define the term "retail sale" as follows: "The term "retail sale" as used in this Section 5 means a sale at defendants' product(s) in any of the following situations: (1) to persons who are not part of defendant's marketing program or distribution system; or, (2) to persons who are not buying to become part of defendants marketing program or distribution system; or, (3) to persons who, although desirous of becoming or who are a part of defendants' marketing plan or distribution system are buying for their own personal or family use." (*Id.* ¶ 5(C).)

  - How can the Company's policy of paying Wholesale Commissions be in compliance with Section 5(A)(2) of the Injunction if Wholesale Commissions are paid whenever a Non-Sales Leader distributor orders product directly from Herbalife, and if in many cases, the purchasing Non-Sales Leaders are not strictly "buying for their own personal or family use"?

  - Is it the Company's policy to only pay Wholesale Commissions when Non-Sales Leaders purchase product directly from the Company expressly for "personal or family use"? If so, how does the Company determine whether product purchased by Non-Sales Leaders will be

internally consumed as opposed to being purchased for advancement in Herbalife's marketing plan or for resale outside of the network?

- Did Herbalife pay Wholesale Commissions to Non-Sales Leaders in 1986, the year this injunction was put into force?

- Section 5(B) of the Injunction states that "defendants shall be in compliance with this Section 5, as long as a verification or documentation system they implement allows them, at any given point in time, to verify or document to plaintiffs that any and all participants who receive commissions, bonuses, overrides and/or advancement from defendants in defendants' marketing program, after entry of this judgment, are based on retail sales made by or through such participant(s) or others introduced directly or indirectly under participant(s)."

- However, in an 8-K filed on May 2, 2012 with the SEC, the Company disclosed that "We don't track [sales to non-distributors] and do not believe it is relevant to the business or investors."

  - Given the Company's numerous public admissions that it cannot and does not track "retail sales," how is it possible for the Company to be in compliance with Section 5(B) of the Injunction?

- Under Section 3(Q) of the Injunction: "Pursuant to Business and Professions Code Sections 17203 and 17535, defendants are hereby permanently enjoined and restrained from: "Making false or misleading representations with respect to any specific goals for participants in defendants' marketing program relating to the number of new customers or new participants a participant may obtain within a specific time period or an amount of money a participant may earn through bonuses and overrides."

- Pershing Square's December 20th presentation listed a number of reasons why Herbalife's Statement of Average Gross Compensation of US Supervisors – 2011 (the "2011 Statement of Average Gross Compensation") was likely to mislead investors and potential distributors, including (i) the fact that 93% of Herbalife distributors (including Non-Sales Leaders) were excluded from the table, (ii) the statement referred to "Average Earnings" but was not adjusted for distributor expenses, (iii) the statement seemed to use a definition for the term "Active" that is inconsistent with other public Herbalife disclosures, (iv) the statement overstated the actual percentage of distributors who reached the rank of Supervisor and above, and (v) the statement failed to properly demonstrate the true probability of reaching the upper echelons of Herbalife's marketing plan.

- We further note that in response to such criticisms leveled by Pershing Square and others, Herbalife issued yesterday a new and substantially revised version of its Statement of Average Gross Compensation for U.S Distributors. We believe that this new disclosure confirms the material

inadequacy of previous Statements of Gross Compensation that were presented to new distributors when inducing them to participate in the Herbalife network, and that the release of this revised statement does not eliminate the serious problems with its predecessor. (Please note that Pershing Square will separately comment on this new Statement of Average Gross Compensation in due course.)

- Given the examples above and the recently revised disclosure, does the Company believe its historical distributor earnings disclosures were not misleading and in compliance with Section 3(Q) of the Injunction? In light of this significant disclosure modification, does the Company feel it has an obligation to refund losses of those distributors who were misled as a result of its previous materially misleading earnings disclosures?

- Pershing Square's presentation also pointed out that Herbalife marketing materials in Brazil suggest new distributors can reach the President's Team in two years. In addition, Herbalife Today magazines suggested that, when Herbalife entered Ireland, distributors could reasonably expect to reach the President's Team in fewer than three years. We note that nearly ten years after entering the Irish market, there were no President's Team members in Ireland.[iii]

    - In light of this, what is the Company's defense against the allegation that it proffered misleading representations to prospective Herbalife distributors as to "specific goals for participants in defendants' marketing program relating to the number of new participants a participant may obtain within a specific time period or an amount of money a participant may earn through bonuses and overrides"?

- On a December 16, 2008 investor day conference call, Michael Johnson made the following statement:

> We know this is a year about building up our recruiting, continuing to build retailing, to switch marketplaces from recruiting only to daily consumption, which is a blend of recruiting and retailing, and then retaining those distributors. Great product, great brand, incredible business opportunity, unlike anything that exists out there, because people can become millionaires at Herbalife.
>
> Not everyone, so we'll take -- [Brad], in case you're listening, we'll take all the legal disclaimers on that, but there's not many companies that can say that today. Most companies are focused on how they can keep their doors open.

- Pershing Square's presentation explained that very few Herbalife distributors achieve levels in the Herbalife marketing plan that would allow for them to become "millionaires." Specifically, we estimated that only one out of approximately 10,000 new distributors reach the President's Team (median compensation: $336,901 – before taxes and expenses).

    - In light of this, how can Michael Johnson's statement that "people become millionaires at Herbalife" be in compliance with Section 3(Q) of the Injunction?

- Pershing Square's presentation analyzed 393 testimonials and earnings claims from editions of Herbalife Today magazines from 1997 through 2004. The average earnings per year from the claims implied an annual income of $178,000 per year. However, the typical "Active" U.S. Herbalife Sales Leader only earned $637 in "gross compensation" in 2011.[iv]

    - Given these figures, how can Herbalife's published testimonial income claims be in compliance with Section 3(Q) of the Injunction?

- Pershing Square's presentation provided numerous examples of senior Herbalife distributors who made exaggerated income earnings claims to prospective Herbalife recruits. For example, Doran Andry, Chairman's Club Member, has a video providing a "live" testimonial implying that earning "lifestyle" money as an Herbalife distributor is a reasonable expectation.

    - How can marketing materials like this be in compliance with Section 3(Q) of the Injunction?

<u>The Notion that the Majority of Distributors are "Discount Customers"</u>

- After the January 10, 2013 Herbalife investor day, Michael Johnson stated that "90% of our distributors, OK, are buying our product, and let me try to clarify this, buy it for one reason and they buy it for the self-consumption." If 90% of Herbalife distributors are discount customers who only sign up because they want to buy Herbalife product at a discount to SRP, then:

    - Why is Herbalife's discount customer renewal rate so much lower than that of Costco or GNC (Costco: ~90%, GNC: ~70%, Herbalife: ~10% per its 2005 10K)?

    - Why would anyone pay $59 for the Mini-International Business Pack ("IBP") to become a 25% discount customer (or alternatively, $109 for a full IBP), when Herbalife products are widely available to non-distributors at discounts of 35% or more?

    - If Non-Sales Leaders are discount customers who purchase product for self-consumption (at a 25% to 42% discount to SRP), why do they pay sales tax assuming the product is sold at 100% of SRP?

    - Why does Herbalife refer to the majority of its Non-Sales Leaders as "small retailers" in its SEC filings if they are in fact discount customers?

- Why are discount customers required to sign a 48,000-word Distributor Agreement in order to purchase Herbalife products?

- Why does Herbalife report "Retail Sales" in its SEC filings assuming all sales are at 100% of SRP if in fact a high percentage of product is sold to discount customers at discounts of 25% or more?

- According to the Company's Sales & Marketing Plan: "The Herbalife money-back guarantee does not apply to products purchased by Distributors, whether or not consumed by them, and this fact must be presented to individuals who become Distributors."

    - Why are discount customers ineligible to receive Herbalife's Money Back Guarantee?

    - Why do discount customers have to resign as distributors and give up their discount before they can return any product to the Company?

- Herbalife independent distributor presentations claim the Company has 65 million customers[v] (which would imply that ~3 million of Herbalife's distributors have an average of more than 20 customers each).

    - How is this possible if such a high percentage of Herbalife distributors sign up simply to get the 25% discount?

- According to the Lieberman survey, 44% of Distributors expect to earn nothing.

    - Shouldn't this figure be 90% if, in fact, 90% of distributors are discount customers who only buy the product for self-consumption?

- Why would an upline distributor sponsor a discount customer to join Herbalife rather than sell the product directly to the discount customer at a 25% discount, which would forego the requirements that the discount customer pay $59 (or $109) for the mini-IBP (or full-IBP) and sign a Distributor Agreement?

- In the Wedbush Securities Conference on December 9, 2009, John DeSimone stated "But the majority of the payout, you can see, more than [half] is the retail profit. Retail profit based off of 2008 figures was $1.8 billion for our distributors. The royalties, production bonus and Mark Hughes bonus was under $800 million, so less than half."

    - What is the basis for Mr. DeSimone's belief that the majority of the distributor payout is retail profit?

- If the Company believes that 90% of distributors only sign-up to buy the product at a discount to SRP for the purpose of self-consumption (i.e., they don't go on to resell the product at retail and earn a "retail profit"), why does management refer to 100% of distributor allowances as "retail profit"?

- In the Amended Final Judgment and Order in *FTC v. BurnLounge*, No. 07-3654 (C.D. Cal.), the Court defined a pyramid scheme as follows:

  - "'Prohibited Marketing Scheme' means an illegal pyramid sales scheme (see e.g., Webster v. Omnitrition Int'l, 79 F.3d 776, 781 (9th Cir. 1996), Ponzi scheme, chain marketing scheme, or other marketing plan or program in which participants pay money or valuable consideration in return for which they obtain the right to receive rewards for recruiting other participants into the program, and those rewards are unrelated to the sale of products or services to ultimate users. <u>For purposes of this definition, "sale of products or services to ultimate users" does not include sales to other participants or recruits or to the participants' own accounts</u>. Dkt. # 474 at 5 (emphasis added)"

    - How do you reconcile your attempt to define distributors as retail customers in light of the 2011 BurnLounge Court decision in California, the judicial district where Herbalife is headquartered?

<u>Internal Consumption</u>

- How much of the Company's final sales to actual consumers, by percentage and dollars, is sold to people outside the distributor network, and how much is sold within the distributor network (over the last five years)?

- Why have the Company and management answered this simple and straightforward question in so many different and inconsistent ways?

  - Response to David Einhorn on May 1, 2012: Des Walsh: "So, we don't have an exact percentage David because we don't have visibility to that level of detail."
    David Einhorn: "Do you have an approximation?"
    Des Walsh: "So well, again going back to our 70% rule, we believe that it's at 70% or potentially in excess of that."

  - In an 8-K filed On May 2, 2012, Herbalife states: "We don't track [sales to non-distributors] and do not believe it is relevant to the business or investors."

- Michael Johnson upon Pershing's announcement (on 12/19/12):
  - Kate Kelly: *"Can you give us a percentage figure though Mr. Johnson as to what percentage of your sales are outside that distribution network."*
  - Johnson: "90%."
  - Kate Kelly: "So the vast majority?"
  - Johnson: "*Absolutely!"*

- Michael Johnson after Herbalife's investor day (on 1/10/13):
  - "It was a misstatement. 90% of our distributors, OK, are buying our product, and let me just try to clarify this, buy it for one reason and they buy it for the self-consumption."
  - "What we have in our company today is we have a tremendous amount of customers;" "I don't have a number for you."

- If the Company does not track retail sales, what other empirical basis do you have to explain the above answers? Why have you provided materially different answers to the same question?

➢ In the Company's January 10, 2013 investor day presentation, management references the 2004 FTC Staff Advisory Opinion and deduces from that Opinion that "the primary motivation for purchasing should be resale and / or consumption." However, in announcing the recent case against Fortune Hi-Tech, the FTC highlighted that the key to a legitimate MLM is an emphasis on selling to "independent third parties" (FTC Midwest Director, Steve Baker, Jan. 28, 2013 Press Conference). Further, on January 28, 2013, the FTC posted on its website a consumer-education piece about pyramids and stated: "If the money you make is based on your sales to the public, it may be a legitimate multilevel marketing plan. If the money you make is mainly based on the number of people you recruit and your sales to them, it's a pyramid scheme."[vi]

- In light of the above statements by the FTC, does the Company still believe that it can be indifferent to the amount of product sold or consumed within the network versus the amount of sales to independent third parties in the determination as to whether Herbalife is a pyramid scheme?

- Why don't you actually track sales to independent third parties, particularly when your competitors, like Tupperware, track this information?

  <u>Tupperware CEO comments during a 1/29/13 interview with Jim Cramer:</u>

  Jim Cramer:

"Can you define very quickly for our viewers what direct selling is and why you're distancing yourself from some of the other companies that are-- that claim to be in your industry?"

Rick Goings:

- *"Over 90% of our sales are through a retail customer. Only 10% to the sales force, and they buy that because we have so many new products every year"*
- *"Most of the network marketers, the bulk of their products are consumption by their network".*
- *"You wouldn't believe the level of detail we have"*
- *"We have a report there of what happened the previous week, what the sales were, what the recruits were, who they were to and people that went to the party. We manage our businesses right down to the detail of it."*

- On a May 2010 investor call, John DeSimone referred to "a lot of other distributor statistics that we have visibility to that you investors don't. So we've got a dashboard that gives us statistics on every one of our distributors and it's close to three dozen statistics. And it's a lot of information. So it tells us order patterns for distributors. It gives us the statistical analysis to determine who's doing clubs, which are more predictable versus who's doing recruiting that they're bringing a lot of people but they're not sticky. And so it gives us a lot of information into visibility."
    - What are the three dozen distributor statistics that Herbalife collects that it does not share with investors? Do any of these statistics track the amount of product that is sold outside the Herbalife network? If not, why not?

<u>"Retail Sales"</u>

- Herbalife's compensation to distributors, as well as its charges to distributors for shipping, handling, taxes and other charges, are calculated based on percentages of the Company's SRP for its products. SRPs also drive the Company's statement of "Retail Sales" and of distributors' "Retail Profits."
    - What is the actual retail price at which Herbalife products are sold to independent third-parties and distributors who consume the product? What would the Company's "Retail Sales" be if they were based on actual retail prices, not SRP?

- Rules 17-A and 18-E of your Sales and Marketing Plan, which binds all distributors, requires distributors to create records of each sale, including product sold, sale price and name and contact information for each customer.

Section 17 Customer Retail Receipts and the Customer Refund Policy

Rule 17-A Providing Retail Receipts to Customer

A Distributor must provide an official completed Herbalife Retail Order Form to all retail customers when the sale is completed. This must list the products sold, the sales price, and the name, address and telephone number of the Distributor and the customer. Distributors are required to maintain their copy of all Retail Order Forms on file for a period of two (2) years. Herbalife maintains the right to request copies of these and to verify the transactions and the terms and conditions of the sale, and the service provided by the Distributor.

- In light of all the recent questions about the Company's sales outside the distributor network and its importance, why have you not simply requested these receipts from all of your distributors so Herbalife could generate empirical evidence which would demonstrate the amount and pricing of third-party retail sales?

Lieberman's Finding that 92% of Herbalife Ultimate Users are Non-Distributors

- According to extrapolations from the 2,000 individuals polled in the Lieberman survey, Herbalife has stated that ~5.7 million U.S. households purchased Herbalife product in the three months prior to the study. Based on the Company's disclosure, there were approximately 500,000 Herbalife distributors in the U.S. as of 12/31/11. Based on Michael Johnson's January 10, 2013 comments, 90% (i.e., 450,000) of these distributors are "discount customers" who only buy the product for self-consumption. This implies that there are only approximately 50,000 active distributors in the U.S. (i.e., distributors who are selling the product to independent third parties). This would imply that each of these 50,000 distributors have, on average, about 114 third-party independent customers for Herbalife products. Does the company have any evidence that would suggest that this is true?

- Based on the figures above, approximately 450,000 of Herbalife's U.S. customers are distributors or discount customers, and approximately 5 million of Herbalife's U.S. customers are non-distributors or retail customers. This suggests ~92% of Herbalife's "customers" are non-distributors or non-discount customers. In a January 2013 investor presentation, Nu Skin disclosed that 10% of its U.S. customers are "retail customers" and 50% are "preferred customers" – customers who sign up to purchase Nu Skin product at a discount.

  - In light of the similarities between the two companies' business models, how is it possible that Nu Skin has five times more discount customers than retail customers while Herbalife has 11 times more retail customers than discount customers?

Herbalife's Argument that Non-Distributors Account for 32% of U.S. "Direct Ship" Volume

- In its January 10th presentation, Herbalife disclosed that in the U.S. in 2012, Herbalife shipped 32% of its volume to non-distributors (31% of orders). According to the Company, these shipments were comprised of 1.4 million orders directly shipped to 460,000 non-distributor unique addresses at an average order size of approximately 260 Volume Points. In 2012 YTD, the ratio of Volume Points to Retail Sales in the U.S. was 1.11 times. Assuming a 7% Surcharge and 4% shipping expense, these 260 Volume Point orders would cost $320 (at full SRP); note that non-distributors supposedly pay 100% of SRP when buying from the Company.

    - Why would a non-distributor pay $320 for 260 Volume Points of product when he or she could pay $59 to become a 25% discount customer and purchase the same products for ~$300 (including the $59 IBP) and then have a 25% discount on all future purchases? Furthermore, how is it possible that these non-distributors had an average order size of $320 when they are purchasing product for their own use? This seems like a lot of Formula 1 and vitamins for one order for one customer.

    - Please provide the breakdown of the 32% of sales shipped to non-distributors by orders submitted at 25% discount, 35% discount, 42% discount and 50% discount levels.

- The Sales & Marketing Plan notes that "FedEx takes typically three to five working days for delivery, and it is recommended that someone be available at the "Ship To" address to accept the shipment. (You may desire to address your shipment to your neighbor, friend, relative, etc.)"

    - Could distributors shipping product to alternative addresses account for the volume Herbalife claims is being purchased by non-distributor customers?

Herbalife's Argument that 92% of Volume is from Mature Markets

- In its January 10th presentation, Herbalife stated that 92% of its 2012 YTD September volume came from "Mature Markets" (i.e., markets that Herbalife entered more than 10 years ago).

    - Why is this analysis based on Volume Points instead of Net Sales?

    - We note that based on pricing sheets obtained from the internet, the ratio of Retail Sales ($USD) to Volume Points for Formula 1 in Malaysia was ~2.1x in 2011, but only ~0.6x in Japan.

- Why does the ratio of Net Sales to Volume Points vary significantly in certain mature markets versus certain emerging markets? In light of the disparate ratios of Net Sales to Volume Points in different markets, isn't it misleading to attempt to demonstrate consistent growth using Volume Points rather than net sales?

- We note that in the 1990s when Herbalife disclosed Retail Sales by country, the following footnote was in the 10-K: "The Company records sales data based on the country **from which** distributor orders are shipped by the Company." (emphasis added)

  - Is Herbalife's country-specific Volume Point disclosure more a function of Herbalife's shipping logistics than true end-demand for the products?

  - If a 25% distributor in Vietnam whose sponsoring Supervisor is based in the United States buys $100 of product directly from Herbalife, where is the revenue booked, in the United States (a mature market) or in Vietnam (an emerging market)?

  - How many President's Team members have distributors from more than one country in their downlines?

- To help conduct additional analysis on the extent of "pop and drop" by country, please provide Net Sales by country for each of the last ten years for each country in which Herbalife products are or have been offered.

- We note that in recent investor presentations, the Company has highlighted its "city by city" approach to growth.

  - What evidence can the Company provide to prove that the seemingly stable growth of mature markets is not being driven by the "pops" of rolling out Nutrition Clubs in newly entered cities masking the "drops" of previously entered, saturated cities?

Herbalife's Argument that "the Vast Majority of our Sales Take Place at a Full Retail Price"

- In the Q&A section of Herbalife's investor presentation, management was asked what percentage of SRP Herbalife product is sold to retail customers. Management responded that "the vast majority of our sales take place at a full retail price," but provided no evidence for this assertion.

  - Given (i) that the Company has stated it does not track the actual retail price at which products are resold to third-party retail customers and (ii) the evidence from Pershing Square's presentation that Herbalife products routinely sell on independent distributor

websites and eBay for discounts of 35%+ from SRP, how can the Company state that its products are resold at "full retail price"? What is the empirical basis for this assertion?

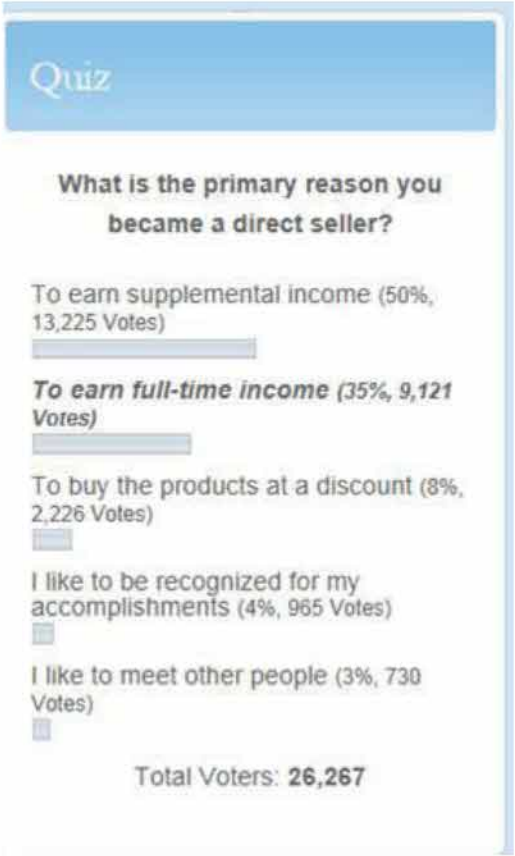
- In response to Pershing Square's evidence that Herbalife products are sold on eBay at a discount of more than 35%, you stated that eBay is not a "proxy for market prices" because "most people . . . shop at eBay to find branded product at a discount price."
  - How do you respond to the fact that GNC's Lean Shake sells on eBay for a <u>premium</u> to its retail price of approximately 2%? Do you deny that, in addition to eBay, Herbalife products are sold on distributor websites at discounts of 35% or more?

- Management went on to state that "And arguably, in Nutrition Clubs, because it's a method of going to market where you've got servings, you've actually got, got sales taking place where the cumulation may be actually be even higher than suggested retail, even if by serving basis."
  - However, Rule 5-E Walk-In Traffic of Herbalife's Nutrition Club procedures states: "Nutrition clubs are not retail locations and operators may not state or imply that they are. It is not permissible to sell product servings to anyone. Products servings are only available to registered Nutrition Club members as part of their daily, weekly or monthly membership fee."
  - Given that products are not allowed to be sold at retail at Nutrition Clubs per Herbalife's own rules and policies, why does the Company assert that "sales [take] place where the cumulation may be actually even higher than suggested retail [price]"?

<u>Lieberman's Finding that Only 4% of Herbalife Distributors Join to Earn "Full-time Income"</u>

- If, according to the Lieberman survey, only 4% of Herbalife distributors join with expectations of earning "full-time income," then:
  - Why do so many Herbalife Independent Distributor presentations emphasize "lifestyle money"?
  - Why is the average Herbalife monthly income reflected in Herbalife Today magazine testimonials equal to $178,000 per year?
  - Why was Herbalife's 2011 Statement of Average Gross Compensation for prospective distributors stratified so that three of the five boxes (60% of the table) represented distributor earnings disclosure for "full-time earners" who only represent less than 4% of Herbalife's Total Leaders?

- Based on a similar survey on its website, why did the Direct Selling Association ("DSA") find that 35% of respondents (out of 26,267) joined direct selling organizations "to earn full-time income"?



(source: www.directselling411.com)

Formula 1: Price "Per Serving"

- Herbalife criticized Pershing Square for comparing the price of Formula 1 to comparable products on a "Per 200 Calorie Serving" basis, arguing that "Per Serving" was the more relevant denominator.

- We note that Formula 1's serving size is substantially smaller than that of competitive products.

  - Why is a serving of Formula 1 only 0.88oz while the average serving of Slim-Fast, Ensure, Lean Shake, Genisoy and Total Soy is 1.42oz?

- When both are mixed with water, why is a serving of Formula 1 only 90 calories while a serving of GNC's Lean Shake is 180 calories?

- We note that, while the term "meal replacement" is not defined in all markets, European Directive 96/8/EC for "meal replacement for weight control" stipulates that "energy provided by a meal replacement shall not be less than 840 kj (200kcal)"[vii](emphasis added). Additionally, Amy Greene (Herbalife Vice President) has discussed the "steal one meal a day from fast food" concept with a "200-calorie meal replacement shake."

    - Given that Herbalife markets Formula 1 as a "meal replacement" and Herbalife marketing materials recommend Formula 1 be served mixed with water at Nutrition Clubs, why is a single serving of Formula 1 only 90 calories when mixed with water? How could a 90-calorie shake be a "meal"? Why is using a "per 200 calorie serving" not the correct way to compare the cost of Formula 1 with comparable products?

Herbalife's $44mm of Spend in "Science and Technical" Activities

- In response to Pershing Square's observation that Herbalife's GAAP R&D spending is "not material," the Company noted in its January 10, 2013 investor day presentation that it has spent $44mm in "science and technical" activities in 2012.

- We note that Herbalife's $44mm includes money spent on "technical operations," "quality assurance," "quality control," "product safety," "regulatory compliance," "nutrition affairs, "regulatory," "product licensing," and "strategic sourcing."

    - What do these items have to do with research and development? Can you please provide a breakdown of costs in these nine categories and explain what these activities include?

- Does Herbalife's $44mm include fees that Herbalife pays Dr. Ignarro and other doctors for speaking at Herbalife distributor events (such as Extravaganzas) and other services?

    - Why has Herbalife paid Dr. Ignarro, a Nobel laureate, more than $15 million? What services does he perform for the Company on an annual basis that justify these payments?

- Does Herbalife's $44mm include "product licensing" fees Herbalife pays to license patents to manufacture and distribute Niteworks?

- What has Herbalife's GAAP R&D been for the past 5 years?

Recruiting Rewards in SG&A

- In response to Pershing Square's estimate that Herbalife includes substantial recruiting rewards in SG&A, the Company responded in its January 10, 2013 investor day presentation that only $36 million of SG&A expenditures in 2011 were "promotion-related."
    - Please define what is included as "promotion-related" per the Company $36mm disclosure.
- In Herbalife's 2010 10-K, the Company disclosed that "Distributor reward and recognition is a significant factor in motivating our distributors. In 2010, 2009, and 2008 we invested approximately $101.6 million, $84.1 million, and $89.6 million, respectively, in regional and worldwide events and promotions to motivate our distributors to achieve and exceed both sales and recruiting goals."
    - Why did Herbalife stop disclosing this metric in its 2011 10-K?
    - Did this spending really decrease from $101.6mm in 2010 to $36mm in 2011?
    - Aren't these costs promotion related? If so, why did you not include them in your answer to our question?
- We note that, according to the 10-K, Herbalife paid "compensation to China sales employees and service fees to China independent service providers totaling $96.8 million" in 2011. Additionally, in a 1/3/13 research report, Wedbush stated: "Again, we are in agreement with the Ackman analysis that some adjustments should be made to the commissions tally from SG&A expense. For example, we would likely classify approximately $63 million of SG&A as commissions / royalty overrides because of the China market. Given the unique set of regulations governing direct selling in China, of which Herbalife is one of only a small handful of companies authorized by the Chinese government to conduct direct selling in that country, the company must classify what all other countries consider to be royalty overrides, into SG&A for China."
    - Given that much (if not all) of this $96.8 million is effectively the same as royalty overrides, why did the Company exclude it from its $36 million "promotion related" SG&A disclosure?
- Herbalife's 2011 10K states that SG&A expenses are comprised of "labor and benefits, sales events, professional fees, travel and entertainment, distributor marketing, occupancy costs, communication costs, bank fees, depreciation and amortization, foreign exchange gains and losses and other miscellaneous operating expenses."
    - Please break down the $1.1 billion of 2011 SG&A expenses into each of these categories.
    - If only $36 million of Herbalife's $1.1 billion of 2011 SG&A expense was "promotion related," what did you spend the other ~$1 billion on?

- Why is there no operating leverage in SG&A?

- Are VAT payments included in SG&A?

Herbalife's Buyback Policy

- In its response to Pershing Square's presentation, management stated that "if somebody wishes to return product, we make it very easy for them to do that." (Des Walsh, January 10, 2013) Recently, the FTC released 188 complaints against Herbalife on its website. A distributor's inability to return product is a recurring theme throughout many of these complaints. [viii]

    - How does the Company reconcile its statement that returning product for a refund is "easy" with these numerous complaints?

- Herbalife's presentation states that "Herbalife buyback policy accepts either product purchased directly from the Company or in the 'field.'" However, Herbalife's Sales & Marketing Plan (p. 23) states that "if a customer requests a refund… Herbalife will exchange the returned product with the identical replacement product for the Distributor as soon as all the required documentation has been received."

    - Does Herbalife's Buyback policy refund "field" purchases or does it simply allow for a product exchange?

- Why did the Company only eliminate the 10% restocking fee in May 2012 and first introduce a buyback policy in Mexico in January 2013?

Herbalife's Numbers Don't Add Up

- According to page 59 of the Herbalife investor presentation, 60% of Herbalife's volume is comprised of Non-Sales Leader purchases (assuming "purchases that do not qualify the purchaser for a royalty, bonus, or sales leader qualification" are made by Non-Sales Leaders). If 60% of volume is purchased by Non-Sales Leaders who are buying the product for self-consumption, and if 32% of volume is shipped directly to non-distributors who are buying the product for self-consumption, then only 8% of volume could have been purchased by Sales Leaders for daily consumption / Nutrition Clubs. This contradicts the Company's repeated statements that daily consumption / Nutrition Club volume accounts for 35% to 40% of Herbalife's volume.

    - How can you reconcile these percentages?

- Do the 60% of "Purchases that Do Not Qualify the Purchaser for a Royalty, Bonus, or Sales Leader Qualification" include purchases by Non-Sales Leaders that make them eligible to purchase product at a higher discount level (i.e. Non-Sales Leaders who are "working their way up to Supervisor")?

- In your May 2012 investor presentation you disclosed that "New Sales-Leader qualification volume percentage of total Volume" was only 16% in 2011. This is similar to the Company's disclosure in its January 10th investor presentation that only 15.2% of volume is from "Volume Points That Meet New Sales Leader Qualification." Based on the following observations, this number appears to be improbably low:

  - Excluding China, Herbalife reported 3,768 million Volume Points in 2011

  - 16% of 3,768 implies 603 million Volume Points were generated from newly qualifying Sales Leaders

  - Based on the increase in Sales Leaders disclosed by the Company in 2011, we estimate that there were ~217,000 New Sales Leaders who qualified in 2011 (excluding China)

  - As a result, in 2011, 217,000 distributors became New Sales Leaders by generating 603mm Volume Points, for an average of ~2,800 Volume Points per New Sales Leader. We note that 18% of New Sales Leaders in 2011 qualified using the "5K" method, which implies that New Sales Leaders who qualified in one month or two months did so with an average of ~2,300 Volume Points per New Sales Leader. This raises the following questions:

    - How can distributors qualify to become a New Sales Leader with fewer than 4,000 Volume Points?

    - In 2007, when the "5K" method did not exist, the average Volume Points per New Sales Leader was ~3,500. Is the decline in average Volume Points per New Sales Leader an indication that more and more distributors are using the "buddy system" to achieve Sales Leader status? What is the "buddy system" and how does it work? Is it a violation of the Company's rules for distributors to use the "buddy system" to qualify for supervisor and above?

    - Does the decline in average Volume Points per New Sales Leader potentially indicate that Herbalife is running out of new recruits who can afford to buy enough product to sign up as a Supervisor?

Herbalife's Argument that "Many Newer Entrants Can and Do Receive Higher Compensation than their Sponsors"

- In its response to Pershing Square's December 20th presentation, the Company disclosed that 80% of Herbalife's 100 top earners in 2011 earned more than their sponsor.
    - We note that Herbalife President's Team members are eligible to receive the discretionary Mark Hughes Bonus.
        - If you excluded this bonus from your analysis, what % of Herbalife's top 100 earners in 2011 would have earned more than their sponsor?
    - Does this analysis include sponsors who are no longer distributors with Herbalife (i.e., even a Sales Leader who earned $1 would earn more than his or her sponsor if his or her sponsor is no longer a distributor)?
- We note that Herbalife had ~500,000 Sales Leaders in 2011. If you did the same analysis for all 500,000 Sales Leaders (instead of only looking at the top 100 earners, or the top 0.02% of Sales Leaders), how many Sales Leaders earned more than their sponsor in 2011?
- Management went on to say that "what you earn is based not on your placement but rather on your activity."
    - What is the average gross compensation for Sales Leaders with between 0 and 5 distributors in their downline? What is the average gross compensation for Sales Leaders with between 5 and 15 distributors in their downline? Between 15 and 25? Between 25 and 50? Between 50 and 100? Between 100 and 150? More than 150?

Distributor Turnover

- Please state, for each of the past five years, how many people enrolled that year by distributor level. Of each annual group of new distributors, how many remained distributors at each succeeding year-end and what was their gross compensation? The data may be arranged as in this illustration:

	Worldwide	For Years 2008 - 2012				
	Number (as of 1/1/)	Additions During Year	Reductions During Year	End Number (as of 12/31/)	Average Comp	Median Comp
Founder's Circle						
Chairman's Club						
Presidents' Team						
Millionaire Team						
GET Team						
World Team						
Supervisor						
Non-Sales Leaders						

(1) Include Wholesale Commissions, Royalty Overrides, Production Bonuses, Mark Hughes Bonuses, and all other payments

- Of the group of distributors who resigned in each of the past five years, what was the average duration of their Herbalife distributorship?

- Why did you stop disclosing the turnover rate for Non-Sales Leaders after 2005?

- Since the Company went public in 2004, how many distributors have reached President's Team? How many distributors have become Sales Leaders? How many total new distributors have joined Herbalife?

- When a Sales Leader fails to requalify, is the Sales Leader removed from Herbalife's distributor base or is the Sales Leader dropped to Non-Sales Leader status?

- What is the average amount of time it has taken for the Company's current President's Team members to reach President's Team (calculated from the time they signed their Distributor Agreement)?

- Beginning in 2009, Herbalife reported "Total New Distributors" in its Regional Key Metrics supplement. We note that this metric, however, is not reported in any of Herbalife's public financials (i.e. 10-Ks / 10-Qs).

    - Why doesn't the Company include this metric in its audited financials?

- The Company's 2011 10K states that "Distributors who purchase our product for personal consumption or for short-term income goals may stay with us for several months to one year."
    - This statement implies that 100% of Non-Sales Leaders turnover every year. Is this true? If not, what percentage turn over each year?

- What has the Company's annual processing fee for Non-Sales Leaders been for the last five years? Does the Company ever waive this fee?

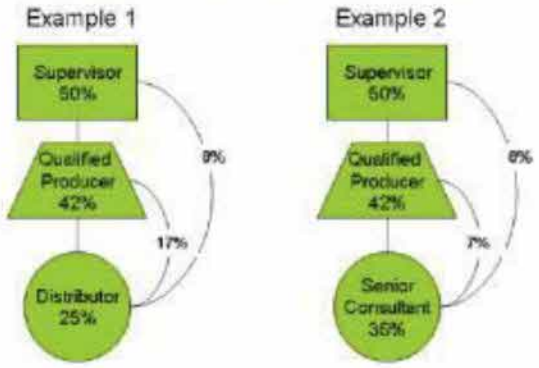
Wholesale Commissions

- In an Herbalife Q&A disclosure, Herbalife notes that "Wholesale Profit is paid by the company as a commission check."[ix]
    - How much did the Company pay distributors in Wholesale Commissions over the last five years (per year)? By region?

- Why does Herbalife refer to Wholesale Profit as "single-level earnings" when commissions can be "split" and paid to multiple levels of distributors (as shown in the Herbalife diagram from your Marketing Plan shown below)?

Q6: What are Split Commissions?

A6: Split Commission is the commission earned from a downline Distributor below a Qualified Producer who is purchasing at less than 42% discount. A commission of 7% or 17% is first paid to the first upline Qualified Producer and the remaining 8% is paid to the first upline Fully Qualified Supervisor.



- Given that other multilevel marketers ("MLMs") (e.g., Reliv International) account for Wholesale Commissions as an operating expense (Reliv International 2011 10K), why does Herbalife treat Wholesale Commissions as a reduction in net sales?

- When a customer buys a TV from an electronics retailer for $1,000 and receives a $100 rebate, the retailer records $900 of net sales. This accounting treatment is appropriate because the purchasing customer receives the rebate.

    - Given that Herbalife pays Wholesale Commissions to upline distributors rather than to the distributor who purchases the product, why does the Company account for these payments as if they were rebates, which has the effect of reducing the amount of recruiting rewards and commissions shown on the Company's income statement?

- We note that Nu Skin "preferred customers" must purchase product at wholesale directly from Nu Skin.

    - What is the business rationale for the Company's policy that does not require distributors to purchase product directly from Herbalife?

- What percentage of Wholesale Commissions paid in 2011 were paid to Sales Leaders and what percentage were paid to Non-Sales Leaders?

Deception and Income Claims

- In its December 20, 2012 presentation, Pershing Square raised a number of material concerns with Herbalife's 2011 Statement of Average Gross Compensation, including disputing Herbalife's representation that more than 25% of Distributors reach the rank of Supervisor, and the fact that 93% of Herbalife distributors who earn zero commissions were excluded from Herbalife's presentation.

- After questions from David Einhorn in May 2012, 2011 Herbalife modified its Statement of Average Gross Compensation in July 2012 to note that the dollar figures shown "are gross, not net income."

    - What are the actual average and median net earnings for Herbalife distributors in each of the distributor levels?

    - Why didn't you provide an estimate of the costs that are incurred by distributors at each earning level to achieve the gross compensation shown, so that prospective distributors can figure out how much money they might actually make?

- In the Company's revised 2011 Statement of Average Gross Compensation for U.S. Supervisors, the median gross compensation for "Active" Leaders is $637. The median gross compensation for Total Leaders is $741.

    - How could the median compensation for Total Leaders be higher than it is for Active Leaders?

- Why did the table in Herbalife's Statement of Average Gross Compensation shown to all prospective distributors only include the average gross compensation for Active Leaders (approximately 7% of total U.S. Distributors as of 12/31/11) and exclude the 93% of distributors who received zero commissions?[x]

- In the Company's 2008 investor day presentation, Herbalife disclosed the amount of World Team, GET Team, Millionaire Team, and President's Team members as of Q3'08 (excluding China): 75,234 World Team; 14,057 GET Team; 3,284 Millionaire Team; 1,200 President's Team (incl. 36 Chairman's Club)

    - Based on this disclosure, there were 5.4 times more World Team members than GET Team members in 2008. But in the 2008 Statement of Average Gross Compensation for U.S. Supervisors, World Team represented 2.7% of Total Leaders and GET Team represented 2.2% of Total Leaders, which implies there were only 1.2x more World Team members than GET Team members (in the U.S.). What explains the discrepancy between these ratios? To the extent Herbalife only included "Active" World Team members in its 2008 Statement of Gross Compensation, is the definition of an "Active" World Team member the same as the definition of an "Active" Supervisor?

    - Multiplying the "Average Earnings" in Herbalife's 2008 Statement of Average Gross Compensation for World Team, GET Team, Millionaire Team, and President's Team members by the number of members in each category disclosed in the 2008 investor presentation implies Herbalife would have paid over $1.4bn in Royalty Overrides and Production Bonuses (and this does not even include the Supervisor level). However, in Herbalife's 2008 10-K, the Company only paid $797mm in "Royalty Overrides" in 2008. Please explain the unexpected outcome of this calculation? Did Sales Leaders outside the U.S. earn approximately half as much as Sales Leaders in the U.S.?

- Please disclose a Statement of Average Gross (and Net) Compensation in 2011 for <u>all</u> Herbalife distributors (as opposed to just U.S. distributors).

- Why don't you provide a Statement of Average Gross (and Net) Compensation in 2011 for all of the countries in which Herbalife operates on your website so that distributors can have better transparency into the Herbalife business opportunity on a global basis?

- In the 2011 Statement of Average Gross Compensation for U.S. Supervisors, Active Leaders were reported as 39.4% of Total Leaders. In the 2011 Regional Key Metrics supplement (and in the 10K), Herbalife reported "Avg Active Sales Leaders" of 56,741, or 52.4% of Total Sales Leaders for the North America region.

    - Did Herbalife have a separate definition of "Active" for these various disclosures? If so, why?

- Why is the Gross Compensation of members of the Founder's Circle and Chairman's Club who reside in the United States excluded from the 2011 Statement of Average Gross Compensation for U.S. Supervisors? Why are you concerned about disclosing to rank-and-file distributors the enormous sums earned by these distributors at the top of the distribution structure?

- Why do Herbalife Independent Distributor presentations claim "everything is really easy" given that only one out of every ~5,000 new Herbalife distributors[xi] achieves an income level commensurate with Herbalife testimonial-based income claims?

Herbalife Independent Distributors

- What roles do Chairman's Club and Founder's Circle members play in the company's operations, decisions, plans etc.? What is the average, highest, and lowest compensation paid to Chairman's Club and Founder's Circle members by the Company?

- Your Sales & Marketing Plan states that Herbalife distributors "are prohibited from selling leads" and may not "earn any compensation (directly or indirectly) for referrals" of distributors to third-party lead providers. (Rule 26-E(l).)

    - Are you aware that a substantial number of your senior-most distributors have affiliates (e.g., Income at Home, IOffice, Online Business Systems, Financial Success Systems, etc.), which sell leads and other business tools to Herbalife distributors for substantial amounts of money?

    - What steps, if any, has Herbalife taken to enforce this rule? How many, if any, distributors have been disciplined for violating this rule?

- In a November 28, 2007 investor presentation, Herbalife's then-CFO stated the following:

  The non-Latino business in the U.S. is being driven primarily by the lead -- Internet lead capture system and we also couple that with sampling. That's been very, very effective in running media, driving people to the website, giving them either a business or a product opportunity following up with sampling.

  Does Herbalife actively participate in or in any way fund the generation of "online leads" that are ultimately sold to Herbalife distributors?

- Is Herbalife aware that senior Herbalife distributors push new distributors to buy leads at substantial prices for as much as $130 per lead?[xii] If Herbalife is truly a product company, then why are senior-distributor affiliates pushing new distributors to purchase leads?

- Do you believe that Herbalife has a duty to ensure that the income claims made in Independent Distributor presentations are consistent with reality? What steps, if any, has the Company taken to ensure that false or misleading claims are not made in Herbalife Independent Distributor presentations?

- Anthony Powell recently left Herbalife and claims to have taken 16,000 distributors with him to another MLM. Des Walsh stated that Powell "had a slightly different philosophy." Herbalife spokesperson Barb Henderson said: "Anthony Powell's stated focus is on creating 'explosive growth' fueled by lead purchases."

  - Given Mr. Powell's 22 years with the Company, when did the Company discover that Mr. Powell and the Company had 'a difference in philosophy'?

  - Why did the company pay Mark Hughes' Bonuses to Mr. Powell over the last five years if the company did not support his business approach?

  - Do any other senior distributors (President's Club, Chairman's Club, and Founders Circle) "have different philosophies" and / or emphasize "lead purchases"? What are you doing to stop these distributors from engaging in inappropriate and / or illegal behavior?

  - Why does the Company selectively enforce its policy regarding distributors soliciting downlines to move to another MLM? Under what circumstances are policies not enforced? Was there a special situation that enabled Powell to leave on good terms and Ford et al to wind up in court? Was there an agreement negotiated and / or executed between Herbalife and Anthony Powell or any of his businesses or subsidiaries around the time of his leaving? Was there any consideration paid by either party as the parties "agree(d) to part ways"?

- How much has the Company paid to settle legal disputes with distributors or former distributors each year for the past five years? How many distributors have been paid settlements by the Company during the last five years?

The Lieberman Survey

- Please release the Lieberman surveys' detailed findings, methodology, research design, question wording and ordering, participant demographics, and other details sufficient to enable the survey approach to be analyzed by an expert in survey methodology and design.

- Why have you chosen to use Lieberman market research and public opinion data based on the survey of 2,000 participants to make claims about your customers instead of relying on internal Herbalife data and customer analysis based on your millions of supposed customers?

- Does the Company have any other survey data on these same subjects, whether collected by Lieberman, the Company or other parties?

Actual Retail Price

- One of the most critical issues in determining whether or not Herbalife is a pyramid scheme is the actual retail price at which Herbalife products are resold to bona fide retail customers. Knowing the actual retail price would assist in calculating the actual Retail Profit earned by Herbalife distributors and in determining whether Herbalife "participants obtain their monetary benefits primarily from recruitment rather than the sale of goods and services to consumers." *See* Peter J. Vander Nat & William W. Keep, *Marketing Fraud: An Approach for Differentiating Multilevel Marketing from Pyramid Schemes*, 21 J. Pub. Pol'y & Mktg. 139, 144 (Spring 2002). Given the importance of this issue:

    - Why didn't the Company respond to Pershing Square's analysis, based on pricing data obtained from independent Herbalife distributor websites and eBay that Herbalife products retail for approximately 35% less than adjusted SRP?

    - Why is the SRP of Herbalife multivitamin tablets more than three times the price of comparable multivitamins such as Centrum?

    - Why are Herbalife's products offered at SRPs substantially higher than comparable products sold in retail stores around the world?

    - Why do Herbalife investor presentations refer to 100% of distributor allowances as "retail profit" (a statement which assumes products sell for 100% of adjusted SRP)?

- Based on our assumptions for actual retail price, Wholesale Commissions, and internal consumption in the Pershing Square presentation, we estimated that the average Herbalife distributor earns approximately $5 per month in Retail Profit (before taxes / expenses).

    - Given that the Company did not respond to this claim, do you agree with our calculation? If not, what does the average Herbalife distributor earn per month in Retail Profit before expenses and taxes and what is the basis for your estimate?

Financial Statements

- Given what appears to be consistent annual cash flows in the business, why are there such dramatic and increasing fluctuations in the intra-quarter revolver amounts (e.g., $581M in borrowings from long term debt and $633M in principal payments on long term debt in Q3 2012 alone)?

- What percentage of Herbalife's sales volume comes in the last five business days of each month? What percentage of Herbalife's Net Sales has occurred in January in each of the last five years? What percentage of Herbalife's Net Sales has occurred in the last five business days of January in each of the last five years?

- Why is it that 22% of the cash on Herbalife's balance sheet as of 9/30/12 is domiciled in Venezuela, a country that represented only 3% of Herbalife's net sales for the first nine months of 2012?

- Why is it that only 1% of the cash on Herbalife's balance sheet as of 9/30/12 is invested in U.S. dollars ($4.7mm) given that the U.S. represents approximately 20% of Herbalife's total sales?

- What percentage of the Company's cash is domiciled offshore?

- Why are distributor allowances for Literature, Promotional and Other positive (whereas they are negative for all other product categories)?

- Why are allowances for product returns accounted for as a reduction to net sales as opposed to as an expense (i.e. a bad debt expense)?

Discontinued Disclosure Items

- Please explain the rationale for Herbalife discontinuing the following disclosure items:

    - In 2004, after reemerging as a public company, Herbalife stopped disclosing "Retail Sales" by country;

- In 2005, Herbalife stopped disclosing distributor turnover;
- In 2006, Herbalife stopped disclosing the turnover rate of Non-Sales Leaders;
- In 2009, Herbalife stopped disclosing the number of President's Team members;
- In 2011, Herbalife stopped disclosing New Sales Leaders;
- In 2011, Herbalife stopped disclosing worldwide events and promotions expenditures; and
- In 2011, Herbalife stopped disclosing the composition of Non-Sales Leaders by discount bracket (until David Einhorn asked about it)

Enforcement of Herbalife Rules

- The United States Court of Appeals for the 9th Circuit held in *Omnitrition* that evidence of "the actual *effectiveness* of … anti-pyramiding distribution rules" is "crucial" in determining whether MLM programs constitute a pyramid scheme. See *Webster v. Omnitrition*, 79 F.3d 776, 783-84 (9th Cir. 1996) (emphasis in original); *see also id.* ("there must be evidence that the program's safeguards are *enforced and actually serve* to deter inventory loading and encourage retail sales" (emphasis added)).
  - What proof does Herbalife have of the "actual effectiveness" of its 70% rule and 10-customer rule? In each of the past five years:
    - How many Herbalife distributors in the U.S. were (i) audited and (ii) disciplined for failure to sell product to at least 10 separate retail customers in a given month (over the last five years)? When a distributor purchases Herbalife product for personal use, can that purchase be used to satisfy the 10-customer rule?
    - How many Herbalife distributors in the U.S. were (i) audited and (ii) disciplined for failing to sell to retail customers and/or sell at wholesale to downline distributors at least 70% of the total value of Herbalife products they retained for resale (over the last five years)?
    - What group or department within Herbalife conducts audits for compliance with respect to these rules? Why don't you publicize the results of whatever compliance audits you do perform?
- In the *Ford* case, Judge Fees noted in 2009 that he had "serious question[s] as to whether or not" the Herbalife 10-customer rule and 70% rule "are not exalting form over substance and

aren't just there for the purpose of creating the impression that the second element of the *Koscot* test has been met." (June 1, 2009 Hr'g Tr., Dkt. #300, at 6.)

- What has Herbalife undertaken since *Ford* to resolve these "serious question[s]?"

- Under Rule 17-A of the Company's Sale & Marketing Plan, Herbalife distributors are required to maintain records of distributor and retail sales for two years. Since Herbalife has the ability to track all distributor and retail sales by obtaining this information from distributors, why hasn't Herbalife done it?

Shipping & Handling

- Given the similarities in business models and international footprints, how is it possible that Herbalife's shipping & handling costs were only $58 million in 2010 (2.1% of net sales)[xiii] while Avon's were nearly $1 billion (9.5% of net sales)?

- How can Herbalife's shipping & handling costs as a percentage of net sales be so much lower than Avon's given Herbalife products that are typically bulkier and heavier?

- In 2010, the Company recorded $397 million in Shipping & Handling revenue. In the same year, the Company disclosed in correspondence with the SEC that it only spent $58 million in Shipping & Handling costs. In other words, Herbalife's Shipping & Handling charges to distributors represented an approximate seven times markup of the actual cost of shipping and handling the product.

  - Why is shipping & handling such a huge profit center for the company?

  - A GNC customer can buy $100 of product online and GNC waives the shipping and handling charge.

    - Why does Herbalife charge Supervisors more than 20% in packaging, shipping and handling charges when they pay $100 for products (14% packaging and handling plus ~8% shipping as a percentage of the discounted purchase price)?

  - Does this $397 million number include the additional Surcharges and Logistics fees Herbalife charges in countries like El Salvador, Costa Rica and Colombia? If not, where does this income show up in Herbalife's P&L?

- Does Herbalife book revenue for product that is "purchased" by distributors but never actually shipped to or picked up by them?

- In a 2011 letter to the Chairman of the House Committee on Ways and Means, Herbalife stated that "South Korea's 40% tariff on imported herbal tea products is among the highest in the

world."[xiv] The letter further stated: "Based on 2009 trade levels, Herbalife will save more than $2.5 million per year due to eliminated duties in South Korea." Based on Herbalife's 2011 10-K, Herbalife's net sales in Korea in 2009 were approximately $115mm. This suggests Herbalife's "Retail Sales" in Korea would have been ~$150mm in 2009 (assuming Sales Leaders in South Korea purchase at a 30% discount to SRP).

  - Given that Korea imposes a 40% tariff, why wouldn't Herbalife's savings be substantially higher than the $2.5 million the Company reported if Korea eliminated duties on imported herbal tea products?

- Why does Herbalife charge a 15% "Surcharge" (in addition to a 7% "Packaging and Handling" charge) in El Salvador, Costa Rica and Colombia?

- Why does Herbalife charge its distributors a Packaging & Handling charge when they pick up product directly from a distribution center?

- How much did Herbalife pay FedEx and UPS in the United States each year over the last five years?

- What other means does Herbalife use to ship product and what are the costs associated with those shipping methods?

Nutrition Clubs

- The Company states that 35% to 40% of its volume is from the daily consumption[xv] / Nutrition Clubs channel. Can Herbalife please reconcile this representation with the following explicit prohibitions against Nutrition Club operators selling product:

  "Rule 2-A:
  A daily, weekly or monthly membership fee may be charged to cover operational costs such as rent, utilities, etc.; these membership fees must not represent the price or cost of products, which may be offered to members and their guests for consumption."

  "Rule 3-B:
  Nutrition Clubs are social gatherings, bringing people together with a focus on good nutrition. They are not retail stores or outlets, nor are they restaurants or carry-out establishments.

  Subject to this restriction, Club operators may offer complimentary products such as shakes, teas, Formula 1 pies and Herbal Aloe Concentrate. Club operators may post a list of available flavors of shakes and teas, as well as any optional ingredients such as protein or fiber, but

consistent with the proper operation of a Nutrition Club they may not post, list or charge individual prices for these products or ingredients. The only permissible Nutrition Club fees are daily, weekly or monthly membership fees to cover operational costs such as rent and utilities."

Source: USA Rules 2010

- Given these restrictions, how can Herbalife represent that 35% to 40% of volume (i.e., retail sales) is generated from the daily consumption / Nutrition Club channel?

- How do you ensure that all of your rules are being followed at the Nutrition Clubs? What audits, inspections and other compliance efforts does the Company undertake? We note that the Nutrition Clubs shown in various Company publications violate several of the Company's rules.

➢ Nutrition Clubs are required to abide by an onerous set of restrictions and rules, including the following:

No exterior signage at residential locations
No mention of Herbalife or its logo on the Club exterior
Windows and doors must be covered so that a passer-by cannot see inside
No advertising or promotion
No depiction of the product visible from the exterior
No indication whether the Club is open or closed
Product must be provided in a disposable cup
No attracting walk-in customers
No sales of product servings
Customers not allowed to carry out product except in small, unmarked containers

- Herbalife has indicated that these rules are meant to "protect its business model," avoid "attracting customers in off the street," since it's a "person to person business." Is another explanation that these rules are designed to circumvent various federal, state and local laws with respect to food service establishments, retail establishments and franchises?

- If the goal of Nutrition Clubs is to generate retail sales and drive consumption, why does Herbalife place so many restrictive rules on Nutrition Club operators that, in many cases, strongly discourage potential retail customers?

- Do U.S. Food and Drug Administration ("FDA") rules on use prohibitions on food service establishments apply to Nutrition Clubs? How about local laws, such as New York City Health Code, Article 81, or state regulations, such as title 14 of the New York Compilation of Codes, Rules and Regulations? Do clubs in California require a permit to operate per the California Retail Food Code? Do states require health certifications to operate a home based

Nutrition Club? Do you actively manage locally regulated retail selling establishment rules? Do you require distributors to submit proof of compliance with regulatory requirements and / or requisite legal requirements when opening up a Nutrition Club? Do you at least inform your distributors of the various specific rules and regulations that may be applicable to Nutrition Clubs? Do you believe that any of your Nutrition Clubs operate in violation of the law?

  - Do distributors pay any sort of membership fee (to Herbalife or to other distributors) to operate a commercial-based Nutrition Club?

- The Company has encouraged investors to visit Nutrition Clubs and do their own due diligence.
  - Why isn't Herbalife willing to publicly provide the addresses of Herbalife's 4,200 and 16,300 commercial-based Nutrition Clubs in the US and Mexico, respectively?

- In May 2007, CEO Michael Johnson described the growth of Nutrition Clubs as "exponential." Why do Nutrition Clubs grow exponentially?

- If the goal of Nutrition Clubs is to "steal a meal from fast food," why did the exponential growth of Herbalife's Nutrition Clubs in Mexico from zero to 40,000 clubs not have any impact on Burger King's Mexican system-wide sales between 2003 and 2007?

- Describe the economics of Nutrition Clubs including start-up expenses, ongoing capital expenditures, typical profit and loss statements, etc. Do you provide any additional disclosure about the potential risk and rewards of opening a Nutrition Club to your distributors? In the U.S., what is the average number of customers per day who go to commercial-based Nutrition Clubs? What is the average life of a Nutrition Club before it closes or changes hands?

Marketing Plan Questions

- In its 2011 10K, Herbalife reported $5.4bn in Retail Sales. Please disclose what percentage of these sales were purchased directly from the company by Sales Leaders, what percentage were purchased directly from the company by Non-Sales Leaders at a 42% discount, what percentage were purchased directly from the company by Non-Sales Leaders at a 35% discount, and what percentage were purchased directly from the company by Non-Sales Leaders at a 25% discount. Rather than determining these percentages based on the order size of the purchase, please calculate these percentages based on the ordering distributor's discount level (as this information is readily available to the Company).

- In 2011, what percentage of TAB team members' collective Personal Volume was comprised of Personally Purchased Volume?

- Does Herbalife have, or has Herbalife ever had, any sort of plan, whereby distributors can deduct income from their monthly royalty override checks to meet their monthly volume thresholds? If so, please describe how this plan works.

- What amount, by percentage and dollars, of the $1,138 million of Royalty Overrides paid in 2011 were royalty "roll-ups"?

- What is the business purpose for paying a senior distributor a commission on the purchase of products of a recruit more than three levels below in his or her downline?

- In the recently released complaints against Herbalife from the FTC, a senior distributor that was with Herbalife for 20 years, made the following complaint:

  "Executive Presidents Team Members ARE NOT SELLING ANY PRODUCT OUTSIDE THE NETWORK, they just buy the product from the company and donate it to some charity (Herbalife Houses from the Herbalife family foundation)"[xvi]

  - How much (a) money and (b) product has been donated to Herbalife Family Foundation (or Casa Herbalife) in the each of the past five years by
    - The Company?
    - Each member of the President's Team, Chairman's Club and Founders Circle?

  - Can senior distributors qualify for their royalty override check by donating to these charities as opposed to purchasing product?

  - When product is contributed to these charities, what valuation is used for tax purposes – SRP, Supervisor's Invoice Price of 50% of SRP, or some other valuation?

Management / Board Questions

- To your knowledge, is the SEC investigating Herbalife or any of its affiliates?

  - If the answer is yes, please advise as to when you became aware that the investigation had begun and state whether Herbalife is cooperating with the investigation.

  - Have Herbalife officers and/or directors hired separate counsel with respect to that investigation? Or with respect to any other matter?

- Are there any ongoing investigations of Herbalife by any US Federal or State agencies? If so, which agencies and what are they investigating?

- Are there any ongoing investigations of Herbalife by any foreign regulatory authorities? If so, which authorities and what are they investigating?

- Has the Board of Directors considered hiring or hired independent counsel to investigate the issues raised by Pershing Square? If not, why not?

- Have Herbalife's auditors questioned Herbalife's business model in any "management letters" during the last five years? Please provide copies of those letters.

- What amount of Herbalife stock has Michael Johnson sold in each fiscal quarter since 2007? Please provide a schedule of stock sales by other named officers of the Company over the last three years.

- Have any Herbalife board members received the Mark Hughes Bonus? If so, which board members and how much in which years?

- How are Mark Hughes' bonuses determined? What criteria are considered in determining who and how much to reward? How much discretion does the Company have in allocating these bonuses?

Belgium:

- In the *Test-Aankoop* lawsuit in Belgium, Herbalife labeled many of the documents it introduced into evidence "confidential", including documents about issues critical to a pyramid-scheme analysis such as turnover figures for Herbalife's Belgian distributors and data on unsold Herbalife products.

    - Will Herbalife publicly disclose the documents it labeled "confidential" in the Belgian action so the market can assess the strength of Herbalife's positions in that case for itself?

    - Why keep these documents hidden from the public's view, particularly when they relate so directly to whether the Belgian court was correct in determining that Herbalife is a pyramid scheme? If Herbalife is so confident that this decision will be reversed on appeal, then wouldn't Herbalife want to vindicate itself in the public arena as well?

Taxation:

- How does the company determine the price of product "sold" to its Luxembourg subsidiary or affiliate before product is resold to other foreign jurisdictions? How does the company determine the price of product sold from the Luxembourg subsidiary/affiliate to other foreign jurisdictions?

- How much of the company's profits are earned in Luxembourg?

- What other transfer pricing or other techniques does the company use that reduce its U.S. taxable and worldwide income?

FDA & Product Related Questions:

- We understand from a source that we deem reliable that up until the last few years, the company resold product that was returned from distributors. If so, how did the company protect consumers from product that might have been tampered with or otherwise improperly stored by the distributor who returned it?

- Has the company's Lake Forest manufacturing facility at all times complied with FDA Current Good Manufacturing Practices ("cGMP") regulations?

- Has the FDA ever inspected the Lake Forest facility? If so, when was the last time the FDA inspected the Lake Forest manufacturing facility and what were its findings?

- Has the company ever sold product manufactured at the Lake Forest facility during a period when the facility was not cGMP compliant?

Other Questions

- In January 2012, the New York Times published an article suggesting that an Herbalife account had been used to facilitate money laundering in Mexico.[xvii]

    - Does the Company admit or deny this allegation? Was an Herbalife account being used to launder money? If so, was the Company aware of it? If the account was being used to launder money, how could the distributor responsible for that account possibly have been in compliance with Herbalife's Ten Retail Customer and 70% Rules?

    - Have any former or current senior Herbalife executives or distributors ever been involved in money laundering or been accused of aiding and abetting money laundering anywhere in the world?

- For each of the following countries, are royalties paid in local currency or US Dollars: Bolivia, Brazil, Bulgaria, Canada, Colombia, Costa Rica, Ecuador, El Salvador, Ghana, India, Ireland, Jamaica, Latvia, Mexico, Norway, Paraguay, Peru, Zambia?

- Why does Herbalife have ATM machines in Mexico?

Mexico Kiosk
(Cash)

- Does Herbalife have formal or informal programs for promoting the distribution of its products in the U.S. among any of the following populations: (1) Hispanics, Koreans or other ethnic groups, (2) college students, (3) the unemployed, (4) single parents, (5) the elderly or (6) the physically disabled?

- During the Company's January 10th presentation, it made repeated comments about the changes at Herbalife during the past few years (e.g., "we are changing"; "our retail efforts are growing", "the new Herbalife", Herbalife Then and Now, etc.). Why was the "then vs. now" narrative such a big focus of your presentation?

- Why is confidence so important in your business?

- Please explain Simon Davies' job function as Director of Internal Audit (and previous roles) while at Herbalife. We ask given his current role as Chief Analytics Officer and previously Chief Financial Officer of Fortune Hi-Tech, which was recently shutdown by the FTC for being a pyramid scheme.

- How many employees and / or outside firms do you have working on providing blog commentary or comments to articles / media that may be negative towards Herbalife? Why did Herbalife buy sites called therealbillackman.com and billackman.net?

- Several of the investment banks providing sell-side research on Herbalife disclose that they have received "non-investment banking, securities-related" compensation from Herbalife. What are these fees for? In total, how much has Herbalife paid (or promised to pay) to these banks for these services?

- For example, "D.A. Davidson & Co. received compensation from this company for non-investment banking, securities-related, services within the past 12 months. D.A. Davidson & Co. expects to receive, or intends to seek, compensation for investment banking services from this company in the next three months."[xviii]

The Girl Scouts

- In Herbalife's Q&A, Michael Johnson compared Herbalife's business model to that of the Girl Scouts:
  - "When it comes to the sales model, there's a strong draw together, called the Direct Selling Association, the DSA. And they are very aligned with this. They are very together in this mission that we have to protect our industry, to grow it, to put a good image on it, and to build it stronger. There's all sorts of different functions that happen in the DSA that take place there. The attack is sad to me. Girl Scouts sell cookies on a direct selling method; nobody attacks them." (emphasis added)
    - When Girl Scouts sell cookies, do eleven levels of "upline" Girl Scouts receive sales commissions?
    - Do the top 1% of Girl Scouts receive 88% of the award badges?
    - How many former Girl Scouts have sued the Girl Scouts' organization and accused it of running a pyramid scheme?
    - How many foreign regulators have declared the Girl Scouts a pyramid scheme?
    - How many Girl Scouts have lost tens of thousands of dollars selling cookies?
    - How many Girl Scouts run side businesses selling names and contact information for other Girl Scouts for $130 per lead?

Further Information

To learn more about Herbalife and to read public documents, court records and financial filings underlying Pershing Square's conclusions and opinions, please go to www.FactsAboutHerbalife.com. For more detail on the assumptions used by Pershing Square to draw its conclusions and opinions, as of the date of the presentation, please see "Who wants to be a Millionaire?" posted on the website.

Disclaimer

Pershing Square Capital Management, L.P. ("Pershing Square") is an investment adviser to funds that are in the business of buying and selling securities and other financial instruments. Pershing Square currently has a short position in Herbalife Ltd. ("Herbalife") common stock. We do not own any options on Herbalife common stock.

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[i] (http://business.ftc.gov/documents/inv08-bottom-line-about-multi-level-marketing-plans)
[ii] (Final Judgment and Permanent Injunction, California v. Herbalife, No. 92767 (Cal. Sup. Ct. Oct. 14, 1986), at ¶ 2, available at http://factsaboutherbalife.com/wp-content/uploads/2012/12/Permanent-Injunction-against-Herbalife-1986.pdf)
[iii] Source: 2010 Statement of Average Gross Compensation of Irish Supervisors
[iv] Herbalife's Statement of Average Gross Compensation of U.S. Supervisors
[v] See following independent distributor presentation, which cites 65 million customers: http://factsaboutherbalife.com/wp-content/uploads/2012/12/Iliana-Koleva-Oct2011.pdf
[vi] (http://www.consumer.ftc.gov/blog/pyramids-fortune)
[vii] (http://www.efsa.europa.eu/en/efsajournal/doc/1466.pdf)
[viii] (http://www.ftc.gov/foia/frequentrequests/1301herbalifecmpts.pdf)
[ix] (Herbalife's Marketing Plan Enhancements 2011: http://factsaboutherbalife.com/wp-content/uploads/2012/12/2011-marketing-plan-q-and-a.pdf)
[x] See page 180 of Pershing Square's December 20, 2012 presentation
[xi] Pershing Square analyzed 393 testimonials and earnings claims from editions of Herbalife Today magazines from 1997 – 2004. The average earnings per year from the claims implied an annual income of $178,000 per year. 1 in 5,000 is used because to earn $178,000 per year, a distributor would either need to be a "senior Millionaire Team member" or a "junior President's Team member."
[xii] http://factsaboutherbalife.com/wp-content/uploads/2013/02/Federal_Trade_Commission_Feb_4_2013_1.pdf
[xiii] Source: Herbalife filings and SEC response letter dated April 21, 2011
[xiv] http://waysandmeans.house.gov/uploadedfiles/herbalife_ltd.pdf
[xv] Morgan Stanley Global Consumer & Retail Conference 11/14/2012
[xvi] http://factsaboutherbalife.com/wp-content/uploads/2013/02/Consumer-complaints-filed-on-the-FTC-Website-2006-2013-Jan-28-2013-1.pdf 709
[xvii] (http://www.nytimes.com/2012/01/09/world/americas/us-agents-aided-mexican-drug-trafficker-to-infiltrate-ring.html?)
[xviii] D.A. Davidson & Co. Herbalife research report dated January 4, 2013

Pershing Square Believes Herbalife is a Pyramid Scheme[1]

- ✓ **Pyramid Scheme.** Pershing Square believes Herbalife Ltd. (NYSE: HLF) is a pyramid scheme because its distributors receive the majority of their compensation by recruiting other distributors, not by selling product to bona fide retail customers.

- ✓ **Exaggerated Earnings Claims.** Through earnings claims that mask an individual's likelihood of success, Herbalife entices people to invest thousands of dollars into a scheme in which the vast majority fail. Using advertisements about 'making more than you can imagine' and a luxurious lifestyle, Herbalife targets people interested in 'work from home,' the unemployed, and those who can least afford to lose – often in low-income, minority communities. The vast majority who buy in to the supposed 'business opportunity,' seeking commissions and other recruiting rewards, suffer losses from buying products they can't sell and from investing in virtually useless 'business methods' (e.g. lead generation, phone and website services, and the like).

- ✓ **Affiliated Parties and Entities.** With Herbalife's assistance, the senior-most Herbalife distributors promote other products and services for new recruits, which purport to increase their chances of success. These senior people control sub-networks of distributors, who pressure recruits to buy more product and to 'grow the business' by purchasing the senior operators' 'business methods.'

What is Herbalife?

Founded in 1980, Herbalife defines itself as a global nutrition company. Its products are sold exclusively through Herbalife independent distributors who conduct business in more than 80 countries. It reported $3.9 billion in net sales in 2011. The Company's stated mission is "to change people's lives by providing the best business opportunity in direct selling and the best nutrition and weight-management products in the world." Below the surface, however, Herbalife draws millions of individuals and families into a global pyramid scheme where they have little chance to ever make money, let alone achieve the dream Herbalife recruiters claim is within reach.

Why We Believe Herbalife is a Pyramid Scheme

Under applicable court decisions and FTC statements, pyramid schemes rest on recruitment rather than genuine retail sales. According to Dr. Peter J. Vander Nat, senior economist at the Federal Trade Commission, a business is "a pyramid scheme if the participants obtain their monetary benefits primarily from recruitment rather than the sale

[1] This document provides a brief synopsis of a presentation entitled "Who wants to be a Millionaire?," made by Pershing Square Capital Management, L.P. ("Pershing Square") on December 20, 2012, to which Herbalife Ltd. responded, among other things, with its own presentation at an Investor and Analyst Day on January 10, 2013.

of goods and services to consumers."[2] Over 90% of the monetary benefits obtained by Herbalife distributors, we estimate, come from recruitment rather than the sale of goods and services to consumers.

In a pyramid scheme, the money at the top is made from the losses of people at the bottom. Pyramid schemes often target people with little or no business experience, vulnerable to high-pressure offers of an 'opportunity' and the dream of an extravagant 'lifestyle,' and who may not see the risks and costs. Herbalife is known to target Latinos, African-Americans, new immigrant communities, stay-at-home moms, the young, and the old.

Herbalife claims that the company is "all about the products." Herbalife leads its distributors to believe that its products are truly extraordinary, that their suggested retail price is fair, that "everybody knows Herbalife," that the Company is "doing research around the clock," and that its staff of scientists are employed to differentiate Herbalife product offerings. But we believe that Herbalife's products are commodities, offered at a massively inflated price. (For example, the suggested retail price for Herbalife vitamins is more than three times the retail price per tablet of comparable vitamins.) The Company's product advertising and R&D expenditures are immaterial, and Herbalife pays PhD's and a Nobel laureate to lend their names and credibility to its 'business opportunity.'

Simply put, Herbalife is able to sell so much of its unadvertised, commodity products at an inflated price only because it bundles its products with a 'business opportunity.'

Success For Herbalife's Distributors Is Exaggerated

Herbalife uses its Statement of Average Gross Compensation for U.S. Supervisors and its numerous testimonials to give new recruits the impression that they can earn over $100,000 per year with the Herbalife 'business opportunity.' But it is extremely rare and very difficult to achieve the wealth Herbalife leads people to believe is within reach. Importantly, only through recruiting can one get to the top of the Herbalife pyramid. Even at the top, however, median "**gross compensation**" is still only $6,000+ per year, and that is before paying for the products, lead generation, overhead and other costs.

- The probability of making it to the level needed to receive the upper compensation advertised by Herbalife testimonials, we estimate, is about 1-in-5000 (0.02%).
- Approximately 93% of Herbalife's U.S. distributors earn $0 in "gross compensation," before counting losses that they suffer to join the network and to buy 'business methods' they are told they need to be successful (e.g., lead generation purchases).
- Approximately 90% of distributors, we estimate, fail (using churn as a proxy for failure) and leave the network, many after investing thousands of dollars on products never resold and exorbitantly priced 'business methods' that are almost useless.

[2] Vander Nat, Peter J. and William W. Keep, "Marketing Fraud: An Approach for Differentiating Multilevel Marketing from Pyramid Schemes," in *Journal of Public Policy and Marketing*, Vol. 21 (1), Spring 2002, at 139-51.

- In the US, the top 1% of Herbalife distributors receive ~88% of "gross compensation"—much higher than the typical multilevel marketing company.

To earn the retail profit they are led to believe is possible, and to recover Herbalife's substantial surcharges and other fees, distributors must resell products at a large premium to similar products on the market. We believe Herbalife's suggested retail prices are artificial, inflated numbers, giving the appearance of greater retail profits, but with little or no relation to the price at which products are actually sold to retail customers.

Millions Harmed By Herbalife's Pyramid Scheme, Costing Them Billions

We believe Herbalife has caused, and continues to cause, substantial monetary and non-monetary harm to unsuspecting consumers. This monetary harm, we conservatively estimate, is many billions of dollars. In a class action settled by Herbalife in 2005 (*Jacobs v. Herbalife International, Inc.*, Case No. CV-02-1431 (U.S.D.J., C.D. Cal.)), over 2,700 distributors filed claims, averaging $10,124 per claimant. The highest claimed losses were $128,241. The *Jacobs* case represented only 2,700 out of millions who have attempted to pursue the Herbalife 'opportunity.'

To quantify harm numerically is inherently conservative. No analysis can properly reflect the loss of time, damaged relationships, and emotional harm a pyramid scheme causes on unsuspecting participants.

Further Information

To learn more about Herbalife and to read public documents, court records and financial filings underlying Pershing Square's conclusions and opinions, please go to www.FactsAboutHerbalife.com. For more detail on the assumptions used by Pershing Square to draw its conclusions and opinions, as of the date of the presentation, please see "Who wants to be a Millionaire?," posted on the website.

Disclaimer

Pershing Square Capital Management, L.P. ("Pershing Square") is an investment adviser to funds that are in the business of buying and selling securities and other financial instruments.

Pershing Square currently has a short position in Herbalife Ltd. ("Herbalife") common stock. We do not own any options on Herbalife common stock.

Pershing Square will profit if the trading price of Herbalife common stock declines and will lose money if the trading price of common stock of Herbalife increases.

Pershing Square may change its views about or its investment positions in Herbalife at any time, for any reason or no reason. Pershing Square may buy, sell, cover or otherwise change the form or substance of its Herbalife investment. Pershing Square disclaims any obligation to notify the market of any such changes.

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The Presentation includes forward-looking statements, estimates, projections and opinions prepared with respect to, among other things, certain legal and regulatory issues Herbalife faces and the potential impact of those issues on its future business, financial condition and results of operations, as well as, more generally, Herbalife's anticipated operating performance, access to capital markets, market conditions, assets and liabilities. Such statements, estimates, projections and opinions may prove to be substantially inaccurate and are inherently subject to significant risks and uncertainties beyond Pershing Square's control.

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Source: Herbalife Independent Distributor Presentation

If I Can Do It

Everything is really easy. If I can do it, you can do it as well.

–Mark Hughes

HERBALIFE.

Herbalife's Disclosure of Distributor Earnings is Inadequate

Every Herbalife Distributor Sees the Company's Disclosure of Distributor Earnings

FINAL TRANSCRIPT

Nov. 28. 2007 / 1:00PM, HLF - HERBALIFE LTD Analyst Meeting

Michael Johnson - *Herbalife Limited - Chairman and CEO*

We are transparent with our earnings potential among supervisors. The staff on this page which is the average gross compensation of U.S. supervisors is a public document, it is available on our website and is part of our introductory business pack that all new distributors receive. So, every new distributor in this Company knows exactly where they stand and what their opportunity is inside the Company.

Herbalife's *Previous* Disclosure of Distributor Earnings

Herbalife offers its Distributors an opportunity to achieve a lifetime of better health through its scientifically advanced weight management and nutrition products. While many of our Distributors join the Herbalife family simply to enjoy our life-changing products, others want to share their results and take advantage of the many income benefits our business opportunity provides. With Herbalife, you can work part-time and earn a supplemental income, or focus solely on your Herbalife Distributorship and increase your financial potential. It's completely up to the individual how much he or she wants to achieve! A Distributor earns profits by buying Herbalife products at wholesale and reselling them at retail. If the Distributor wants to increase his or her involvement in the business and enjoy the possibility of higher levels of income, he or she may sponsor others into the business and develop an organization.

Over 25% of Distributors reach the rank of Supervisor and above ("Leader"), qualifying them for additional compensation which is paid by Herbalife based upon the sales production of those they have sponsored directly and indirectly. The annual gross compensation paid by Herbalife to all Leaders during 2011 averaged $2,900. Over 39% of Supervisors are "Active" (defined as those who generated at least 2,500 points of volume in 2011 after becoming Supervisor).The annual gross compensation paid by Herbalife to Active Leaders during 2011 averaged approximately $7,300.

STATEMENT OF AVERAGE GROSS COMPENSATION OF U.S. SUPERVISORS – 2011

Active Leaders

Earning Level	% of Total Leaders	% of Active Leaders	Average Earnings (USD)
President's Team	0.2%	0.6%	$ 515,689
Millionaire Team	0.7%	1.7%	$ 100,195
GET	2.6%	6.5%	$ 22,766
World Team	2.9%	7.3%	$ 6,224
Supervisor	33.1%	83.9%	$ 901
Total	39.4%	100.0%	$ 7,348

The amounts above are in addition to and do not include profits earned on the resale of products to consumers or other Distributors.

The figures stated above are not a guarantee nor are they a projection of a typical Distributor's earnings or profits. Like any other independent business, the achievement or failure of a Distributor depends upon his or her skill set, commitment and desire to succeed. At Herbalife, the opportunity to earn more is always available to each and every Distributor.

Published: 03/02/12

The table in Herbalife's disclosure of Distributor earnings only included "Active" Sales Leaders. Inactive Sales Leaders and Non-Sales Leaders were excluded

Prior Issue #1: 93% of Distributors Excluded from the Table

Herbalife excluded from the table the 93% of its U.S. Distributor base earning $0 in "Gross Compensation" (Inactive Sales Leaders and Non-Sales Leaders)

Active Leaders				% of Total Distributors
Earning Level	% of Total Leaders	% of Active Leaders	Average Earnings (USD)	
President's Team	0.2%	0.6%	$ 515,689	0.04%
Millionaire Team	0.7%	1.7%	$ 100,195	0.1%
GET	2.6%	6.5%	$ 22,766	0.5%
World Team	2.9%	7.3%	$ 6,224	0.5%
Supervisor	33.1%	83.9%	$ 901	5.9%
Total	39.4%	100.0%	$ 7,348	7.0%
Inactive Sales Leaders	**60.6%**		**$ 0** [(1)]	**10.7%**
Non-Sales Leaders			**$ 0**	**82.3%**
				100.0%

(1) Per the Company's disclosure, Inactive Sales Leaders must not be earning any Royalty Overrides [(39.4%)*($7,348) = $2,900; which implies Inactive Supervisors "Gross Compensation" must be $0].

93% of Distributors Excluded from the Table (Cont'd)

Consumers should be informed of the number and percentage of zero-earning Distributors

Source: *FTC v. Trek Alliance*, No. 02-9270 (C.D. Cal. June 24, 2003).

A. Failing to disclose, clearly and conspicuously, before any consumer becomes a Marketing Program participant, all information material to a consumer's decision to participate in the Marketing Program, including but not limited to the following:

(1) The number and percentage of current Marketing Program participants who have not received any commissions, bonuses or overrides;

Prior Issue #2: "Gross" "Earnings"

Herbalife's prior Statement of "Gross" Compensation referred to "Average Earnings," but it was not adjusted for Distributor expenses

STATEMENT OF AVERAGE GROSS COMPENSATION OF U.S. SUPERVISORS – 2011

Active Leaders

Earning Level	% of Total Leaders	% of Active Leaders	Average Earnings (USD)
President's Team	0.2%	0.6%	$ 515,689
Millionaire Team	0.7%	1.7%	$ 100,195
GET	2.6%	6.5%	$ 22,766
World Team	2.9%	7.3%	$ 6,224
Supervisor	33.1%	83.9%	$ 901
Total	39.4%	100.0%	$ 7,348

The amounts above are in addition to and do not include profits earned on the resale of products to consumers or other Distributors.

Published: 03/02/12

"Gross" "Earnings" (Cont'd)

After David Einhorn questioned the company on a conference call, Herbalife revised its disclosure to explain that "Earnings" are before expenses. For at least 10 years, Herbalife had not disclosed this fact to its U.S. Distributors[1]

STATEMENT OF AVERAGE GROSS COMPENSATION OF U.S. SUPERVISORS – 2011

ACTIVE LEADERS				
Earning Level	% of Total Leaders	% of Active Leaders	Average Earnings Compensation (USD)	Median Compensation (USD)
President's Team	0.2 %	0.6 %	$ 514,638	$ 336,901
Millionaire Team	0.7 %	1.7 %	$ 100,195	$ 97,303
Get Team	2.6 %	6.5 %	$ 22,766	$ 19,417
World Team	2.9 %	7.3 %	$ 6,224	$ 5,659
Supervisor	33.1 %	83.9 %	$ 901	$ 475
Total	39.4 %	100 %	$ 7,354	$ 637

The amounts above do not include the income Distributors can earn from their retail or wholesale income, so the actual ~~compensation can be somewhat higher~~, depending upon each Distributor's personal-selling effort. Also, the figures above are gross, not net income.

Revised: 07/25/12

(1) Source: Herbalife Statement(s) of Average Gross Compensation of U.S. Supervisors 2002 through 2011.

Failing to Disclose Expenses

This itemized list of Business Support Materials below comes from the blog of a former Herbalife Non-Sales Leader Distributor showing nearly $2,000 of expenses in only three months, excluding Herbalife product purchases. The Company seldom acknowledges these costs exist

DATE	COST	DESCRIPTION
03-Aug-09	$449.00	charged by my upline Distributor for Distributorship sign up + remaining cost of decision pkg.
17-Aug-09	$562.62	charged for leads purchased from Online Marketing Solutions
17-Aug-09	$112.52	charged for website access from The Online Business
18-Aug-09	$991.26	charged by Herbalife for an order put in by my upline Distributor and had sent to me
26-Aug-09	$25.00	Merchant Account
27-Aug-09	$75.00	Merchant Account
14-Sep-09	$39.55	charged for new style Decision Package sent to lead
15-Sep-09	$55.94	charged by The Online Business System for website access
21-Sep-09	$35.00	Merchant Account
03-Oct-09	$112.22	charged by Herbalife for website setup for one year
14-Oct-09	$168.00	charged for Online Business System supplies that my upline Distributor order I pay for
15-Oct-09	$52.74	charged by The Online Business System for website access
21-Oct-09	$35.00	Merchant Account
	$2,713.85	**GRAND TOTAL**

http://www.trishparr.com/what-online-business-systems-and-herbalife-don%E2%80%99t-tell-you/

In Jacobs v Herbalife, a class action lawsuit of 8,800 Distributors against the company, average Sales Leader expenses were ~$10,000 [1]

(1) *Jacobs v. Herbalife International, Inc.*, Case No. CV-02-1431 (U.S.D.J., C.D. Cal.). Declaration of Michael Rosenbaum, sworn to August 23, 2005. Rosenbaum, managing director of claims administrator, sent 8,822 notices to potential class members and received back 2,701 claims. Submitted claims totaled $27,345,366 and averaged $10,124 per claimant. The highest totaled $128,241.

Prior Issue #3: Cherry-Picking "Active" Leaders

Herbalife used multiple definitions of the term "Active." In its public filings, it broadly defines "Active" Sales Leaders. In its Distributor earnings disclosure, it used a narrower definition

STATEMENT OF AVERAGE GROSS COMPENSATION OF U.S. SUPERVISORS – 2011

ACTIVE LEADERS	
Earning Level	% of Total Leaders
President's Team	0.2 %
Millionaire Team	0.7 %
Get Team	2.6 %
World Team	2.9 %
Supervisor	33.1 %
Total	39.4 %

Herbalife Regional Key Metrics - Reclassified for 6 Regions

North America	2011
Volume Points (in 000)	987,082
Net Sales ($ in 000)	898,831
New Distributors	280,513
Avg Active Sales Leaders	56,741
Total Sales Leaders	108,211
% Active	52.4%

Source: Herbalife Regional Key Metrics supplement. Consistent with this disclosure, Herbalife reported 56,741 Average Active Sales Leaders in North America for the year ended 12/31/11 in its 2011 10-K.

Herbalife cherry-picked the highest earning "Active" Supervisors for its Distributor earnings disclosure

Prior Issue #4:
"Over 25% of Distributors reach Supervisor"

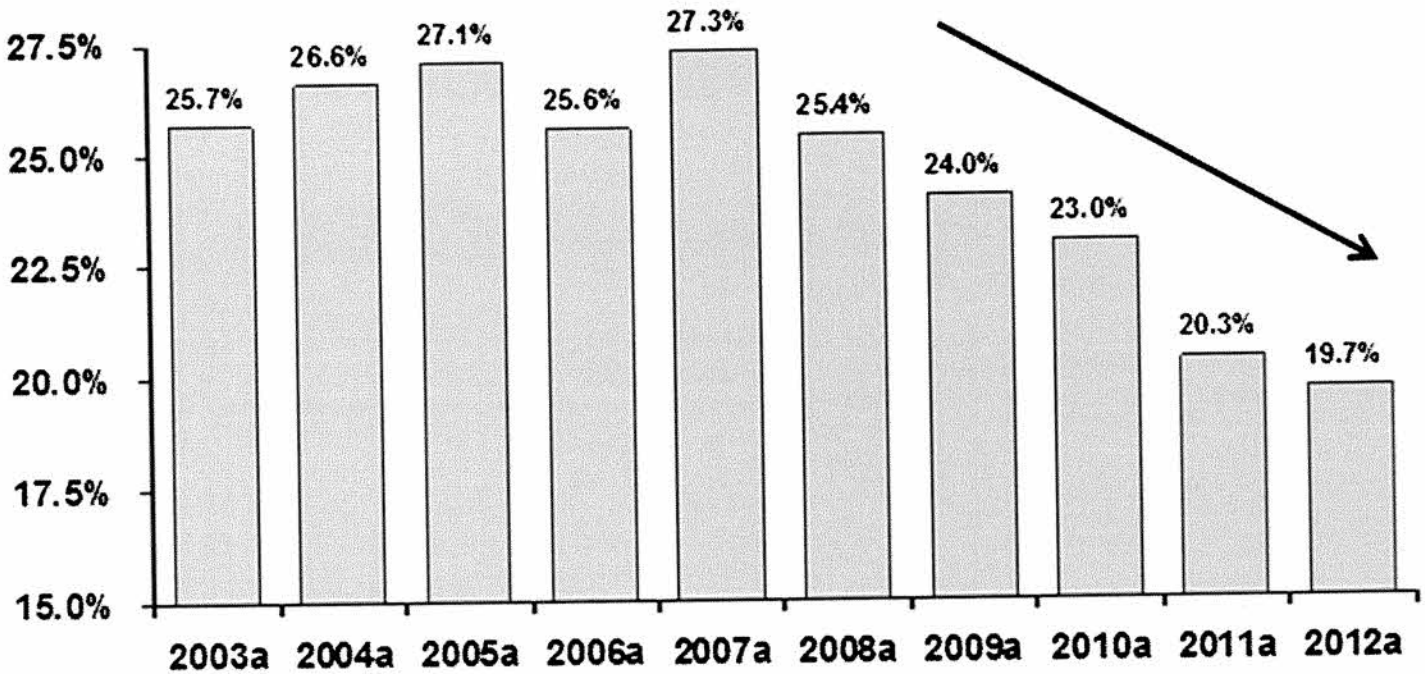
Herbalife stated that "*over 25% of Distributors reach the rank of Supervisor and above*," implying a new distributor has a one-in-four chance of being in one of the table's earnings brackets (so long as they are "Active")

Over 25% of Distributors reach the rank of Supervisor and above ("Leader"), qualifying them for additional compensation which is paid by Herbalife based upon the sales production of those they have sponsored directly and indirectly. The annual gross compensation paid by Herbalife to all Leaders during 2011 averaged $2,900. Over 39% of Supervisors are "Active" (defined as those who generated at least 2,500 points of volume in 2011 after becoming Supervisor).The annual gross compensation paid by Herbalife to Active Leaders during 2011 averaged approximately $7,300.

"Over 25% of Distributors reach Supervisor" *(cont'd)*

Herbalife had made this statement in each of its U.S. distributor earnings disclosures since 2003, even though Sales Leaders as a % of total distributors has been lower than 25% since 2009

% of Total Distributors that are Sales Leaders (1)



(1) Represents % of total distributors that are Sales Leaders for the entire company. Herbalife does not break out total distributors by region.
Source: Herbalife public filings, Herbalife's Regional Key Metrics supplemental disclosure, and Herbalife Q1'09 Investor Presentation.

But even this percentage is overstated...

"Over 25% of Distributors reach Supervisor" (Cont'd)

To determine what % of distributors make Sales Leader:

Don't ask: what is the ratio of Sales Leaders to distributors?
Ask: what is the ratio of new Sales Leaders to new distributors?

In 2011, Herbalife stopped disclosing New Sales Leaders

North America Distributor Mix

	2009a				2010a				
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Total
New Sales Leaders (1)	7,893	10,633	10,569	9,153	8,127	12,558	11,035	9,451	79,419
New distributors (2)	50,738	59,712	58,586	49,642	60,453	71,223	64,662	52,075	467,091
Ratio of New Sales Leaders to New Distributors									17.0%

Only about one-out-of-six distributors makes Sales Leader rather than one-out-of-four

(1) 2009 Source: Regional Key Metrics (2009); 2010 Source: Herbalife public filings.
(2) Source: Regional Key Metrics (2011).

Prior Issue #5: Getting to the Top is Much Harder than Advertised

Herbalife overstates a participant's likelihood of getting to the top of the pyramid

Manual de Entrenamiento para

Distribuidores Herbalife

MAYORISTA: SER O NO SER?

QUE SE NECESITA?

- ES IMPOSIBLE LLEGAR A LA SEGUNDA BASE SI SU PIE TODAVIA ESTÁ EN LA PRIMERA. Tiene usted miedo de dejar la primera base?
- Desafíese. ESTABLEZCA SUS METAS PROPIAS. Acuérdese que los únicos que fracasan en la vida son aquellos que no lo intentaron. Usted no puede alcanzar una meta si no la establece primero
- SEA RESPONSABLE DE UD. MISMO. No culpe a los otros por su fracaso, no se queje. Usted es responsable por usted mismo y su negocio.

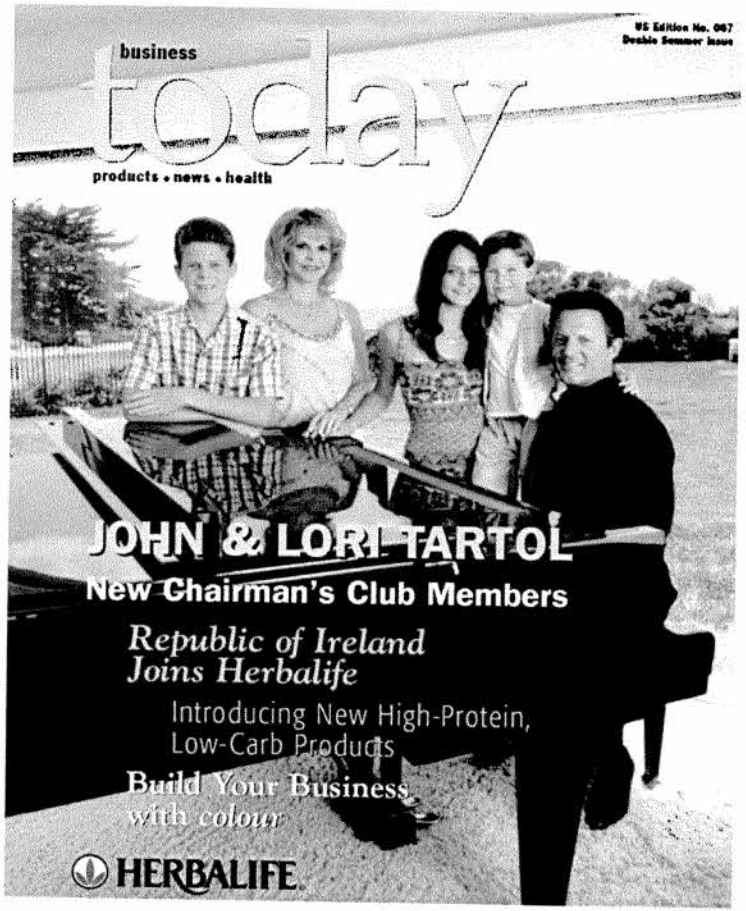
Use, Wear, Talk → President's Team in two years

- NO SE CONCENTRE EN "COMO HACER DINERO". "Olvídese de cuanto gana usted o las personas de su línea ascendente y concéntrese en cuanto ganan los DISTRIBUIDORES que dependen de Ud."
- USE, LLEVE Y HABLE -> EL EQUIPO DE LOS PRESIDENTES EN 2 AÑOS (1)

Source: Manual de Entremiento para Distribuidores Herbalife (Buenos Aires, 2001).
(1) Translation: "Use, Wear and Talk → President's Team in two years."

Getting to the Top is Much Harder than Advertised (Cont'd)

John Tartol, Chairman's Club member and an Herbalife director, stated in an Herbalife newsletter that Distributors today could make it to the President's Team in less than three years



In three years, Lori and John became members of the President's Team.

"Distributors can make it even faster today than we did," says John. "There are so many more sales and marketing tools now and a support system everyone can plug into. We're not only working for ourselves, but for the Company as a whole. When a team succeeds, there's more for everyone!"

Getting to the Top is Much Harder than Advertised (Cont'd)

Herbalife entered Ireland in 2000. Ten years later not a single Irish Distributor had even made it to Millionaire Team

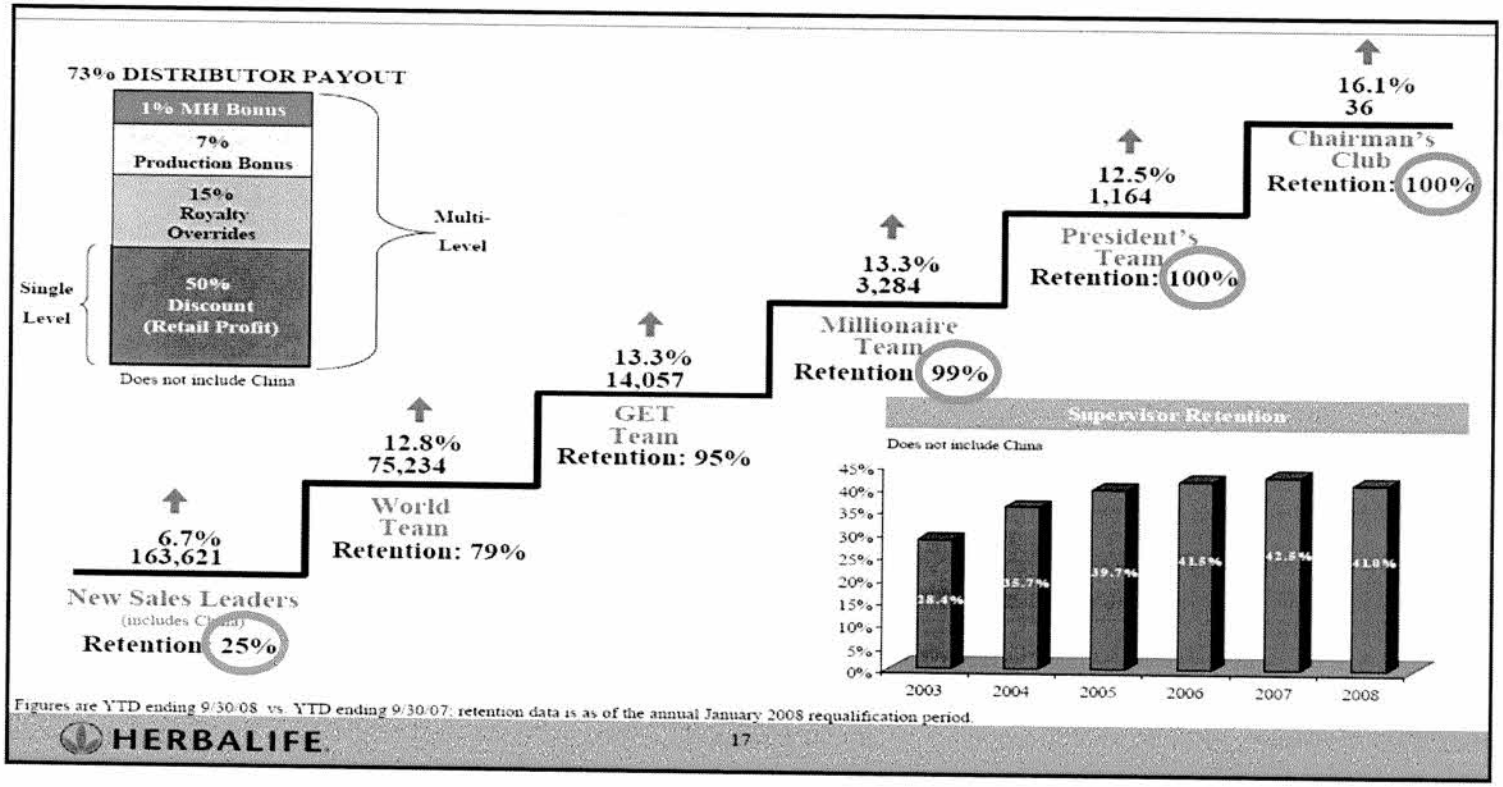
Statement of Average Gross Compensation of Irish Supervisors

Over 21% of Distributors ranked as Supervisor and above ("Leader"), qualifying them for additional compensation which is paid by Herbalife based upon the sales production of those they have sponsored directly or indirectly. The annual gross compensation paid by Herbalife, in addition to profits earned on the resale of products to consumers or other Distributors, to all Leaders during 2010 averaged €1,500. Over 42% of Supervisors are "Active" (defined as those who generated at least 2,500 points of volume in 2010 after becoming Supervisor). The annual gross compensation paid by Herbalife to Active Leaders during 2010 averaged approximately €3,700.

Active Leaders			
Earning Level	% of Total Leaders	% of Active Leaders	Average Earnings (EUR)
President's Team	0.0%	0.0%	0
Millionaire Team	0.0%	0.0%	0
GET	3.6%	8.4%	32,614
World Team	2.7%	6.3%	5,003
Supervisor	36.5%	85.3%	761
Total	42.8%	100.0%	EUR 3,711

Getting to the Top is Much Harder than Advertised (Cont'd)

There is almost no turnover at the top



Source: Herbalife Investor Day Presentation (Dec-2008).

Getting to the Top is Much Harder than Advertised (Cont'd)

If one member equals one foot, then the bottom of the pyramid would equal the distance from New York City to Cleveland (~470 miles)

	Members[1]	
President's Team[2]	1,220	0.2 miles
Millionaire Team	3,353	0.6 miles
GET Team	14,537	2.8 miles
The Bottom of the Pyramid[3]	2,472,078	470 miles

The bottom of the pyramid would require 47 PowerPoint slides[4]

(1) As of 9/30/08. Source: Herbalife Investor Presentation March 2009.
(2) President's Team includes Chairman's Club and President's Team members.
(3) The Bottom of the Pyramid includes Non-Sales Leaders, Supervisors and World Team members.
(4) Assuming PowerPoint slides are 10 inches wide.

Getting to the Top is Much Harder than Advertised (Cont'd)

The probability of a new Distributor getting to these levels is statistically insignificant

Herbalife offers its Distributors an opportunity to achieve a lifetime of better health through its scientifically advanced weight management and nutrition products. While many of our Distributors join the Herbalife family simply to enjoy our life-changing products, others want to share their results and take advantage of the many income benefits our business opportunity provides. With Herbalife, you can work part-time and earn a supplemental income, or focus solely on your Herbalife Distributorship and increase your financial potential. It's completely up to the individual how much he or she wants to achieve! A Distributor earns profits by buying Herbalife products at wholesale and reselling them at retail. If the Distributor wants to increase his or her involvement in the business and enjoy the possibility of higher levels of income, he or she may sponsor others into the business and develop an organization.

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STATEMENT OF AVERAGE GROSS COMPENSATION OF U.S. SUPERVISORS – 2011

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Published: 03/02/12

Everything Is Not Really Easy

Source: Herbalife Independent Distributor Presentation (2011)

If I Can Do It

Everything is really easy. If I can do it, you can do it as well.

–Mark Hughes

HERBALIFE

- There is nothing easy about achieving the wealth and lifestyle new Distributors are led to believe are possible
- Herbalife is effectively a closed system at the very top. The probability of making it to Millionaire Team, which would allow a new Distributor to earn an amount commensurate with Herbalife's testimonial earnings claims (~$178k), is approximately one in five-thousand [1]

(1) We analyzed 393 testimonials and earnings claims from editions of Herbalife Today magazines from 1997 – 2004. The average earnings per year from the claims implied an annual income of $178,000 per year. To earn this amount per year, a new distributor would need to reach Millionaire Team (average income per year: ~$100,000 in 2011). In 2008, there were ~3x more Millionaire Team members than President's Team members. Millionaire Team members also have a 99% retention rate, which implies roughly 3 times as many Millionaire Team members were created as President's Team members from 2004 through 2009, putting the odds at 1 out of every 3,400 new distributors achieved Millionaire Team.
1 in 5,000 is used because to earn $178,000 per year, a distributor would either need to be a "senior Millionaire Team member" or a "junior President's Team member."

Even Michael Johnson Acknowledges Prior Disclosure Statements Were Inadequate

Herbalife Ltd., Q4 2012 Earnings Call, Feb 20, 2013

Michael Johnson - *Herbalife Limited - Chairman and CEO*

"During the last 2 years, we've been developing two programs that will help with this simplification, and we've accelerated the implementation of these programs.

The first is a recently provided updated and expanded U.S. statement of average gross compensation. We believe this document sets a new disclosure standard for compensation in the MLM industry. It is posted on our website and will be included in all U.S. startup kits, as was the prior disclosure. However, we are taking it a step further. We have decided to include this disclosure document in every new distributor application in the U.S. by the end of this month.

In April of this year, we will announce name changes for how we categorize distributors and customers that will more clearly delineate the portion of our 3.2 million distributors who are in fact wholesale customers versus those who are active distributors or sales leaders."

Why does it take increased scrutiny for Herbalife to realize its material inadequacies?

But Significant Issues Still Exist in the New Disclosure Statement

Herbalife's *Newly Issued* Disclosure of Distributor Earnings

STATEMENT OF AVERAGE GROSS COMPENSATION PAID BY HERBALIFE TO UNITED STATES DISTRIBUTORS IN 2012

People become Herbalife Distributors for a number of reasons. The majority (73%)[1] primarily join us to receive a wholesale price on products they and their families enjoy. Some wish to earn part-time money, wanting to give direct sales a try and are encouraged by Herbalife's low start-up costs (at their option, a mini-International Business Pack (IBP) at $59 or full IBP at $109) and money-back guarantee[2]. Others are drawn to Herbalife because they can be their own boss and can earn rewards based on their own skills and hard work.

Whatever the motivation, an Herbalife Distributorship is something like a gym membership: results vary with the time, energy and dedication you put into it. Anyone considering an active Distributorship needs to understand the realities of direct selling. It is hard work. There is no shortcut to riches, no guarantee of success. However, for those who devote the time and energy to develop a stable base of customers and then mentor and train others to do the same, the opportunity for personal growth and an attractive part- or full-time income exists. Moreover, unlike other businesses, there are minimal start-up costs in beginning your Herbalife Distributorship. There is no need for a Distributor to spend significant amounts of money on sales aids or other materials. In fact, Herbalife's corporate policy discourages the use of such sales aids, especially in the first few months of a Distributorship.

The majority of Herbalife's independent Distributors (71%) have not sponsored another Distributor and are therefore "single-level" Distributors. Single-level Distributors benefit from buying Herbalife products at a preferred price for their consumption and that of their families, and for many this is the only benefit they seek. Some may also be retailing products for a profit and this profit is not included in any of the compensation figures below.

Some Distributors (29%) have decided to sponsor others to become Herbalife Distributors. In that way, they may seek to build and maintain their own downline sales organizations. They are not paid anything for sponsoring new Distributors. They are paid solely based on product sales to their downline Distributors for their own consumption or for retail to others. This multi-level compensation opportunity is detailed in Herbalife's Sales & Marketing Plan, which is available to all Distributors on line at www.myherbalife.com.

Herbalife's *Newly Issued* Disclosure of Distributor Earnings

For potential Distributors to make an informed decision, we offer the following chart to show the different ranges of average gross compensation that Herbalife pays to its Distributors. The figures below do not include any retail / wholesale profit that a Distributor makes from selling Herbalife's products to others nor do these figures include expenses incurred by a Distributor in the operation or promotion of his or her business. Such business expenses can vary widely. They might include advertising or promotional expenses, product samples, training, rent, travel, telephone and internet costs, and miscellaneous expenses. The compensation received by the Distributors in this chart is not necessarily representative of the gross compensation, if any, that any particular Distributor will receive. These figures should not be considered as guarantees or projections of your actual gross compensation or profits. Success with Herbalife results only from successful product sales efforts, which require hard work, diligence and leadership. Your success will depend upon how effectively you exercise these qualities.

(1) Based on a Distributor research survey conducted by Lieberman Research Worldwide, January 2013, with a margin of error of +/- 3.7%.

(2) 90 days on the return of the IBP and one year on the return of resalable inventory, upon leaving the business.

Published: 2/2013

The compensation chart below indicates that 434,125 Distributors (88%) received no payments from Herbalife during 2012. However, this chart does not include amounts earned by Distributors on their sales of Herbalife products to others.

Additionally, this chart does not include the benefit to Distributors buying Herbalife products at a preferred price for their consumption and that of their families. Based on the company's survey, 73%[1] of individuals became Distributors primarily for this benefit.

51.0% of all sales leaders as of February 1st, 2011, requalified by February 1st, 2012 (including 33.5% of first time sales leaders)

The majority of those Distributors who earned in excess of $100,000 in 2012 had reached the level of Herbalife's President's Team. During 2012, 47 U.S. Distributors joined the level of President's Team. They averaged 9 years as an Herbalife Distributor before reaching President's Team, with the longest being 20 years and the shortest being less than three years.

(1) Based on a Distributor research survey conducted by Lieberman Research Worldwide, January 2013, with a margin of error of +/- 3.7%.

Herbalife's *Newly Issued* Disclosure of Distributor Earnings (Cont'd)

Single-Level Distributors (No Downline)

Economic Opportunity	Distributors*		
	Number	%	
• Wholesale price on product purchases • Retail profit on sales to non-Distributors	351,065	71%	The economic rewards for single-level Distributors are the wholesale pricing received on products for consumption by the Distributor and his or her family as well as the opportunity to retail product to non-Distributors. Neither of these rewards are payments made by the company and therefore are excluded from this schedule

Non-Sales Leaders** With a Downline

Economic Opportunity	Distributors		
	Number	%	
• Wholesale price on product purchases • Retail profit on sales to non-Distributors • Wholesale profit on sales to another Distributor	60,333	12%	In addition to the economic rewards of the single-level Distributors above, which are not included in this chart, certain non-sales leaders with a downline may be eligible for payments from Herbalife on downline product purchases made directly with Herbalife. 2,466 of the 4,449 eligible Distributors earned such payments in 2012. The average total payments to the 2,466 Distributors was $104.

Sales Leaders** With a Downline

Economic Opportunity	Distributors		Average Payments from Herbalife	All Sales Leaders with a Downline			
	Number	%		Number of Distributors	% of Total Grouping	Average Gross Payments	

• Wholesale price on product purchases
• Retail profit on sales to non-Distributors
• Wholesale profit on sales to another Distributor
• Multi-level compensation on downline sales
  • Royalties
  • Bonuses
	82,464	17%	>$250,000	194	0.2%	$724,030	This chart does not include amounts earned by Distributors on their sales of Herbalife products to others

			$100,001-$250,000	452	0.5%	$148,808	
			$50,001-$100,000	539	0.7%	$68,912	
			$25,001-$50,000	1,136	1.4%	$35,581	
			$10,001-$25,000	1,940	2.4%	$15,538	
			$5,001-$10,000	2,552	3.1%	$7,008	
			$1,001-$5,000	11,307	13.7%	$2,216	
			$1-$1,000	39,151	47.5%	$292	
			0	25,193	30.6%	$0	
			Total	82,464	100.0%	$4,485	

* 30,621 of the 351,065 single-level Distributors are sales leaders without a downline

** Sales leaders are Distributors that achieved the level of Supervisor or higher. See details on Herbalife's marketing plan at www.myherbalife.com.

Key New Statements in the New Disclosure Statement

In response to criticisms leveled by Pershing Square and others, on February 6, 2013, Herbalife issued a substantially revised Statement of Average Gross Compensation for U.S. Supervisors. We believe that this new disclosure statement confirms the material inadequacies in the previous disclosures, which Herbalife used for years to misrepresent the business opportunity to millions of Distributors

The following new statements are in direct contradiction to past statements / practices by Herbalife and its senior Distributors:

- "There is no need for a Distributor to spend significant amounts of money on sales aids or other materials. In fact, Herbalife's corporate policy discourages the use of such sales aids…"
- "…nor do these figures include expenses incurred by a Distributor in the operation or promotion of his or her business. Such business expenses can vary widely. They might include advertising or promotional expenses, product samples, training, rent, travel, telephone and internet costs, and miscellaneous expenses."
- "The compensation chart below indicates that 434,115 Distributors (88%) received no payments from Herbalife during 2012."
- "51.0% of all sales leaders as of February 1st, 2011, requalified by February 1st, 2012 (including 33.5% of first time sales leaders)"
- "The majority of those Distributors who earned in excess of $100,000 in 2012 had reached the level of Herbalife's President's Team. During 2012, 47 U.S. Distributors joined the level of President's Team. They averaged 9 years as an Herbalife Distributor before reaching President's Team, with the longest being 20 years and the shortest being less than three years."

These incremental disclosure changes follow a familiar pattern for Herbalife, i.e. when one aspect of their business is scrutinized, Herbalife makes small, incremental revisions

Material Omissions / Changes to the New Disclosure Statement

While Herbalife included many new statements purporting to increase transparency, the new disclosure statement (i) still has material omissions and (ii) makes substantive changes that highlight the inadequacies in its prior disclosures

- *Omission / Change #1:* Completely changed Distributor disclosure methodology
  - Herbalife no longer provides compensation data by Distributor level as in past disclosures (now differentiates based on arbitrary average payment ranges from Herbalife)
  - Created new Distributor categories including: "single-level," "non-sales leaders with a downline" and "sales leaders with a downline"
- *Omission / Change #2:* Eliminated median compensation levels
  - After scrutiny of its disclosure statement, Herbalife changed its statement mid-year in 2012 and added median compensation to the compensation table. Herbalife has once again excluded this important disclosure
- *Omission / Change #3:* "Active leader" no longer a distinction
  - Pershing Square previously challenged Herbalife's methodology of only including so-called Active Leaders in its compensation table (which has the effect of inflating compensation amounts). We believe this change is a further acknowledgement of its previously deceptive disclosure statements

Ongoing Issues

- *Ongoing Issue #1:* At least 83% of Distributors are still excluded from the average gross payments schedule
  - Herbalife only includes "sales leaders with a downline" in its compensation figures even though many of the other Distributors likely enter the scheme for the business opportunity. This again has the effect of inflating the disclosed compensation amounts
  - Why doesn't Herbalife include all Distributors in the average earnings statements? Why not let prospective Distributors see how much money Founder's Circle and Chairman's Club members make? Why not provide median income levels? Why change terminology and break out by average earnings level vs. Distributor level?
- *Ongoing Issue #2:* Herbalife only provides gross earnings levels without any specific cost information
  - For the first time, Herbalife states that Distributor expenses "might include advertising or promotional expenses, product samples, training, rent, travel, telephone and internet costs, and miscellaneous expenses." Why not provide an estimate of such amounts (including for opening a nutrition club)?
  - We further note that these expenses do not include (i) the significant personal purchases that are typically required to achieve and stay at the Supervisor level and (ii) leads distributors are encouraged to buy

New Issues in Revised Disclosure Statement

- ***New Issue #1:*** **Relying on Lieberman's survey to state that 73% primarily join to receive a discount**
  - **First, this directly contradicts Michael Johnson's recent statement that 90% of Distributors join for one reason – self consumption (CNBC interview on January 10, 2013)**
  - **Second, this number is based on a survey (as opposed to using actual internal data), the full details of which have not been released (and which we believe is seriously flawed)**
  - **Even Herbalife acknowledged in its 2011 and prior 10Ks and recent 8K filings that over 70% of its non-sales leaders are "small retailers" and "potential supervisors" (see decreasing trend of "discount buyers" since 2007 in table)**
    - **"Small retailer": product users and sales people who generate modest sales to friends and family**
    - **"Potential supervisors": Distributors who are proactively developing a business with the intention of qualifying to become a sales leader**

	2007	2008	2009	2010	2011[1]
Discount Buyers	52%	51%	47%	29%	27%
Small Retailers	26%	29%	36%	57%	61%
Potential Supervisors	22%	20%	17%	14%	12%

  - **How could 73% of all Distributors primarily join to receive a discount when the Company acknowledges that over 70% of just the non-sales leaders are either selling the product or proactively developing a business? More importantly, why doesn't Herbalife rely on its own internal data vs. using Lieberman for this important metric?**
  - **Lastly, Herbalife made absolutely no mention of Lieberman in its recently disclosed 10K**

(1) Company stopped disclosing Distributor base information in its 2011 10K, but after David Einhorn questioned the Company on a conference call, the Company released 2011 Distributor base information in its 8-K filed on May 2, 2012.

New Issues (Cont'd)

- *New Issue #2:* Implication that 71% are merely discount customers (given they don't have a downline)
  - First, this completely ignores the notion that a significant amount of these Distributors are actually joining the scheme for the business opportunity and do not have a downline because they are either failed Distributors or building up to become a supervisor
    - If Herbalife truly believes 71% of Distributors are discount customers, then why don't they simply have a discount customer option (without the business opportunity) like the competitors? For example, NuSkin has distinctions in its customer base (e.g., Retail Customer & Preferred Customers) that requires its customers to disclose whether or not they plan to retail NuSkin products when they sign up.
  - Second, the 71% includes 30,621 Distributors who are actually Supervisors. We believe it is highly unlikely these supervisors are purchasing approximately $3K - 4K of product over a short period of time solely for personal consumption as discount customers.

New Issues (Cont'd)

- Lastly, if one believes that only the 142K Distributors with a downline are active participants, then those Distributors would have to sell to an average of 36.4 customers (assuming a total of 5.2 million external customers per the Lieberman survey), while inside the pyramid they only have 2.4 discount customers. That would mean the ratio of external customers paying full price to internal customers getting 25%+ discounts is 15:1. One would think the ratio should be the reverse.

- *New Issue #3:* "No need for a Distributor to spend significant amounts of money on sales aids or other materials."
  - Such sales aids and lead generation methods have been a vital part of senior Distributor's recruitment practices for over 30 years
  - How then has Herbalife allowed its senior Distributors to use these aggressive tactics for the last 30+ years?
  - What portion of new sales leaders use sales aids and other materials (e.g., lead generators)? How much do new sales leaders spend on such materials?

Necessary Additional Disclosure

Pershing Square believes Herbalife should release the same level of newly disclosed data and the following supplemental data for the past 10 years

- Average and median gross and net (based on cost estimates) payments by each specific level within organization (e.g., Founder's Circle, Chairman's Club, President's Team, etc.).
- Churn levels for each of the various levels of Distributors including non-sales leaders. Importantly, provide churn data for single level and non-sales leaders.
  - Herbalife stated that 51.0% of sales leader requalify and only 33.5% of first time sales leaders requalify
  - Based on these churn levels for just the sales leaders, only 2.3% of new sales leaders (who joined in year 1) will remain as sales leaders by year 5.

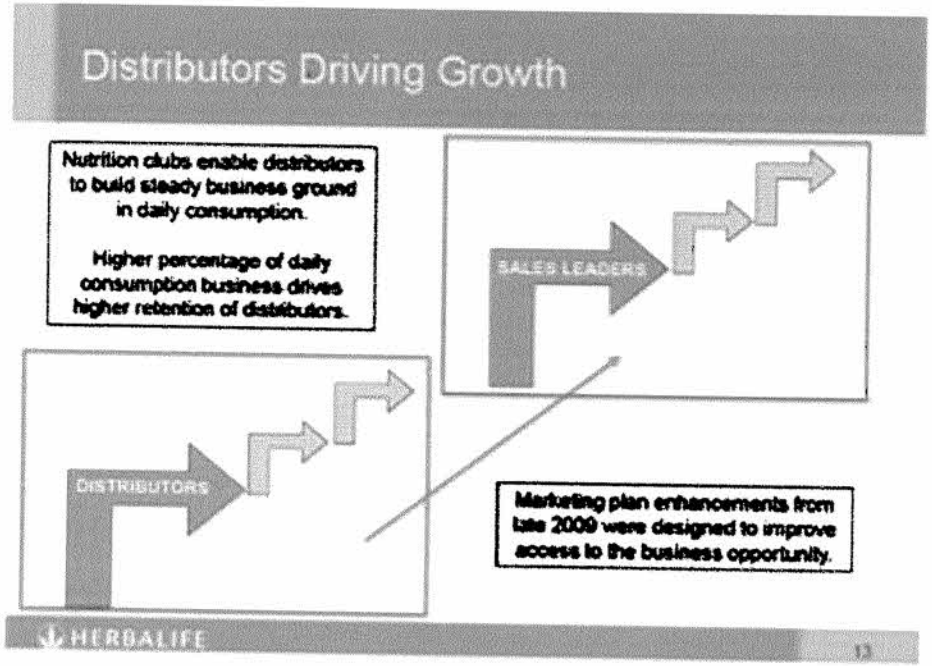
Year	1	2	3	4	5
Requalifying	33.5%	51.0%	51.0%	51.0%	51.0%
Distributors	100.0	33.5	17.1	8.7	4.4
Dropping Out	66.5	16.4	8.4	4.3	2.2
Remaining	33.5	17.1	8.7	4.4	2.3

- Total Volume purchased by all of the currently disclosed levels and by each Distributor level

Notion that Non-Sales Leaders Primarily Join to Receive a Discount

New Marketing Plan Makes It Easier To Become Sales Leader

Herbalife changed its marketing plan in 2009 to make it easier for Distributors to become sales leaders



daily consumption. So we changed the marketing plan to help people get into the business easier and then build from a distributor to a sales a little bit more slowly so they can build consumers through that daily consumption model. So when they become a sales leader, they already have a business. And we tested this idea in a market and it tested very well, and people that became sales leaders were much more productive, much more active when they became a sales leader over a long period of time than those who became a sales leader quickly. So that was an important change for us.

Source: Herbalife Investor Presentation (Jun-2010)

New Marketing Plan Makes It Easier To Become Sales Leader (Cont'd)

Herbalife Investor Presentation (2009)

"We're making some changes [to our marketing plan]… to increase the addressable population in developing markets. So ***we're going to create a softer approach for people to move from what we call distributor up to supervisor***, going from a 25% discount to 50% discount, where they can participate in more of that discount structure below."

Barclays Research Report

"The rationale is that the supervisor will give up part of the markup so that the [Non-Sales Leader] distributor now has an incentive to recruit…"

Research Analyst explained the rationale for the marketing plan change

New Marketing Plan Makes It Easier To Become Sales Leader (Cont'd)

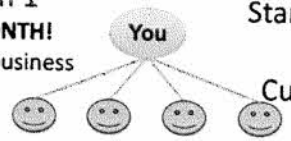
Herbalife's *new* marketing plan encourages Distributors to become sales leaders in a short four months

Marketing Plan – how you can develop your organisation in the next few months

Month 1

THIS MONTH!

Your new business



Starting with **4 - 5** Customers

This example is based on a true story of what happened to a 61 year old lady called Nina who started just as a customer – she got great product results which led to her getting her first customers as a Distributor

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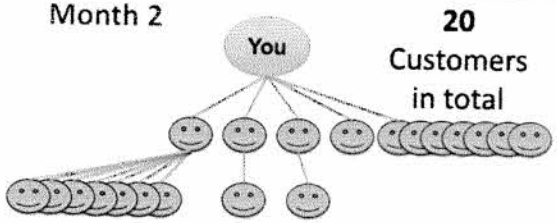
Marketing Plan – how you can develop your organisation in the next few months

Month 2



20 Customers in total

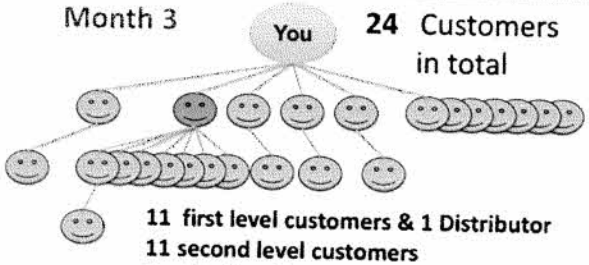
11 first level customers
9 second level customers

- **You have started developing MULTI-LEVEL CUSTOMERS!!**

HERBALIFE 44

Marketing Plan – how you can develop your organisation in the next few months

Month 3



24 Customers in total

11 first level customers & 1 Distributor
11 second level customers
1 third level customer

- **You have developed a few more MULTI-LEVEL CUSTOMERS!!**

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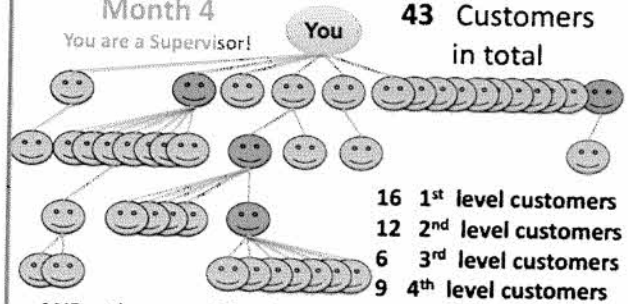
Marketing Plan – how you can develop your organisation in the next few months

Month 4

You are a Supervisor!



43 Customers in total

16 1st level customers
12 2nd level customers
6 3rd level customers
9 4th level customers

AND... there are 4 Senior Consultants in this organisation

HERBALIFE 46

Source: Herbalife Success Training Seminar Presentation

Herbalife Distributor Discount Analysis

Herbalife Distributors must pay a 7% packaging and handling charge ("Surcharge") and ~4% shipping charge on the Suggested Retail Price for products ordered directly from the Company

Retail Price: $36.15	Price for Formula 1 Shake Mix (750g) in 2012					
	Discount Level	Shipping[2] 4%	Packaging 7%	Sales Tax[4] 8.50%	Total Cost	Total Volume Points
Supervisor	50%	$1.45	$2.53	$3.07	$25.12	32.75
Qual. Producer	42%	$1.45	$2.53	$3.07	$28.02	32.75
Success Builder[5]	42%	$1.45	$2.53	$3.07	$28.02	32.75
Sr. Consultant [1]	35%	$1.45	$2.53	$3.07	$30.55	32.75
Distributor	25%	$1.45	$2.53	$3.07	$34.16	32.75

Distributor are also charged sales tax on the Suggested Retail Price in most states.

(1) Once you become a Senior Consultant, you will never go back to the 25% discount.
(2) FedEx Shipping Rate is variable based on the Retail Value purchase (2.5% for order $1,000/up; 4% for orders $125-$399; Min $6 for orders under $125)
(3) Herbalife charges 7% packaging and handling fee to the full retail of all products, gifts and promotional orders
(4) Taxes are based on the tax rates of shipping destination. Examples based on Los Angeles, California (NY, AK, HI, NH, DE, MT, NM, NJ, PA, FL, MD, TX don't charge sales tax on Herbalife supplements)
(5) Singles Order of 1000 Volume Points with temporary 42% discount on this order and next orders for that month only

Discounts and Cost Savings Widely Available

However, discounts are widely available online, which would not require a "customer" to join as a Distributor.

	Retail Price: $36.15	Online Store Fees and Discounts Available to the Public				
	Discount Available	Additional Discount	Handling Fee	Freight	Sales Tax (7) 8.50%	Membership
lifemanaVIP	25-50%	5% (1) *on orders $75+	Free	Free *on orders $35+	No Tax	Free
herbalforYes!	21-40%	5-15% (2) *on orders $50+	Free	Free *on orders $45+	Yes	Free
Freshest Herbal Fresh Genuine Herbalife Prod	26%+	5% (3) *on orders $150+	Free	Free *on orders $43+	Yes	Free
trulyherbal Fast Shipping. Excellent Service.	35-45%	5-10% (4) *on orders $100+	Free	Free *on orders $35+	Yes	Free
HERBALOFT save more. weigh less.	20-50%	15% (5) *on orders $150+	Free	Free *on orders $75+	Yes	Free
Herbal Diet Shop Direct from Herbalife Warehouse	20-35%	5-15% (6) *on orders $90+	Free	Free *on orders $35+	Yes	Free
HERBALIFE. Independent Distributor	25-50%	0%	7% *Fee on SRP	2.5-4% *Based on SRP	Yes *Charged on SRP	$68.66 (8)

(1) Lifemana Promo Code is available on the website (http://www.lifemanavip.com/main)
(2) HerbalForYes Coupons are available on the website (http://www.herbalforyes.com/herbalforyes-coupons.html)
(3) Coupon Code: Fastst-Onlin to save 5% off on orders over $150 is available on their website (http://www.freshestherbal.com/)
(4) Coupon Code for 10% off on $200+ is available online (http://www.retailmenot.com/view/trulyherbal.com)
(5) Coupon Code discount of 15% available on the website for all orders over $150
(6) Additional Discount Coupon Codes available on the website (http://www.herbaldietshop.com/member-login.html)
(7) Taxes are based on the tax rates of shipping destination (our examples is based on Los Angeles, California (NY, AK, HI, NH, DE, MT, NM, NJ, PA, FL, MD, TX don't charge sales tax on Herbalife supplements). Sales tax is calculated after discount and promotions
(8) Includes $6 S&H and 8.5% sales tax based on Los Angeles, California,

Almost Always Cheaper to Buy Products Online

As shown in this analysis, unless you reach the Supervisor level (4,000 VP) , it is generally cheaper to buy the products online through one of these sources.

	Retail Price: $36.15	Purchases based on Quantities of Formula 1 Shake Mix (750g)				
	Shipping and P&H Cost	Total Cost 8 Units (~260 VP)	Total Cost 16 Units (~500 VP)	Total Cost 31 Units (~1000VP)	Total Cost 77 Units (~2500VP)	Total Cost 123 Units (~4000VP)
lifemanaVIP	Free	$179.99	$359.97	$705.74	$1,735.14	$2,775.59
herbalforYes!	Free	$193.60	$387.19	$750.18	$1,863.36	$2,976.54
Freshest Herbal (Fresh Genuine Herbalife Prod)	Free	$216.05	$432.09	$837.18	$2,079.44	$3,321.70
trulyherbal (Fast Shipping. Excellent Service.)	Free	$206.16	$412.32	$798.86	$1,984.28	$3,169.69
HERBALOFT (save more. weigh less.)	Free	$208.47	$414.94	$807.81	$2,006.55	$3,205.30
Herbal Diet Shop (Direct from Herbalife Warehouse)	Free	$214.85	$429.69	$832.53	$2,067.90	$3,303.27
HERBALIFE (Independent Distributor)	9.5-11% *Fee on SRP	$273.29	$485.29	$848.42	$2,107.36	$3,010.58

(1) Lifemana VIP offers :free shipping with purchases over $35,; no taxes on purchases; and additional promotional coupon of 5% off with purchases over $75
(2) HerbalForYes offers: free shipping over $45. additional coupons 5-15% on orders of $50 or more. All prices include sales tax of 8% based on zip code 90010 (Los Angeles, CA)
(3) Freshest Herbal offers free shipping with over $43 and additional 5% off orders over $150. Sales tax of 8.5% is included in all prices based on zip code 90010 (Los Angeles, CA)
(4) TrulyHerbal offers: 20-30% Off + FREE Shipping over $35 + FREE P/H = 35-50% Total Savings! Also additional coupon available to receive 10% off of orders over $200. Includes 8.5% sales tax based on sip code 90010 LA California
(5) Herbaloft shipping is free on orders over $75, additional discount available up to 15%, no handling fee. Tax is calculated at 8.5% is based on LA California zip code 90010
(6) Herbale Diet Shop offers additional discount 5-15%. Tax is based on LA California with the zip code 90010
(7) Taxes are based on the tax rates of shipping destination (our examples is based on Los Angeles, California (NY, AK, HI, NH, DE, MT, NM, NJ, PA, FL, MD, TX don't charge sales tax on Herbalife supplements)
(8) Singles Order of 1000 Volume Points with temporary 42% discount on this order and next orders for that month only

Lastly, Compensation Numbers Don't Even Add Up

Pershing Square tried to reconcile the U.S. royalty override and found a large discrepancy.

Royalty Overrides Implied by Herbalife's *New* Statement of Average Gross Compensation (2012)

	# of Distributors	Avg Payments ($)	Royalty Overrides ($mm)
SLs w/ a Downline			
Tranche 1	194	$724,030	$140.5
Tranche 2	452	148,808	67.3
Tranche 3	539	68,912	37.1
Tranche 4	1,136	35,581	40.4
Tranche 5	1,940	15,538	30.1
Tranche 6	2,552	7,008	17.9
Tranche 7	11,307	2,216	25.1
Tranche 8	39,151	292	11.4
Tranche 9	25,193	0	0.0
SLs w/o a Downline	30,261	0	0.0
NSLs w/ a Downline	2,466	104	0.3
Implied Royalty Overrides			$370.1

Royalty Overrides Implied by Herbalife's Public Filings[1]

United States ($mm)	Q1 2012	Q2 2012	Q3 2012	Q4 2012	FY 2012
Net Sales	$205	$218	$203	$191	
Gross Margin[2]	79.7%	80.3%	80.2%	80.1%	
Implied COGS	$42	$43	$40	$38	
Royalty Overrides Buildup[3]					
Net Sales	$205	$218	$203	$191	$817
Less: COGS	(42)	(43)	(40)	(38)	(163)
Less: Cont. Margin	(95)	(94)	(91)	(80)	(360)
Implied Royalty Overrides	$67.5	$81.4	$71.7	$73.8	$294.4

$370 ≠ $294

(1) Source: Herbalife 10-Q filings from Q1 2012 to Q3 2012 and 2012 10-K filing.
(2) Assumes United States Gross Margin is equal to Consolidated Gross Margin.
(3) Includes Royalty Overrides, Production Bonuses and Mark Hughes Bonus.

HERBALIFE.

STATEMENT OF AVERAGE GROSS COMPENSATION PAID BY HERBALIFE TO UNITED STATES DISTRIBUTORS IN 2012

People become Herbalife Distributors for a number of reasons. The majority (73%)[1] primarily join us to receive a wholesale price on products they and their families enjoy. Some wish to earn part-time money, wanting to give direct sales a try and are encouraged by Herbalife's low start-up costs (at their option, a mini-International Business Pack (IBP) at $59 or full IBP at $109) and money-back guarantee[2]. Others are drawn to Herbalife because they can be their own boss and can earn rewards based on their own skills and hard work.

Whatever the motivation, an Herbalife Distributorship is something like a gym membership: results vary with the time, energy and dedication you put into it. Anyone considering an active Distributorship needs to understand the realities of direct selling. It is hard work. There is no shortcut to riches, no guarantee of success. However, for those who devote the time and energy to develop a stable base of customers and then mentor and train others to do the same, the opportunity for personal growth and an attractive part- or full-time income exists. Moreover, unlike other businesses, there are minimal start-up costs in beginning your Herbalife Distributorship. There is no need for a Distributor to spend significant amounts of money on sales aids or other materials. In fact, Herbalife's corporate policy discourages the use of such sales aids, especially in the first few months of a Distributorship.

The majority of Herbalife's independent Distributors (71%) have not sponsored another Distributor and are therefore "single-level" Distributors. Single-level Distributors benefit from buying Herbalife products at a preferred price for their consumption and that of their families, and for many this is the only benefit they seek. Some may also be retailing products for a profit and this profit is not included in any of the compensation figures below.

Some Distributors (29%) have decided to sponsor others to become Herbalife Distributors. In that way, they may seek to build and maintain their own downline sales organizations. They are not paid anything for sponsoring new Distributors. They are paid solely based on product sales to their downline Distributors for their own consumption or for retail to others. This multi-level compensation opportunity is detailed in Herbalife's Sales & Marketing Plan, which is available to all Distributors on line at www.myherbalife.com.

For potential Distributors to make an informed decision, we offer the following chart to show the different ranges of average gross compensation that Herbalife pays to its Distributors. The figures below do not include any retail / wholesale profit that a Distributor makes from selling Herbalife's products to others nor do these figures include expenses incurred by a Distributor in the operation or promotion of his or her business. Such business expenses can vary widely. They might include advertising or promotional expenses, product samples, training, rent, travel, telephone and internet costs, and miscellaneous expenses. The compensation received by the Distributors in this chart is not necessarily representative of the gross compensation, if any, that any particular Distributor will receive. These figures should not be considered as guarantees or projections of your actual gross compensation or profits. Success with Herbalife results only from successful product sales efforts, which require hard work, diligence and leadership. Your success will depend upon how effectively you exercise these qualities.

(1) Based on a Distributor research survey conducted by Lieberman Research Worldwide, January 2013, with a margin of error of +/- 3.7%.

(2) 90 days on the return of the IBP and one year on the return of resalable inventory, upon leaving the business.

The compensation chart below indicates that 434,115 Distributors (88%) received no payments from Herbalife during 2012. However, this chart does not include amounts earned by Distributors on their sales of Herbalife products to others.

Additionally, this chart does not include the benefit to Distributors buying Herbalife products at a preferred price for their consumption and that of their families. Based on the company's survey, 73%[1] of individuals became Distributors primarily for this benefit.

Single-Level Distributors (No Downline)

Economic Opportunity	Distributors*		
	Number	%	
• Wholesale price on product purchases • Retail profit on sales to non-Distributors	351,065	71%	The economic rewards for single-level Distributors are the wholesale pricing received on products for consumption by the Distributor and his or her family as well as the opportunity to retail product to non-Distributors. Neither of these rewards are payments made by the company and therefore are excluded from this schedule

Non-Sales Leaders With a Downline**

Economic Opportunity	Distributors		
	Number	%	
• Wholesale price on product purchases • Retail profit on sales to non-Distributors • Wholesale profit on sales to another Distributor	60,333	12%	In addition to the economic rewards of the single-level Distributors above, which are not included in this chart, certain non-sales leaders with a downline may be eligible for payments from Herbalife on downline product purchases made directly with Herbalife. 2,466 of the 4,449 eligible Distributors earned such payments in 2012. The average total payments to the 2,466 Distributors was $104.

Sales Leaders With a Downline**

Economic Opportunity	Distributors		Average Payments from Herbalife	All Sales Leaders with a Downline			
	Number	%		Number of Distributors	% of Total Grouping	Average Gross Payments	
• Wholesale price on product purchases • Retail profit on sales to non-Distributors • Wholesale profit on sales to another Distributor • Multi-level compensation on downline sales • Royalties • Bonuses	82,464	17%	>$250,000	194	0.2%	$724,030	This chart does not include amounts earned by Distributors on their sales of Herbalife products to others
			$100,001-$250,000	452	0.5%	$148,808	
			$50,001-$100,000	539	0.7%	$68,912	
			$25,001-$50,000	1,136	1.4%	$35,581	
			$10,001-$25,000	1,940	2.4%	$15,538	
			$5,001-$10,000	2,552	3.1%	$7,008	
			$1,001-$5,000	11,307	13.7%	$2,216	
			$1-$1,000	39,151	47.5%	$292	
			0	25,193	30.6%	$0	
			Total	82,464	100.0%	$4,485	

* 30,621 of the 351,065 single-level Distributors are sales leaders without a downline
** Sales leaders are Distributors that achieved the level of Supervisor or higher. See details on Herbalife's marketing plan at www.myherbalife.com.

51.0% of all sales leaders as of February 1st, 2011, requalified by February 1st, 2012 (including 33.5% of first time sales leaders)

The majority of those Distributors who earned in excess of $100,000 in 2012 had reached the level of Herbalife's President's Team. During 2012, 47 U.S. Distributors joined the level of President's Team. They averaged 9 years as an Herbalife Distributor before reaching President's Team, with the longest being 20 years and the shortest being less than three years.

(1) Based on a Distributor research survey conducted by Lieberman Research Worldwide, January 2013, with a margin of error of +/- 3.7%.

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Published Date: 02/2013

HERBALIFE

STATEMENT OF AVERAGE GROSS COMPENSATION OF U.S. SUPERVISORS – 2011

Herbalife offers its Distributors an opportunity to achieve a lifetime of better health through its scientifically advanced weight management and nutrition products. While many of our Distributors join the Herbalife family simply to enjoy our life-changing products, others want to share their results and take advantage of the many income benefits our business opportunity provides. With Herbalife, you can work part-time and earn a supplemental income, or focus solely on your Herbalife Distributorship and increase your financial potential. It's completely up to the individual how much he or she wants to achieve! A Distributor earns profits by buying Herbalife products at wholesale and reselling them at retail. If the Distributor wants to increase his or her involvement in the business and enjoy the possibility of higher levels of income, he or she may sponsor others into the business and develop an organization.

Over 25% of Distributors reach the rank of Supervisor and above ("Leader"), qualifying them for additional compensation which is paid by Herbalife based upon their activities and those they have sponsored directly and indirectly. The annual gross compensation paid by Herbalife to all Leaders during 2011 averaged $2,900 (with a median level of $741). Over 39% of Supervisors are "Active" (defined as those who generated at least 2,500 points of volume in 2011 after becoming Supervisor). The annual gross compensation paid by Herbalife to Active Leaders during 2011 averaged $7,354 (with a median level of $637).

ACTIVE LEADERS				
Earning Level	% of Total Leaders	% of Active Leaders	Average Earnings Compensation (USD)	Median Compensation (USD)
President's Team	0.2 %	0.6 %	$ 514,638	$ 336,901
Millionaire Team	0.7 %	1.7 %	$ 100,195	$ 97,303
Get Team	2.6 %	6.5 %	$ 22,766	$ 19,417
World Team	2.9 %	7.3 %	$ 6,224	$ 5,659
Supervisor	33.1 %	83.9 %	$ 901	$ 475
Total	39.4 %	100 %	$ 7,354	$ 637

The amounts above do not include the income Distributors can earn from their retail or wholesale income, so the actual compensation can be somewhat higher, depending upon each Distributor's personal-selling efforts. Also, the figures above are gross, not net income.

The figures stated above are not a guarantee nor are they a projection of a typical Distributor's earnings or profits. Like any other independent business, the achievement or failure of a Distributor depends upon his or her skill set, commitment and desire to succeed. At Herbalife, the opportunity to earn more is always available to each and every Distributor.

Revised: 07/25/12

Witherington, James

From: DeMartino, Laura
Sent: Sunday, June 09, 2013 6:15 PM
To: Greisman, Lois C.
Subject: FW: HOT LETTER FROM REPRESENTATIVE LINDA SANCHEZ ASSIGNED TO BCP, OFFICE OF THE DIRECTOR (LAURA DEMARTINO)
Attachments: 8387.PDF

Importance: High

Hi Lois, Could your folks please draft a response to this Congressional letter re Herbalife? It would be great to get a draft response by early next week. Thanks! Laura

---

From: Taylor, Susan
Sent: Friday, June 07, 2013 9:01 AM
To: DeMartino, Laura; Benway, Kathleen; Bumpus, Jeanne; Clark, Donald S.; Cornish, Alexis CTR; Davis, Anna; Dawson, Rachel Miller; Delaney, Elizabeth A; Dickie, Judith A.; Feuer, Stacy; Frankle, Janice Podoll; Goins, Suzie S.; John, Subin; Keller, Aaron; Kim, Janet; Kingsland, Gail M.H.; Koehler, David K.; Koslov, Tara Isa; Kraus, Elizabeth; Norris, Catherine; Okuliar, Alexander; Patton, Andrew; Pyos, Monica M.; Runco, Philip; Rybnicek, Jan; Simons, Claudia A.; Slater, Abigail A.; Tabor, April; Vandecar, Kim; Vedova, Holly L.; Watson, Shaundra; Watts, Marianne R.; Wright, Joshua D.; Yun, John; Zylberglait, Pablo
Subject: HOT LETTER FROM REPRESENTATIVE LINDA SANCHEZ ASSIGNED TO BCP, OFFICE OF THE DIRECTOR (LAURA DEMARTINO)
Importance: High

Witherington, James

From: Todaro, Christine
Sent: Tuesday, June 11, 2013 5:35 PM
To: Greisman, Lois C.
Cc: Vaca, Monica E.
Subject: RE: HOT LETTER FROM REPRESENTATIVE LINDA SANCHEZ ASSIGNED TO BCP, OFFICE OF THE DIRECTOR (LAURA DEMARTINO)
Attachments: Letter to Congresswoman Linda Sanchez Final.docx

Lois,

Attached is a draft letter to Congresswoman Sanchez. Please let me know any changes you would like me to make.

Thanks,

Christine

From: Greisman, Lois C.
Sent: Sunday, June 09, 2013 9:18 PM
To: Todaro, Christine
Cc: Vaca, Monica E.
Subject: Fw: HOT LETTER FROM REPRESENTATIVE LINDA SANCHEZ ASSIGNED TO BCP, OFFICE OF THE DIRECTOR (LAURA DEMARTINO)
Importance: High

(b)(5)

From: DeMartino, Laura
Sent: Sunday, June 09, 2013 06:15 PM
To: Greisman, Lois C.
Subject: FW: HOT LETTER FROM REPRESENTATIVE LINDA SANCHEZ ASSIGNED TO BCP, OFFICE OF THE DIRECTOR (LAURA DEMARTINO)

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Subject: HOT LETTER FROM REPRESENTATIVE LINDA SANCHEZ ASSIGNED TO BCP, OFFICE OF THE DIRECTOR (LAURA DEMARTINO)
Importance: High

Witherington, James

From: Vaca, Monica E.
Sent: Tuesday, June 11, 2013 9:27 PM
To: Greisman, Lois C.; Todaro, Christine
Subject: Re: HOT LETTER FROM REPRESENTATIVE LINDA SANCHEZ ASSIGNED TO BCP, OFFICE OF THE DIRECTOR (LAURA DEMARTINO)

NR

Monica Vaca

From: Greisman, Lois C.
Sent: Tuesday, June 11, 2013 05:37 PM
To: Todaro, Christine
Cc: Vaca, Monica E.
Subject: RE: HOT LETTER FROM REPRESENTATIVE LINDA SANCHEZ ASSIGNED TO BCP, OFFICE OF THE DIRECTOR (LAURA DEMARTINO)

Non Responsive

From: Todaro, Christine
Sent: Tuesday, June 11, 2013 5:35 PM
To: Greisman, Lois C.
Cc: Vaca, Monica E.
Subject: RE: HOT LETTER FROM REPRESENTATIVE LINDA SANCHEZ ASSIGNED TO BCP, OFFICE OF THE DIRECTOR (LAURA DEMARTINO)

Lois,

Attached is a draft letter to Congresswoman Sanchez. Please let me know any changes you would like me to make.

Thanks,

Christine

From: Greisman, Lois C.
Sent: Sunday, June 09, 2013 9:18 PM
To: Todaro, Christine
Cc: Vaca, Monica E.
Subject: Fw: HOT LETTER FROM REPRESENTATIVE LINDA SANCHEZ ASSIGNED TO BCP, OFFICE OF THE DIRECTOR (LAURA DEMARTINO)
Importance: High

(b)(5)

From: DeMartino, Laura
Sent: Sunday, June 09, 2013 06:15 PM
To: Greisman, Lois C.
Subject: FW: HOT LETTER FROM REPRESENTATIVE LINDA SANCHEZ ASSIGNED TO BCP, OFFICE OF THE DIRECTOR

(LAURA DEMARTINO)

Hi Lois, Could your folks please draft a response to this Congressional letter re Herbalife? It would be great to get a draft response by early next week. Thanks! Laura

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Subject: HOT LETTER FROM REPRESENTATIVE LINDA SANCHEZ ASSIGNED TO BCP, OFFICE OF THE DIRECTOR (LAURA DEMARTINO)
Importance: High

Witherington, James

From: Davis, Regina L.
Sent: Wednesday, June 12, 2013 3:35 PM
To: Greisman, Lois C.; Vaca, Monica E.; Salsburg, Daniel R.; Anguizola, Roberto
Subject: FW: Request for Documents FOIA-2013-00740
Attachments: Request for Documents FOIA-2013-00740.docx; Request Description.pdf

Forwarding for a response.

Thank you.
Regina L. Davis

From: Peterson, Mark D.
Sent: Wednesday, June 12, 2013 3:16 PM
To: Davis, Regina L.
Subject: Request for Documents FOIA-2013-00740

Good Afternoon:

On April 09, 2013, we received a FOIA request for records related to Herbalife (See attached request letter for more detail). It covers the period from Februrary 1, 2013, to April 9, 2013.

Here are some key points for responding (Please read carefully paragraph 6 of this email (below):

1. Please search promptly for responsive records, whether or not they will ultimately be subject to disclosure. This is because we are under a preservation obligation as soon as we receive a FOIA request.

2. Please send any documents responsive to this request to me, Mark Peterson in HQ-585. If you have questions about whether documents are responsive or you need assistance downloading or providing the documents, please call me at ext. 3731. If you have a legal question, please contact OGC attorney Dione Stearns, who supervises the program.

3. Please send (or provide access to) all responsive records, even if you expect parts or the entire package to be withheld under one of the nine FOIA exemptions. The FOIA office must have a record showing we have carefully reviewed all responsive documents. If there is information that will help the FOIA Office's review, please include the information in the comments field of the attached referral form.

4. Once the FOIA Office completes its initial review, we will send the documents back to you with any proposed redactions based on applicable FOIA exemptions. At that point you can raise any objections you may have to the information we propose to release, and we can discuss additional redactions. We will always make sure you understand what information is being released before we send records to the requester.

5. Please be sure to send the signed referral form (attached) along with the responsive documents. *(When opening the referral form, please select "**Enable Macros**" when prompted so that it appears in the proper format.)* If your search reveals no responsive records, please return the referral form with your signature, the time it took you to search and a statement in the comments field that you searched and found no responsive documents. If you believe additional offices or individuals may have responsive records, please specify that information on your form.

6. The FOIA stipulates that we respond within 20 working days but we have already missed that deadline as two offices did not return their responses to our office until yesterday. One response included an email exchange relating to the National Consumers League ("NCL") that mentinoed Lois Greisman (a March 12, 2013, email concerning her preparation of a response to the NCL on behalf of Chairwoman Ramirez). While that email is not responsive to his request, please direct your attention to parts 1, 2 and 4 of the attached FOIA request fo responsive documents.

7. You may find additional information here: https://ftcintranet.ftc.gov/cfportal/foia/index.cfm.

If you have any questions or concerns, or if it seems like the search for documents will take much over one to two hours, please don't hesitate to contact me at (202) 326-3731.

Thank you for your time.

Sincerely,

Mark Peterson

Witherington, James

From: Todaro, Christine
Sent: Thursday, June 13, 2013 9:32 AM
To: Greisman, Lois C.; Kelly, Andrea
Subject: RE: FHTM Documents

Non Responsive

From: Greisman, Lois C.
Sent: Thursday, June 13, 2013 9:30 AM
To: Kelly, Andrea
Cc: Todaro, Christine
Subject: Re: FHTM Documents

Non Responsive

From: Kelly, Andrea
Sent: Thursday, June 13, 2013 09:24 AM
To: Greisman, Lois C.
Subject: RE: FHTM Documents

Lois-

(b)(5)

From: Greisman, Lois C.
Sent: Wednesday, June 12, 2013 5:37 PM
To: Kelly, Andrea
Cc: Todaro, Christine
Subject: RE: FHTM Documents

Non Responsive

From: Kelly, Andrea
Sent: Wednesday, June 12, 2013 4:00 PM

To: Greisman, Lois C.
Subject: FHTM Documents

Hi Lois,

I just wanted to let you know that I am getting ready to return some of the documents that you provided in response to the FOIA request relating to Fortune High Tech Marketing.
Also, as I'm sure you are aware, we do have a pending FOIA request for correspondence between the FTC and Pershing Square. I have therefore passed the documents that we received from them on to Alex Seery in our office, who is processing that request.

Let me know if you have any questions!

Andrea Kelly
Paralegal Specialist
Federal Trade Commission
Office of the General Counsel
(202) 326-2836

Witherington, James

From: Peterson, Mark D.
Sent: Thursday, June 13, 2013 1:34 PM
To: Todaro, Christine
Cc: Kelly, Andrea; Greisman, Lois C.
Subject: RE: FHTM Documents

Non Responsive

From: Todaro, Christine
Sent: Thursday, June 13, 2013 1:21 PM
To: Peterson, Mark D.
Cc: Kelly, Andrea; Greisman, Lois C.
Subject: RE: FHTM Documents

I reviewed the documents with my colleagues and we believe we received the documents during meetings with the respective groups. Let me know if you have any additional questions.

Mark, do you need the documents back?

Thanks,

Christine

From: Peterson, Mark D.
Sent: Thursday, June 13, 2013 11:15 AM
To: Todaro, Christine
Cc: Kelly, Andrea
Subject: FW: FHTM Documents

Hi Christine:

I placed in your mail drop the documents that Andrea described in her email to Lois. (b)(5)
(b)(5)

Thanks,

Mark Peterson
FOIA Attorney
Office of General Counsel
Federal Trade Commission
Washington D.C. 20580
202-326-3731

From: Kelly, Andrea
Sent: Thursday, June 13, 2013 9:26 AM
To: Peterson, Mark D.
Subject: FW: FHTM Documents

FYI- I have some records that may be responsive to one of your requests. (See below)

From: Kelly, Andrea
Sent: Thursday, June 13, 2013 9:25 AM
To: Greisman, Lois C.
Subject: RE: FHTM Documents

(b)(5)

From: Greisman, Lois C.
Sent: Wednesday, June 12, 2013 5:37 PM
To: Kelly, Andrea
Cc: Todaro, Christine
Subject: RE: FHTM Documents

Non Responsive

From: Kelly, Andrea
Sent: Wednesday, June 12, 2013 4:00 PM
To: Greisman, Lois C.
Subject: FHTM Documents

Hi Lois,

I just wanted to let you know that I am getting ready to return some of the documents that you provided in response to the FOIA request relating to Fortune High Tech Marketing.
Also, as I'm sure you are aware, we do have a pending FOIA request for correspondence between the FTC and Pershing Square. I have therefore passed the documents that we received from them on to Alex Seery in our office, who is processing that request.

Let me know if you have any questions!

Andrea Kelly
Paralegal Specialist
Federal Trade Commission
Office of the General Counsel
(202) 326-2836

Witherington, James

From: Todaro, Christine
Sent: Tuesday, June 18, 2013 5:42 PM
To: Greisman, Lois C.
Subject: RE: Pershing Square Press Release

Did Laura tell you whether Chuck signed the letter to Truth in Advertising and Chairwoman Ramirez signed the letter to Congresswoman Sanchez? I sent both letters to her last week but haven't heard anything.

From: Greisman, Lois C.
Sent: Tuesday, June 18, 2013 5:31 PM
To: Ammerman, Janet; Vander Nat, Peter J.; Todaro, Christine; Vaca, Monica E.
Subject: FW: Pershing Square Press Release

From: Holley, Steven L. [mailto:HolleyS@sullcrom.com]
Sent: Tuesday, June 18, 2013 1:30 PM
To: Greisman, Lois C.
Subject: Pershing Square Press Release

Hi Lois –

I am sending along a press release that Pershing Square just issued concerning the latest survey commissioned by Herbalife on the issue of retail sales to customers outside Herbalife's distribution network. (b)(5)

(b)(5)

Regards,

Steve

Steven L. Holley | Sullivan & Cromwell LLP
125 Broad Street, New York, NY 10004-2498
☎ (212) 558-4737 | (212) 291-9074
holleys@sullcrom.com

This e-mail is sent by a law firm and contains information that may be privileged and confidential. If you are not the intended recipient, please delete the e-mail and notify us immediately.

Witherington, James

From: Ammerman, Janet
Sent: Tuesday, June 18, 2013 6:50 PM
To: Vander Nat, Peter J.; Greisman, Lois C.; Todaro, Christine; Vaca, Monica E.
Subject: RE: MLM issues

(b)(5)

From: Vander Nat, Peter J.
Sent: Tuesday, June 18, 2013 6:07 PM
To: Greisman, Lois C.; Ammerman, Janet; Todaro, Christine; Vaca, Monica E.
Subject: MLM issues

I have been looking at the same press release earlier this afternoon. Especially interesting is:

> … 1986 consent decree with the State of California, which imposed a permanent injunction on the company. The injunction, among other things, prohibits Herbalife from operating a marketing program that pays compensation to distributors unless it is based upon "retail sales." The order requires Herbalife to implement a system to "verify and document" sales of products and requires that "their records are current and accurate to a point in time which does not precede [a] request for verification or documentation by more than 90 days."

(b)(5)

From: Greisman, Lois C.
Sent: Tuesday, June 18, 2013 5:31 PM
To: Ammerman, Janet; Vander Nat, Peter J.; Todaro, Christine; Vaca, Monica E.
Subject: FW: Pershing Square Press Release

Witherington, James

From: Sallygreenberg <(b)(6)
Sent: Sunday, June 23, 2013 8:51 PM
To: Greisman, Lois C.
Subject: Re: TSR Proposal

Non Responsive

On Jun 23, 2013, at 6:55 PM, "Greisman, Lois C." <LGREISMAN@ftc.gov> wrote:

> Sally, I think you and others from NCL, along with other consumer advocates, have been invited to meet with Jessica on July 9. Do you have that invitation?

From: Sallygreenberg [mailto:(b)(6)
Sent: Sunday, June 23, 2013 12:25 PM
To: Greisman, Lois C.
Subject: Re: TSR Proposal

Lois - I had a further thought on our July 15 meeting - might Jessica Rich be available to come and meet briefly with the consumer groups. Some of us might know her but those of us who don't - me included - would welcome the opportunity to be introduced. We all worked closely with David Vladeck and knew him well and of course she and David worked closely together. This would be great if it can be worked out. Let me know what you think and thanks so much Lois.

Sally Greenberg

Sent from my iPhone

On Jun 18, 2013, at 11:43 AM, "Greisman, Lois C." <LGREISMAN@ftc.gov> wrote:

> Yes. 12:15.

From: Sallygreenberg [mailto:(b)(6)
Sent: Tuesday, June 18, 2013 11:42 AM
To: Greisman, Lois C.
Subject: Re: TSR Proposal

Non Responsive

On Jun 18, 2013, at 11:36 AM, "Greisman, Lois C." <LGREISMAN@ftc.gov> wrote:

> Non Responsive

From: Sallygreenberg [mailto:(b)(6)
Sent: Tuesday, June 18, 2013 09:24 AM
To: Greisman, Lois C.

For Release: 05/21/2013

FTC Seeks Public Comment on Proposal to Ban Payment Methods Favored in Fraudulent Telemarketing Transactions

In an ongoing effort to protect consumers

Witherington, James

From: Dorman, Frank
Sent: Tuesday, June 25, 2013 8:27 AM
To: Greisman, Lois C.
Subject: FYI -- NY Post article re pyramid schemes

NEW YORK POST

FTC may reclimb pyramid scheme

By MICHELLE CELARIER

Last Updated: 6:36 AM, June 25, 2013

Posted: 12:01 AM, June 25, 2013

The Federal Trade Commission is considering tightening the ground rules on pyramid schemes, sources told The Post.

The FTC's rethink comes as it is under growing pressure from lawmakers and consumer groups to investigate Herbalife, the $5 billion multi-level marketing company that hedge fund activist Bill Ackman has accused of being a pyramid scheme.

The FTC has been reluctant to pursue Herbalife, due in part to the expense of going up against such a huge, well-financed company — especially given the ambiguity of the rules, sources said.

At issue is whether sales to distributors count as retail sales.

That's key because earnings from retail profits must be greater than recruiting-related compensation to prevent a company from being classified as a pyramid scheme.

A 2004 staff letter, which the FTC is considering revisiting, has been interpreted by multi-level marketers to mean that internal sales do count as retail sales.

Letter On Herbalife by New York Post

Herbalife, which denies it is a pyramid scheme, said that "many of our distributors are simply discount customers, and we have millions of non-distributor customers in the US as determined by research performed by Nielsen."

However, the FTC recently shut down a smaller MLM company, Fortune Hi–Tech Marketing, because a majority of its sales were not outside its distributor network.

"They didn't seem to be giving any credit for internal consumption," said Jarrel Price of Height Analytics.

Last week, William Keep, The College of New Jersey Business School dean and MLM expert, wrote to the FTC asking it to clarify its position.

The FTC, Keep said, "has remained surprisingly silent" even though the industry has interpreted the staff letter differently from recent court and FTC decisions.

Witherington, James

From: Dorman, Frank
Sent: Thursday, July 11, 2013 1:54 PM
To: Greisman, Lois C.
Subject: news inquiry re Herbalife

Stephanie Mercimer of Mother Jones is writing about the hedge fund fight over Herbalife.

I told her we have nothing to say.

(b)(5)

Witherington, James

From: Dorman, Frank
Sent: Thursday, July 11, 2013 5:05 PM
To: Greisman, Lois C.
Subject: Herbalife

FYI:

Michelle Celarier of the NY Post is "working on a story for tomorrow's paper about a meeting between six consumer organizations and the FTC (Lois Greisman). . ."

I said have no comment.

Witherington, James

From: Todaro, Christine
Sent: Friday, July 12, 2013 9:53 PM
To: Greisman, Lois C.
Subject: Fw: TSR Proposal

From: Sally Greenberg [mailto:(b)(6)
Sent: Friday, July 12, 2013 05:03 PM
To: Todaro, Christine
Subject: RE: TSR Proposal

Hi, Christine - I just now have the list for Monday at 2 – see you soon and thanks a lot for all the assistance in putting this meeting together. Who will be there from FTC besides Lois?

Sally Greenberg and John Breyault- NCL
Bertha Guerrero – Hispanic Federation
Brent Wilkes – LULAC
Ami Gadhia – Consumers Union'
Linda Sherry – Consumer Action

From: Todaro, Christine [mailto:ctodaro@ftc.gov]
Sent: Friday, July 12, 2013 4:46 PM
To: 'Sally Greenberg'
Subject: RE: TSR Proposal

Hi Sally,

Whenever you have a minute, please let me know who will be attending the meeting on Monday. Also, when you arrive at the FTC, please go to the 6th street visitor entrance. Security will call me when you arrive. My phone number is 202-326-3711, in case you have any problems.

Have a nice weekend and I look forward to meeting you at 2pm on Monday.

Thanks,

Christine

From: Sally Greenberg [mailto:(b)(6)
Sent: Tuesday, June 11, 2013 6:19 PM
To: Todaro, Christine
Subject: RE: TSR Proposal

I don't know yet – can I let you know next week sometime? There will likely be 4 or 5 of us at most. I think! t hanks, Christine.

From: Todaro, Christine [mailto:ctodaro@ftc.gov]
Sent: Tuesday, June 11, 2013 5:25 PM
To: 'Sally Greenberg'
Subject: RE: TSR Proposal

Yes, that date and time still works for us. Would you mind letting me know who will be attending from your organization?

I look forward to meeting you then.

Thanks,

Christine

From: Sally Greenberg [mailto:(b)(6)
Sent: Tuesday, June 11, 2013 5:27 PM
To: Todaro, Christine
Subject: RE: TSR Proposal

Christine does – 2-3 on July 15th work?

From: Todaro, Christine [mailto:ctodaro@ftc.gov]
Sent: Friday, June 07, 2013 4:48 PM
To: 'Sallygreenberg'
Subject: RE: TSR Proposal

Hi Sally,

We are available the following dates and times:

Monday, July 15th from 2pm-3pm
Wednesday, July 17th from 10am-11am
Monday, July 22nd from 2pm-3pm

Please let me know if any of these dates/times work well for you and your consumer groups.

Thanks,

Christine

From: Sallygreenberg [mailto(b)(6)
Sent: Thursday, June 06, 2013 8:41 AM
To: Todaro, Christine
Subject: Re: TSR Proposal

Christina - could you perhaps give me 3 possible dates in the next few weeks that would work for FTC folks and ill ask our consumer groups which might work best ? I think that should work out well. Thank you!

Sent from my iPhone

On Jun 6, 2013, at 8:15 AM, "Todaro, Christine" <ctodaro@ftc.gov> wrote:

Not Responsive

From: Sallygreenberg [mailto: (b)(6)
Sent: Wednesday, June 05, 2013 10:32 PM
To: Todaro, Christine
Subject: Re: TSR Proposal

Non Responsive

On Jun 5, 2013, at 9:06 PM, "Todaro, Christine" <ctodaro@ftc.gov> wrote:

Non Responsive

From: Sallygreenberg [mailto (b)(6)
Sent: Wednesday, June 05, 2013 06:25 PM
To: Greisman, Lois C.
Cc: Todaro, Christine
Subject: Re: TSR Proposal

Non Responsive

On Jun 5, 2013, at 6:15 PM, "Greisman, Lois C." <LGREISMAN@ftc.gov> wrote:

We are happy to meet with you. I've added Christine Todaro, and attorney in Marketing Practices. I am heading out of town and I ask that you two coordinate a meeting in the next few weeks.
Thanks. Lois

From: Sally Greenberg [mailto: (b)(6)
Sent: Tuesday, June 04, 2013 6:10 PM
To: Greisman, Lois C.
Subject: RE: TSR Proposal

If we were interested in bringing a group of consumer folks in to discuss Herbalife and Pyramid Schemes in general, could you help set up a meeting – with you or other staff there at the FTC? Thanks Lois and let me know.

Sally

Witherington, James

From: Anguizola, Roberto
Sent: Monday, July 15, 2013 1:57 PM
To: Greisman, Lois C.; Todaro, Christine; Vaca, Monica E.; Ammerman, Janet
Subject: RE: Herbalife complaints

False earnings claims.

Roberto Anguizola
Assistant Director
Division of Marketing Practices
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mail Stop H-286
Washington, DC 20580
Tel. (202) 326-3284

From: Greisman, Lois C.
Sent: Monday, July 15, 2013 1:55 PM
To: Todaro, Christine; Anguizola, Roberto; Vaca, Monica E.; Ammerman, Janet
Subject: RE: Herbalife complaints

What is the nature of the complaints filed against affiates?

From: Todaro, Christine
Sent: Monday, July 15, 2013 12:10 PM
To: Anguizola, Roberto; Vaca, Monica E.; Ammerman, Janet; Greisman, Lois C.
Subject: Herbalife complaints

(b)(5)

[redacted]

Christine

Witherington, James

From: Todaro, Christine
Sent: Monday, July 15, 2013 11:47 AM
To: Greisman, Lois C.; Ammerman, Janet; Vaca, Monica E.; Anguizola, Roberto
Subject: RE: FYI: NY Post story re Herbalife

I find it interesting that the story says Jessica may attend because I didn't tell Sally that until this morning.

From: Greisman, Lois C.
Sent: Monday, July 15, 2013 10:54 AM
To: Todaro, Christine; Ammerman, Janet; Vaca, Monica E.; Anguizola, Roberto
Subject: FW: FYI: NY Post story re Herbalife

From: Dorman, Frank
Sent: Monday, July 15, 2013 10:22 AM
To: Greisman, Lois C.
Subject: FYI: NY Post story re Herbalife

http://www.nypost.com/p/news/business/groups_ftc_to_talk_herbalife_probe_keVtZm0e8x3EPhOZHgT4aJ

Witherington, James

From: Todaro, Christine
Sent: Wednesday, July 17, 2013 3:22 PM
To: Greisman, Lois C.; Ammerman, Janet; Vaca, Monica E.
Subject: RE: CNBC Herbalife story

The Post called our meeting, "spicy."

http://www.nypost.com/p/news/business/ftc_herbalife_meeting_spicy_uQQEcdjAB5chxXyl5q2kwN

From: Greisman, Lois C.
Sent: Wednesday, July 17, 2013 3:06 PM
To: Ammerman, Janet; Vaca, Monica E.; Todaro, Christine; Rich, Jessica L.; Harwood, Charles A.
Subject: FW: CNBC Herbalife story

From: Dorman, Frank
Sent: Wednesday, July 17, 2013 2:16 PM
To: Greisman, Lois C.
Subject: CNBC Herbalife story

Excerpt from transcript of CNBC video:

" . . . today herbalife is on the move once again. . . . the ftc reportedly calling herbalife's practices, quote, disturbing at a meeting with consumer activists. the ftc is concerned that the company is taking advantage of hispanic immigrants, high percentage of its distributors are hispanic. the ftc did not say it had launched any kind of full-fledged probe. . . "

Witherington, James

From: Rich, Jessica L.
Sent: Wednesday, July 17, 2013 3:35 PM
To: Greisman, Lois C.
Subject: Re: LA Times inquiry re Herbalife

Yes

From: Greisman, Lois C.
Sent: Wednesday, July 17, 2013 03:27 PM
To: Rich, Jessica L.
Subject: FW: LA Times inquiry re Herbalife

(b)(5)

From: Dorman, Frank
Sent: Wednesday, July 17, 2013 1:46 PM
To: Greisman, Lois C.
Subject: LA Times inquiry re Herbalife

The reporter, Stuart Pfeifer, asked if we can confirm that FTC staff (he named you and Jessica) met with consumer groups about Herbalife.

I won't confirm that unless you say otherwise.

He's may be reacting to this NY Post story --
http://www.nypost.com/p/news/business/ftc_herbalife_meeting_spicy_uQQEcdjAB5chxXyl5q2kwN

From: Federal Trade Commission <subscribe@subscribe.ftc.gov>
Sent: Thursday, January 3, 2013 11:07 AM
To: Matties, Deborah J. <DMATTIES@ftc.gov>
Subject: Daily Clips 01.03.13

FTC Daily Clips Banner

January 3, 2013 (Thursday)

Today's Clips Alert is available athttps://ftcintranet.ftc.gov/clips/pdfs/Clips 010313.pdf

COMPETITION

FTC Chairman Pushing for a Google Antitrust Decision This Week.All ThingsD 1/2

FTC may strike deal with Google this week. WSJ 1/2 (pasted below)

Federal Trade Commission to end antitrust investigation of Google.WaPo 1/2

Google Said Poised to Resolve FTC Antitrust Probe Today.Bloomberg 1/3

Industry on alert for FTC's pending Google decision. Politico Pro 1/2 (pasted below)

FTC seeks Google case resolution. Politico Pro 1/2 (pasted below)

WSJ: Microsoft Lawyer Pans Reported Google Antitrust Agreement. WSJ 1/2 (pasted below)

Microsoft urges FTC to crack down on Google.The Hill 1/2

Microsoft criticizes Google's proposed settlement with FTC.LA Times 1/2

CONSUMER PROTECTION

Energy shot's 'no crash' claim is disputed by Watchdog.NY Times 1/2

OF INTEREST

Antitrust focus turns to FTC helm, Senate panel.The Deal 1/2

U.S. Senate approves FTC, FCC nominees.Reuters 1/2

FTC nominee Joshua Wright to skip Google cases.Politico 1/3

Senate Confirms FCC, FTC Nominations.Ad Week ½

New FAA head among appointments approved by Senate.Reuters 1/2

Senate confirms Baer as AAG as deadline approaches.GCR 1/2

Regulators Cut J.P. Morgan Community-Lending Grade. WSJ 1/2 (pasted below)

TWEETS

Google
@time: Report: Google set to dodge federal antitrust lawsuit with FTC deal |http://t.co/

H1irdc13(via @TIMEBusiness) (4,142,000+ followers)

@washingtonpost: FTC to end antitrust investigation of Googlehttp://t.co/nhV9PgqL (1,358,700+ followers)

@mashable: @Google to Resolve @FTC #Antitrust Case Today, Report Sayshttp://flip.it/auRpr (1,300,000+ followers)

@bjmendelson: The FTC is getting someone who received funding from Google in the past but promises to be "totally objective" about them in the future. (762,750+ followers)

@bloombergnews: Google said poised to resolve FTC antitrust probe today |http://t.co/MzPYPEVj (756,200+ followers)

@fastcompany: Steamy Google, FTC Smackdown Ends Today, Likely Without A Lawsuithttp://t.co/6cbV16SF#FastFeed (634,100+ followers)

@sengineland: Google-FTC Antitrust Settlement Imminent, Microsoft Preemptively Objecting by@gsterlinghttp://t.co/LHwis7yB(144,750+ followers)

@latimestech: Microsoft criticizes Google's proposed settlement with FTChttp://t.co/NTdqZB3M

Reports: @FTC will resolve its antitrust investigation of @Google todayhttp://tinyurl.com/aajmowu (1,100+ followers)

New Commissioner
@TheHill: Senate confirms @FTC, @FCC pickshttp://bit.ly/TwBO60 by @HilliconValley's @brendansasso. (288,200+ followers)

Miscellaneous
@consumerreports: FTC makes appliance energy information easier to find onlinehttp://t.co/KmFIOq3w (227,900+ followers)

@pogowasright: Talking about deceptive practices: #privacy & anonymity service called on the carpet:https://www.cotse.net/mail/src/login.php .... (Jan 2 notice) cc @FTC #n (2,750 followers)

Did you resolve to lose weight in 2013? @FTC suggests consumers be wary of ads for weight loss products http://bit.ly/ZUQdOn (500+ followers)

If there is any justice in this world, the @FTC would be joining forces with the @SEC_Enforcement to investigate Herbalife. $HLF (350+ followers)

The @FTC offering $50,000 in contest to end robocallshttp://cnnmon.ie/TwW0Vx (via @CNNMoney) (200+ followers)

@Citibank stealthy intro of fees for "no fee" account is sharp practice. Telling @FTC and @CFPB about it. #baitandswitch bad for consumers. (27 followers)

THE WALL STREET JOURNAL

FTC May Strike Deal With Google This Week
By BRENT KENDALL

January 2, 2013

The Federal Trade Commission could make a final decision in its long-running antitrust probe ofGoogle Inc. this week, before one of the agency's five commissioners leaves office, according to people familiar with the investigation.

The agency and Google have been discussing settlement terms along similar lines as those under consideration last month, people familiar with the probe said.

The FTC in December was close to concluding its nearly two-year examination of Google when the company offered to make several voluntary changes to its search practices. The company also agreed to settle government concerns regarding its use of mobile-technology patents that it acquired when it bought handset maker Motorola Mobility.

The potential deal came under heavy criticism from some Google competitors as too lenient, and the agency decided it needed more time to consider whether Google's offer was good for consumers. Among their concerns, competitors urged the FTC to require Google to make its search changes legally binding instead of voluntary.

The potential agreement would allow the FTC to enforce Google's voluntary commitments, people familiar with the matter said. Further details about the potential deal couldn't immediately be learned. An FTC spokeswoman and a Google spokesman declined to comment.

A deal is likely to be announced this week, these people said, before one of the commissioners, J. Thomas Rosch leaves office. Mr. Rosch, a Republican member of the commission, said he would leave the agency on Monday.

Mr. Rosch's replacement, nominee Joshua Wright, was confirmed by the Senate this week. Mr. Wright has pledged to recuse himself from Google-related matters for two years to avoid any appearances of conflict of interest.

Mr. Wright has served as director of research at the International Center for Law and Economics, a group that has received funding from several corporations, including Google. In his academic writings, he has questioned the wisdom of bringing an antitrust case against the company.

The FTC's lengthy investigation has primarily focused on whether Google abused its dominance in Internet searching to favor its own services and harm competitors.

European antitrust officials also have been investigating Google and are expected to extract more extensive and binding commitments from the company as part of any legal settlement there.

Fairsearch.org., a coalition of companies urging action against Google, on Wednesday said the FTC shouldn't resolve its investigation until it learns more about what the company offers the European Commission.

"The FTC has every reason to consider Google's proposal to the EC before deciding how to resolve the FTC's own investigation to ensure that US consumers and innovators get at least the benefit of the remedies that are implemented in Europe," the group said.

Industry on alert for FTC's pending Google decision
By Michelle Quinn
1/2/13

The tech industry has been complaining about Google's use of key patents to fight competitors and waiting as the FTC appears to be moving swiftly to take action — but now anticipation for a resolution has turned to dread.

In the past few days, Apple and Microsoft have sent letters to the five FTC commissioners, arguing that no settlement in the patent case is better than what the commission is contemplating, according to sources. The concern, said one source familiar with the letters, is that the settlement allows Google to seek injunctive relief on standards-essential patents and that the FTC is being used by Google to impose its policy agenda.

Whatever the agreement, it could potentially rewrite the rules of the road when it comes to patents that are part of industry standards.

The FTC and Google appear to be close to announcing a final resolution to two Google antitrust investigations, one involving patents and another involving search. Sources say that the commission is racing to settle the nearly two-year probe this week before the departure of a long-term, swing-vote commissioner. The patent resolution has been finished for weeks, according to sources, but the commission is trying to resolve the more difficult search case.

There is potential for the FTC's agreement to upend the delicate balance of power in ongoing patent fights between Google and others, such as Microsoft and Apple. A settlement with the FTC may affect ongoing litigation and reshape how the industry treats standards.

The settlement is expected to involve Google agreeing to limit its pursuit of injunctions when it comes to its standards-essential patents.

It is important to find a balance between the rights of patent holders and those who want to license, said Doug Lichtman, a UCLA law professor.

"By carefully metering whether injunctions are available, the patent system can achieve that balance," he said. "The time to make the change is now, before the threat of extortive licensing in any way derails technology markets."

The settlement reportedly involves some wiggle room for Google to pursue injunctions, and other players may be forced to seek similar types of commitments. Some have raised concerns that the settlement may give Google too much flexibility and be weaker than recent court decisions.

When it purchased Motorola Mobility for $12.5 billion, Google picked up a treasure trove of patents, including those that are part of industry standards and key for allowing technologies to work well together.

But in some patent disputes, Motorola Mobility has tried to block competitors from using its standards-essential patents by seeking injunctions in courts and taking cases to the International Trade Commission. Apple and Microsoft both agreed not to seek injunctive relief. Companies have argued that pursuing injunctions was a violation of the promise firms make when they agree to make their technologies part of a standard and should be off the table.

Congress took up the issue with a hearing on the ITC and exclusion orders, and the FTC pursued an investigation of the issue. It is unclear if the FTC agreement with Google would include Google's cases in front of the ITC, which blocks products from crossing the border. U.S. courts have rarely issued injunctions in cases involving standards-essential patents, and in recent months judges have indicated a lack of interest in pursuing injunctions in cases involving patents that are part of standards.

Given that reluctance, it is unclear what impact the FTC's consent decree on Google and patents could have. Some industry observers argue that the FTC's consent decree could prevent Google from wreaking havoc in the future by holding up competition. Or it could weaken Google when it comes to negotiations. It is "conceivable that if Google makes a flat promise not to pursue injunctions on standards-essential patents, even if the licensee seeks an injunction against Google, it might embolden potential licensees to hold out, knowing that Google would not be able to block their products," said Mike Carrier, a law professor at Rutgers.

The deal may signal to other firms that they, too, may face potential enforcement action if

they pursue injunctions on standards-essential patents.
"The FTC settlement will be perceived rightly by all patent-owners as a de facto per se rule limiting their legitimate property and contract rights if they choose to enter into" a standards setting organization, said Adam Mossoff, associate professor of law at George Mason University School of Law. That will lead to fewer patent owners making their technology part of a standard, he said.
Jon Potter, president of the Application Developers Alliance, noted in ablog post on PandoDaily: "If the Google-FTC agreement establishes a patent injunction framework, and other technology companies make the same commitments — which seems prudent in order to avoid their own FTC problems — then smartphone patent litigation could actually decrease in 2013."
The industry, however, will likely see some benefit in any resolution given that Motorola Mobility has been the one to stir up the patent world with the pursuit of injunctions, said Jorge Contreras, associate professor at American University's Washington College of Law.
"Google has had enough time to think about how they want to situate Motorola within the larger Google organization. And as old-line Google was fairly cool on patents, I think they'll start to fall into line with Apple and Microsoft as far as their public positions on FRAND," he said, referring to the acronym for licensing standards-essential patents on a fair, reasonable and non-discriminatory basis.

POLITICO PRO

FTC seeks Google case resolution
By STEVE FRIESS
1/2/13

The FTC is racing to settle a nearly two-year antitrust probe of Google this week before the departure of a long-term, swing-vote commissioner, sources with knowledge of the investigation told POLITICO.

The settlement would be along the lines of an agreement brokered between the commission and Google in December that requires Google to sign a consent decree over its use of standards essential patents against rivals but otherwise get away with only voluntary changes to its business practices regarding search advertising and use of reviews from other websites, the sources said.

FTC Chairman Jon Leibowitz is said to be pushing the case to a speedy conclusion before the departure of Commissioner Tom Rosch whose replacement, Joshua Wright, was confirmed by the Senate on Tuesday.

Rosch told POLITICO he expects to leave office this Monday, pending the swearing in of Wright. Wright has pledged to recuse himself from any enforcement action against Google for two years because of academic research he has done on behalf of the search company.

Rosch, who remains away on vacation, said via email that he will return to his Virginia home on Friday evening and "I expect to be a commissioner until Monday."

"My sense is that they want to finish before Josh Wright takes office," said one source close to the case. "It makes things easier and it's a gesture of respect to Rosch."

For nearly two years, Google has been investigated by both the FTC and the European Union on a variety of antitrust allegations. The biggest of those is whether the world's dominant search engine engages in anti-competitive behavior by manipulating results to shunt users unknowingly toward Google-owned properties for shopping, travel and other services.

Others include Google's use of "snippets" of content from other websites — like reviews

from TripAdvisor or Yelp — without permission and contracts that make it difficult for users of Google Ad Words to compare prices for buying "keyword" ads with other search services.

Sources have said the FTC is poised to settle with Google with a voluntary settlement agreement. The FTC can enforce any violation of the voluntary settlement under fair trade practice provisions of the FTC Act. That outcome, which was expected in mid-December, was punted to January following an outcry from Google foes.

Neither Google nor the FTC would comment for this article.

Rosch, when asked if he would leave before getting to vote on the Google case given how involved he has been in the probe, replied: "I can't talk about Google. But I have spent a lot of time on it."

Some have read that to imply he would like to have an influence on the decision.

"If it's important to Commissioner Rosch, who has spent a lot of time and effort on this investigation, to formally vote on it and to be heard on the outcome of this, I think that will get consideration from the other commissioners," said Matthew Reilly, a former FTC litigator and assistant director of the agency's Bureau of Competition.

Reilly is working with FairSearch.org, the consortium of tech companies including Microsoft and Expedia who have complained of Google's anti-competitive behavior.

The group, clearly sensing that Leibowitz is likely to resolve the case by Monday, posted on its blog late Wednesday urging the chairman not to resolve the matter in a hurry. Rather, Leibowitz ought to delay resolution on the case until Google submits its settlement offer to the European Commission — expected later this month.

"If the FTC fails to take decisive action to end Google's anti-competitive practices, and locks itself out of any remedies to Google's conduct that are offered in Europe later this month, the FTC will have acted prematurely and failed in its mission of protecting America's consumers," FairSearch said on its blog.

The big question remains how crucial Rosch is to what Leibowitz hopes to accomplish. If he is the swing vote in a possible 3-2 decision to pursue aggressive action against Google on grounds it violates anti-trust laws, the chairman would need to move quickly. Wright has pledged to abstain from Google matters for two years on account of a conflict of interest, so without Rosch the tally could be 2-2. A tie results in no action by the FTC.

Rosch, a Republican appointee, has long been a mystery on this topic, sending off signals in every direction as to how he might vote.

"Would the train be speeded up to do the vote?" asked former FTC Chairman William Kovacic, Leibowitz's predecessor. "It all depends on whether Jon needs the vote."

There is precedent for letting a departing commissioner take part in an important decision before the end of a tenure. It was, in fact, Rosch who urged his colleagues to allow then-outgoing Commissioner Pamela Harbor Jones to vote in the antitrust case against Intel in 2010 when the chipmaker entered a settlement to avoid litigation.

Yet Kovacic said that's a lousy, artificial reason to close up a long, expensive process.

"You start playing with fire when you adjust the calendar for these kinds of comings and goings," he said. "You don't know what's going to happen."

THE WALL STREET JOURNAL

WSJ: Microsoft Lawyer Pans Reported Google Antitrust Agreement
By Shira Ovide
January 2 2013

Microsoft, which has a history of being hunted by antitrust regulators, now is complaining that regulators aren't being tough enough against its rival Google.

In a blog post published Wednesday, Microsoft Deputy General Counsel Dave Heiner expressed disappointment in Google's potential agreement to avert a lawsuit by the Federal Trade Commission, a U.S. antitrust authority.

The Wall Street Journal and other news organizations have reported Google appears close to pledging several voluntary changes to satisfy the FTC concerns about potential abuses of its market position in Web search. The Journal also has reported Google is expected to sign a consent decree in a separate probe on of how it handled mobile patents that it acquired in its purchase of Motorola Mobility last year.

"News reports have stated that the FTC may close its investigation if Google merely makes certain 'voluntary commitments' to reform its behavior," Heiner wrote.

His post expressed skepticism that Google could "be trusted on the basis of non-binding assurances that it will not abuse its market position further." On the patents issue, Heiner also wrote Google's potential agreement "appears to be less demanding than the pledge the U.S. Department of Justice received from Apple and Microsoft nearly a year ago."

Heiner also reiterated a longstanding complaint that Google is hindering Microsoft's ability to offer a fully functionally YouTube mobile app for Microsoft's Windows Phone smartphones.

Microsoft says Google isn't providing access to YouTube data in the same way it does for Apple's iPhone and for smartphones powered by Google's Android software. The app for Windows Phone is therefore essentially YouTube's website without features offered for YouTube apps on other smartphones, the company says.

Microsoft has aired the YouTube complaint since at least 2011, but Heiner added a fresh allegation in his post.

"Last month we learned from YouTube that senior executives at Google told them not to enable a first-class YouTube experience on Windows Phones," Heiner wrote.

A Google spokesman disputed Microsoft's assertions. "Contrary to Microsoft's claims, it's easy for consumers to view YouTube videos on Windows phones," he said. "In fact, we've worked with Microsoft for several years to help build a great YouTube experience on Windows phones."

The post underscores the rivalry between Microsoft and Google, which compete in many areas including Web search and operating software for smartphones and computers. Microsoft Chief Executive Steve Ballmer repeatedly has criticized Google for abusing its market lead in Web search, and for intruding on consumer privacy with Google's online-ad business.

THE WALL STREET JOURNAL

Regulators Cut J.P. Morgan Community-Lending Grade
By DAN FITZPATRICK

January 2 2013

Regulators twice in the past six months disclosed downgrades of J.P. Morgan Chase & Co.'s community-lending practices, a rare occurrence for any large U.S. bank.

The Office of the Comptroller of the Currency lowered J.P. Morgan Chase's primary deposit-taking bank and credit-card-lending unit to "satisfactory" from "outstanding" after examining their performance under a law designed to encourage banks to lend to low- and moderate-income neighborhoods. Regulators examine banks' compliance with this law, called the Community Reinvestment Act, every few years.

J.P. Morgan, the largest U.S. bank by assets, is the only one of the four biggest commercial lenders to have a "satisfactory" CRA rating attached to its primary bank as well as its credit-card operations. The main deposit-taking banks at Bank of America Corp., BAC -0.77%Wells Fargo & Co. and Citigroup Inc. C -0.08%all scored "outstanding" in their most recent exams. Bank of America's credit-card unit, FIA Card Services NA, also scored a "satisfactory."

"It's got to be embarrassing for them," said Ken Thomas, a Miami-based banking consultant. A downgrade "is pretty serious, especially for a big bank."

A J.P. Morgan Chase spokeswoman said "we continue to make the loans and investments that strengthen communities—and will strive to regain our 'outstanding' rating." During the period examined by the OCC, she said J.P. Morgan contributed more than $500 million in financing and tax credits for affordable housing and economic-development projects in low- and moderate-income communities.

The downgrades are the latest sign of a more aggressive approach from the OCC, the primary national-bank regulator.

The OCC has warned all big banks that it is going to be tougher when enforcing rules that prohibit practices considered unfair or deceptive to customers.

For J.P. Morgan, it also is preparing two formal enforcement actions designed to remedy operational weaknesses. One is expected to target the lapses in risk controls that allowed a small group of London-based traders to rack up losses of more than $6 billion in 2012, according to people familiar with the company's discussions with regulators. The other will address alleged weaknesses in the bank's antimoney-laundering systems and require the bank to beef up those procedures, said people close to the discussions. The OCC declined comment.

The OCC released the rating change for J.P. Morgan Chase's Newark, Del., credit-card lending unit, Chase Bank USA NA, Wednesday. The exam covered a period from November 2008 through December 2011. The OCC's assessment of the credit-card lending unit cited "evidence of illegal credit practices inconsistent with helping to meet community credit needs" as reason for the change in the rating.

The downgrade of its primary bank, New York-based JPMorgan Chase Bank NA, was disclosed in early August and covered a period from 2007-2010.

Both exams found fault with the bank's behavior under the Federal Trade Commission Act that prohibits "unfair and deceptive acts and practices." The assessment of the larger bank released last August referred to an incident that resulted in a OCC fine of $2 million. The OCC levied the fine in 2011 after finding that J.P. Morgan used high-pressure sales tactics and made false statements in the marketing of a credit-protection product sold by its car-loan division.

The product, in exchange for a monthly fee, promised to cancel some or all of a borrower's

outstanding debt if the borrower fell into trouble. The bank didn't admit or deny wrongdoing but consented to the $2 million penalty and said it would distribute nearly $25 million to affected customers.

The OCC's exam of J.P. Morgan's large bank also cited the bank's actions in the servicing and modification of mortgages, foreclosures and its compliance with the Servicemembers Civil Relief Act, which stops foreclosures for active-duty service members. Even though J.P. Morgan and Chief Executive James Dimon emerged from the financial crisis in better shape than peers, they still struggled with large loan losses, scrutiny over document errors and the disclosure that the bank foreclosed on homes owned by active-duty military members. J.P. Morgan acknowledged the errors after conducting an internal audit.

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From: Federal Trade Commission <subscribe@subscribe.ftc.gov>
Sent: Tuesday, January 8, 2013 12:44 PM
To: Matties, Deborah J. <DMATTIES@ftc.gov>
Subject: Daily Clips 01.08.13

FTC Daily Clips Banner

January 8, 2013 (Tuesday)

Today's Clips Alert is available athttps://ftcintranet.ftc.gov/clips/pdfs/Clips 010813.pdf

COMPETITION

Google's FTC agreement may bring help to Apple. Chicago Daily Law Bulletin 1/7 (pasted below)

Issa to FTC: Google leaks were prohibited by law. Politico Pro 1/7 (pasted below)

Congressman Demands Investigation of Google FTC Probe Leaks.Mashable 1/7 (blog)

Rep. Issa Demands Investigation Of FTC Over Google Leaks.TPM News 1/7

Rosch: "I was always willing to litigate" against Google.GCR 1/7

Microsoft Contends FTC-Google Deal Kills Pending Motorola Patent Cases.All ThingsD 1/7

OPINION: FTC's Standards-Essential Patent Settlement: The Real "Elephant" in the Room? Forbes 1/8 (blog)

FTC Concedes to Google on Antitrust Ruling.Search Engine Journal 1/7 (blog)

What Google's FTC Deal Means for the Patent Wars.TIME 1/7

Congressman: Google FTC probe results were leaked illegally.C-Net News 1/7

Editorial: FTC and Google -- why the right decision feels so wrong to so many people.EndGadget 1/8 (blog)

FTC Says It Won't Investigate Why Vt. Gas Prices Are High.VPR News 1/7

Avis and Hertz Acquisitions Raise Questions Over Rate Trend.NY Times 1/7

CONSUMER PROTECTION

You Have Until April 1 To Claim Refund On These Misleading Dietary Supplements & Cold Remedies.The Consumerist 1/7

FTC offers restitution to supplement ad victims.RBR News 1/8

Do Coconut Shells Make Towels Less Germy? WSJ 1/7 (pasted below)

Bill Ackman Says Just Getting Started Exposing Herbalife.Bloomberg 1/7

Banks Reach Settlements on Mortgages.NY Times 1/7 (blog)

BofA reaches $11.6 billion settlement with Fannie Mae.Reuters 1/7

BofA settles with Fannie Mae for $10 billion USAT 1/7

OF INTEREST

Facebook begins rolling out new single-column Timeline with greater emphasis on messages.Next Web 1/8

TWEETS

Food Marketing
@bayareabites: App, crackle, pop: Junk food marketers target your kids online @tlaskawy @gristhttp://owl.li/gCwYF @FTC (66,100+ followers0

Google
@nytimes: Google's rivals say FTC antitrust ruling missed the point:http://t.co/kbNljouH (7,062,000+ followers)

@time: What Google's FTC deal means for the patent wars |http://t.co/g7ZcqCHo (via @TIMEBusiness) (4,157,800+ followers)

@Engadget: Editorial: FTC and Google -- why the right decision feels so wrong to so many people -http://t.co/K9CeeSGQ #EngadgetCES (571,900+ followers)

@thehill: Issa calls for probe of FTC leaks in Google casehttp://t.co/AaJ6k7H2 by@jenmartinez (290,200+ followers)

@cnetnews: Congressman: Google FTC probe results were leaked illegallyhttp://t.co/q85ne7An (193,550+ followers)

@allthingsd: Microsoft Contends FTC-Google Deal Kills Pending Motorola Patent Cases -by @LizGanneshttp://t.co/Jb6oT2yU (96,200+ followers)

@DarrellIssa: I've asked for an investigation of the FTC leaks about @google. STORY:http://t.co/ZGtpVKKP (70,500+ followers)

@washtimes: OLIVER: Google-FTC settlement a victory for the free market: Consumers don't want a state-run search engine:http://t.co/LZsifpA3 (60,500+ followers)

@ILHisChambr: @ILHisChambr commends @FTC for decision to conclude antitrust investigation of @Google, Inc.http://goo.gl/ZF6jK #internetfreedom (750 followers)

Miscellaneous
@consumerwriter: Techies, be the people's hero MT @FTC Only 10 days left to a contest to stop robocalls & win $50,000!http://robocall.challenge.gov #FTCrobo (1,950+ followers)

CHICAGO DAILY LAW BULLETIN

Google's FTC agreement may bring help to Apple
January 7, 2013
By Roy Strom —rstrom@lbpc.com
Law Bulletin staff writer

In the legal war to bolster their positions in the smartphone market, Google Inc. and Apple

Inc. remain sworn enemies.

So it may seem odd that a legal move by Google may bolster Apple's chances in a separate legal fight the iPhone-maker currently faces with Samsung Electronics at the International Trade Commission (ITC).

A local patent lawyer and law professors said a settlement Google reached last week with the Federal Trade Commission (FTC) could do just that.

Google agreed with the FTC not to seek sales bans on competitors' products that infringe the standard-essential patents it acquired through the purchase of Motorola Mobility last year. These patents become essential for companies in the same industry because they cover basic parts of a technology.

In a separate case at the ITC, Apple and a host of other technology companies argued that the ITC, as a rule, should not levy a sales ban on Apple's or any other company's products if they infringe standard-essential patents.

"(Google's agreement) should certainly serve as an additional warning to all courts that it would be a tremendous mistake to grant an injunction against a product that infringes a standard-essential patent," said Jonathan Masur, a professor of patent law at the University of Chicago Law School.

"The FTC's decision is, of course, not binding on a judge at the ITC or any other court. ... But I hope that it will exert some sway."
In this case, standard-essential patents cover such technology that lets cellphones connect to wireless networks.

Companies that receive patents like this typically agree to license them to competitors on "fair, reasonable and nondiscriminatory" terms.

If regulators or courts grant injunctions, or sales bans, on products that infringe standard-essential patents, then holders of those patents could demand large licensing fees, the FTC said in a release accompanying the Google agreement. The FTC calls this scenario a patent "hold-up."

"This type of patent hold-up can lead to higher prices, as companies may pay higher royalties for the use of Google's patents because of the threat of an injunction, and then pass those higher prices on to consumers," the FTC said.

In a separate, ongoing case at the ITC, Apple faces the threat of a potential sales ban on its iPod, iPhone and iPad products if the ITC finds Apple infringed Samsung's standard-essential patents.

David L. Newman, an intellectual property partner at Arnstein & Lehr LLP, said the ITC could rely on the FTC's agreement with Google as a basis not to place an import ban on Apple's products.

The FTC-Google agreement laid out an arbitration process as a way to agree on fair licensing terms for standard-essential patents. If a patent owner does not offer fair licensing terms and instead seeks a sales ban first, the FTC says that could constitute a violation of the Sherman Antitrust Act.

"The ITC might rely on that reasoning to find that the conduct in the case of Samsung could rise to the level of a violation of the antitrust rules," Newman said.

"And so tying the logic of the FTC's ruling against Google could lead the ITC to determine that such an injunction on behalf of Samsung could hurt the public."

The ITC asked for public comment in the Apple case — No. 337-794 — on using sales bans as a remedy for infringing standard-essential patents.
The ITC expects to make a decision by Feb. 6.

While the FTC's agreement with Google makes clear its view on the issue, Daryl Lim, an assistant professor of patent law at The John Marshall Law School, said any impact on the Apple-Samsung case could face limitations by the two agencies' differing goals and mandates.

"The prevailing view is that the ITC, like the Federal Circuit, views patents as a property right which warrants injunctive relief as the norm," Lim said.

"The ITC and district courts, while cognizant of the public interest factor of the FTC-Google (agreement), will treat it similarly to a private settlement."

POLITICO PRO

Issa to FTC: Google leaks were prohibited by law
By Michelle Quinn
1/7/13

Rep. Darrell Issa has a question for the FTC inspector general regarding the Google antitrust case: Who let the news out?

Issa, chairman of the House Committee on Oversight and Government Reform, asked for an investigation of press leaks of information in the FTC's Google antitrust probe.

In a letter dated Jan. 3, the California Republican asked Scott Wilson, the FTC's inspector general, to initiate an investigation of leaks in the agency's Google investigations. "It is believed that the commission may be contributing to, or is the source of, this information," he wrote. "This is of concern because such leaks are prohibited by law and counterproductive to the investigative process."

The FTC is prohibited from sharing nonpublic information to the media and the public, he wrote, adding that when information is shared it is required to be on the record and for attribution.

Issa's letter was first reported by the website Mashable.

On Jan. 3, the FTC announced the results of its investigations into Google's business practices. The agency shut down its investigation into Google's search business with Google agreeing to voluntary changes. The agency issued a proposed consent decree in how Google treats key patents with Google agreeing to limit its pursuit of injunctions against those who violate these patents.

Other lawmakers such as Sen. Ron Wyden (D-Ore.) have expressed concerns about leaks in the investigation. "The FTC's credibility is eroded when confidential details of internal discussions are revealed to the media as has continually been the case in the investigation of Google," Wyden wrote in November.

The FTC confirmed receiving the letter but declined to provide comment. Google also declined to comment.

THE WALL STREET JOURNAL

Do Coconut Shells Make Towels Less Germy?

By LAURA JOHANNES
January 7, 2013

More fabrics are being crafted from materials that sound like they came straight out of a forest. Made from bamboo, eucalyptus and coconut, the fabrics are promoted as having the ability to deter bacterial growth, but scientists say some claims aren't proven.

Bamboo fabric, a popular material for bedding, towels and clothing, has been marketed as retaining the naturally antibacterial qualities of the bamboo plant. However, a 2009 study found the fabrics are rayon made from bamboo, which doesn't retain the plant's properties, says textile scientist Ian R. Hardin, the study's author. Seven commercial bamboo fabrics tested in the study were found not to be antibacterial.

"The natural properties of the bamboo plant are simply not going to survive" the rayon-making process, adds Dr. Hardin, professor emeritus of textile science at the University of Georgia in Athens, Ga. Rayon is made from cellulose typically obtained from trees, but it can be obtained from bamboo, and the result is a virtually indistinguishable fabric, he says.

The Federal Trade Commission filed administrative complaints in 2009 against four companies selling products labeled as bamboo. According to the complaints, the companies' labeling and advertising was "deceptive" because the products weren't natural bamboo and didn't retain its antibacterial qualities. The cases were subsequently settled, and the companies agreed not to make false claims, according to court documents.

Dr. Hardin's study included Jonano brand products sold by Sami Designs LLC of Wexford, Pa., and Bamboosa brand products sold by M Group Inc., Andrews, S.C. Both companies were part of the FTC's 2009 settlement. Bonnie Siefers, owner of Sami Designs, declined to comment. A representative for M Group couldn't immediately be reached for comment.

In 2010, the FTC sent letters to 78 retailers warning them to stop advertising rayon products as bamboo. Last week, to settle an FTC complaint, four retailers—Amazon.com, Leon Max Inc., Macy's Inc. and Sears Roebuck & Co.—agreed to pay a total of $1.26 million in penalties, the agency said. The complaint said the companies violated federal textile-identification law by labeling products as bamboo without disclosing they were rayon. In the proposed agreement, the retailers didn't admit to wrongdoing. Macy's declined to comment; Amazon and Sears didn't return calls; and a representative for Leon Max couldn't be reached for comment.

A $48 yoga towel from Manduka LLC is made of polyester infused with "activated carbon" derived from recycled coconut shells. The Ombré eQua Plus towel, made from Cocona brand fabric, "provides superior odor management," according to the El Segundo, Calif., company's website. Manduka says its "internal focus group" found that after heavy use odor was "negligible" compared with a similar towel without the carbon.

Recycled coconut shells are used to make the carbon, which is embedded into polyester yarn to make Cocona brand fabric, says Chris Castagno, chief marketing officer of Cocona Inc. of Boulder, Colo. The carbon absorbs moisture. Cocona-funded studies have found the fabric dries faster than other materials and a dry fabric is less likely to grow bacteria, Mr. Castagno says. Cocona doesn't claim its fabric is antibacterial and doesn't have any studies to show it slows bacteria growth, he adds.

Eucalyptus sheets from Sacred Sleep LLC ($200 for a queen set) are "antimicrobial" and deter dust-mite growth, the Salida, Colo., company says. The fibers used in its sheets are

called Tencel, made from eucalyptus trees by Austria'sLenzing AG. Sacred Sleep says its claims are based on studies by the manufacturer.

Tencel, a type of rayon made using an environmentally friendly process, is also used in towels, baby wipes and apparel. The fibers don't kill bacteria but their structure draws in moisture to create a "desert-like atmosphere" on the surface that is inhospitable to bacteria, says Nina Nadash, a home textile merchandiser for Lenzing in the Americas.

At least two published scientific studies have tested Tencel's ability to retard bacterial growth. A study published in 2009 in the Journal of Applied Microbiology put underarm sweat samples from five men and five women on a variety of fabrics, including cotton, polyester and fabric made from Tencel. The fabrics were incubated in a warm, wet environment for 24 hours. The Tencel fabric with male sweat showed less bacteria growth than most of the other fabrics but the results weren't statistically significant, meaning they could have occurred by chance, the study says. Tencel fabric grew fewer bacteria on the samples with female sweat than polyester, but about the same as cotton.

Tencel fabric, however, was the best at discouraging odor-causing bacteria, says Bernard Redl, a microbiologist at Austria's Medical University of Innsbruck and a study author.

A 2009 laboratory test funded by Lenzing found that fabric with Tencel fibers deters dust mites. According to the test results—which were obtained from the website of Valley Forge Fabrics Inc., a Pompano Beach, Fla., company that sells Tencel sheets—swatches of a Tencel-cotton blend and a control fabric of 100% cotton were infected with 300 dust mites. After 42 days in the lab, the Tencel-cotton swatches had no dust mites while the controls had an average of 5,500 mites.

This type of study doesn't mean a sheet will help allergy sufferers, says Darryl C. Zeldin, scientific director of the National Institute of Environmental Health Sciences, as it wasn't done "in a real setting, when people are sleeping in their beds" and there would be moisture from human bodies and skin flakes, which mites eat.

Officials at Lenzing couldn't be reached for comment on the dust-mite study.

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COMPETITION

Justice Department and Patent Office Issue Policy Statement on Patents. NY Times 1/8 (blog)

Google Drops Microsoft Patent Claim. WSJ 1/9 (pasted below)

Google Withdraws Patent Claims Against Microsoft. All ThingsD 1/8

Microsoft says FTC settlement should end claims over essential patents. GCR 1/8

Daily Report: Mobile Apps Drive Rapid Change in Searches. NY Times 1/8 (blog)

Americans may face rising gasoline prices again in 2013. LA Times 1/8

Clearwire bid drives shares above deal price with Sprint. Kansas City Star 1/9

Oil slips as gasoline, distillate supplies jump. Market Watch 1/9

CONSUMER PROTECTION

Advocate: IRS does poor job on identity theft. USAT 1/9

Apple, Facebook, Microsoft unite on app privacy front. Politico Pro 1/9 (pasted below)

Loeb Counters Ackman's Bet Against Herbalife. NY Times 1/8 (blog)

Four retailers fined by FTC in bamboo mislabeling cases. Kids Today 1/9 (blog)

OF INTEREST

Editorial: Another Slap on the Wrist. NY Times 1/9

A Financial Service for People Fed Up With Banks. NY Times 1/9

OPINION: The EPA Is Politicized---So Make It Official. WSJ 1/8 (pasted below)

TWEETS

Competition

@hotelinsight: Priceline wins U.S. approval for purchase of Kayak | skift.com/2013/01/08/u-s... (2,560+ followers)

US Federal Trade Commission OKs #Priceline purchase of #Kayak. Now we wait for #Expedia takeover of #trivago. chicagotribune.com/business/break... (162 followers)

@jpnKevin_T: @TheJusticeDept @FTC Read what Qualcomm said about Apple status as "willing" FRAND licensee less than a month ago po.st/Y5m8rE (1,250+ followers)

@jpnKevin_T: Apple & Microsoft are playing you as FRAND fools @FTC @TheJusticeDept FRAND rules always allowed injunctive relief vs unwilling licensees (1,250+ followers)

@jpnKevin_T: @FTC @TheJusticeDept are you usurping the legislative? Microsoft Tells Its FRAND Story to the Court po.st/pEGIOK @scrawford (1,250+ followers)

Google

@usnews: By closing its investigation into Google, the FTC ignored that Google's designed to preserve its advertising monopoly http://bit.ly/WyWY0g (42,300+ followers)

@GooglePhones: FTC's Google Settlement a "Third Way" Approach for Antitrust Enforcement bit.ly/UKPLjC #GooglePhone (20,600+ followers)

@highervis: Google FTC Decision and What It Means For You: In case you missed it, the U.S. Federal Trade Commission finally ... bit.ly/ZCtt4R (4,620+ followers)

@JaffePR: Google Search and Free Speech - On Thursday, the Federal Trade Commission announced that, after its ... ow.ly/2uaxUi (1,390+ followers)

@TechnoNewsDaily: Watchdog seeks FTC staff opinion on Google antitrust case: FTC Chairman Jon Leibowitz (Credit: screenshot by S... adf.ly/H5Gul (1,340+ followers)

@SPATLAW: Remain persuaded by FTC Commissioner Ohlhausen'd dissent against forcing Google/MMobility to accept FRAND licenses. ftc.gov/os/caselist/12... (160 followers)

A Free Speech Perspective on the FTC/Google Settlement medialawbytesandpieces.com/2013/01/08/goo... (153 followers)

Identity Theft

@ITRCSD: Why Care About Identity Theft?: youtu.be/k3yh9hjnE44 via @FTC #IdentityTheft (17,450+ followers)

@PrivacyToday: Check out the @FTC's new YouTube video about credit reports and identity theft: ow.ly/gDGMW (3,370+ followers)

Josh Wright

The Senate confirmed my #Mason contracts professor as an FTC Commissioner! Congrats @Josh_D_Wright!! (777 followers)

Miscellaneous

@MarketingApex: FTC Prosecution of Affiliates for Advertising Claims at Affiliate Summit West 2011: This was a conference sessi... bit.ly/Wz1f3P (8,460+ followers)

@DanitaBlackwood: Travel plans? Did you see an alert from @FTC about #hotel fees that are more than you bargained for> go.usa.gov/gZPY #travel (6,770+ followers)

THE WALL STREET JOURNAL

Google Drops Microsoft Patent Claim
By SHIRA OVIDE
January 9 2013

On the heels of Google Inc.'s agreement with U.S. regulators to limit how it can wield its technology patents, the

Internet search firm dropped a pending patent claim against Microsoft Corp.

Google on Tuesday asked the U.S. International Trade Commission, a federal body that frequently tackles patent disputes, to drop claims that Microsoft was infringing two patents held by Google's Motorola Mobility unit. The ITC claims date to 2010, before Google's acquisition of Motorola Mobility.

Last week, as part of an agreement with the U.S. Federal Trade Commission to end an investigation into Google's potential violations of antitrust law, Google made pledges about how it would handle disputes over "standard essential patents," or patents that cover broad areas of technology such as how to deliver online video to mobile devices.

In these disputes, Google agreed to limits on when it could ask a court to block sales of competing companies' products. There has been murkiness about how the FTC agreement affects existing patent litigation involving Google and companies such as Microsoft.

The two patent claims Google asked to drop concern such patents. Google was asking the ITC to block imports of Microsoft's Xbox videogame console, a move that effectively would have halted Xbox sales in the U.S.

Google didn't say in Tuesday's ITC filing why it asked to drop the two patent claims against Microsoft. As part of the 2010 ITC filing, Google is still asking the ITC to intervene in a dispute with Microsoft on one Motorola Mobility patent.

Microsoft Deputy General Counsel David Howard said the company was pleased Google dropped the two ITC patent claims, and that Microsoft hoped Google would "now withdraw similar claims pending in other jurisdictions as required by the FTC Consent Order."

The ITC didn't immediately respond to a request for comment.

Microsoft and Google have other patent lawsuits pending in federal courts, including a closely watched case in Seattle.

Technology-news website All Things D earlier reported on Google's dropped patent claim.

THE WALL STREET JOURNAL

OPINION: The EPA Is Politicized—So Make It Official
This federal regulatory agency, like many others, would be better run by a bipartisan commission.
By STEVEN F. HAYWARD

Lisa Jackson, who announced on Dec. 27 that she was stepping down as head of the Environmental Protection Agency, will be leaving under a cloud. It turns out that she had been using an email account, under the alias "Richard Windsor," to conduct official business, in an apparent attempt to evade federal transparency laws, including the Freedom of Information Act. After the account came to light in the fall, the Justice Department agreed to release thousands of emails later this month.

This disturbing episode is only one of many under Ms. Jackson's administration. Will her successor be any better? In a way, the question is beside the point. The agency's regulatory machine—and its advancement of the Obama administration's green agenda—would proceed on automatic pilot even if the president didn't bother to appoint a successor.

Here is a suggestion: Reform the EPA by politicizing it. What! Do I mean to say that the agency isn't political enough already? Actually, in one important sense it isn't—and that is part of the problem.

Both the EPA and the Nuclear Regulatory Commission do much the same thing—that is, protect the public against environmental risks. But there is a big difference between the two. The EPA is headed by a single administrator and given wide latitude under various environmental statutes to make sweeping regulatory determinations on his or her sole authority. The NRC, by contrast, is run by a five-member commission drawn from both parties, just as are several other independent regulatory bodies such as the National Labor Relations Board, the Federal Trade Commission, the Securities and Exchange Commission and the Consumer Products Safety Commission.

There is a reason Congress has adopted the commission model. While a bipartisan consensus exists for regulating some parts of the economy by independent agencies that harness specialized expertise, there remains an underlying partisan disagreement about the means and ends of policy. The commission model recognizes and accommodates these disagreements, with a process that emphasizes public debate and is more transparent and accountable.

The EPA's single-administrator model, on the other hand, is based on what amounts to a conceit that some policy matters are beyond politics or meaningful controversy. This is the apotheosis of the Progressive Era ideal, or rather myth, of enlightened administration by neutral experts. It is also a tactic to deny that what are deeply political administrative decisions are in fact political. The single-administrator model makes it much easier for an ideologue

like Ms. Jackson to use the regulatory process as a steamroller to achieve policy goals.

A bipartisan commission would change this dynamic. The president would, as is customary, still appoint a majority of the commissioners, including the chairman. But the minority would have their dissent on policy matters on the record.

In regulatory bodies such as the Consumer Product Safety Commission, minority commissioners and their staffers act as brakes on permanent bureaucrats and agency staff, and the minority commissioners are able exert influence over final policy decisions. At the EPA, however, bureaucrats can embrace self-serving justifications, stifle dissent and represent their manipulated scientific findings and economic assessments as beyond controversy or uncertainty—which U.S. administrative law then makes difficult to challenge successfully in court.

Changing the EPA into a commission won't solve all of its problems. But it would make it much harder for the EPA to ignore or suppress contrary scientific evidence on issues such as global warming, air pollution and toxic risks. It would also make it harder to impose regulations—as happens today—with fanciful cost-benefit ratios that go unchallenged.

In the case of global-warming regulation, for example, an EPA that operated on the commission model would find it problematic to censor its own dissenting employees the way it did in 2009 with Alan Carlin, a 30-year career official who challenged the agency's "endangerment" finding on greenhouse gases, which was the first step on the EPA's way to issuing emissions regulations.

Mr. Carlin was told to cease his work on the issue and not to communicate his views publicly. An inspector general's report subsequently vindicated his critique of the agency's finding, but it was too late to hold up the regulatory juggernaut. Mr. Carlin has since retired.

If you think reforming the EPA into a five-member commission is a modest reform of little consequence, here's a suggestion. Have House Republicans introduce a bill to do this, and watch how ferociously the environmental establishment fights it.

Mr. Hayward is a visiting professor at Pepperdine University's School of Public Policy and the author of the "Almanac of Environmental Trends" (Pacific Research Institute, 2011).

POLITICO PRO

Apple, Facebook, Microsoft unite on app privacy front
By Michelle Quinn
1/9/13

Apple, Facebook and Microsoft are joining forces for a new initiative to educate developers about privacy.

Called "ACT 4 Apps," the initiative will be run by the Association for Competitive Technology, a trade association for application developers. The effort will focus on bringing privacy experts to developer events and include its own gatherings to talk about federal and state laws and how developers should include privacy considerations when making applications, said Morgan Reed, ACT's executive director. It also will support the development of privacy tools and academic and market studies, as well as continuing to bring app developers to Washington and statehouses.

Founded in 1998 by application developers, ACT has more than 5,000 members, small and medium-sized firms. This is the first time Apple, Facebook, Verizon, AT&T and Blackberry are joining ACT as sponsors. Microsoft, eBay, Oracle, Intel and VeriSign are already sponsors.

The inclusion of Apple is notable because the iPhone and iPad have been leading platforms for developers making applications and because Apple is not known to join trade groups or initiatives.

ACT 4 Apps comes as federal and state regulators are increasingly looking at how firms that collect data online handle users' privacy, particularly when it comes to mobile applications.

In December, the FTC unveiled its update to the Children's Online Privacy Protection Act, which creates new rules protecting kids under the age of 13. The California attorney general has sued Delta over its mobile applications and has issued warning letters to many other developers. ACT 4 Apps plans to work with the FTC and state attorneys general, Reed said.

Developers often do not think they are creating applications with privacy issues, Reed said. "We want to turn the conversation around from finger wagging to go where developers are and talk about how to include privacy in their efforts to make awesome apps," he added.

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COMPETITION

Wyden: Google leaks 'particularly troubling'. Politico Pro 1/9 (pasted below)

Senator blasts leaks in FTC's Google investigation. C-Net News 1/9

What happens to Google's other patent cases? Politico Pro 1/9 (pasted below)

DOJ, patent office spell out patent holders' rights. Daily Deal 1/8

Why the Feds Should Have Been Tougher on Google. The New Yorker 1/9 (blog)

Did Google's Promise to "Do No Evil" Convince the FTC to Do Nothing About its Search Bias? TIME 1/10

FTC's Rosch wanted to sue Google for lying. Politico Pro 1/10 (pasted below)

Why the FTC Was Right Not to Sue Google. Forbes 1/10 (blog)

Crude Settles Above $93 a Barrel After EIA Data. CNBC 1/9

Natural Gas Climbs on Biggest Stockpile Drop in Almost Two Years. Bloomberg 1/10

GenCorp readies sale of missile interceptor unit. Daily Deal 1/9

GenCorp will sell business segment to expedite $550 million acquisition. Modesto Bee 1/9

Supervalu sells grocery chains, including Albertsons, to Cerberus. LA Times 1/10

CONSUMER PROTECTION

How Multi-Level Marketers Dodged a Bullet. CNBC 1/9

Editorial: Bill Ackman's Short Sale Puts Herbalife in Cross Hairs. Bloomberg 1/10

Herbalife says "legitimate company," takes on Ackman. Reuters 1/10

Mortgage Rule Will Not Change the Banking Game: KBW. The Street 1/10 (blog)

TWEETS

Google
@usnews: By closing its investigation into Google, the FTC ignored that Google's designed to preserve its advertising monopoly http://t.co/2nUXbEgX (42,300+ followers)

@MercNews: Google drops patent claims against Microsoft's Xbox after FTC deal http://t.co/4zSPDR0u (16,100+ followers)

@politicopro: FTC's Rosch says he wanted to sue Google because of lies about collecting users' personal info, not antitrust issues. politico.pro/ZKycBn (2,700+ followers)

#Microsoft left fuming after the #FTC ruling over #Google: Google must heave a sigh of relief… goo.gl/fb/CfdfL (2,750+ followers)

Hey @FTC if you always rule in favor of patent owners, why bust the kneecaps of SEP owners like Motorola and Samsung? http://www.groklaw.net/article.php?story=20130106101927687 ...
(450+ followers)

With the FTC's #Antitrust Lawsuit Settled, Google Will Further Monopolize Search motherboard.vice.com/blog/with-the-... (200 followers)

Bamboo
@tristatebbb: http://Amazon.com , others fined to settle @FTC charge they falsely labeled textiles as bamboo though they were rayon.http://bit.ly/WAn7vD (500+ followers)

Herbalife
@cnbc: Dan Loeb's letter on Herbalife bet: "Pyramid Scheme" accusation has no merit; thesis that FTC will take up, shut down $HLF is "preposterous" (985,200+ followers0

Miscellaneous
@katyonthehill: .@BerinSzoka: @FTC is using reports as "agency threats" to pressure cos "to do things that aren't voluntary." #adweek #2013CES (1,100+ followers)

Filed @ftc complaint against @spotify for constant spam emails after multiple unsubscribe attempts. Not like it'll stop, but whatever. (100+ followers)

POLITICO PRO

Wyden: Google leaks 'particularly troubling'
By Tony Romm
1/9/13

LAS VEGAS — Sen. Ron Wyden on Wednesday strongly criticized the FTC's handling of the Google antitrust investigation, which he said was rife with leaks that he found "particularly troubling."

"I'm determined to get to the bottom of this," the Oregon Democrat said, noting he planned to work in close coordination with Rep. Darrell Issa (R-Calif.).

Earlier this week, Issa wrote the agency's inspector general to call for an investigation of the sources of those leaks.

"What happened in the Google case was wrong," Wyden said.

The senator previously expressed doubts about the FTC's Google probe, and he even wrote the agency in November to register his concern about the "confidential details" seeping out of the commission. At the time, Wyden said the FTC's probe had been misguided.

"That over the course of the last several years Google has rapidly taken market share away from its competitors is not an indication that the search industry is uncompetitive," the senator wrote, "but evidence that Google is better meeting consumer preferences for a search engine."

The missive preceded by months the FTC's decision to close its search and advertising cases. Asked about the conclusion, Wyden remarked at a press conference, "When you strip it down and look at it, there are no barriers to entry in any significant way."

POLITICO PRO

What happens to Google's other patent cases?
By Michelle Quinn
1/9/13

Google's decision to withdraw patent claims to bar Microsoft's Xbox 360 on Monday now raises the question of what happens to Google's standards patent claims against Apple and Microsoft in other venues around the world.

Those cases will likely continue, but a key issue is what happens to Google's effort to obtain injunctive relief should it win those claims.

Some observers say it would logically follow from Google's decision at the International Trade Commission on the Xbox case that it would drop efforts to get injunctions against Microsoft or Apple in other venues, such as in Germany and in U.S. district courts. Those courts have more remedies in patent disputes other than blocking products such as awarding monetary settlements but Google could pull its claims for injunctive relief.

Microsoft's view is that the search company is required to withdraw claims for injunctive relief in these venues to comply with the FTC's consent order. David Howard, Microsoft's corporate vice president and deputy general

counsel, said in a statement that the company was "pleased that Google has finally withdrawn these claims for exclusion orders against Microsoft, and hope that it will now withdraw similar claims pending in other jurisdictions as required by the FTC consent order."

Since the FTC released its proposed consent order against Google, there has been confusion over whether the FTC was requiring Google to withdraw all current claims of injunctive relief in all venues. Microsoft, also, made its feelings known in a filing at the International Trade Commission, saying that because of the FTC's consent decree, it expected Google to withdraw its cases based on these patents. The FTC had confirmed that the consent decree did not require the company to do so.

Google's decision to withdraw its claims against Microsoft at the ITC came after the Justice Department in conjunction with the U.S. Patent and Trademark Office made a statement about injunctions and standards-essential patents that seemed at odds with the FTC's recent consent decree with Google.

Google announced its action only hours after the DOJ and the PTO issued an unusual joint statement Monday that urged only very limited exceptions to patent holders seeking product injunctions when it comes to standards-essential patents.

"The DOJ was the catalyst," said a person familiar with the case. "It pointed out the weaknesses in the FTC's consent decree with Google."

POLITICO PRO

FTC's Rosch wanted to sue Google for lying

By Steve Friess

1/10/13

Outgoing FTC Commissioner J. Thomas Rosch told POLITICO on Wednesday he wanted to sue Google because the company lies to users about why it collects their personal information and not because of antitrust issues.

The explanation — a novel approach that none of the other commissioners publicly advocated — adds a surprising new wrinkle to a post-mortem on the agency's investigation. Among other things, critics charge, it implies that the commissioners who decided to end the case were unaware or confused about one another's views.

Rosch, an antitrust litigator who is scheduled to leave office on Friday after seven years on the commission, said he believes that Google's claim in its privacy disclosure that it collects personal information to improve the user experience is a "half-truth." He believed they're really collecting the information to maximize their profits.

"That was a fictitious claim," Rosch said. "I knew we'd have to litigate that. It was clear to me, because that would wound them very deeply if they had to change that claim."

The FTC could have brought an action against Google under that theory on consumer protection grounds — even though the investigation was chiefly about antitrust concerns.

When asked whether he thinks many users even read the fine print of such disclosures when they sign up for YouTube or Google+, Rosch replied, "Apparently Google thinks they do or they wouldn't say it."

A Google spokesperson declined comment on Wednesday.

The commission announced last week that it had voted 5-0 to close its nearly two-year antitrust investigation without filing a lawsuit against the search firm. Instead, the FTC accepted a voluntary agreement that Google would allow advertisers to manage ad data in any software and would provide websites the ability to opt out of being "scraped," a term referring to the practice of excerpting snippets of reviews from sites like Yelp and Trip Advisor for use in Google review sites.

Rosch is a vocal critic of the FTC's endorsement of that voluntary agreement, which Google insisted is legally enforceable, because he views it as bad precedent. He also said that he, Commissioners Maureen Ohlhausen and Edith Ramirez opposed that endorsement, all of which POLITICO has confirmed. By that count, Rosch said, the majority opposed sanctioning that agreement.

Chairman Jon Leibowitz declined comment on Wednesday, but on Friday he told POLITICO that he was befuddled by Rosch's claim that he supported a lawsuit against Google.

Rosch said he was perfectly clear with his colleagues as well as with executives of Google and other companies that visited him to make their cases.

"My general practice is to make a clear statement of everything I am thinking before people walk out of my office because I think people deserve that," said Rosch, who will be replaced by Joshua Wright, a George Mason University scholar. Of Leibowitz's claim of ignorance to his views, Rosch said, "I have no idea what that's about. No idea."

Such exchanges worry FTC-watchers who wonder how Leibowitz handled the commissioners' exchanges leading up to the vote on Jan. 2, which is believed to have taken place either by phone or the Internet. By that point, the full commission hadn't convened to discuss this matter since November, a gap that provided plenty of time for confusion among the members.

"They didn't know where each other stood and they still don't," said a source close to the case, who was dissatisfied with the outcome. "It's the chairman's job to try to get the commission to the same place. It seems like they're all learning one another's views now via the media."

Rosch took some responsibility for the public's confusion as to what the likely outcome was for the FTC case. He said he touted the hiring of litigator Beth Wilkerson to focus on Google which, he said, "created some false expectations" that the agency was ready to sue Google on charges of search result manipulation.

And he noted that Joaquin Almunia, the European Commission's competition chief who is still working on his conclusion to its antitrust probe of Google, created pressure on the FTC when, early in 2012, he said he expected Google to make concessions on four key areas including search bias.

Still, many continue to focus on Leibowitz and the claim that he encouraged anti-Google forces by telling them privately he wanted to sue Google on antitrust grounds. At last week's press conference, the chairman said such a suit was never likely.

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COMPETITION

Editorial: FTC shows restraint in probing Google's product promotion. Boston Globe 1/11

FTC Chairman Defends Google Settlement: We Did What The Law Required. TPM 1/11

EU still wants to challenge Google "diverting traffic" to its own services. All Things D 1/10

European Version of FTC Accuses Google of Abusing Its Dominant Search Results. Atlantic Wire 1/11

Report: European Commission May Force Google To Change How It Presents Its Search Results. Tech Crunch 1/10

EU says Google must change search results presentation. Reuters 1/11

FTC boots merger review trigger. B&C News 1/10

Is There A Monopoly In Social Media? The DOJ Thinks So. WSJ 1/10 (pasted below)

FTC announces 2013 merger filing thresholds. Daily Deal 1/10

CONSUMER PROTECTION

Wanted: COPPA clarity. Politico Pro 1/10 (pasted below)

Avoiding loan-modification hoaxes. NY Times 1/10

Herbalife Defends Itself Against Pyramid Allegations. But Does the Market Believe? TIME 1/11

Connecticut officials decry false warnings that cell phone numbers going public. Register Citizen 1/11

OF INTEREST

Nixon 100th Attracts Kissinger, Ben Stein: D.C. Scene. Bloomberg 1/10

When to call for help after a data breach. Network World 1/10

TWEETS

HSR
@BCbeat: FTC Boosts Merger Review Trigger bit.ly/WT93Os (6,000+ followers)

Google
Dear @ftc the #EU has a different view - #EU says #Google must change search results presentation http://reut.rs/WTPJkn #antitrust (350+ followers)

COPPA
I agree - TV/web PSAs, not pamphlets RT @RebeccaNewton: Donna of ESRB says the @FTC needs to educate parents and teachers. #fosicoppa (1,300+ followers)

"@FOSI: Tim S. says that the @FTC is going to have partner with app developers to better implement the ideas of #COPPA #fosicoppa"#dpd13 (200+ followers)

What do the #FTC changes to #COPPA mean to your company, website, mobile apps? Attend COPPA Boot Camp on 1/28 in D.C. bit.ly/WF5I4R (28 followers)

Kids' Apps

@AdamThierer: I still wonder if anyone in #FTC Economics Bureau took serious look at how new #COPPA regs impact market for kids' sites & apps. #fosicoppa (3,300+ followers)

THE WALL STREET JOURNAL

Is There A Monopoly In Social Media? The DOJ Thinks So
By Tom Gara
January 10 2013

(UPDATE: We've added a statement from Bazaarvoice to the story below)

You might associate antitrust lawsuits with industry titans like Microsoft, Visa and Mastercard, but the Department of Justice chases after small fry too. Today, it launched an action against BazaarvoiceBV-11.26%, a relatively low-key social media marketing company that went public in February 2012.

Bazaarvoice does what thousands of other small companies claim to do, helping businesses make use of social media to better connect with their markets. It was bigger than than most though, working with companies like Best Buy, AT&T and Macy's to set up customer review and discussion features on their websites. It earned $39 million in revenues in its most recent quarter, up 54%.

The company has found itself in the crosshairs of the DOJ due to an acquisition it made last year. From today's DOJ statement:

WASHINGTON – The Department of Justice filed a civil antitrust lawsuit today against Bazaarvoice Inc. challenging the company's June 2012 acquisition of PowerReviews Inc. The department said that the $168.2 million transaction substantially lessened competition in the market for product ratings and reviews platforms in the United States, resulting in higher prices and diminished innovation.

The department's lawsuit, filed in the U.S. District Court in the Northern District of California, in San Francisco, seeks to restore the competition that was extinguished by the transaction.

Bazaarvoice's acquisition of PowerReviews was not reported under the Hart-Scott-Rodino Antitrust Improvements Act of 1976, which requires companies to notify and provide information to the department and the Federal Trade Commission before consummating certain acquisitions. The department began its investigation shortly after the transaction closed.

"Bazaarvoice bought PowerReviews knowing that it was acquiring its most significant rival and hoping to benefit from diminished price competition," said Bill Baer, Assistant Attorney General in charge of the Department of Justice's Antitrust Division. "Without competitive pressure from PowerReviews, Bazaarvoice will be able to increase prices to retailers and manufacturers for its product ratings and reviews platform. This lawsuit seeks to prevent one firm from dominating the product rating and review platforms market, and demonstrates that transactions that are not reported to us are not immune from scrutiny."

Bazaarvoice replied to the charge with this statement (emphasis ours):

"We are disappointed with the filing of today's lawsuit. We provided the DOJ with extensive documents, data, and information demonstrating that our acquisition of PowerReviews was procompetitive and did not result in a lessening of competition. We spent more than six months explaining that there is robust and ample competition in the market for social commerce engagement tools. We disagree with the DOJ's decision to ignore that evidence and we will now shift our attention to a court of law where we expect to be fully vindicated."

The DOJ complaint describes Bazaarvoice as the "dominant commercial supplier of product ratings and reviews platforms in the United States," claiming that by purchasing its competitor it removed a crucial source of price competition.

Silicon Valley is a pretty dynamic place, and social media consultancies are dime a dozen, so exactly how difficult it would be for another company to offer these kind of services will be a big question as the case moves forward.

While it would be very hard to find another company to compete with Visa and Mastercard — just like it was hard to find one to compete with Microsoft in the 1990s — the whole marketplace for social media services seems pretty vibrant these days.

That doesn't mean Bazaarvoice didn't crow about snuffing out a competitor. According to the DOJ, its case included comments like this from the company's management:

- One of the company's co-founders noted that the acquisition of PowerReviews would "[e]liminat[e] [Bazaarvoice's] primary competitor" and provide "relief from [] price erosion;"

- The company's current chief executive officer wrote that Bazaarvoice had "literally, no other competitors" beyond PowerReviews; and

- The company's former chief executive officer projected that, as a result of the transaction, Bazaarvoice would have "[n]o meaningful direct competitor."

POLITICO PRO

Wanted: COPPA clarity
By Alex Byers
1/10/13

Industry and app advocates have a clear message for the FTC on its late-December update to kids' privacy rules: Tell us more.

That was the takeaway from a discussion hosted by the Family Online Safety Institute on Thursday afternoon that threw questions about the highly anticipated privacy regulation at representatives from Facebook, the FTC, the App Developers Alliance and the Electronic Safety Ratings Board. The problem, panelists and audience members said, is that app makers and site operators still need more clarity — even with the 167-page statement the FTC wrote on the updated regulations.

Without more information on issues like the actual knowledge standard for when third parties have to comply with COPPA rules or which sites are considered primarily or secondarily directed to kids, the thinking is that industry players — especially the smaller ones — will have trouble complying with the updated rules and turn away from the kid-oriented space.

"This rule almost certainly diminishes greatly the amount of content that will be produced for kids, and that is directly contrary to the original congressional intent," said Tim Sparapani, vice president of government relations for the App Developers Alliance. He added that the FTC deserves an "incomplete or failing grade" on the update.

Even the FTC's detractors on the COPPA modernization — which was one of the agency's biggest privacy plays in 2012 — admit that striking a balance between growing privacy concerns for kids and innovative offerings from the industry is not an easy task. But they still want more from the commission: More information, more wiggle-room and, with a July 1 implementation date, more time.

"I think many expected it to be more of a year to comply," said Jennifer Hanley, FOSI policy and legal director. "Even the safe harbors are rushing; the lawyers in town are all rushing to figure out, 'What do we need to do?'"

Stakeholders want more from the FTC on parental consent mechanisms and what constitutes data used for internal site operations, but one of the biggest questions for COPPA-focused entities is when the rules apply to third-party plug-ins under the FTC's actual knowledge standard. Plugin makers caught a break when the FTC scaled back its original proposal — which would have covered third parties if they had a "reason to know" they were on a child-directed site — but companies still want expansion from the FTC on when they will be considered to have met the standard.

"Many probably will look at a model where they define themselves what their official mechanisms and communications channels are, and anything that falls outside of that will not be deemed kind of official from the company," said Ed Palmieri, privacy counsel at Facebook. "At this point, there's no other way to do it."

As far as more guidance from the FTC, pamphlets or memos may not cut it, app advocates said. They want the commission to go on an education tour across the country and talk directly with app makers about COPPA. Whether or not that happens, though, stakeholders can expect more direction from the agency down the road as questions continue to emerge.

"It's impossible in rule text to account for every factual situation that's going to arise. We have FAQs already — they are now woefully out of date. So essentially, I think, for us, one of the first steps is to try to update the FAQs," said Rick Quaresima, an assistant director in the FTC's Division of Advertising Practices. "We haven't updated them in a long time, but going forward I really think we expect that to be a living, breathing document that will be updated a lot more as these scenarios come up. You can't anticipate everything, even with two rounds of comment."

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COMPETITION

Supreme Court to Hear Generic Settlement Cases. Pharmacy Times 1/14

Gas prices to drop in 2013, U.S. agency and AAA say. Sun-Sentinel 1/14

FTC Fires Back at Microsoft, et al. Regarding Google Antitrust Ruling. Daily Tech 1/14

CONSUMER PROTECTION

Fate of Herbalife's Stock May Lie With Government Agencies. NY Times 1/14 (blog)

Harry Reid Disavows Report Linking Him to Bribery Case. Roll Call 1/13

Sen. Reid denies involvement, knowledge of Utah businessman's claims about attorney general. WaPo 1/14

Mobile Developer Settles With FTC Over Background-Check App. Media Post 1/14

Minnesota looks to toughen laws for pugnacious bill collectors. Star Tribune 1/15

FTC's proposed used-car rule a lemon, critics claim. NBC News 1/15

Robo Calls, Do-Not-Call Violations a Target of FTC, Lawsuit. NBC Los Angeles 1/14

FTC Proposes Revised EnergyGuide Label Rules. Courthouse News Service 1/14

OF INTEREST

Zaxby's: Data breach could affect customers at more than 40 Ga. Stores. Atlanta Business Chronicle 1/14

Critics attack Coke's anti-obesity ad. USAT 1/14

VIDEO: Computer scam accuses you of viewing child porn. USAT 1/15

UPS Quits Takeover in Europe. WSJ 1/14 (pasted below)

TWEETS

Filaquarian

@mediapost: Mobile Developer Settles With FTC Over Background-Check App: Two Minnesota companies have agreed to take... http://bit.ly/TWlo7d (45,750+ followers)

Email Scam

@WXYZDetroit: #SCAM ALERT: Don't be the next victim. The FTC warns of an email scam going around: http://t.co/dSWqjNPR #EarlyRisers (30,800+ followers)

Antitrust

@compplicyint: US: @FTC adjusts threshold at which companies must report #mergers http://bit.ly/V6inDY (900+ followers)

@Corp_Laws: FTC Announces Increases to Thresholds for Pre-Merger Notification and Limitations on... bit.ly/V058RE | by @DWTLaw (500+ followers)

Google

From @CNNMoney: The FTC opted to allow #Google to continue on with the evolution of #Search. Where will that lead? ow.ly/gNHG0 (350+ followers)

THE WALL STREET JOURNAL

UPS Quits Takeover in Europe
By ROBIN VAN DAALEN, VANESSA MOCK and BETSY MORRIS

UPS -0.21%United Parcel Service Inc. UPS -0.21%abandoned a nearly $7 billion bid for Dutch parcel-delivery company TNT Express NV, TNTE.AE +5.68%after encountering stiff objections to the deal from European antitrust regulators.

The acquisition would have been the biggest in UPS's 105-year history, and relinquishing it is a strategic retreat for the Atlanta-based company. A deal would have strengthened UPS's global reach, bringing new operational mass to its delivery business outside Asia and the U.S.

UPS revised its €5.2 billion proposal—which was announced last March—three times in a bid to overcome concerns from the European Commission, and still wasn't satisfying the demands.

The regulator was worried the overnight-parcel-delivery market would effectively become a duopoly between the combined UPS-TNT business and DHL, a unit of Deutsche Post DPW.XE -0.74%AG. The regulator also worried that other parcel-delivery companies, including U.S. rival FedEx Corp., FDX +0.29%could be shut out of the market.

Both DHL and FedEx lobbied against the deal being approved.

The deal is the latest in a series of high-profile transactions to be challenged by Europe's antitrust regulator. In February, the commission rejected a $17 billion merger between NYSE Euronext NYX -0.67%and Deutsche Börse DB1.XE +0.15%AG. In September, Universal Music Group agreed to sell many treasured record labels to win approval for its $1.9-billion purchase of rival EMI Group Ltd.

The commission is due to announce its decision by Feb. 5, but UPS said after a meeting with the regulator that it expects the commission to block the deal.

"We are extremely disappointed with the EC's position," said UPS Chief Executive Scott Davis. "We proposed significant and tangible remedies designed to address the EC's concerns with the transaction."

The news surprised UPS employees; they had been executing plans to bring TNT into the fold right up until they discovered the deal had fallen apart, according to a person familiar with the situation.

Once the commission's decision is announced, UPS said it will pay TNT a €200 million ($267 million) termination fee. UPS had originally expected to receive approval after a preliminary antitrust review.

UPS had hoped that a plan to sell some of its assets, together with some TNT assets, could have created a new pan-European overnight-parcel-delivery competitor, or integrator. The assets' proposed buyer, parcel-delivery company DPD, is controlled by French state-owned postal group La Poste.

"The commission and the merging parties had two very different visions of the logistics industry," said David Anderson, a Brussels-based partner at law firm Berwin Leighton Paisner. "The commission has identified only four integrators in the market, and two of those were merging here, while UPS and TNT see a wide spectrum of service providers competing and putting competitive pressure on the merging parties and others in the market."

Although the commission had taken an uncompromising stance on the need for a new rival to be created out of the merger, its officials appeared surprised by UPS's statement that it didn't expect the deal to be cleared.

A person familiar with the commission's thinking said it had sought binding guarantees that DPD could fill the gap in the marketplace and that it wanted this anchored in a contract, as some of the last concessions put forward earlier this month by UPS had been filed "too late" and were "too complex" to be tested thoroughly prior to any commission decision on the deal.

"The commission spelled out during the meeting on Friday what it needed," the person said. "Maintaining competition in the express delivery sector was key. And there was still willingness to find a way forward." That deal also would have needed to address regulators' outstanding concerns, notably whether any agreement would have provided DPD with sufficient long-term access to air transportation. However, UPS didn't move to meet those demands, the person said.

FedEx is unlikely to step in and offer its own bid, people close to the company said. The Memphis-based arch rival to UPS has said it wasn't interested, believing the deal to be too pricey, they said. FedEx "is one of the few companies with the balance sheet to pull off a deal," Helane Becker, analyst with Dahlman Rose, said in a report Monday. But Ms. Becker added that FedEx is focused instead on expanding in Europe through smaller, "tuck in" acquisitions.

FedEx officials declined to comment.

UPS offered €9.50 a share for TNT, which was split from Dutch postal company PostNL NV PNL.AE +1.82%in 2011 under pressure from shareholders who argued the express business would be an interesting acquisition target. PostNL, TNT's biggest shareholder with nearly 30%, said it plans to sell its stake, assuming the deal with UPS doesn't proceed.

TNT's shares fell amid news of UPS's decision to call off its takeover attempt. The stock fell 41% to €4.84 in Amsterdam on Monday on Monday. PostNL shares sank 36% to €1.82, also in Amsterdam. Shares in UPS rose 1.7% to $79.24 at 4 p.m. Monday in composite trading on the New York Stock Exchange.

TNT said it would pursue a future as an independent company. "Now we'll focus on our stand-alone strategy, which we presented in February," Chief Executive Bernard Bot said in a telephone interview on Monday.

European Commission officials declined to comment, saying only that they would issue their official verdict by Feb. 5. UPS -0.21%

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COMPETITION

Gas prices near January record, but there are some positive signs. LA Times 1/24

CONSUMER PROTECTION

Operators of alleged time-share scam settle with government. LA Times 1/24

Recognize foreclosure scams for what they are. Chicago Tribune 1/24

Icahn Says No Respect for Bill Ackman After Herbalife Bet. Bloomberg 1/25

FTC Warns of New E-mail Scam. Kiplinger 1/24

Federal Trade Commission holds forums on avoiding fraud. Portland Press Herald 1/24

US FTC study taking aim at marketing of booze on social media. Reuters (via GMA News) 1/25

Sony Slapped With $390,000 U.K. Data Breach Fine. Information Week 1/42

OF INTEREST

Record Foreign Takeovers Mean Scrutiny for Davos Bankers. Bloomberg 1/25

TWEETS

Timeshare

@FinnLawGroup: #FTC goes after timeshare resale companies. | consumeraffairs.com/news/timeshare... (1,000+ followers)

Privacy

@nelcaucusac: Audio of #BigData Panel at State of the Net: @Neustar @bde Senate Commerce @paulohm (w/ @FTC) & @nancyscola: http://bit.ly/USO8uQ #SOTN (650 followers)

COPPA

Privacy Update: Complying With COPPA Under The FTC's New Children's Online Privacy... http://t.co/BtihqtpJ | by @polsinelli (10,200+ followers)

@arentfox: FTC Tech Blog Suggests Solution for Plug-In COPPA Compliance: http://t.co/6zBF453l (650+ followers)

Miscellaneous

@bostinnovation: Yelp's Revenue Model? Extortion, Say Nearly 700 FTC Complaints http://t.co/TKKBaLlg (20,100 followers)

Gregory J. Wilcox: Federal Trade Commission growing skittish over sale of Pratt & Whitney Rocketdyne: There is o... bit.ly/TuNxEE (300+ followers)

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COMPETITION

Pfizer, Lilly profit hurt by generic competition. USAT 1/29

CONSUMER PROTECTION

FTC Says: Pyramid Scheme, Prepare To Be Busted. WSJ 1/28 (pasted below)

Federal, state regulators shut down Fortune Hi-TechUSA Today 1/28

Direct-Seller Fortune Hi-Tech Marketing Accused of FraudBloomberg BusinessWeek

1/28

Fortune Hi-Tech Marketing shut down as pyramid scheme Reuters/Chicago Tribune1/28

Madigan, other AGs, sue Kentucky company for pyramid schemeChicago Sun-Times 1/28

Cord blood bank to improve data security. Reuters 1/28

Blood bank settles FTC charges for failing to protect personal information. The Hill 1/28

FTC Online Privacy Protection Campaign Kicks Into High Gear. CIO.com 1/28

FOIA release from FTC outs Yelp as 'Internet Mafia', Daily Caller 1/28

Law firm: Google faces class action suit in UK over secret tracking of Apple users. WaPo 1/28

FTC: Put an end to unsolicited mail, calls, e-mail. Daily Journal 1/29 (blog)

Who can stop robocalls? FTC tries to crowdsource a solution but falls flat. The Verge 1/28

TWEETS

Fortune Hi-Tech Marketing
@CNBC: ALERT: FTC has charged Fortune Hi-Tech Marketing with running a pyramid scheme. #FHTM (999,550+ followers)

@CNBC: Source: FTC Press Conference at 1p ET is not about Herbalife. (via @herbgreenberg) $HLF (999,550+ followers)

@JimCramer: @herbgreenberg This Fortune Hi-Tech story is killing $HLF (616,650+ followers)

@herbgreenberg: Fortune Hi-Tech's website now replaced w/this: http://t.co/3cOgGrJ2 (40,650+ followers)

Fortune Hi-Tech gave big contribution last year to GOP outside group http://t.co/9WtKT92P via @sharethis (600+ followers)

Federal, state regulators shut down Fortune Hi-Tech http://t.co/cFUckfaE (2,800+ followers)

Data Security/Cbr
@pogowasright: @HHSGov & @FTC took action when devices with unencrypted PII/PHI were stolen from cars. Keep reminding employees not to leave PII in cars #n (2,800+ followers)

@pogowasright: Glad to see @FTC went after entity where #privacy policy promised one thing, but PII was left in & stolen from car: http://j.mp/Wxvt6v #n (2,800+ followers)

@pogowasright: @PogoWasRight: @FTC action against CBR shows that #privacy policies do matter, and they'll

hold you to yours. databreaches.net/?p=26773 #infosec #privchat #n

Privacy
FTC Online Privacy Protection Campaign Kicks Into High Gear #privacy #FTC @kencorbin shar.es/CxreH via @CIOonline (900+ followers)

9/11 Coins
Private mint to pay FTC $750,000 settlement: By Jeff Starck An issuer of commemorative coins and me... bit.ly/VmwF00 #coin #news

Miscellaneous
@OM: It is time FTC/DOJ anti-trust to start investigation Facebook practices on abusing its platform, like Microsoft in 90s http://t.co/5Yhaa1Yv (1,329,600+ followers)

@digiphile: "It may be that the robocall problem is simply too tough to crowdsource"-@adrjeffries on @FTC contest http://bit.ly/WMeNLC (175,200 followers)

TV HITS

Fortune Hi-Tech Marketing

WCBS-NY radio

WLEX (NBC) Lexington

WPSD (NBC) Paducah

CNBC

WTVF (CBS) Nashville

WDKY (FOX) Lexington

THE WALL STREET JOURNAL

FTC Says: Pyramid Scheme, Prepare To Be Busted
By Tom Gara
January 28 2013

(This post has been updated – see below)

From this morning's FTC announcement:

> The Federal Trade Commission will co-host a press conference in Lexington, KY, today at 1 p.m. ET (Noon Central Time), with the Kentucky Attorney General's office, to announce a major action against an allegedly illegal pyramid scheme.
>
> Steve Baker, Director of the FTC's Midwest Region Office, and Kentucky Attorney General Jack Conway will be available to answer reporters' questions.

So who is in the FTC's cross hairs? We'll have to wait until 1 p.m to find out (the announcement will be webcast here). Companies recently in the spotlight for their direct selling model are trading down this morning: shares in HerbalifeHLF -0.30%are down almost 10% this, and fellow direct marketer Nu SkinNUS +2.08%is down 5%. CNBC are flashing a headline saying the announcement is not about Herbalife, but nobody has yet suggested who is is about.

Update: From the Lexington Herald Leader in Kentucky:

> Officials with Kentucky Attorney General Jack Conway's office and the Federal Trade Commission were inside the Lexington headquarters of Fortune Hi-Tech Marketing Monday morning, sending employees of the multi-level marketing firm home.
>
> Conway is scheduled to hold a news conference with FTC Midwest region director Steve Baker at 1 p.m.

to: "announce actions relating to an alleged global pyramid scheme operating in Kentucky."

Baker and other officials at the company's headquarters, located at 860 Corporate Drive, declined to comment. Lexington police were seen leaving the building at 11:45 a.m., along with people unloading boxes marked with the FTC logo.

Here's a lengthy USA Today piece on Fortune's business model, and the complaints against it, from back in 2010.

Update II: In its press conference, the FTC has confirmed the case is being filed against Fortune. "Today is the beginning of the end for one of the most prolific pyramid schemes," it said.

Note: *The Office of Public Affairs compiles the FTC's Daily Clips. An archive of previous versions of Daily Clips is available in PDF format on the intranet.*

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COMPETITION

AMA, AARP Back FTC In Pay-For-Delay Antitrust Fight. LAW360 1/30 (Blog)

FTC Revises Hart-Scott-Rodino Thresholds for 2013. Lexology 1/30

Google's Increased Lobbying Belies Cut in Total Spending. Bloomberg 1/30

CONSUMER PROTECTION

Data privacy -- not always as 'private' as you think. KOMO News 1/31

Mobile Health Unlikely to Face Much Regulatory Scrutiny, Lawyer Says.

Wall Street Journal 1/30 (blog)

FTC Blames Banks for Faulty Debt Collection Docs.American Banker 1/30

(pasted below)

Collectors hound consumers for a million disputed debts per year, FTC study finds.

National Law Journal 1/30

8 Things We Learned From FTC Report On Debt-Buyers. Consumerist 1/30 (blog)

There's bad debt, then there's bad debt (blog). Allentown Morning Call 1/30

Settlement for breach involving 300,000. Healthcare IT News 1/30

Seeds of Truth from the Pom Wonderful FTC Case. Natural Products Insiders 1/30

Jeremy Johnson: John Swallow shook me down. FOX 13 (Salt Lake City) 1/30

DeWine warns businesses about fake FTC emails. Cantonrep.com 1/30

Ackman Ahead in Herbalife Bet. New York Post 1/31

OF INTEREST

My Turn: Why the Federal Trade Commission? Washington Post 1/30

Validity of Consumer Bureau at Stake in Legal Challenge. Bloomberg 1/31

TWEETS

Debt Buyers Report

@consumerist: 8 Things We Learned From FTC Report On Debt Buyers - http://t.co/pefvlGsw (35,600+ followers)

COPPA

@McAfeeNews: Blog: 5 Ways to Ensure Online Privacy for Kids: Congress and the Federal Trade Commission (FTC) have taken speci... http://bit.ly/11I52oK

(11,450+ followers)

Privacy

@JuliaAngwin: AKA Julie & Julia: My interview with FTC Commissioner Julie Brill on Technology and Privacy bit.ly/

SUsUQN (10,300+ followers)

Miscellaneous

@digiphile: Eventually, the SEC & FTC will have to hire (more?) people who can audit algorithms. http://t.co/3JeqpzyP #bigdata (175,450+ followers)

@sustainbrands: Four Key Takeaways from the FTC's Recent Crackdown | http://t.co/U6ZyvsUb (17,350+ followers)

Persuade The FCC/FTC To Force The Cell Phone Carriers To Unlock All Smart Phones Purchased With A Contract Or ETF Paid. wh.gov/V6k2 (250+ followers)

Please submit comments to the FTC opposing the amendment. It will help MLM and harm consumers http://t.co/Zbwrv2qL (850+ followers)

TV HITS

Fake FTC emails

WLWT-CIN (NBC) Cincinnati, OH

Made in USA

Fox Business Network

Debt Buyer Study

KTNV-LV (ABC) Las Vegas, NV

WTVA (NBC) Columbus, MS

Credit Reports

(This clip appeared on eight TV stations around the country)

Jeremy Johnson

KSTU-SLC (FOX) Salt Lake City, UT

AMERICAN BANKER

FTC Blames Banks for Faulty Debt Collection Docs

By Jeff Horwitz, January 30, 2013

Consumer debt buyers rarely get thorough documentation of the defaulted loans they purchase, a Federal Trade Commission report found. The conclusion could lead to greater scrutiny of how banks recoup charged off debts by selling them to collectors.

The FTC report — billed as the first comprehensive picture of the market for defaulted consumer debts — looked at all debts, from medical to utility bills. But defaulted credit card debts dominate the debt buying market, the FTC found, with more than $55 billion in such accounts selling every year. These debts — which sell for an average of 4 cents on the dollar — make up more than 70% of the total debt sales market.

Notably, the FTC aimed some of its harshest criticism at banks and other original creditors — not the large debt buyers themselves.

Banks and other creditors generally dictate the debts and records that are sold and the terms of the sale, the FTC report found. But they rarely provide thorough documentation, sometimes sell debt too old to be collected through the legal system, and regularly disavow the underlying accuracy of their own files, the FTC found.

These practices are especially problematic because according to FTC estimates consumers dispute around 3.5% of all debts, around a million a year. The commission's study did not delve into determining how often banks and other creditors sold incorrect debts, but called the sheer number of contested collection attempts a "significant consumer protection concern."

"We know enough from our law enforcement experience that of the million debts disputed, a large number are debts on which there are problems," says Thomas Pahl, assistant director of the FTC's Bureau of Consumer Protection.

That conclusion was met by immediate protest from industry attorneys such as Chris Willis, an attorney for Ballard Spahr who has advised banks and debt buyers on sale practices.

"My clients report routinely that they get a lot of those dispute letters downloaded off the Internet and mailed in," says Willis, arguing that many borrowers are simply trying to delay or stop collections by contesting the validity of

debts.

The FTC's report should worry banks all the same, Willis says. "The biggest concern they identify, the amount of information sold to the buyer, is solely controlled by the banks."

With the exception of American Express, all of the major banks sell at least a portion of their defaulted credit card debts.

The FTC's report acknowledges significant limitations. It did not survey small debt buyers, which turn out to buy more controversial accounts, such as those that are old enough to be time-barred or those of consumers in bankruptcy. Moreover, it did not obtain information about debts that the debt buyers outsourced to other collection companies.

But the scope of the review, which included 5,000 portfolios of defaulted debt with a face value of $143 billion, vastly exceeds any research to date. In a 2012 series raising questions about the quality of banks' consumer debt records, American Banker published a handful of debt sale agreements. The FTC's report confirms that the terms of the sales — which sometimes disavowed the collectability of debts and sometimes even the accuracy of banks' own files — are similar across the industry.

Only 13% of the sold accounts reviewed by the FTC were accompanied by any account documents. Thirty-seven percent of the accounts sold failed to identify how much of the alleged debt was principal rather than interest or fees, essential information for collection purposes.

"Most purchase and sale agreements provided very limited, if any, right for debt buyers to put back debts to debt sellers on the grounds that information from debt sellers was missing or inaccurate," the report states. "No contracts required credit issuers (or subsequent resellers) to notify consumers that their debts had been sold to a debt buyer."

Beyond the FTC's general displeasure with the terms of debt sales and the paucity of documentation given to the buyer, the commission stressed concern about how banks have treated so called time-barred debts, which are too old to legally enforce.

Such debts are not inherently illegal to pursue — though consumer advocates and the FTC have long been skeptical that consumers would pay them if collectors disclosed they were legally invalid.

Most contracts "were either silent about out of statute debts or expressly stated that sellers' inclusion of out of statute debts was not a breach of the contract."

Time barred debt could be a regulatory flashpoint, Pahl and Willis say.

"The commission has never gone so far as to say that you shouldn't sell time barred debt," Pahl says. "But if you are going to sell it and collect on it, there are a lot of consumer risks that are created."

In the near-term, the report may shift the scrutiny on debt buying issues onto banks from the major debt collection firms to the creditors that supply them with claims. Although the report didn't delve into the controversial topic of how major debt buyers use collections litigation, it did find that the big firms met the minimum standards of the fair debt collections act and refrained from selling disputed debts.

"The conventional wisdom as to how bad they are was probably too strong for this class of debt buyers," Pahl says, referring to the largest purchasers.

In a statement, the Debt Buyers Association, a trade association for companies that purchase defaulted debt, said it was working with its members on standards requiring certain documentation at the time of purchase.

The FTC analysis comes at a time when numerous state and federal agencies are looking at debt collection and documentation issues.

The report called on states to strengthen their laws governing debt collection, and commission staff has kept the Consumer Financial Protection Bureau's staff abreast of its research, Pahl says.

"The CFPB is very interested and debt collection and debt buying issues, and it is really well designed to tackle this kind of problem," he says. "A couple folks over there are former members of the industry, and really the idea is that we intend to keep pursuing this."

Note: *The Office of Public Affairs compiles the FTC's Daily Clips. An archive of previous versions of Daily Clips is available in PDF format on the intranet.*

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THE COMMISSION

Leibowitz announces exit plan. Daily Deal 2/1

Opinions vary on Leibowitz's FTC era. Politico Pro 2/1 (pasted below)

COMPETITION

Google Makes Offer in 3-Year European Antitrust Case. NY Times 2/1

CONSUMER PROTECTION

Note: Read full coverage of the Mobile Privacy Report coverage here

F.T.C. Suggests Privacy Guidelines for Mobile Apps. NY Times 2/1

Path Inc. to Settle Charges Over Collecting Kids' Data. WSJ 2/1 (pasted below)

Editorial: Europe Moves Ahead on Privacy. NY Times 2/3

Q. and A. With Viviane Reding. NY Times 2/2

Privacy Flaw in Path's iPhone App Shares Location Data. NY Times 2/1 (blog)

Data Protection Laws, an Ocean Apart. NY Times 2/2

Opinion: FTC issues mobile privacy policy guidelines. ZD Net 2/4

FTC fines maker of Path app $800,000 for privacy violations. PC World 2/3

FTC embraces mobile 'Do Not Track' proposal. Politico Pro 2/1 (pasted below)

Feds Urge App Makers, Mobile Operating Systems to Do Better on Privacy. All Things D 2/1

FTC offers guidelines for mobile industry on how to protect users' privacy. WaPo 2/2

Mobile Apps Must Guard Privacy Or Laws Will, FTC Chief Says. Bloomberg 2/1

Path Settles With FTC Over Alleged COPPA Violations. All Things D 2/1

Salve for shorts. NY Post 2/3

Herbalife plunges on FTC probe report. CNN Money 2/4

Protect Against Tax Identity Theft. WSJ 2/3 (pasted below)

FTC issues guidelines for mobile applications. Reuters 2/2

FTC gives consumers a peek into how debts are bought and sold. Plain Dealer 2/2

Toy pyramid scheme. Google + 2/1

Herbalife Selloff Eases as Execs Wave Off FTC Fears. FOX Business 2/4

TWEETS

Chairman Leibowitz
@techradar: Hillary isn't the only one packing up an office today, FTC Chairman Leibowitz is stepping down - bit.ly/

VA0tK8 #News (43,350+ followers)

@katyonthehill: Chairman Leibowitz to exit after building activist @FTC @adweek http://tinyurl.com/b2tb4tl (1,150+ followers)

@PaulNemitz: After Adding Online #Privacy Protections, US F.T.C. Chief Resigns nyti.ms/11mBb3J. Who will take over ? #eudatap #datenschutz (1,000 followers)

Jon Leibowitz Resigns as F.T.C. Chairman - NYTimes.com nyti.ms/WEpulv (2,100 followers)

A blow for anti-business advocates? Do not track leader steps down @adexchanger adexchanger.com/online-adverti... (150+ followers)

FTC chairman departing-- washingtonpost.com/business/techn ... (20 followers)

Mobile Privacy Report
@mashable: FTC Says You Should Be Able to Block Smartphone Tracking http://t.co/Qcct19XT (3,146,850+ followers)

@Engadget: FTC issues mobile privacy guidelines, values clarity and Do Not Track - http://t.co/CJhgtBgo (583,850+ followers)

@wsjbusiness: FTC Targets Privacy on Mobile http://t.co/nyH3q3w (255,300+ followers)

@verge: FTC gives app developers new privacy guidelines, suggests 'Do Not Track' for mobile http://t.co/zp5XOQRs (166,000+ followers)

@latimesbiz: FTC: Give mobile device users more privacy disclosures -- or else http://t.co/ln3ro2dK (126,750+ followers)

@allthingsd: The @FTC issued a list of recommendations for app makers to help protect users' privacy: http://flip.it/BsZAH (101,100 followers)

@wyattnyt: Do Not Track them on their cell. Do Not Track them -- we will tell! So sayeth @FTC http://nyti.ms/WammfE (900+ followers)

Path
@mashable: Path Settles With FTC Over Data Privacy 'Deception' http://t.co/SDxDr6Kk (3,146,850+ followers)

@forbes: Remember when Path 'stole' all of its users' contacts? App to pay FTC $800,000 http://t.co/t1seKKc1 (1,313,550+ followers)

@thenextweb: Path settles with the FTC for $800,000 over unauthorised iOS contact data collection http://t.co/2yMwUlsA by @epro (837,600+ followers)

@guardian: Path fined $800,000 by FTC over iOS privacy breach http://t.co/v3YPBEmX (795,900+ followers)

@cnetnews: App maker Path to pay $800,000 to settle privacy issues with FTC http://t.co/WOQbw2Ha (198,400+ followers)

@nickbilton: On same day Path settles with @FTC, a new post suggests the company is taking location data w/out permission: http://t.co/cPiOeB9o (166,350+ followers)

@tpm: FTC fines 'Path' app $800,000 for violating kids' privacy as FTC chairman resigns: http://t.co/7lqEwEiT (114,200+ followers)

#ATDBriefing: 4) Meanwhile, @Path settled with the @FTC for $800,000 over alleged #COPPA violations: http://dthin.gs/XuAm38 (101,100 followers)

Miscellaneous
@BloombergNews: Herbalife drops after report of law-enforcement probe, FTC complaints | http://t.co/cCDnzRUF (789,100+ followers)

@businessinsider: Herbalife Shares Are Already Getting Crushed Today After New York Post Report About FTC Investigation read.bi/YOsrCQ (169,850+ followers)

POLITICO PRO

Opinions vary on Leibowitz's FTC era

By Steve Friess
2/1/13

The legacy of Federal Trade Commission Chairman Jon Leibowitz will be a matter of perspective.

Was he a fearless visionary who dragged his agency into the modern era on privacy and consumer protection? Or did his indecision and rudderless leadership let mighty Google off the hook after a two-year antitrust investigation?

Leibowitz offered his own take Friday during a media call to roll out new guidelines to prevent mobile app purveyors from collecting personal data without a user's permission.

"I don't have any regrets," said the 54-year-old former chief counsel to former Sen. Herb Kohl (D-Wis.) on the Senate Judiciary Committee. "My sense is we have worked to protect consumers on competition and privacy. We brought cases when appropriate and stood down when the law required it."

The standing down comment most recently alludes to the announcement in early January that Google would not face any prosecution or sanctions related to allegations the search engine's practices were unfair to competitors and deceptive to the public.

Leibowitz's immediate predecessor, Bill Kovacic, said the Google matter certainly will weigh on how this era is viewed because Leibowitz made lofty predictions for how he would tame Google as he fought to have the FTC and not the Department of Justice handle the case.

"You don't get such a good grade for setting the expectations in the wrong place," Kovacic said. "Jon and his colleagues wrote that report card and, in a way, the Obama administration wrote the report card and said, 'Do more. Don't be like the timid Bush people. Act.' That came back to bite him."

The rap on Leibowitz was that he bowed to pressure from a Google-friendly White House. And Tom Rosch, a former commissioner who stepped down last month, told POLITICO in November that he was troubled by how susceptible and reactionary Leibowitz seemed to pressure from the Capitol.

"He's political, and I'm sure he views himself as a consensus builder," said Gene Kimmelman of the New America Foundation, a former Justice Department chief counsel for the Competition Policy and Intergovernmental Relations. "He's a really nice guy, everybody likes him. But we need some more not-nice people in there. The point is not to be liked, the point is to do the right thing by the American people. You're gonna piss people off."

Leibowitz defenders note that he felt he needed to strike a delicate balance as he worked to expand the so-called Section 5 authority, a tenet of the law that he argued gave the agency broader latitude to bring cases. The commissioner felt he needed to be responsive to Congress out of fear that lawmakers could endure fierce backlash as the FTC did in the 1970s, when the agency tried to ban advertising to children, they said.

Those who sing Leibowitz's praises — activists in the consumer protection and privacy fields — point to a lengthy list of FTC actions that show him not buckling to powerful business interests. In particular, Leibowitz fans cite the hiring of attorney David Vladeck — previously an activist attorney — to head consumer protection litigation.

One key example: The FTC's recent, aggressive pursuit of major brands on charges they are deceptive in their advertising. Dannon, for instance, was called out for false health claims. In one case related to Reebok and a shoe health claim, the FTC obtained a $25 million settlement that netted 315,000 consumers a refund check. Overall, the FTC clawed back more than $250 million in damages for wronged American consumers.

"Leibowitz brought the FTC into the 21st century in terms of consumer protection by making a major commitment to turn the Bureau of Consumer Protection into a serious watchdog instead of a lapdog," said Jeffrey Chester, executive director of the Center for Digital Democracy. "He leaves a legacy of a revitalized FTC that now has the capability to protect consumers in the digital era."

Ira Rheingold, the National Association of Consumer Advocates' executive director, agreed: "He rebuilt the FTC. For many years, it was not engaged in consumer protections in any real way. But in the last four years, it became much more aggressive in bringing enforcement actions and writing rules."
Kimmelman was less impressed.

"I've seen a lot of enforcement actions that were really low-hanging fruit; cases where it was obvious a company is defrauding the American people," Kimmelman said. "That's great, but I haven't seen anything where I thought, 'Wow, they really went for broke here.' Overall, [Leibowitz] has done a good job, but there's nothing the agency has done that says, 'That took some cojones.'"

But on privacy, the FTC under Leibowitz certainly tussled with the big companies and extracted landmark commitments, defenders said. Google and Facebook both settled with the FTC with 20-year agreements to be more transparent in how it collects and manages personal data. Both must submit to external audits of their practices every other year, and Google was fined $22.5 million last year for failing to uphold its promises.

Leibowitz also earned praise for his recent reworking of the regulations under the Child Online Privacy Protection

Act.

"That was one of the significant achievements," said Marc Rotenberg, executive director of the Electronic Privacy Information Center. "Congress seemed unable or unwilling to enact the necessary changes to that law."

There were well-known cases that Leibowitz and his commission chose not to pursue. Much to the howl of antitrust activists, the FTC approved the merger of EMI and Universal Music Group as well as the marriage of Express Scripts and MedCo Health Solutions.

A few matters that reflect upon Leibowitz's tenure still hang in the balance. There is the pending outcome of FTC v. Watson Pharmaceuticals, a case before the Supreme Court this term in which justices must decide whether "pay-for-delay" agreements in which drug firms holding brand name patents pay other companies to withhold generic drugs from market are legitimate business contracts.

And a final push by Leibowitz for the FTC and Congress to ally with a worldwide effort to curb the ability of websites to track computer users — the so-called Do Not Track issue — remains unresolved as well.

Leibowitz's sole lament on Friday was that he was unable to persuade Congress to give the FTC more power to punish. In his typically self-effacing yet political biting way, he said: "We would be a stronger agency if we were able to penalize companies. On this matter — and perhaps only on this matter — I stand with [the late GOP power player] Caspar Weinberger" who said the same thing when he was the FTC chairman in the early 1970s.

The Google case, however, may ultimately overshadow the rest.

"I am afraid he may be remembered as the guy who made the biggest antitrust mistake in American history," said antitrust expert Eric Clemons of University of Pennsylvania's Wharton School of Business. "The Google case is very complicated. The economics of two-sided markets is unlike anything else in antitrust, and he presided over a commission that did not think it was interesting enough to learn about. We may pay for that mistake for a decade. Or we may be forced to reconsider very soon. Either should embarrass him greatly."

THE WALL STREET JOURNAL

Path Inc. to Settle Charges Over Collecting Kids' Data
By DANNY YADRON, February 1, 2013

WASHINGTON—Path Inc., a maker of a popular social networking app, agreed to an $800,000 settlement with the Federal Trade Commission over charges it collected children's personal information without their parents' consent, regulators said Friday.

The company also settled charges it misled users of all ages by collecting information from smartphone address books without permission. It agreed to privacy reviews every other year for the next 20 years.

Path's app lets users share with their friends journal entries and photos along with personal information such as jogging routes and sleep times.

The company, started in 2010, has acknowledged it illegally collected data from children, but a spokeswoman said it was accidental, and the company began correcting the problem before being contacted by investigators last year.

The settlement comes as Washington has attempted to beef up regulations on what data firms can collect from Internet users, especially children. In December, the FTC broadened enforcement of some parts of the Children's Online Privacy Protection Act of 1998, known as Coppa, as more youngsters use social networks and smartphones.

Path attracted regulators' attention last year following reports the company collected information from users' phone contacts without permission. The stored data was used to suggest friends to Path users, a spokeswoman said.

In addition, while investigating the company, regulators determined it had collected similar information from about 3,000 children under the age of 13. Coppa requires parental consent to obtain personal information from children younger than 13, with fines of up to $16,000 per violation.

"As you may know, we ask users their birthdays during the process of creating an account," the company said in a statement on its website. "However, there was a period of time where our system was not automatically rejecting people who indicated that they were under 13."

The largest penalty for a Coppa violation was issued in 2011, when Playdom, a subsidiary of Walt Disney Co., agreed to a $3 million settlement.

Path which has 55 employees, joins several large technology companies that have faced privacy sanctions in

recent years, including Google Inc. and Facebook Inc.

The company is run by Dave Morin, an early Facebook Inc. employee, and has raised $41 million in venture capital, a spokeswoman said.

The settlement marks the last significant action under FTC Chairman Jon Leibowitz, who said this week he was stepping down in mid-February. Mr. Leibowitz said he would recuse himself from most decisions until then.

He predicted Friday's announcement was a prelude to future privacy legislation by Congress. "The industry is going to face much more prescriptive laws down the road," Mr. Leibowitz said. "And I don't think it's that far down the road."

POLITICO PRO

FTC embraces mobile 'Do Not Track' proposal
By Alex Byers
2/1/13

The FTC urged that industry adopt mobile 'Do Not Track' tools Friday as a way for consumer privacy protections to keep pace with the rapid adoption of wireless technologies.

A third report on mobile privacy from the commission Friday lays out steps — some more concrete than others — that mobile platforms, app developers and advertising networks should take. Suggestions include providing timely notice about data collection and obtaining consent before gathering sensitive information but also urges industry take up technology tools to put control into the hands of consumers.

While an enforceable and comprehensive Do Not Track option for the Internet at-large has long hung over the privacy world, the FTC's suggestion of a mobile mechanism is an indication that getting a grip on mobile privacy is emerging as a top priority. Implementing the DNT standard is a task that may be best handled by mobile platform operators like Apple, Google, Microsoft and BlackBerry, the FTC said.

"Offering this setting or control through the platform will allow consumers to make a one-time selection rather than having to make decisions on an app-by-app basis," the report states. "Apps that wish to offer services to consumers that are supported by behavioral advertising would remain free to engage potential customers in a dialogue to explain the value of behavioral tracking and obtain consent to engage in such tracking."

In addition to the mobile Do Not Track proposal, the report calls on app developers to improve coordination with ad networks and other third parties and participate in self-regulatory programs.

The agency also touched on a topic that's been at the center of the NTIA's multi-stakeholder debate on app privacy: whether to use icons to convey privacy policies or favor short-text based disclosures. While the report includes a section about icons and how they could be beneficial, both the report and FTC Chairman Jon Leibowitz stopped short of endorsing one strategy over the other, saying only that icons should be "considered."

"We think best practices require better notification to consumers and icons are one approach. I think a trillion ads have the Ad Choices icon — those are mostly on PCs," he told reporters Friday. "'Consider,' we think, is the right approach. It's one way to get the best practices."

Leibowitz added that the commission sees its efforts on mobile privacy as complementary to the NTIA process.

"We have been coordinating with the NTIA, we're participating in their process and we hope that the stakeholders at the NTIA process will consider these best practice recommendations as they develop their code of conduct for mobile app transparency," he said.

The third privacy report was released on the same day that the commission announced its latest enforcement action — this time, a privacy settlement against the social network Path. That company, the FTC said, violated the Children's Online Privacy Protection Act and deceptively collected personal information from users' address books even after consumers told it not to.

Leibowitz on Friday announced he would resign from the commission Feb. 15. As he prepares to depart, the tech industry and privacy groups are in a wait-and-see situation over who takes his place. Regardless of who takes over though, some expect the agency to increase its enforcement portfolio in the privacy space.

More enforcement from the FTC wouldn't be a terrible thing for app developers, though, said Association for Competitive Technology Executive Director Morgan Reed.

"The developer community, our community is moving at a million miles an hour and changing the world in pretty amazing ways. It's always good to know what the rules of the road are," Reed said. "So enforcement sometimes clarifies what they mean because frankly, FTC rulemakings and the FAQs and everything else they put out don't

always serve as very clear guideposts."

THE WALL STREET JOURNAL

Protect Against Tax Identity Theft

By TOM HERMAN

Many taxpayers are facing a severe identity crisis.

Internal Revenue Service officials said recently they are intensifying efforts to combat the growing problem of identity theft and tax-refund fraud. The IRS now has more than 3,000 employees working on cases of identity theft, more than double the level of a year ago.

Thieves can create havoc by filing bogus refund claims using someone else's Social Security number or other identifying information that has been stolen. The painful result: Victims face delays in getting their refunds.

Thieves have grown remarkably ingenious in recent years, especially in the realm of cyberspace. Techniques include sending out phony emails that appear to be from the IRS.

These emails, which may even include the IRS logo, typically claim the recipient can get a refund by clicking on a website and supplying certain sensitive personal information.

If you get one of these so-called phishing expeditions, don't reply or open any attachments. The IRS emphasizes that it doesn't "initiate contact with taxpayers by email to request personal or financial information." This includes "any type of electronic communications, such as text messages and social-media channels."

But what if you take all the most sensible precautions and still get stung by identity thieves? The IRS offers a few suggestions:

"If you receive a notice from IRS and you suspect your identity has been used fraudulently, respond immediately by calling the number on the notice."

If you didn't get a notice but suspect you're a victim, call the IRS's "identity protection specialized unit" at 800-908-4490, extension 245.

Fill out IRS Form 14039, available at www.irs.gov.

Contact the IRS's Taxpayer Advocate Service (877-777-4778) if you can't get your issue resolved by going through regular channels and are experiencing financial woes. Nina Olson, the IRS's national taxpayer advocate, recently wrote about the identity-theft problem in her annual report to Congress.

Notify the Federal Trade Commission (consumer.ftc.gov), or call the FTC's hotline: 877-438-4338. The FTC website offers helpful tips.

Notify local police.

Contact fraud departments at the three major credit-reporting firms—Experian, TransUnion and Equifax.

Close any suspect accounts.

The Justice Department's website (justice.gov) has information on the general problem of identity theft and fraud.

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COMPETITION

Health care, not Google, may shape Leibowitz's legacy. GCR 2/4 (pasted below)

FTC given more time for Arbitron-Nielsen review. The Deal 2/4

CONSUMER PROTECTION

FTC corrects language on Herbalife. NY Post 2/5

Seeking a Company's Elusive Sales Data. NY Times 2/4 (blog)

Herbalife Responds: We're Unaware of Regulatory Investigation. WSJ 2/4 (pasted below)

Herbalife shares fall after FTC discloses law-enforcement probe. WaPo 2/4

FTC Corrects Herbalife Statement After Probe Report. Bloomberg 2/4

Herbalife slams news report of law enforcement probe. Reuters 2/4

Herbalife rises despite FTC probe report. CNN Money 2/4

FTC corrects Herbalife investigation statement as shares rebound. Seattle Times 2/4

Herbalife vs. FTC: Multilevel Marketing Company Says It's Not Under Investigation. SLATE 2/4 (blog)

The FTC Has Released A Gigantic Document Dump Showing Angry Customer Complaints About Herbalife. Business Insider 2/4

Don't get scammed like Manti Te'o did. MarketWatch 2/5

OF INTEREST

Data breach exposes Energy Department's 'continuing story of negligence'. Info World 2/5

TWEETS

Chairman Leibowitz
@ronmknoxdc: From GCR: Legacy of Leibowitz at the @FTC may be shaped more by health care than by Google. http://www.globalcompetitionreview.com #antitrust (160+ followers)

Google
@FTC's public comment period on #Google deal extended until 22 February: ABA tech subcommittee says it needs more time to respond (41 followers)

Privacy
@Threatpost: .@FTC Endorses New #Privacy Guidelines, #DoNotTrack for Mobile Apps, Devices - http://t.co/mthr2DaP (23,200+ followers)

Given @FTC inquiry into data brokers and Privacy Report, when will companies stop using SSN last 4 default passwords? http://www.ftc.gov/opa/2012/12/databrokers.shtm ... (400+ followers)

Herbalife
@bloombergnews: FTC corrects Herbalife statement after false probe report sends shares down most in a month | http://t.co/cCDnzRUF (790,200+ followers)

@BusinessInsider: The FTC Has Released A Gigantic Document Dump Showing Angry Customer Complaints

About Herbalife http://t.co/MDs6YMTH (170,250+ followers)

@MarketWatch: Herbalife rejects report that it's under investigation by FTC http://t.co/J1d0od3Y (63,450+ followers)

Miscellaneous
The federal government added a new category to its crime database: "romance scams." on.mktw.net/WYj68y (3,200+ followers)

@FTC really needs to look into if @Allstate is short-changing claims from policy-holders while wasting $ on stupid ads. @nbc @cnbc @cnn @cbs (350+ followers)

FBN NEWS: Hlf officials telling people they dont believe they are subject of FTC probe; not been contacted by FTC may have statement later (27,450+ followers)

GLOBAL COMPETITION REVIEW

Health care, not Google, may shape Leibowitz's legacy
Ron Knox • Monday, 4 February 2013

Jon Leibowitz, the outgoing chairman of the US Federal Trade Commission, says he'll let others judge his legacy at the commission – and observers say that it may be health care enforcement, rather than the commission's headline investigation of Google, that will define his time at the agency.

For Leibowitz, who went from Capitol Hill policy worker to perhaps the most high-profile antitrust enforcer in a generation, says the FTC's perceived struggles in reigning in the world's largest online search company casts an immediate glow on his four-year tenure as chairman.
He will step down from the commission on 15 February.

In an interview with *GCR*, Leibowitz, says he believes that history will look back at the commission's decision to end its investigation of Google without bringing a search bias case "and say we did the right thing".

"You always want to bring big cases, but it's more important to do what the law requires," he says of the commission's 5-0 vote not to sue Google for allegedly gaming its search results. "The evidence was not binary, but the vote was unanimous".

As significant as the Google decision was – Leibowitz continues to believe the standard-essential patent settlement with Google will serve as a template for similar conduct in the future – antitrust observers and indeed Leibowitz himself look at two health care cases pending before the US Supreme Court as the potential cornerstones of his time as a commissioner.

The FTC's challenge of the *Phoebe Putney* hospital merger case, argued before the Supreme Court last year, will help decide whether state regulation can shield potentially anti-competitive mergers from the antitrust laws.

And this summer, the court is scheduled to hear arguments for and against the legality of reverse-payment settlements in patent lawsuits between branded and generic drug makers. The settlements have been a policy and enforcement emphasis for Leibowitz since his first days at the commission as he committed to fighting what he branded as "pay-for-delay" deals in the courts, the media and in Congress.

Now, observers say, the Supreme Court hearing is a culmination of years of fighting what, at times, appeared to be a losing courtroom battle.

"He was really the champion behind that," says Matthew Reilly, at Simpson Thacher & Bartlett and former head of the division that oversaw hospital mergers at the FTC. "It would have been easy to say that pay-for-delay was a loser. And state action was a loser. His enforcement agenda – and the success of that agenda – has been pretty remarkable."

Leibowitz says that after the US Department of Justice opposed the FTC's requests for the Supreme Court to hear two earlier reverse-payment cases in 2005 and 2006 – including the commission's case against Schering-Plough – he and his fellow commissioners struggled with whether to continue to push for a split among the circuit courts.

There was "a lot of soul-searching at the commission," Leibowitz says. "We were fighting a bit of a lonely fight for a while."

But eventually, the commissioners unanimously decided to challenge at least one more "pay-for-delay" deal. "It seemed to us that the majority of the courts just didn't have it right, and it was worth bringing one more case to see if we could bring the law to where we wanted it to be.

"We sought to develop a circuit split. And we did what we wanted to do," he says.

Claudia Higgins, a partner at Kaye Scholer and a former FTC official, says the Supreme Court's decision looms large, both for businesses looking for firm guidance on the issue, and for history's view of Leibowitz. "If that case comes down as the FTC is hoping, I think that will be his legacy," Higgins says.

Leibowitz has also been instrumental in pushing for both enforcement and policy actions in consumer protection and privacy matters, which are part of the commission's mandate. During his time as chairman, the commission has brought several cases against predatory lenders, debt consolidation scammers and other fraudulent activity. It also brought groundbreaking cases against Google and Facebook for online privacy violations.

Leibowitz's resignation has been rumoured since at least last summer, and it was thought that if the Google investigation ended prior to 1 January, he would depart the commission before President Obama's second inauguration.

Sources say that for a variety of reasons, the next chairman is more likely to come from within the commission than from private practice or another agency. And there's a good chance that person will be a woman, observers say.

Over the past few months, President Obama has been reproached by critics and advocacy groups for staffing many of the positions within his administration with men. The *New York Times* recently took Obama to task for favouring male appointees in 11 of 15 cabinet departments.

Nominating another man to lead the FTC may be politically unpalatable at the moment, observers say.

What's more, the administration may prefer to nominate one of two potential woman candidates currently at the commission – Commissioners Julie Brill and Edith Ramirez, both Democrats. If the Obama administration chose to appoint either to the chairmanship, it would avoid Senate confirmation hearings and votes that would be required of an outside candidate and would likely add months to the process.

Multiple sources say Brill is likely to be the administration's top candidate to take over the chairmanship. Ramirez has also been mentioned as a candidate, as have potentially less-likely candidates such as the FTC's Bureau of Economics director, Howard Shelanski, and Leslie Overton, the deputy head of the US Department of Justice's antitrust division.

His legacy aside, Leibowitz says he is happy to leave the commission much as he found it when he first joined in 2004 – a strong enforcer and advocate for consumers.

"The commission was a strong and bipartisan agency when I came, and I like to think that I leave it as a strong and bipartisan agency as I head off into the sunset," he says.

THE WALL STREET JOURNAL

Herbalife Responds: We're Unaware of Regulatory Investigation
By Steven Russolillo
February 4 2013

Herbalife Ltd has come out swinging against accusations that the Federal Trade Commission is investigating the nutrition company, as reported earlier by the New York Post.

In a statement, Herbalife says it is responding to "misleading and inaccurate information":

> Other than the voluntary dialogue with regulators, which we communicated on our January investor day, we are unaware of any other regulatory interest and/or investigation. We are demanding a correction from the NY Post.
>
> Since its founding in 1980, Herbalife has positively impacted the lives and health of consumers. For a direct selling company of our size, we have had a relatively low number of complaints to the FTC. However, we take every one of them seriously and stand by our record of doing right by our distributors and all consumers of our products.

The New York Post reported Herbalife is the subject of a law enforcement investigation. Herbalife shares fell as much as 12%, but have bounced back in early afternoon trading. The stock recently fell 3.7% to $33.82.

The New York Post is published by News Corp., which also owns The Wall Street Journal.

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COMPETITION

Google Said Close To Antitrust Settlement With Europe. Investor's Business Daily 2/7

CONSUMER PROTECTION

Email Spam Declines? Or Just Migrates? Conversable Economist 2/5 (blog)

IRS cracking down on ID theft, tax fraud. AP (via WSJ pasted below) 2/7

A free trip to Rio, with many weird strings attached. LA Times 2/7

Ackman Renews Herbalife Pyramid Claim in 40-Page Treatise. Bloomberg 2/8

FTC goes after weight-loss "news" sites. WaPo 2/7 (blog)

Matheson helped Johnson in FTC fight — sort of. Salt Lake Tribune 2/7

Acai Berry fake news website operators fined millions of dollars by FTC. Naked Security 2/8

FTC Releases Alarming Report on Children Apps. FOX 24 News 2/8

No Call Violator Pays Fine. KTTS-TV 2/7

As Nigerians Await New Consumer Law. This Day 2/7

IRS struggles with tax fraud via identity theft. USAT 2/8

IRS identity theft crackdown leads to 109 arrests. USAT 2/8

ASSOCIATED PRESS (via THE WALL STREET JOURNAL)

IRS cracking down on ID theft, tax fraud
February 7, 2013

MIAMI — With tax filing season heating up, an aggressive Internal Revenue Service crackdown is targeting the growing problem of criminals who use stolen identities to seek tens of thousands of dollars in fraudulent tax refunds.

Acting IRS Commissioner Steven T. Miller said Thursday that a January sweep in 32 states and Puerto Rico identified 389 ID theft suspects, including 109 who were arrested. The number of IRS ID theft investigations tripled in 2012 and is focused on high-risk cities such as Miami, New York, Atlanta, San Francisco, Chicago and Los Angeles.

In 2012, the IRS says its investigations and in-house filtering systems prevented $20 billion in would-be fraudulent refunds, up from $14 billion the year before. But Miller acknowledged that thieves still get away with stealing numerous tax refunds, although the IRS could not provide exact loss figures.

"In terms of how much got past us, we're quite sure some did," Miller told reporters in a conference call. "I know it doesn't approach the number that we stopped."

Like so many other types of fraud, Florida again is a national leader. Florida tops the U.S. in identity theft complaints at 178 for every 100,000 residents, according to the Federal Trade Commission. The Miami area is even worse, at 324 complaints per 100,000 residents. Miller said Miami and Tampa are the epicenters of the problem in Florida.

"Identity theft tax refund fraud has spread though South Florida like a virus," said Miami U.S. Attorney Wifredo Ferrer, whose office has prosecuted numerous tax fraud cases.

Legitimate taxpayers whose IDs are stolen often must wait months to get their refunds. Miller said there's a current backlog of 300,000 cases and an average wait time of 180 days for a resolution.
"I can say we are getting much better," Miller said. "We know that we need to do much, much more."

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COMPETITION

U.S. Clears DNA Firm's Acquisition by Chinese NYT 12/30

Some of J&J's McNeil Brands Likely Joining Sanofi's Chattem, Inc.Philly.com 12/31

Senate Approves Baer to Head Justice Department's Antitrust Team.Reuters 12/30
(Also appears in WSJ)

William Baer Confirmed as Justice Department Antitrust Chief. NYTDealBook 12/30 (Blog)

Baer Confirmed as U.S. Justice Department Antitrust Chief.Bloomberg 12/30

Top 10 Business Stories of 2012: Auto Recovery Leads the Way.Equities.com 12/30

FTC Investigation Regarding The Vitamin Shoppe's Planned Acquisition of Super Supplements.Noodls 12/31

CONSUMER PROTECTION

Frustrations With Robocalls, and the Joy of the Ordinary.NYT 12/28 (Opinion)

Thanks, Internet, for the 2012 Memories. WSJ (Opinion) 12/30 (pasted below)
New Rules on Debit-Card Processing Start to Pinch Small Banks, Credit Unions.
Washington Post 12/30
Facebook Feature Allowed Strangers To Read And Delete Private Messages.
Business Insider 12/31

Payday Lender Settles Charges with Minnesota.ConsumerAffairs 12/30

Children's Privacy Rule Could Have Wider Effect Star Tribune 12/30

PSU: Social Security Numbers Compromised due to Malware.GantDaily.com 12/31

State Warns of Charity Scams Related to Newtown Tragedy.Greenwich-Post 12/31

OF INTEREST

Source Still Optimistic Clyburn Could Be Confirmed this Congress.Multichannel News 12/30

TWEETS

Privacy
FTC To Investigate What Info Data Brokers Are Collecting & Selling About Consumers – The Consumeristhttp://t.co/R2NWIskf (68,700+ followers)

Green Guides
@CSRwire: The #FTC finally clarified what language is acceptable for #marketers of #green productshttp://t.co/1G6gjFhK (18,400+ followers)

Food Marketing
@preventioninst: Empty!http://t.co/iHzOU9kX MT @MarionNestle FTC's latest report on food marketing to kids: glass half full or empty (4,450+ followers)

COPPA
@adtech: FTC restricts behavioral targeting of kids; new rules go into effect next July:http://t.co/PEZciJjF via @Adweek #adtech #advertising... (26,050+ followers)

Miscellaneous
Would be great if @FTC investigated false ads for unlimited datahttp://www.zdnet.com/blog/cell-phones/be-careful-with-mvno-plans-their-unlimited-plans-are-limited-too/7513 . . . Have they made public statements on this topic?
(2,350+ followers)

Wonder how many NPEs actually 3rd party entities for big companies suing small frys to hide anti-competitiveness?http://po.st/slvgCE (1,200+ followers)

Gotta love how @Panasonic avoids mentioning their horrible MTS format in cameras specs. Too bad @FTC guys are too busy. (1,100+ followers)

What is the @FTC doing to address the Herbalife allegations as laid out by Bill Ackman? "http://www.factsaboutherbalife.com " (100+ followers)

Vitamin Shoppe Inc. / FTC Investigation Regarding The Vitamin Shoppe's Planned Acquisition of Super Supplements:...bit.ly/XaprOA (14 followers)

TV HITS

Gift Cards
KONG-SEA -Seattle, WA
WFIE (NBC) - Evansville, IN
WJAR-PVD (NBC) - Providence, RI
WSYM (FOX) -Lansing, MI
KALB (NBC) -Alexandria, LA
KMOT (NBC) - Minot, ND
WMC-MEM (NBC) - Memphis, TN

Food Marketing
KOKI (FOX) - Tulsa, OK

Privacy
CSPAN2 - U.S. Cable

Kids Mobile Apps
YNN -Binghamton, NY

Health Claims
CHSJ -Canada National

Of Interest
CSPAN3 - U.S. Cable

THE WALL STREET JOURNAL

Thanks, Internet, for the 2012 Memories
Federal judge Richard Posner dismissed as 'silly' the patent spat between Apple and Google.

By L. GORDON CROVITZ, December 30, 2012

On behalf of the two billion people now online, a look back at 2012, with thanks where it's due:

• To low capital-gains taxes: The low rates on profits made from investing in sometimes speculative ideas funded many years of entrepreneurial activity. Money flowed into U.S. venture capital as returns were taxed at a modest 15% rate—though this is still 15% higher than in countries with no capital gains taxes, such as South Korea and New Zealand. It looks like next year will bring higher taxes, including on capital gains. Expect less capital to fund the next new things.

• To Ecuador and Russia Today: WikiLeaks founder Julian Assange became a self-caricature, seeking asylum in Ecuador's Embassy in London rather than face criminal charges in Sweden, and doing television shows for Russia Today, a network run byVladimir Putin's government. For any remaining fans, this clarified that he is no journalist or friend of freedom. His now-dormant WikiLeaks simply made it easy for a low-level military officer-turned-traitor to leak U.S. intelligence.

• To the United Nations: When the International Telecommunications Union, a U.N. agency, held its conference in Dubai, its leaders promised not to claim power over the Internet and pledged to operate by consensus, not by voting. Late one night, there was a vote of 89 authoritarian regimes against 55 free countries to give governments the U.N.'s blessing to censor the Internet, monitor traffic and lock up online troublemakers.

The U.S. walked out. It is unregulated engineers at private companies who run the tens of thousands of networks that make up the Internet. Keeping an open Internet is more valuable than continuing any U.N. agency.

• To President Obama's campaign staff: The Federal Trade Commission threatened to issue do-not-track regulations for the Internet, which would have sacrificed free, ad-supported services online for a supposed privacy right. Then the Obama campaign became a sophisticated user of online "cookies" to track tens of millions of voters—dropping more cookies on people's computers to track their behavior and preferences even than doesBest Buy .

By combining online tracking with data from the biggest consumer-marketing companies, the campaign delivered highly customized political pitches. Luckily for people who prefer making their own privacy trade-offs online rather than relying on some new law, it became too embarrassing for the administration's FTC regulators to prohibit the marketing tactics that helped Mr. Obama win re-election.

• To President Obama: When he briefly tried out the campaign theme of "you didn't build that," he inadvertently reminded everyone who did build the Internet. He said: "The Internet didn't get invented on its own. Government research created the Internet so that all companies could make money off the Internet." Actually, government's limited role was funding the private companies that built the Internet. The government's purpose wasn't to build an Internet for commercial opportunities. Indeed, it took new laws to allow commercial uses beyond the original government-approved academic and military uses.

• To Judge Richard Posner: When one of the many software-patent cases was heard by this federal jurist, he declared that the patent emperor has no clothes. Judge Posner dismissed as "silly" lawsuits and countersuits between Apple andGoogle over the 250,000 claimed patents in today's smartphones. "Patents in the field of information technology," he said, "often have little if any value except defensively." Congress should get the hint and start treating patents in different industries differently.

• To YouTube: This subsidiary of Google protected the First Amendment by refusing a White House demand that it remove an anti-Muslim video the administration blamed for sparking the violence that led to the death of an ambassador and other American officers in Benghazi, Libya. The video played no part in the attack by an Islamist terror group.

• To optimistic entrepreneurs: We still don't have the personalized jetpacks featured in the 1960s television show "The Jetsons," but imaginative technologists made progress in other jaw-dropping areas. Self-driving cars are speeding to reality, with several auto makers testing vehicles and some states approving their use. We could soon be wearing glasses with built-in computer displays. Electronic health records may finally bring health care into the modern era.

• Finally, to the many foreign-born people with technology degrees now living in visa limbo in the U.S.: Thanks for being patient while Washington dithers on more open immigration. One quarter of U.S. high-tech companies have at least one foreign-born founder, and an immigrant or a first-generation American created 40% of the Fortune 500 companies. But there was a decline in the percentage of Silicon Valley firms started by foreigners—the first time this happened. People grew impatient and went home to be entrepreneurs. American policy always returns to its roots of open immigration, at least eventually. Let's make more-open immigration the top New Year's resolution for 2013.

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See first few stories in BCP matters. The USAToday story is the best one.

More on Herbalife:
http://www.npr.org/blogs/money/2013/01/16/169468312/the-fight-over-herbalife
http://www.businessinsider.com/herbalife-shares-fall-below-ackman-short-2013-1

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COMPETITION

Pfizer, Lilly profit hurt by generic competition. USAT 1/29

CONSUMER PROTECTION

FTC Says: Pyramid Scheme, Prepare To Be Busted. WSJ 1/28 (pasted below)

Federal, state regulators shut down Fortune Hi-Tech USA Today 1/28

Direct-Seller Fortune Hi-Tech Marketing Accused of Fraud Bloomberg BusinessWeek 1/28

Fortune Hi-Tech Marketing shut down as pyramid scheme Reuters/Chicago Tribune 1/28

Madigan, other AGs, sue Kentucky company for pyramid schemeChicago Sun-Times 1/28

Cord blood bank to improve data security. Reuters 1/28

Blood bank settles FTC charges for failing to protect personal information. The Hill 1/28

FTC Online Privacy Protection Campaign Kicks Into High Gear. CIO.com 1/28

FOIA release from FTC outs Yelp as 'Internet Mafia'. Daily Caller 1/28

Law firm: Google faces class action suit in UK over secret tracking of Apple users. WaPo 1/28

FTC: Put an end to unsolicited mail, calls, e-mail. Daily Journal 1/29 (blog)

Who can stop robocalls? FTC tries to crowdsource a solution but falls flat. The Verge 1/28

TWEETS

Fortune Hi-Tech Marketing

@CNBC: ALERT: FTC has charged Fortune Hi-Tech Marketing with running a pyramid scheme. #FHTM (999,550+ followers)

@CNBC: Source: FTC Press Conference at 1p ET is not about Herbalife. (via @herbgreenberg) $HLF (999,550+ followers)

@JimCramer: @herbgreenberg This Fortune Hi-Tech story is killing $HLF (616,650+ followers)

@herbgreenberg: Fortune Hi-Tech's website now replaced w/this: http://t.co/3cQgGrJ2

(40,650+ followers)

Fortune Hi-Tech gave big contribution last year to GOP outside group http://t.co/9WtKT92P via @sharethis (600+ followers)

Federal, state regulators shut down Fortune Hi-Tech http://t.co/cFUckfaE (2,800+ followers)

Data Security/Cbr

@pogowasright: @HHSGov & @FTC took action when devices with unencrypted PII/PHI were stolen from cars. Keep reminding employees not to leave PII in cars #n (2,800+ followers)

@pogowasright: Glad to see @FTC went after entity where #privacy policy promised one thing, but PII was left in & stolen from car: http://j.mp/Wxvt8v #n (2,800+ followers)

@pogowasright: @PogoWasRight: @FTC action against CBR shows that #privacy policies do matter, and they'll hold you to yours. databreaches.net/?p=26773 #infosec #privchat #n

Privacy

FTC Online Privacy Protection Campaign Kicks Into High Gear #privacy #FTC @kencorbin shar.es/CxreH via @CIOonline (900+ followers)

9/11 Coins

Private mint to pay FTC $750,000 settlement: By Jeff Starck An issuer of commemorative coins and me... bit.ly/VmwF00 #coin #news

Miscellaneous

@OM: It is time FTC/DOJ anti-trust to start investigation Facebook practices on abusing its platform, like Microsoft in 90s http://t.co/5Yhaa1Yy (1,329,600+ followers)

@digiphile: "It may be that the robocall problem is simply too tough to crowdsource"-@adrjeffries on @FTC contest http://bit.ly/WMeNLC (175,200 followers)

TV HITS

Fortune Hi-Tech Marketing

WCBS-NY radio

WLEX (NBC) Lexington

WPSD (NBC) Paducah

CNBC

WTVF (CBS) Nashville

WDKY (FOX) Lexington

THE WALL STREET JOURNAL

FTC Says: Pyramid Scheme, Prepare To Be Busted

By Tom Gara

January 28 2013

(This post has been updated – see below)

From this morning's FTC announcement:

> The Federal Trade Commission will co-host a press conference in Lexington, KY, today at 1 p.m. ET (Noon Central Time), with the Kentucky Attorney General's office, to announce a major action against an allegedly illegal pyramid scheme.
>
> :
>
> Steve Baker, Director of the FTC's Midwest Region Office, and Kentucky Attorney General Jack Conway will be available to answer reporters' questions.

So who is in the FTC's cross hairs? We'll have to wait until 1 p.m to find out (the announcement will be webcast here). Companies recently in the spotlight for their direct selling model are trading down this morning: shares in Herbalife HLF -0.30%are down almost 10% this, and fellow direct marketer Nu Skin NUS +2.08%is down 5%. CNBC are flashing a headline saying the announcement is not about Herbalife, but nobody has yet suggested who is is about.

Update: From the Lexington Herald Leader in Kentucky:

> Officials with Kentucky Attorney General Jack Conway's office and the Federal Trade Commission were inside the Lexington headquarters of Fortune Hi-Tech Marketing Monday morning, sending employees of the multi-level marketing firm home.
>
> :
>
> Conway is scheduled to hold a news conference with FTC Midwest region director Steve Baker at 1 p.m. to "announce actions relating to an alleged global pyramid scheme operating in Kentucky."
>
> :
>
> Baker and other officials at the company's headquarters, located at 860 Corporate Drive, declined to comment. Lexington police were seen leaving the building at 11:45 a.m., along with people unloading boxes marked with the FTC logo.

Here's a lengthy USA Today piece on Fortune's business model, and the complaints against it, from back in 2010.

Update II: In its press conference, the FTC has confirmed the case is being filed against Fortune. "Today is the beginning of the end for one of the most prolific pyramid schemes," it said.

Note: *The Office of Public Affairs compiles the FTC's Daily Clips. An archive of*

previous versions of Daily Clips is available in PDF format on the intranet.

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From: Lupovitz, Joni </O=FTCEXCHANGE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=JLUPOVITZ>
Sent: Monday, February 11, 2013 12:39 PM
To: Wagman, Jillian <jwagman@ftc.gov>
Subject: FW: FYI -- Herbalife news clips

From: Dorman, Frank
Sent: Tuesday, February 05, 2013 9:34 AM
To: Lupovitz, Joni; Harwood, Charles A.; Greisman, Lois C.; Vaca, Monica E.; Stearns, Dione J.
Subject: FYI -- Herbalife news clips

FTC corrects language on Herbalife
New York Post

Herbalife plunges on FTC probe report
CNNMoney
The investigation was revealed after the **Federal Trade Commission** disclosed a list of 192 complaints against Herbalife from the past seven years in response to a Freedom of Information Law request by the newspaper. "The **FTC** redacted some sections, ...

Herbalife Selloff Eases as Execs Wave Off FTC Fears
Fox Business
Shares of Herbalife (HLF) battled back from a 12% plunge on Monday after FOX Business's Charlie Gasparino reported that Herbalife executives are telling people they don't believe the embattled nutrition company is the subject of a **Federal Trade** ...

FTC issues mobile privacy policy guidelines
ZDNet
Based on data gathered by trade associations, academic, privacy groups and the **FTC's** own experience with mobile privacy issues, the report recommends that consumers should have to actively consent before apps are allowed to access "sensitive" ...

Salve for shorts
New York Post
The existence of the probe emerged after the **Federal Trade Commission**, responding to a Freedom of Information Act request by The Post, released 192 complaints filed against Herbalife over the past seven years. The **FTC** redacted some sections, saying it ...

Herbalife Drops After Report of Law-Enforcement Probe
Bloomberg
The **FTC**, in responding to a Freedom of Information Law request from the New York Post, should have said that it withheld some information from documents posted online because it can't disclose consumer complaints obtained from foreign sources if they ...

The FTC Has Released A Gigantic Document Dump Showing Angry Customer ...
Business Insider
Through a FOIA request, New York Post's Michelle Celarier has obtained 192 complaints about Herbalife filed with the **Federal Trade Commission** over the last seven years. According to the Post's report, the **FTC** is probing the multi-level marketing ...

From: Lupovitz, Joni </O=FTCEXCHANGE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=JLUPOVITZ>
Sent: Monday, February 11, 2013 12:39 PM
To: Wagman, Jillian <jwagman@ftc.gov>
Subject: FW: FYI -- Herbalife news clips

From: Greisman, Lois C.
Sent: Tuesday, February 05, 2013 9:38 AM
To: Dorman, Frank; Lupovitz, Joni; Harwood, Charles A.; Vaca, Monica E.; Stearns, Dione J.
Subject: RE: FYI -- Herbalife news clips

NY Post article looks good. Thanks Frank. L

From: Dorman, Frank
Sent: Tuesday, February 05, 2013 9:34 AM
To: Lupovitz, Joni; Harwood, Charles A.; Greisman, Lois C.; Vaca, Monica E.; Stearns, Dione J.
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From:	Lupovitz, Joni </O=FTCEXCHANGE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=JLUPOVITZ>
Sent:	Monday, February 11, 2013 12:39 PM
To:	Wagman, Jillian <jwagman@ftc.gov>
Subject:	FW: Herbalife on NPR Morning Edition

From: Prewett, Cecelia
Sent: Wednesday, January 16, 2013 2:31 PM
To: Matties, Deborah J.; JDL; Lupovitz, Joni; DeLorme, Christine Lee
Cc: Kaplan, Peter P.
Subject: RE: Herbalife on NPR Morning Edition

It's 1/28. Peter has more details.

From: Matties, Deborah J.
Sent: Wednesday, January 16, 2013 2:01 PM
To: JDL; Prewett, Cecelia; Lupovitz, Joni; DeLorme, Christine Lee
Subject: Herbalife on NPR Morning Edition

http://www.npr.org/blogs/money/2013/01/16/169468312/the-fight-over-herbalife (no mention of FTC, but brief mention at end of "federal regulators")

Do we know when our Fortune Hi-Tech Marketing pyramid case will be announced? It was voted last week. Seems like it might get picked up more than usual because of the Herbalife situation.

Debbie Matties
Attorney Advisor
Office of Chairman Jon Leibowitz
Federal Trade Commission
dmatties@ftc.gov
(202) 326-2047(office)
(202) 758-7697 (mobile)

From: Matties, Deborah J. </O=FTCEXCHANGE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=DMATTIES>
Sent: Wednesday, January 23, 2013 1:40 PM
To: Wagman, Jillian <jwagman@ftc.gov>
Subject: Fw: Issues from Davos

Not Responsive

From: Harwood, Charles A.
Sent: Wednesday, January 23, 2013 01:05 PM
To: Matties, Deborah J.; Kaufman, Daniel; Hippsley, Heather
Subject: RE: Issues from Davos

(b)(5)

CH

Charles Harwood
Federal Trade Commission, Bureau of Consumer Protection
202-326-2280 | charwood@ftc.gov

From: Matties, Deborah J.
Sent: Wednesday, January 23, 2013 1:03 PM
To: Harwood, Charles A.; Kaufman, Daniel; Hippsley, Heather
Subject: RE: Issues from Davos

Thanks Chuck.

(b)(5)

Not Responsive

From: Matties, Deborah J. </O=FTCEXCHANGE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=DMATTIES>
Sent: Thursday, January 24, 2013 11:06 AM
To: Dorman, Frank <fdorman@ftc.gov>
Subject: Fw: Jan. 28 press event media plan
Attach: FHTM media plan.docx

(b)(5)

-- Debbie

From: DeLorme, Christine Lee
Sent: Thursday, January 24, 2013 10:56 AM
To: Matties, Deborah J.
Subject: FW: Jan. 28 press event media plan

(b)(5)

From: Dorman, Frank
Sent: Thursday, January 24, 2013 10:53 AM
To: Baker, Steven; Harwood, Charles A.; O'Toole, David A.; Bhimani, Rozina C.; Kossow, Todd M.; DeLorme, Christine Lee; Kingsland, Gail M.H.; Custer, Richard; Benway, Kathleen
Subject: Jan. 28 press event media plan

(b)(5)

From: Google Alerts <googlealerts-noreply@google.com>
Sent: Monday, February 4, 2013 7:15 PM
To: Matties, Deborah J. <DMATTIES@ftc.gov>
Subject: Google Alert - "Federal Trade Commission" FTC

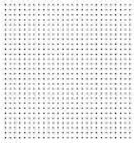
News 13 new results for **"Federal Trade Commission" FTC**

Herbalife plunges on FTC probe report
CNNMoney
The investigation was revealed after the **Federal Trade Commission** disclosed a list of 192 complaints against Herbalife from the past seven years in response to a Freedom of Information Law request by the newspaper. "The **FTC** redacted some sections, ...
See all stories on this topic »

FTC issues mobile privacy policy guidelines
ZDNet
The **Federal Trade Commission** (**FTC**) has issued a new set of guidelines in order to try and secure user privacy in a move that could affect companies including Apple and Microsoft. The FTC's guidelines -- although currently non-binding -- are directed at ...
See all stories on this topic »

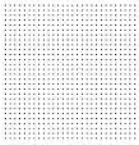
Salve for shorts
New York Post
The existence of the probe emerged after the **Federal Trade Commission**, responding to a Freedom of Information Act request by The Post, released 192 complaints filed against Herbalife over the past seven years. The **FTC** redacted some sections, saying it ...
See all stories on this topic »

Path hit by $800k FTC fine for privacy breaches
Mobile World Live
Social networking app Path has been fined $800,000 by the US **Federal Trade Commission** (**FTC**), after collecting personal information of children without parental consent. The app maker agreed to settle the charges brought by the FTC, which said it ...
See all stories on this topic »


Mobile World Live

Herbalife Selloff Eases as Execs Wave Off FTC Fears
Fox Business
Herbalife's stock tumbled double digits earlier on Monday after the New York Post reported Los Angeles-based company is the subject of a law enforcement investigation, citing documents released by the **Federal Trade Commission**. Herbalife said it is ...
See all stories on this topic »

Herbalife (HLF) Slammed, FTC Opens Probe as Multitude of Complaints Released
Streetinsider.com (subscription)
According to the NY Post on Monday, the **Federal Trade Commission** (**FTC**) may be conducting a probe into Herbalife's operations. The news came following an information request from the Post under the Freedom of Information Law. The FTC said there have ...
See all stories on this topic »


Streetinsider.com (subscription)

Arbitron (ARB), Nielsen (NLSN) to Provide FTC More Time in Proposed Merger
Streetinsider.com (subscription)
Arbitron Inc. (NYSE: ARB) announced that, following informal discussions with the staff at the **Federal Trade Commission** ("**FTC**") , Arbitron and Nielsen Holdings (NYSE: NLSN) have agreed to voluntarily provide the FTC with additional time in which to ...
See all stories on this topic »

The FTC Has Released A Gigantic Document Dump Showing Angry Customer ...
Business Insider
Through a FOIA request, New York Post's Michelle Celarier has obtained 192 complaints about Herbalife filed with the **Federal Trade Commission** over the last seven years. According to the Post's report, the **FTC** is probing the multi-level marketing ...
See all stories on this topic »

Herbalife Drops After Report of Law-Enforcement Probe
Bloomberg
The **Federal Trade Commission** corrected a statement that erroneously said Herbalife Ltd. (HLF) was the subject of a law-enforcement probe after a report about the non-existent investigation sent the supplement maker's shares down the most in a month ...
See all stories on this topic »

Bloomberg

FTC Pushes Privacy Guidelines for Mobile: What It Means for Hyperlocals
Street Fight
... must consider new safeguards — such as "up-front" disclosures and "do not track" mechanisms — to stay in line with new mobile guidelines issued Friday by the **Federal Trade Commission**. Although the new **FTC** guidelines are not enforceable ...
See all stories on this topic »

FTC issues mobile app guidelines for Apple, Google and others

Inquirer

THE UNITED STATES **FEDERAL TRADE COMMISSION** (**FTC**) has issued guidelines for app developers that include offering "do not track" options. The FTC issued a 36-page report on the state of smartphone app privacy and issued a number of non-binding ...

See all stories on this topic »

Inquirer

FTC demands "Do Not Track" for mobile apps

The H

The US **Federal Trade Commission** (**FTC**) has made another contribution to the growing debate over the privacy of personal data on smartphones and tablet PCs. With a package of recommendations PDF , the US authority is urging mobile operating system ...

See all stories on this topic »

US FTC issues privacy protection guidelines for mobile industry

Computer Business Review

The US **Federal Trade Commission** (**FTC**) has recommended in a staff report that stakeholders in mobile marketplaces, such as app developers, should improve users' privacy controls. The majority of the recommendations call for the stakeholders to ensure ...

See all stories on this topic »

Blogs 3 new results for **"Federal Trade Commission" FTC**

Herbalife under investigation by Federal Trade Commission ...

Shares in Herbalife (NYSE:HLF) fell over six per cent early Monday, after the New York Post reported that the U.S. *Federal Trade Commission* (*FTC*) is investigating the nutritional supplement maker upon receiving hundreds of complaints over ...

Proactiveinvestors USA & Canada website

Herbalife subject of FTC investigation: NY Post - MarketWatch

NEW YORK (New York) - Herbalife (NYSE:HLF) , the nutritional products distributor, is under scrutiny by the *Federal Trade Commission*, according to the New York Post. The report said the *FTC* has received 192 complaints against the firm in ...

MarketWatch.com - MarketPulse

FTC regulations confirm ODs exempt from Red Flags Rule « News ...

By newsfromaoa

The *Federal Trade Commission* (*FTC*) recently confirmed a 2010 AOA legislative victory when it issued regulations affirming that optometrists are generally not required to comply with the anti-identity theft "Red Flags Rule." The FTC action ...

News from the AOA's Blog

Web 1 new result for **"Federal Trade Commission" FTC**

The Federal Trade Commission (FTC) on Friday...

The **Federal Trade Commission** (**FTC**) on Friday announced Path has agreed to settle charges that it deceived users in its iOS app by collecting personal ...

thenextweb.tumblr.com/.../the-federal-trade-commission-ftc-o...

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From: Google Alerts <googlealerts-noreply@google.com>
Sent: Tuesday, February 5, 2013 4:57 PM
To: Matties, Deborah J. <DMATTIES@ftc.gov>
Subject: Google Alert - "Federal Trade Commission" FTC

News 6 new results for **"Federal Trade Commission" FTC**

The **Federal Trade Commission** And The Need For Investigations Into Pyramid ...
Seeking Alpha
The **Federal Trade Commission**, on the other hand, has stated "the critical question for the **FTC** is whether the revenues that primarily support the commissions paid to all participants are generated from purchases of goods and services that are not ...
See all stories on this topic »

FTC Issues Mobile Privacy Disclosures Report
Mondaq News Alerts (registration)
In the latest in a series of efforts by federal and state regulators to improve privacy practices in the exponentially growing industry of applications ("apps") for mobile devices such as smartphones and tablets, the **Federal Trade Commission** ("**FTC** ...
See all stories on this topic »

FTC Reaches Settlement with American Tax Relief LLC for Scamming ...
LoanSafe
(Source: **FTC**) - Under an agreement with the **Federal Trade Commission**, the defendants in a scheme that allegedly bilked consumers out of more than $100 million by falsely claiming they could reduce their tax debts must surrender more than $15 million in ...
See all stories on this topic »

Arbitron And Nielsen Voluntarily Provide FTC Additional Time For Merger Review
RTT News
The media and marketing research company Arbitron Inc. (ARB: Quote) Monday announced that, following informal discussions with the staff at the **Federal Trade Commission** or "**FTC**", Arbitron and Consumer information and measurement firm Nielsen ...
See all stories on this topic »

FTC corrects language on Herbalife
New York Post
The **Federal Trade Commission** yesterday corrected an earlier statement regarding a "law-enforcement investigation" into Herbalife. In response to a Freedom of Information Act request by The Post, the **FTC** said some complaints against the company were ...
See all stories on this topic »

Former FTC Commissioner Rosch Moves Back to Latham & Watkins
The BLT: Blog of Legal Times (blog)
... U.S. **Federal Trade Commission**, is returning to Latham & Watkins in D.C. and San Francisco as of counsel. Rosch served as managing partner of the firm's San Francisco office from 1994 to 2005, prior to his confirmation with the **FTC** in 2006. In his ...
See all stories on this topic »

Web 4 new results for **"Federal Trade Commission" FTC**

FTC: Give mobile device users more privacy disclosures -- or else ...
The **Federal Trade Commission** called on the fast-growing mobile device ... "This is a report about best practices," outgoing **FTC** Chairman Jon Leibowitz said.
www.latimes.com/.../la-fi-tn-ftc-mobile-privacy-consumers-re...

Path and the FTC
Today the United States **Federal Trade Commission** (**FTC**) announced that it reached a settlement pending court approval with Path regarding alleged violations ...
blog.path.com/post/42023928427/path-and-the-ftc

FTC Suggests Privacy Controls for Mobile Devices - WSJ.com
Claudio Papapietro for The Wall Street Journal. The **FTC'S** recommendations reflect an emphasis on mobile privacy. The **Federal Trade Commission** wants the ...
online.wsj.com/.../SB10001424127887324610504578260061...

FTC slams (and punishes) social network Path for deceiving users ...
The developers of Path have agreed to settle **Federal Trade Commission** (**FTC**) charges that the social network has deceived users and improperly collected ...
www.nbcnews.com/.../ftc-slams-punishes-social-network-path-...

Tip: Use site:restrict in your query to search within a site (site:nytimes.com or site:.edu). Learn more

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Create another alert.
Manage your alerts.

From: Google Alerts <googlealerts-noreply@google.com>
Sent: Friday, January 11, 2013 4:11 PM
To: Matties, Deborah J. <DMATTIES@ftc.gov>
Subject: Google Alert - "Federal Trade Commission" FTC

News **10** new results for **"Federal Trade Commission" FTC**

Taiwan's Fair Trade Commission slaps Samsung with a small fine for misleading ...
Android Authority
Samsung is in trouble with the **FTC** once again. It seems that the Taiwanese **Federal Trade Commission** has now slapped the company with a small fine due to a misleading advertisement. To be honest, the sum charged was pretty paltry at just NT$300,000. ...
See all stories on this topic »

Did Google's Promise to 'Do No Evil' Persuade the FTC to Do Nothing About Its ...
TIME
Has the **Federal Trade Commission** (**FTC**) been seduced by Google's famous promise to "do no evil"? That's the question a lot of critics are asking in the wake of the Internet search giant's antitrust settlement with the FTC last week. The problem, critics ...
See all stories on this topic »

Joshua Wright begins term at the FTC #thecircuit
Washington Post (blog)
FTC's Wright begins term: Joshua Wright started his term at the **Federal Trade Commission** Friday, replacing outgoing **FTC** commissioner J. Thomas Rosch. Wright, formerly a professor of law at George Mason University, has previously served as a visiting ...
See all stories on this topic »

FTC Sues to Shut Down Alleged $220 Million Scam
Bloomberg
The **Federal Trade Commission** sued to shut down an alleged $220 million telemarketing scheme operating out of the Empire State Building, saying it has victimized thousands of people, including the elderly and disabled. The Tax Club Inc. has duped ...
See all stories on this topic »

FTC Clears Google for Monopoly Abuse, But Will the EU?
Business 2 Community
Last week the **Federal Trade Commission** (**FTC**) announced that it would not be taking legal action against Google for monopolistic abuses provided that Google changed some of its business practices relating to mobile patents. Interestingly, it found that ...
See all stories on this topic »

FTC shows restraint in probing Google's product promotion
Boston Globe
The **Federal Trade Commission** showed a wise level of restraint last week when it ended an antitrust investigation of Google without filing a lawsuit against the company. The commission's 5-0 decision to let Google off doesn't mean that the Internet ...
See all stories on this topic »

Economists with Charles River Associates (CRA) Assist Google with Closing ...
PYMNTS.com
... in providing economic, financial, and management consulting services, today announced that economists in the Antitrust & Competition Economics Practice assisted Google in its response to the **Federal Trade Commission's** (**FTC**) antitrust investigation.
See all stories on this topic »

Amazon, Macy's, Sears Fined For False Bamboo Claims
SustainableBusiness.com
The **Federal Trade Commission** (**FTC**) seems to be serious about stopping false green marketing claims - it fined four high-profile retailers for falsely claiming that clothing, fabrics and textiles were made from bamboo fiber. Amazon.com, Leon Max, Macy's ...
See all stories on this topic »

Background Screening Industry Focused on Accuracy after Stories of ...
ESR NEWS
This increased attention included a **Federal Trade Commission** (**FTC**) report recommending regulations on data brokers and the FTC charging companies with alleged Fair Credit Reporting Act (FCRA) violations. In March 2012, the FTC, the nation's chief ...
See all stories on this topic »

Herbalife Defends Itself Against Pyramid Allegations, But Does the Market ...
TIME
... presentation during which he accused Herbalife of being nothing more than a complex pyramid scheme that would either collapse under the weight of its own fraudulence or fall apart due to regulatory action by the **Federal Trade Commission** (**FTC**).
See all stories on this topic »

Blogs **2** new results for **"Federal Trade Commission" FTC**

Liveblog: ABA Panel on FTC Google Settlement | Firedoglake

By Jane Hamsher
Jonathan M. Jacobson, Wilson Sonsini, Goodrich & Rosati, New York, NY; Geoffrey A. Manne, Lewis & Clark Law School, Portland, OR; Gary L. Reback, Carr & Ferrell LLP, Menlo Park, CA; J. Thomas Rosch, *Federal Trade Commission*, ...
Firedoglake

Telemarketers Stole $200 Million, FTC Says - Courthouse News ...

... Telemarketers working out of the Empire State Building defrauded elderly and disabled people of $200 million by promising to help them start Internet-based businesses, the *FTC* claims in court. The *Federal Trade Commission* sued the Tax ...
Courthouse News Service

Web 1 new result for **"Federal Trade Commission" FTC**

FTC to Consumers - Federal Trade Commission

FTC to Consumers. You May be Due a Refund for Dietary Supplements. FTC Challenged Marketers' Claims that Products could Cause Weight Loss or Treat and ...
www.ftc.gov/opa/2013/01/iovaterefund.shtm

Tip: Use quotes ("like this") around a set of words in your query to match them exactly. Learn more

Delete this alert.
Create another alert
Manage your alerts.

From: Google Alerts <googlealerts-noreply@google.com>
Sent: Monday, January 28, 2013 10:49 PM
To: Matties, Deborah J. <DMATTIES@ftc.gov>
Subject: Google Alert - "Federal Trade Commission" FTC

News — **3** new results for **"Federal Trade Commission" FTC**

FTC Goes After MLM Fortune Hi-Tech Marketing; Is Herbalife Next?
Benzinga
The **Federal Trade Commission** (**FTC**) announced that it had seized the assets of Fortune Hi-Tech Marketing on Monday. The FTC called the company a "classic pyramid scheme." FHTM describes itself as "direct selling company." On its website, it states that ...
See all stories on this topic »

Madigan joins FTC, states to shut down global pyramid scheme
The Rock River Times
CHICAGO --- Joining the U.S. **Federal Trade Commission** (**FTC**) and attorneys general from Kentucky and North Carolina, Illinois Attorney General Lisa Madigan (D) announced Jan. 28 legal action against Fortune Hi-Tech Marketing (FHTM), an alleged ...
See all stories on this topic »

Herbalife, NuSkin Drop Ahead of FTC Pyramid Scheme Announcement
Benzinga
The **Federal Trade Commission** (**FTC**) will host a press conference later today in Kentucky to announce a major action against an allegedly illegal pyramid scheme. Bill Ackman of Pershing Square has called Herbalife a "well-managed pyramid scheme" and ...
See all stories on this topic »

Blogs — **1** new result for **"Federal Trade Commission" FTC**

Following FTC fines, UK iPhone users sue Google for bypassing ...
By Jordan Kahn
Following *FTC* fines, UK iPhone users sue Google for bypassing Safari privacy settings · Google agreed to pay a record $22.5 million *Federal Trade Commission* fine in August following an investigation into whether it bypassed mobile Safari ...
9to5Mac

Web — **3** new results for **"Federal Trade Commission" FTC**

FTC Brings Seventh Action in Three Months Against Debt Relief ...
FTC Brings Seventh Action in Three Months Against Debt Relief Companies ...
www.ftc.gov/opa/2013/01/innwealth.shtm

FTC bars POM juice's health claims - IFT.org
According to the Los Angeles Times, the U.S. **Federal Trade Commission** (**FTC**) has upheld a judge's finding that the owners of POM Wonderful pomegranate ...
www.ift.org/food...ftc-bars-pom-juices-health-claims.aspx

FTC Closes Antitrust Investigation of Google - Wilson Sonsini ...
On January 3, 2013, the **Federal Trade Commission** (**FTC**) announced that it has closed its 19-month investigation of Google, with the five commissioners ...
www.wsgr.com/WSGR/Display.aspx?SectionName=clients/...

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From: Matties, Deborah J. </O=FTCEXCHANGE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=DMATTIES>
Sent: Thursday, January 10, 2013 6:39 PM
To: JDL <JDL@ftc.gov>
Subject: Herbalife - SEC Investigation?

---

http://www.reuters.com/article/2013/01/10/us-herbalife-investors-idUSBRE9090UK20130110

At the very end of the article it says, "Separately, the U.S. Securities and Exchange Commission's enforcement division has opened an investigation into Herbalife, a source familiar with the matter said."

(b)(5)

Debbie Matties
Attorney Advisor
Office of Chairman Jon Leibowitz
Federal Trade Commission
dmatties@ftc.gov
(202) 326-2047(office)
(202) 758-7697 (mobile)

From:	Matties, Deborah J. </O=FTCEXCHANGE/OU=FIRST ADMINISTRATIVE GROUP/ CN=RECIPIENTS/CN=DMATTIES>
Sent:	Wednesday, January 16, 2013 2:01 PM
To:	O'Toole, David A. <DOTOOLE@ftc.gov>
Subject:	NPR this morning

Just fyi - http://www.npr.org/blogs/money/2013/01/16/169468312/the-fight-over-herbalife

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From:	Matties, Deborah J. </O=FTCEXCHANGE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=DMATTIES>
Sent:	Wednesday, January 9, 2013 12:56 PM
To:	JDL <JDL@ftc.gov>
Cc:	Prewett, Cecelia <cprewett@ftc.gov>; Kaplan, Peter P. <pkaplan@ftc.gov>; Lupovitz, Joni <JLUPOVITZ@ftc.gov>; DeLorme, Christine Lee <cdelorme@ftc.gov>
Subject:	Pyramid Scheme case

(b)(5)

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(202) 758-7697 (mobile)

From: Matties, Deborah J. </O=FTCEXCHANGE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=DMATTIES>
Sent: Wednesday, January 23, 2013 5:08 PM
To: Harwood, Charles A. <charwood@ftc.gov>; Kaufman, Daniel <DKAUFMAN@ftc.gov>; Hippsley, Heather <HHIPPSLEY@ftc.gov>
Subject: Re: Issues from Davos

(b)(5)

-- Debbie

From: Harwood, Charles A.
Sent: Wednesday, January 23, 2013 01:00 PM
To: Matties, Deborah J.; Kaufman, Daniel; Hippsley, Heather
Subject: RE: Issues from Davos

Not Responsive

(b)(5)

CH

Charles Harwood
Federal Trade Commission, Bureau of Consumer Protection
202-326-2280 | charwood@ftc.gov

Not Responsive

Duplicate

From: O'Toole, David A. </O=FTCEXCHANGE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=DOTOOLE>
Sent: Wednesday, January 16, 2013 2:25 PM
To: Matties, Deborah J. <DMATTIES@ftc.gov>
Subject: RE: NPR this morning

Thanks, I heard it on the way into the office this morning. (b)(5)
(b)(5)

http://www.slate.com/articles/business/moneybox/2013/01/herbalifea_pyramid_scheme_bill_ackman_and_daniel_loeb_go_to_war_over_the.html

Duplicate

From: Matties, Deborah J. </O=FTCEXCHANGE/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=DMATTIES>
Sent: Wednesday, January 16, 2013 6:17 PM
To: O'Toole, David A. <DOTOOLE@ftc.gov>
Subject: Re: NPR this morning

Thanks - good article. Will be interesting to see what kind of coverage we get.

-- Debbie

Duplicate

From: NYTimes.com <nytdirect@nytimes.com>
Sent: Thursday, January 10, 2013 3:54 AM
To: Matties, Deborah J. <DMATTIES@ftc.gov>
Subject: Today's Headlines: New York Is Moving Quickly to Enact Tough Curbs on Guns

---

[illegible]

[illegible]

Today's Headlines

[illegible]

IN THIS EMAIL

[illegible]

TOP NEWS

New York Is Moving Quickly to Enact Tough Curbs on Guns

[illegible]

The Wilderness of Loading a Range of Winter's Life

[illegible]

Fred Thiele Battle Over Healthcare

[illegible]

QUOTATION OF THE DAY

[illegible]

[illegible]

HOME & GARDEN

Insurance Whose Cats Run Free

OPINION

The Debt Ceiling's Escape Hatch

WORLD

Chinese, Arms Land Dis. Sash. In Set for Venezuela Inauguration

Activists Convicted in Vietnam Crackdown on Dissent

At Three Catholic and Sensing, France Debates Gay Marriage

U.S.

Cash for Hay Driving Thieves to More Puddles

Pap Test Could Help Find Cancers of Uterus and Ovaries

Washington National Catedral Announces It Will Hold Same-Sex Weddings

POLITICS

Obama's Pick for Treasury Is Said to Be His Chief of Staff

Public Goals, Private Reserves to Debt Campaign

Rules, Meeting Gun Control Advocates, Vote Action

BUSINESS

U.S. Consumer Watchdog to Leave Mortgage Rules

Deep Cuts Raise Questions About Morgan Stanley

A.I.G. Says It Will Not Join Lawsuit Against Government

TECHNOLOGY

Delegation From U.S. Organ Web Arrives in Nestle Korea

In Pursuit of Mobile Applications, Many Are Turning to Apple

In Pursuit of Mobile Applications, Many Are Turning to Apple

SPORTS

Bonds and Bonsman Stolen Out

Questions of Strategy as Griffin Has Surgery

Despite Six Figures Tie to Steroids, Pieces Falls Short

ARTS

Where Modernity Present Questions

Oscar Memories of the Last, or First, Time

Winnie Pilkand Cation Exhibit

NEW YORK REGION

Organ Calls for State to Return to Progressive Ideals

Newborns Sweeping Dominates Opening of Unicameral Legislative Session

Avenue Ocean Infrared to Spray Crack to Lower Manhattan

FASHION & STYLE

Generation LEGITIMA

From England, Fashion's Large Outlings

Designing Tailoring and Tumble to Pinkill Collections

EDITORIALS

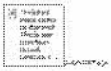
Outpourings in the House

Not Caesar's Weak List

A Step Backward in Bush Regulations

OP-ED

In Defense of Hazel for Defense



Witherington, James

From: Dorman, Frank
Sent: Thursday, July 11, 2013 9:07 AM
To: Stearns, Dione J.
Subject: RE: News inquiry

Tracking:

Recipient	Delivery
Stearns, Dione J.	Delivered: 7/11/2013 9:07 AM

Ok, thanks

-----Original Message-----
From: Stearns, Dione J.
Sent: Wednesday, July 10, 2013 10:17 PM
To: Dorman, Frank
Subject: Re: News inquiry

Yes, they should send a FOIA request.

----- Original Message -----
From: Dorman, Frank
Sent: Wednesday, July 10, 2013 05:13 PM
To: Stearns, Dione J.
Subject: News inquiry

Dione

The NY Post asked how many letters we've received asking us to investigate Herbalife? Does your office track that? Would it take a FOIA request?

Witherington, James

From: Taylor, Susan
Sent: Wednesday, July 10, 2013 4:44 PM
To: Clark, Donald S.; Dorman, Frank
Cc: DeMartino, Laura; Cornish, Alexis CTR
Subject: RE: News inquiry

There was one Congressional in 1998 and 2 in 2013.

-----Original Message-----
From: Clark, Donald S.
Sent: Wednesday, July 10, 2013 4:39 PM
To: DeMartino, Laura; Taylor, Susan; Cornish, Alexis CTR
Cc: Dorman, Frank
Subject: FW: News inquiry

(b)(5)

-----Original Message-----
From: Dorman, Frank
Sent: Wednesday, July 10, 2013 4:35 PM
To: Clark, Donald S.
Subject: News inquiry

Don,

The New York Post asked how many letters has the FTC received asking the agency to investigate Herbalife?

Is that easy to find?

Thanks

Frank

Witherington, James

From: Dorman, Frank
Sent: Wednesday, July 10, 2013 5:49 PM
To: Taylor, Susan
Subject: Re: Correction regarding Herbalife

No problem. Thank you

From: Taylor, Susan
Sent: Wednesday, July 10, 2013 05:48 PM
To: Dorman, Frank
Subject: Re: Correction regarding Herbalife

Sorry, I don't know the answer to that. I only handle Congressionals.

From: Dorman, Frank
Sent: Wednesday, July 10, 2013 04:59 PM
To: Taylor, Susan; Clark, Donald S.; Cornish, Alexis CTR; DeMartino, Laura
Subject: Re: Correction regarding Herbalife

Thanks. Have we had any letters from others, not congress members?

From: Taylor, Susan
Sent: Wednesday, July 10, 2013 04:51 PM
To: Clark, Donald S.; Cornish, Alexis CTR; Dorman, Frank; DeMartino, Laura
Subject: Correction regarding Herbalife

We have gotten 3 Congressional letters – one from 1998 from Senator Coverdell which was a constituent letter, one in 2003 from Senator Craig which was also a constituent letter and one in 2013 from Representative Sanchez.

Witherington, James

From: Dorman, Frank
Sent: Wednesday, July 10, 2013 5:09 PM
To: DeMartino, Laura
Subject: Re: Correction regarding Herbalife

Ok, thanks

From: DeMartino, Laura
Sent: Wednesday, July 10, 2013 05:04 PM
To: Dorman, Frank; Taylor, Susan; Clark, Donald S.; Cornish, Alexis CTR
Subject: RE: Correction regarding Herbalife

Yes, we have received letters from others (b)(5) [redacted]

(b)(5) [redacted]

From: Dorman, Frank
Sent: Wednesday, July 10, 2013 5:00 PM
To: Taylor, Susan; Clark, Donald S.; Cornish, Alexis CTR; DeMartino, Laura
Subject: Re: Correction regarding Herbalife

Thanks. Have we had any letters from others, not congress members?

From: Taylor, Susan
Sent: Wednesday, July 10, 2013 04:51 PM
To: Clark, Donald S.; Cornish, Alexis CTR; Dorman, Frank; DeMartino, Laura
Subject: Correction regarding Herbalife

We have gotten 3 Congressional letters – one from 1998 from Senator Coverdell which was a constituent letter, one in 2003 from Senator Craig which was also a constituent letter and one in 2013 from Representative Sanchez.

Witherington, James

From: Taylor, Susan
Sent: Wednesday, July 10, 2013 4:52 PM
To: Clark, Donald S.; Cornish, Alexis CTR; Dorman, Frank; DeMartino, Laura
Subject: Correction regarding Herbalife

We have gotten 3 Congressional letters – one from 1998 from Senator Coverdell which was a constituent letter, one in 2003 from Senator Craig which was also a constituent letter and one in 2013 from Representative Sanchez.

Witherington, James

From: Dorman, Frank
Sent: Wednesday, July 10, 2013 5:42 PM
To: (b)(6)
Subject: Re: Herbalife question

Alas, it's not so easy, because letters were sent to different people in the agency. I know only the ones you've asked about in recent months. I'll ask if the FOIA office can track it down.

From: Celarier, Michelle [mailto:(b)(6)
Sent: Wednesday, July 10, 2013 03:40 PM
To: Dorman, Frank
Subject: Herbalife question

Hi Frank—Can you tell me how many letters you have received asking the FTC to investigate Herbalife?

I know of six so far, but I think there may be others that I've not heard about.

I could do a FOIA on this, but it seems you could easily provide the information.

Thanks,
(b)(6)

Brent Wilkes

From: (b)(6)
Sent: Saturday, July 13, 2013 10:08 PM
To: (b)(6)
Cc:

Subject: Herbalife

(b)(6)

Thank you.

(b)(6)

I would like to have a meeting with the FDA about Herbalife. I recently had a meeting with the company and as part of my pre-research I was shocked to find out that the company is actually a pyramid scheme that is defrauding over 300,000 latinos a year. In addition, it appears that they have opened thousands of nutrition clubs that are trying to avoid FDA, local and state regulations which apply to retail outlets selling food products like soy shakes, teas and snack bars. See the article below.

If possible I would like to speak with someone at FDA to discuss Herbalifes practices and to see if anything can be done to stop their deceptive practices and bring them up to code.

(b)(6)
National Executive Director
League of United Latin American Citizens
(b)(6)
Washington, DC (b)(6)
(b)(6)
www.lulac.org

Are Herbalife's Nutrition Clubs Operating In Violation Of The Law?

Feb 8 2013, 07:48

Introduction

As a longtime entrepreneur and business owner, I can understand the allure of the Herbalife (HLF) Nutrition Club. Distributors are able to launch their own establishment with minimal upfront investment. Combine that with the assurance of riches from their mentors and many see the business opportunity as the chance of a lifetime.

The addition of Nutrition Clubs to Herbalife's selling model has provided Herbalife with the potential to dramatically increase revenue and provide it with its most essential success catalyst-its ability to recruit new distributors and increase the retention rate of current distributors.

It was no surprise that the clubs were a major focus for Herbalife during its analyst presentation on January 10th. While Bill Ackman presented some less than desirable photos of Nutrition Clubs during his "Who Wants

to Be a Millionaire" presentation, Herbalife responded with a heartwarming video to show that you can't really judge a club by its cover.

Ackman presented some of the onerous restrictions placed on club owners (as discussed in the next section), yet in our opinion he failed to unearth what we believe is a significant concern - the legality of the Herbalife Nutrition Clubs.

The Rules

If you want to open a Herbalife Nutrition Club you need to abide by an exhaustive list of rules and regulations. Yet, they are also sure to note that distributors are independent business operators and that Herbalife does not "approve, endorse, authorize, guarantee or assume any obligation with regard to Nutrition Clubs".

With that noted let's highlight some of the key points in the Herbalife Nutrition Club Rules:

1. Nutrition Clubs are not franchises
2. Nutrition Clubs are not restaurants or carry-outs
3. Nutrition Clubs are not food service establishments
4. Nutrition Clubs are not retail stores
5. Nutrition Clubs cannot post prices for products but may charge a membership fee
6. Nutrition Clubs may keep inventory on hand and may sell product at retail
7. Nutrition Club owners must deface or destroy product labels and containers before disposing in order to protect against counterfeiting
8. Nutrition Clubs must cover the windows so that the interior of the club is not visible from the exterior
9. Herbalife instructs distributors that all opened products must be consumed on club premises.
10. Herbalife instructs distributors that any opened product cannot be removed from the club. Following these instructions, distributors are given the false information that: "This is a key differentiation from operating a retail location, which is not allowed".
11. Herbalife's Nutrition Club Manual is 32 pages; yet devotes a mere 54 words describing regulatory requirements, i.e., business, tax and health permits and/or licenses in connection
12. Open/Closed sign cannot be visible from the exterior.
13. Clubs cannot advertise on radio or television

Why is Herbalife Concealing its Nutrition Clubs?

The aforementioned club rules are just a sample of the restrictions placed on distributors who run Nutrition Clubs. Some of the restrictions are just plain laughable:

3-H Proper Disposal of Product Containers
To protect against those who might seek to counterfeit Herbalife product, Club operators are required to deface or destroy product labels and containers before disposing of empty containers.

At first blush I thought Herbalife enacted the above procedure to ensure concealment of Nutrition Clubs from the public and regulators. Good for Herbalife for taking all steps necessary to ensure that bands of dumpster divers don't have an opportunity to find an empty Herbalife product container, which could obviously be used for the illicit purpose of counterfeiting Herbalife's products.

3-D Product Retailing

Nutrition Clubs are social gatherings, bringing people together with a focus on good nutrition. They are not retail stores or outlets, nor are they restaurants or carry-out establishments. Club operators may keep product inventory on hand, and they may sell their inventory at retail. All Herbalife products must be sold unopened and in their original Herbalife packaging.

Well, there you have it! Nutrition Clubs are NOT retail stores or outlets. This is curious, given the fact that "Club operators may keep product inventory on hand, and they may sell their inventory at retail".

So, just to be clear, a Nutrition Club is not a retail store, but a club may sell inventory at retail.

Please note this exchange between top sales leaders Amber Wick and Mary Holloway at the Herbalife Nutrition Training Seminar at Herbalife Extravaganza 2011: (note these comments are made with the Vice President of Global Ethics and Compliance Frank Lameberti sitting on the stage)

AMBER: When we say we're not a retail establishment, does that mean that we cannot retail out of the establishment? No. It means that when we walk in the front door, we don't necessarily want it to look like a retail smoothie shop.

This is a building where we do many things....it doesn't mean though that we don't retail out of the nutrition club. In fact, it is that we want you to retail.

We don't want it to look like exclusively like a RETAIL smoothie shop because it's not. There are so many more things that are done inside of the building. But I hear sometimes that people don't necessarily want to retail out of the nutrition club.

Well we do wellness profiles at a table, one on one presentations...where people walk out with their program.

MARY: But they didn't go to the shelf to pick it up. We had it in the back, and we just go pull it in the back from our cabinets and bring it out front and write up on it and get em going on the products.

Herbalife explicitly says that a Nutrition Club is "not a retail store or outlet". You also "may not operate on the premises of retail establishments".

But according to Amber and Mary as stated above, you can 'hide' the product in the back room and bring it out when someone wants to buy it. It's clear that Nutrition Club owners are selling product, they just don't want anyone to know about it.

The big question: Why would Herbalife go out of its way to conceal the fact that they are actually retailing products from these locations?

It is in our opinion that Herbalife is intentionally attempting to conceal the fact that these are "retail operations" because of the increased scrutiny and obligations that Herbalife would be exposed to.

Note that Herbalife is also quick to distance itself from any association with the word 'Franchise'. From Jon Taylor, a noted MLM expert:

"Are MLMs franchises? Though many promoters refer to their MLMs as —like a franchise or as an—unfranchise- or even as a —personal franchise, the last thing MLM executives want is to have to comply with franchise disclosure requirements, including a franchise disclosure document that could be hundreds of pages long with financial data, background of founders, etc."

In one look at the requirements of the Franchise Disclosure Document, it's clear that there are many disclosures that Herbalife would rather avoid -- especially point 19, which relates to Financial Performance Representations.

While we are less concerned about the Franchise issue, Herbalife is concealing the fact that they are operating Retail Food Establishments because they are fully aware that they are in violation of FDA, state and local laws and regulations.

Food Establishments

According to the FDA's Food Establishment Safety Guidelines, a "Food establishment" is an operation that "stores, prepares packages, serves, vends, or otherwise provides food for human consumption".

They also state that "A private home, a room used as living or sleeping quarters, or an area directly opening into a room used as living or sleeping quarters may not be used for conducting Food Establishment operations."

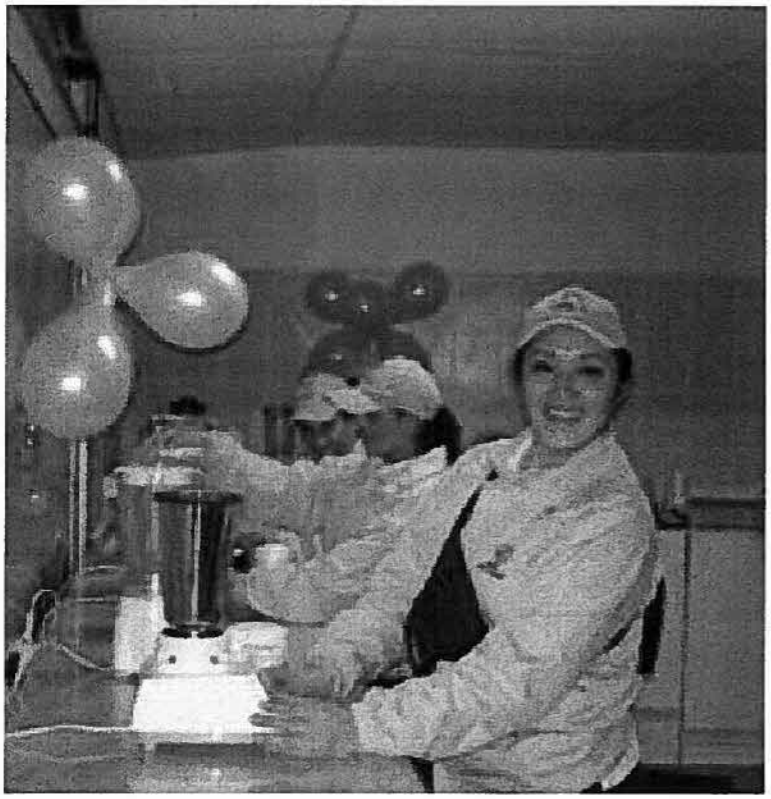
Herbalife is headquartered in California. This is from the California Retail Food Code:

Q: Can I prepare food in my home for sale to others?

No. In California all food that is intended to be sold to the public, must be prepared in an approved commercial food preparation facility. Such facilities cannot be connected directly to a private residence.

Q: Who needs a Permit to operate a food facility?

Any person, business, or organization that prepares, sells, or gives away food to the public needs a permit...operator...must show that the facility meets minimum requirements of the California Retail Food Code.



The picture above represents a typical nutrition club, where distributors serve shakes to customers, prepared in a blender and made with milk.

Milk is defined by the FDA as a "potentially hazardous food" and therefore requires stringent guidelines relating to the preparation and storage any foods served using milk as an ingredient.

Watch Dr Luigi Gratton prepare a Formula One shake with milk (the recommended way of preparation).

And, remember, according to the FDA, a distributor preparing and selling shakes to clients from their home would be in violation of the laws:

A private home, a room used as living or sleeping quarters, or an area directly opening into a room used as living or sleeping quarters may not be used for conducting food establishment operations.

Retail Selling Establishments

A Retail selling establishment is a fixed location from which a person sells products and services; as opposed to direct selling (the model Herbalife uses) which is the sale of products or services person-to-person away from a fixed location.

State; City; County and/or federal regulatory agencies impose numerous regulatory requirements on retail selling establishments. These requirements include, but are not limited to, business licenses; zoning approval and physical location requirements such as number of parking spacing and fire and safety code compliance. Additionally, operators of retail selling establishments must procure the appropriate retail sales tax license and remit the requisite sales tax to the appropriate licensing authority.

I contacted my local regulators and found that opening a Nutrition Club wouldn't be a walk in the park as Herbalife suggests. I was advised to find a location and submit plans -- showing sq. ft., parking, accessibility,

fire protection, bathrooms, etc. If it met zoning and building requirements, my next steps would involve obtaining license board and health department approval.

Herbalife informs distributors (1) they are permitted to operate a Nutrition Club from a home or office and (2) the retail sale of unopened products does not give rise to the Club meeting the legal criteria of a retail selling operation. In fact, according to its Corporate Nutrition Club manual, only the sale of opened products would cause clubs to meet the criteria of retail selling operations.

Herbalife's directive to "acquire any necessary licenses" does not constitute clear notice that licenses and other regulatory requirements must be met before a distributor can operate a Nutrition Club.

Clear notice would be something like:

LICENSES MUST BE OBTAINED AND REGULATORY REQUIREMENTS MUST BE MET BEFORE A DISTRIBUTOR CAN OPERATE A NUTRITION CLUB

(A) Contact the appropriate local, state or federal government agencies in order to acquire all necessary business, tax and health permits and/or licenses.

(B) Distributors must submit proof to the company that she/he has obtained all requisite licenses, health permits and fulfilled all regulatory requirements before commencing operation of a Nutrition Club.

(C) Distributors cannot operate a Nutrition Club from (1) a private home; (2) a room used as living or sleeping quarters; or (3) an area directly opening into a room used as living or sleeping quarters.

(D) Distributors cannot operate a Nutrition Club from an office or any other commercial location until she/he has obtained all requisite licenses; health permits, inspections and approvals.

Conclusion

We believe that Herbalife is intentionally concealing the existence of its home based and commercial nutrition clubs. This is due to our belief that a significant portion of Herbalife's home and commercial based nutrition clubs are in violation of FDA and local, state, city and county laws.

We believe that the authorities have the legal right to shut down each and every non-conforming Herbalife Nutrition Club in existence until the clubs are 'up to code' in regards to obtaining the appropriate permits, licenses, training and equipment.

We believe that the average time for the typical commercial Nutrition Club to get "up to code" would take between roughly 6 months to 1 year. This would lead to a significant disruption in Herbalife's current business model.

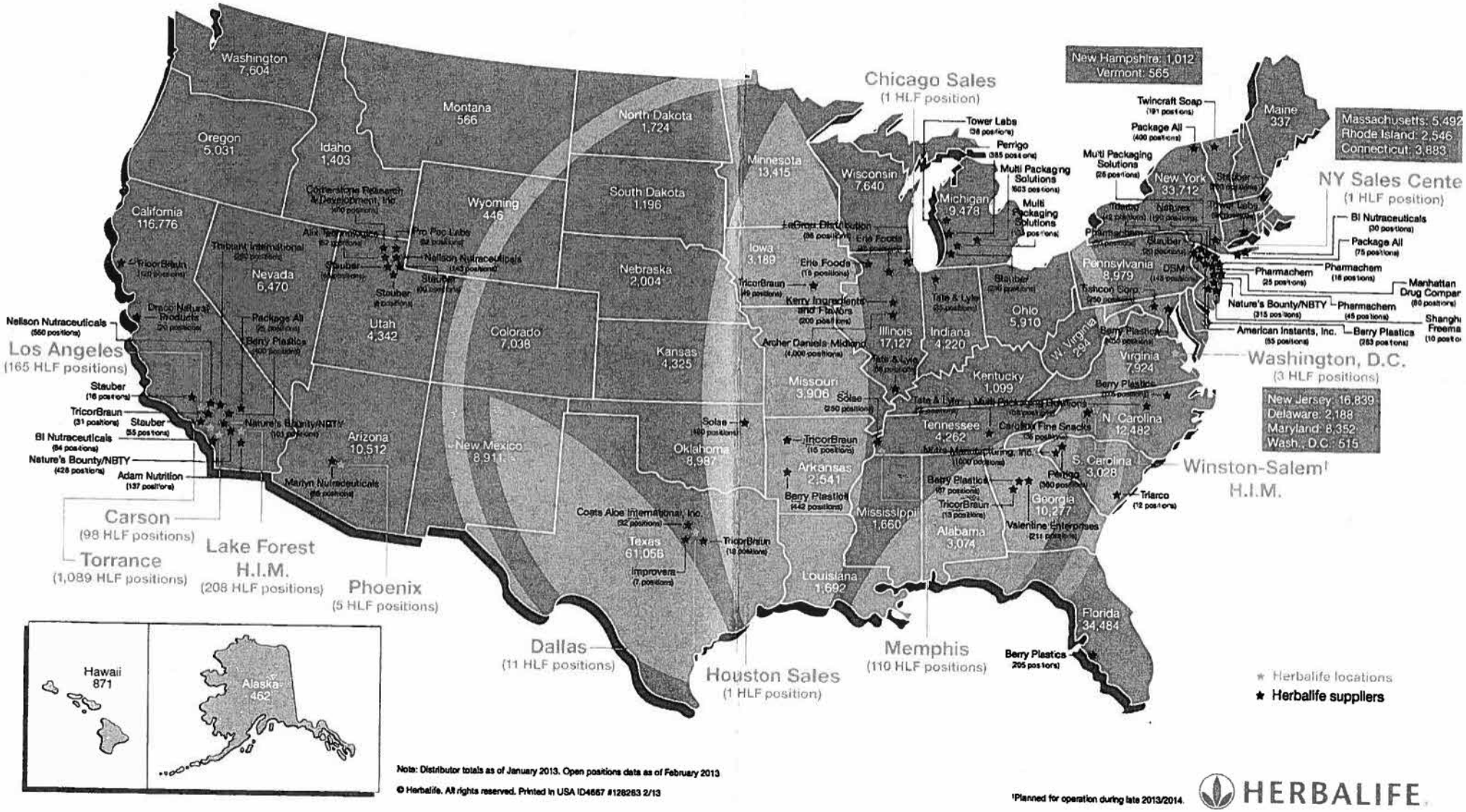
We also believe that Herbalife at some point (due to its onnerous club rules and regulations) could be forced to become a franchisor to these stores, in turn potentially changing the entire business model for Herbalife.

It is important that investors realize the extent that Herbalife has gone to conceal what is supposedly the future of the company.

While the legality of the clubs is not our only concern with Herbalife (please read our first, second, and third report on HLF for more details), we believe that it should be a major concern for all investors.

Many believe that the only legal action that Herbalife might potentially face would be via the FTC or the SEC, yet we believe that the legality of its Nutrition Clubs should be front and center as part of the entire debate surrounding this company.

Herbalife Across the United States 2013



Note: Distributor totals as of January 2013. Open positions data as of February 2013

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¹Planned for operation during late 2013/2014.

HERBALIFE

Beware of work-at-home stings

THE FEDERAL TRADE Commission has gone after some 500 work at home schemes in recent years. Still, the recession and jobless ness are mighty incentives for people to try programs that promise easy money. Our reporter sampled a few such offers. The re sult: He won't be giving up his day job.

'Stuff envelopes! Get paid!'

The setup. "Get paid $5 per envelope, up to $1,276.57+ weekly ... stuffing en velopes and mailing company circu lars," said an EASYHomeJOB online ad, which also said you could earn as much as $350,000 a year.

The hook. We signed up for a free trial membership but then had to pay $67 for the EASYHomeJOB System, sold by IVI Global Enterprise of Buffalo, N.Y. The com pany, like the others mentioned here, had a Better Business Bureau rating of F.

The sting. The payment bought us access to a Web site with a guide to sell ing get rich quick information. Here's how it works: You place classified ads—"EARN $1,500+ Weekly"—online or in print to get customers to send you $5, for which you'll mail them reports such as "How to get big dollars in your mailbox every day!" and circulars for products like the EASYHomeJOB System.

We tried to contact the company by phone and e mail but got no response.

'Assemble products at home'

The setup. "Stop sending money to 'stuff ing envelopes' scams ... make money by assembling products in the comfort of your own home," said Wes State Mort gage, of Eugene, Ore. We spent $26 for its Home Employment Directory, which lists companies seeking home assemblers.

The hook. We chose one listed compa ny at random, Gone Fish'n Tackle, of Aus tin, Texas, and went into the business of tying fishing flies. "If you make 3,000 flies, you will be paid $1,500 ... make 20 to 40 flies per hour," the listing said.

The sting. We paid $50 to Gone Fish'n for a starter kit that enabled us to make 24 flies. The company would pay us $12 for those, if they passed inspection, leaving us $38 in the hole. To continue, we'd have to keep buying materials: $40 for the makings of 144 flies. We'd have to spend $890 on ma terials, including the initial outlay, to pro duce 3,048 flies, for which we'd be paid $1,524. That nets $634 for about 190 hours of labor, or slightly less than $3.35 per hour, about half the federal minimum wage.

Heather Smith, president of Gone Fish'n, says the company sells 1,500 start er kits per year, but only 20 regulars have actually made a business of selling flies back to the company. "Selling of the kits is where we make our money," she says, adding that dissatisfied customers can get a full refund within 45 days of purchase.

'Start an Internet business'

The setup. "Learn how to make $107,389 in six months, just filling out forms and doing searches on Google and Yahoo," said an ad for the Google Money Tree kit. The fine print disclosed that it's not affili ated with Google. A ticking "Order now!" clock added urgency; the price of the "free" CD kit would shoot up to $197 in just 15 minutes.

The hook. You must give your credit card number to pay $3.88 shipping for the CD. By so doing, you consent to let Google Money Tree charge your account $72.21 a month for access to its Web site if you don't cancel within seven days.

The sting. The Web site and compact disc give disorganized information on sell ing on the Internet. The BBB has 478 com plaints on file against the company related to unauthorized credit card charges; it failed to respond to 460. Calls to the com pany for comment took us to a call center in an undisclosed location. Managers prom ised to pass on our request to the company.

Real vs. bogus homework

Yes, you can work at home, but don't expect to get rich quick. Some 4.2 million Americans use their home as a base for occupations ranging from landscaping and housecleaning services to tax preparation, engineering consulting, and farming, according to the National Association for the Self-Employed. If you want to avoid a scam, the Federal Trade Commission and NASE advise:

Don't pay for materials. Legitimate home product-assembly businesses are local and never ask you to buy the materials.

Be wary of network building. Stay away from multilevel marketing schemes that make earnings contingent on your ability to sign up an ever-growing pyramid of "distributors" who are supposed to do the same and pass sales commissions up the line.

Do some sleuthing. Check the company's Better Business Bureau rating. Also do a search at *www.ripoffreport.com* and *www.complaints.com*.

Be a skeptic. Don't depend on promises of 100 percent satisfaction and money-back guarantees. They might be worthless.

ILLUSTRATION BY KIM ROSEN

Pyramid Schemes

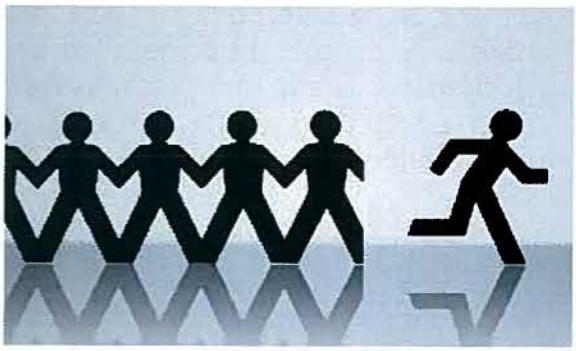
Don't Let One Collapse on You

A guide from NCL's Fraud Center

How Can You Tell if You Are Being Ripped Off?

Unfortunately, many consumers are duped into joining a pyramid scheme through high-pressure sales, such as seminars or other group meeting environments.

If you are considering going to a meeting to learn about a new business opportunity, and you think it could be a scam, print out the following checklist and take it with you to the plan meetings.



Remember: if you think something's wrong, or you can't afford to lose your entire "investment," get out!

The National Consumers League's Pyramid Schemes Checklist

If you find yourself considering a business opportunity, and something feels a little fishy, use this checklist to figure out whether you're looking at a scam. If you check any of the following boxes, consider it a red flag. It may be a scam!

- ☐ You are being told that you can make easy money, surprisingly high profits or returns.
- ☐ You have to pay a lot of money up-front to participate.
- ☐ You will not have the opportunity to get out in a reasonable amount of time and get your money back.
- ☐ You have to buy a lot of stuff (for "training," or "inventory," etc.) that you will not be able to return.
- ☐ You do not recognize the company. You have never heard of the promoter before and have a hard time finding any legitimate information on the promoter.

- ☐ The promoter is not a member of the Better Business Bureau, local Chamber of Commerce, or other recognized industry trade association (like the Direct Selling Association or the Direct Marketing Association). *Note: Even if they are not a member of any of these, you may still be able to find more information about them through these organizations.*

- ☐ Everyone at the meeting seems to be a member of a particular group - neighborhood, church, club, school, or business. *Note: Pyramid scheme operators often target "affinity groups," or people who share similar interests, to take advantage of social pressures.*

- ☐ You are being told that you will make money primarily for bringing in other recruits - and you may even get a share of their initial investment.

- ☐ You are being offered the opportunity to invest in a company or a franchise, but there is no prospectus or detailed information provided. A *prospectus is a detailed document that provides information about the nature of the investment, historic returns, etc. These are often required for franchise opportunities and investments in company stock, for example.*

- ☐ You do not understand what is being offered to you. You are told to trust them, or given examples of others who have been successful.

- ☐ Something just doesn't feel right. Trust your instincts!

Pyramid Schemes

Don't Let One Collapse on You

A guide from NCL's Fraud Center

MLMs and Pyramid Schemes: What's the difference?

Unfortunately, many fraudsters disguise illegal pyramid schemes as legitimate MLM plans. Consumers approached to participate in a MLM plan should consult the chart below to help determine whether they are being asked to join a legitimate MLM plan or a dangerous pyramid scheme.

	Multi-Level Marketing Plan	Pyramid Scheme
Business Focus	Sales of products and services to end-users (NOT other distributors)	Recruiting new members
Profits	Primarily based on the sales of products and services by the distributor. Perhaps some percentage of income from sales by downline recruits.	Primarily membership fees paid by new recruits or "bonuses" for meeting recruitment goals.
Products or Services for Sale	Household goods or services that consumers typically use in everyday life. Goods and services are priced competitively with traditional retail outlets.	Often a thinly-veiled and poorly-made "miracle" product or service that few consumers want or need. Merchandise is typically priced well above comparable products sold in retail stores.
Start-up Costs	Low or none at all.	Substantial, often involving recurring "membership" fees or expensive "educational," "training," or "advertising" materials that can easily be found free of charge elsewhere.
Support System	Low-pressure, eager to answer questions about the business and provide detailed information in writing upon request, such as a business and marketing plan	High pressure, with a constant focus on recruiting new members of the scheme. Hard to reach when questions arise.
Employee/ customer References	Eager to provide references who provide honest evaluations of the viability of the MLM plan and the work necessary to succeed.	Unwilling or unable to provide references or only provides references who themselves attempt to recruit a caller.
Sales Pitch	Provides detailed information about the work involved. Offers no promise of easy riches. Does not use high-pressure sales tactics.	Involves promises of large profits with minimal work, often in high-pressure seminar environments. Uses phrases like "limited time offer," "can't miss opportunity," and "guaranteed income."

		income.
Info Available?	Has a good report with the Better Bsuiness Bureau (BBB) and consumer protection agencies and is registered with the local Chamber of Commerce. Provides detailed information on their Web site AND provides hard copies of annual or quarterly reports, business plans, and marketing materials on demand, for little or no charge.	Not registered with the BBB or local Chamber of Commerce. Information about the company is scarce or limited to a Web site.
Merchandise Buy-Back	Buys back unsold merchandise at 90% or more of purchase price.	Refuses to buy back merchandise at all or buys back at significantly less than the wholesale price
Getting out of the Business	Easily accomplished and accompanied by a reasonable merchandise buy-back program.	Difficult, with high-pressure tactics used to keep participants in the scheme, possibly accompanied by pitches to spend more money on "training" to improve performance.
How Long the Business Will Last	Sustainable, based on repeat sales of products and service	Doomed to collapse
How Likely You'll Profit	Profits are based on time and effort devoted to selling goods or services to consumers.	The vast majority of participants lose money.
The Bottom Line	**It's a legal business opportunity that may or may not be a good fit for you.**	**It's illegal. Don't waste your money.**

Los Angeles Times | ARTICLE COLLECTIONS

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Latinos crucial to Herbalife's financial health

L.A. company Herbalife estimates Latinos account for about 60% of its U.S. sales made through its network of independent distributors.

February 15, 2013 | By Stuart Pfeifer, Los Angeles Times

The future of Herbalife is riding on Latinos.

The Los Angeles company estimates that Latinos account for about 60% of its U.S. sales made through its network of independent distributors. And a growing slice of those sales are coming from informal nutrition clubs run out of people's homes and strip mall shops.

It's a cultural phenomenon that got its start in Mexico and is quickly catching on among immigrants who have moved to Southern California. Budding entrepreneurs like Angel Perez, a 27-year-old from Inglewood, are forming the backbone to Herbalife's growth.

Perez runs her nutrition club out of a tiny, aging retail shop that from the outside shows no signs that she's even open for business. But behind a single glass front door, covered by a green curtain, there's a lively atmosphere inside.

Colombian singer Shakira's voice blares from overhead speakers. *"Hola! Como estas?"* Perez says before blending an Herbalife meal-replacement shake for a customer. She charges club members $4 per visit, entitling them to a protein shake, hot tea and glass of aloe vera juice.

But these nutrition clubs — and Herbalife's business structure — have come under intense scrutiny.

The company is in the middle of a Wall Street battle between two billionaire activist investors. On one side, hedge fund manager Bill Ackman contends the company is a pyramid scheme in which most of the independent salespeople lose money and get stuck with a product that nobody wants. Ackman said he wagered $1 billion that the company would fail, shorting an eye-popping 20% of the company's shares.

Betting against him is Carl Icahn, who dismisses pyramid scheme accusations with high praise about Herbalife's business model. Icahn disclosed this week that he bought nearly 13% of the company's shares, and was talking to executives about taking the company private.

At the heart of this battle: Herbalife's army of salespeople.

Among the biggest accusations facing the company is that it targets low-income members of minority communities, including Latinos, by making unachievable promises of vast wealth from selling its line of protein powders, vitamins, supplements and beauty products.

One of Ackman's biggest allegations is that most distributors end up with garages filled with products they cannot sell. Meanwhile, the distributors who brought them into the business get rich for recruiting them.

Herbalife, founded in 1980, has faced such criticism for decades. The debate centers on the way the company compensates its distributors, allowing them to profit from their own sales as well as sales made by distributors they've recruited — and distributors those distributors have recruited.

The company challenges the criticism, saying it's a legitimate company that sells nutritious products while offering entrepreneurs like Perez a chance to build their own businesses.

Herbalife President Des Walsh said the company does not target any specific demographic. The company's popularity among Latinos exploded in recent years, he said, when U.S. distributors imported the nutrition club concept from Mexico, which is second to the United States in Herbalife sales.

"This wasn't a company focus on the Latino community," Walsh said. "This was the Latino community in the United States seeing and hearing of the tremendous success of nutrition clubs in Mexico and then seeking to replicate that here."

Its marketing efforts do hit the Latino community. The company recently signed a 10-year, $44-million sponsorship of the Los Angeles Galaxy professional soccer team, which has a massive Latino fan base. Each year, it holds a national convention in Spanish called "Extravaganza Latina."

Before nutrition clubs started in Mexico, the only way for consumers to buy Herbalife products was in bulk containers to be used at home. A cheaper alternative is being served up at the nutrition clubs, where consumers can buy single servings and drink them in social settings, surrounded by other people with similar weight-loss goals.

This concept has taken off among Latinos, who are taught at an early age that natural remedies such as herbs and juices are a better option than U.S.-style medicine, said Alexandro Jose Gradilla, chair of the Chicano Studies Department at Cal State Fullerton. That makes Herbalife products popular among immigrants.

Selling the products for profit is also a good fit for Latinos because it allows distributors to take advantage of relationships within the close-

knit immigrant community, Gradilla said.

Herbalife spokeswoman Barbara Henderson said in a statement that the company "follows all applicable laws in dealing with distributors, whether Latino or not," but she did not elaborate further.

On a recent afternoon, dozens of independent distributors filled the lobby of a massive Herbalife warehouse in Carson, waiting to pick up products for their small businesses. Nearly all of them spoke to Herbalife staff in Spanish.

Some said they had successful businesses that generated thousands of dollars of monthly income. Many said they ran nutrition clubs based in storefronts or at their homes. Others just had a dream.

Hipolito Bolaños, 55, wore a pin on his shirt that read, "*Pierda peso ahora. Pregunteme como!*" the slogan made famous by Herbalife founder Mark Hughes: "Lose weight now, ask me how."

"My hope is to open my own club, to build a business out of it," Bolaños said in Spanish. Other than pitching products to friends and co-workers, he had no business plan. He said he first started using Herbalife products to deal with joint pain developed while working a construction job in New York.

Gustavo Parra, who was loading the trunk of his BMW 528i with Herbalife products, runs a nutrition club in a Bellflower strip mall. He has a long list of customers and more than 500 distributors beneath him who feed his monthly commissions, which he says nets $6,000 to $12,000 a month.

"I can't believe this happened to me," said Parra, 44, who came to the United States about 25 years ago from Mexico and has been selling Herbalife products for 10 years. "I love this job because I help people feel great and the company pays me."

Parra's success story is an exception. About 90% of Herbalife distributors make little or no income, the company acknowledges.

Ismael Vasquez of Riverside said he gave up his nutrition club in January 2012 because he wasn't making enough money. "There was not a lot of profit, just $500 to $600 per month," Vasquez said.

He had other concerns.

Herbalife encourages distributors to be more than salespeople; it asks them to build relationships with customers, to counsel them about the products and help them achieve their goals. Vasquez said distributors do not receive enough training to do that.

"Some of the people we had in our organization, they were not promoting the product in a way that was recommended by the company," said Vasquez, who now works at a Montebello bakery. "They would create their own ideas, telling people they could use aloe [vera juice] for eye drops. When we would find out about those kinds of things, we would try to correct it."

Operating from homes is a concern to the Los Angeles County Department of Public Health.

It's against the law to prepare and sell food — even nutrition shakes — from homes, said Eric Edwards, a county environmental health specialist. The county has shut down two Herbalife nutrition clubs in the last year for operating in retail space without proper health licenses, according to health department records.

"You can't operate a restaurant out of your home," Edwards said. "When they are making the shakes they are preparing food. Then they're expected to follow all the same rules, regulations and laws that a restaurant would."

Walsh, the Herbalife president, said the company instructs its distributors to follow all local ordinances.

Ruben Guerra, chairman of the Latino Business Assn., said he knows people who have made "pretty good money" selling Herbalife products.

However, he believes it's a job that requires a significant investment of time and energy in order to succeed.

"Unfortunately, some in the Latino community are vulnerable mainly because they come from Mexico or poor communities and they're always feeling like they want to get ahead," Guerra said. "When they tell you about these get-rich-quick ideas, they're very vulnerable. Who doesn't want to get rich quick?"

Times staff writer Salvador Rodriguez contributed to this report.

stuart.pfeifer@latimes.com

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Witherington, James

From: Dorman, Frank
Sent: Wednesday, July 17, 2013 2:47 PM
To: Hackley, Cheryl
Cc: Kaplan, Peter P.
Subject: RE: Urgent LA Times request re Herbalife investigation

Got it. Thanks

From: Hackley, Cheryl
Sent: Wednesday, July 17, 2013 2:47 PM
To: Dorman, Frank
Cc: Kaplan, Peter P.
Subject: FW: Urgent LA Times request re Herbalife investigation

Cheryl Hackley
Office of Public Affairs
202-326-2480

From: (b)(6) [mailto: (b)(6)
Sent: Wednesday, July 17, 2013 1:15 PM
To: Office of Public Affairs
Subject: Urgent LA Times request re Herbalife investigation

Greetings,

I'm a reporter for the Los Angeles Times. I'm wondering if someone is available to comment on reports that the FTC is meeting with consumer groups to discuss allegations that Herbalife is a pyramid scheme. Either contact me by email or by telephone at (b)(6)

Thanks very much.

-(b)(6)

(b)(6) Staff Writer
Los Angeles Times
202 W 1st St
Los Angeles, CA 90012
Office: (b)(6)
Mobile: (b)(6)
Twitter: (b)(6)

Witherington, James

From: Kelly, Andrea
Sent: Tuesday, June 11, 2013 3:30 PM
To: Kaplan, Peter P.
Cc: Vera, Elena R.
Subject: RE: Request for Documents FOIA-2013-00914

Non Responsive

From: Kelly, Andrea
Sent: Monday, June 03, 2013 8:57 AM
To: Kaplan, Peter P.; Dorman, Frank
Cc: Vera, Elena R.
Subject: RE: Request for Documents FOIA-2013-00914

Peter and Frank,

I just wanted to touch base regarding this FOIA request. First, I should clarify that the request asks for all correspondence between the FTC and The National Consumers League, not just as it relates to Herbalife. I have attached another copy of the original FOIA request (2013-00914), in case it got lost in the shuffle. Please let me know if this changes your response, or if you still do not have any records.

Non Responsive

From: Kaplan, Peter P.
Sent: Wednesday, May 29, 2013 3:43 PM
To: Dorman, Frank; Kelly, Andrea
Subject: RE: Request for Documents FOIA-2013-00914

From: Dorman, Frank
Sent: Wednesday, May 29, 2013 3:37 PM
To: Kelly, Andrea; Kaplan, Peter P.
Subject: Fw: Request for Documents FOIA-2013-00914

We don't have any correspondence.

From: Hackley, Cheryl
Sent: Wednesday, May 29, 2013 03:32 PM
To: Dorman, Frank; Kaplan, Peter P.
Subject: FW: Request for Documents FOIA-2013-00914

FOIA request on Herbalife. Please let Andrea know what you have.

From: Kingsland, Gail M.H.
Sent: Wednesday, May 29, 2013 2:37 PM
To: Hackley, Cheryl
Cc: Lordan, Elizabeth
Subject: FW: Request for Documents FOIA-2013-00914

Thanks for picking this up Cheryl.

Gail M. Kingsland, Programs Specialist
Federal Trade Commission
Office of Public Affairs
202-326-2178 desk 301-917-7205 cell
Connect with the FTC
FTC.gov I Facebook I @FTC
@laFTC I Newsroom
"The true mark of a good leader is their willingness to serve first." Stephen E. Young

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From: Kelly, Andrea
Sent: Wednesday, May 29, 2013 2:26 PM
To: Kingsland, Gail M.H.
Subject: FW: Request for Documents FOIA-2013-00914

Non Responsive

From: Kelly, Andrea
Sent: Friday, May 24, 2013 11:54 AM
To: Davis, Regina L.; Lake, Lisa
Cc: Kelly, Andrea
Subject: Request for Documents FOIA-2013-00914

Witherington, James

From: Dorman, Frank
Sent: Tuesday, June 25, 2013 8:24 AM
To: Kaplan, Peter P.
Subject: RE: ny post: FTC may reclimb pyramid scheme

She called me. Lois said no comment.

From: Kaplan, Peter P.
Sent: Tuesday, June 25, 2013 8:23 AM
To: 0208DL
Subject: Fw: ny post: FTC may reclimb pyramid scheme

Hi all. Just curious did anyone get a call on this? Doesn't look like it but I wanted to check w everyone....

From: Hackley, Cheryl
Sent: Tuesday, June 25, 2013 08:15 AM
To: Kaplan, Peter P.; Dorman, Frank
Subject: ny post: FTC may reclimb pyramid scheme

NEW YORK POST

FTC may reclimb pyramid scheme

By MICHELLE CELARIER

Last Updated: 6:36 AM, June 25, 2013

Posted: 12:01 AM, June 25, 2013

The Federal Trade Commission is considering tightening the ground rules on pyramid schemes, sources told The Post.

The FTC's rethink comes as it is under growing pressure from lawmakers and consumer groups to investigate Herbalife, the $5 billion multi-level marketing company that hedge fund activist Bill Ackman has accused of being a pyramid scheme.

The FTC has been reluctant to pursue Herbalife, due in part to the expense of going up against such a huge, well-financed company — especially given the ambiguity of the rules, sources said.

At issue is whether sales to distributors count as retail sales.

That's key because earnings from retail profits must be greater than recruiting-related compensation to prevent a company from being classified as a pyramid scheme.

A 2004 staff letter, which the FTC is considering revisiting, has been interpreted by multi-level marketers to mean that internal sales do count as retail sales.

Letter On Herbalife by New York Post

Herbalife, which denies it is a pyramid scheme, said that “many of our distributors are simply discount customers, and we have millions of non-distributor customers in the US as determined by research performed by Nielsen.”

However, the FTC recently shut down a smaller MLM company, Fortune Hi–Tech Marketing, because a majority of its sales were not outside its distributor network.

“They didn’t seem to be giving any credit for internal consumption,” said Jarrel Price of Height Analytics.

Last week, William Keep, The College of New Jersey Business School dean and MLM expert, wrote to the FTC asking it to clarify its position.

The FTC, Keep said, “has remained surprisingly silent” even though the industry has interpreted the staff letter differently from recent court and FTC decisions.

Read more: FTC may re-examine pyramid scheme guidelines - NYPOST.com
http://www.nypost.com/p/news/business/ftc_may_reclimb_pyramid_scheme_prZ0NFMqiKjbevc3mbwwiO#ixzz2XEIHCpmm

Cheryl Hackley
Office of Public Affairs
202-326-2480 office
Connect with the FTC
FTC.gov | Facebook | @FTC
@laFTC | Newsroom

Witherington, James

From: Lordan, Elizabeth
Sent: Tuesday, June 25, 2013 9:06 AM
To: Kaplan, Peter P.; 0208DL
Subject: Re: ny post: FTC may reclimb pyramid scheme

Not me. Almost sounds as if she inferred from somebody's letter to the ftc that we were reconsidering, based on the fact that the letter wants us to reconsider.

From: Kaplan, Peter P.
Sent: Tuesday, June 25, 2013 08:22 AM
To: 0208DL
Subject: Fw: ny post: FTC may reclimb pyramid scheme

Duplicate

From: Hackley, Cheryl
Sent: Tuesday, June 25, 2013 08:15 AM
To: Kaplan, Peter P.; Dorman, Frank
Subject: ny post: FTC may reclimb pyramid scheme

Duplicate

Witherington, James

From: Dorman, Frank
Sent: Tuesday, June 25, 2013 9:04 AM
To: Kaplan, Peter P.
Subject: RE: ny post: FTC may reclimb pyramid scheme

Already did

From: Kaplan, Peter P.
Sent: Tuesday, June 25, 2013 9:04 AM
To: Dorman, Frank
Subject: Re: ny post: FTC may reclimb pyramid scheme

OK thanks. Can you send the story to her and Monica?

From: Dorman, Frank
Sent: Tuesday, June 25, 2013 08:23 AM
To: Kaplan, Peter P.
Subject: RE: ny post: FTC may reclimb pyramid scheme

Duplicate

From: Kaplan, Peter P.
Sent: Tuesday, June 25, 2013 8:23 AM
To: 0208DL
Subject: Fw: ny post: FTC may reclimb pyramid scheme

Duplicate

From: Hackley, Cheryl
Sent: Tuesday, June 25, 2013 08:15 AM
To: Kaplan, Peter P.; Dorman, Frank
Subject: ny post: FTC may reclimb pyramid scheme

Duplicate

Witherington, James

From: Kaplan, Peter P.
Sent: Friday, July 12, 2013 4:10 PM
To: Vaca, Monica E.
Subject: RE: Bloomberg

OK, thanks. They seem to have an insatiable appetite for this.

From: Vaca, Monica E.
Sent: Friday, July 12, 2013 4:09 PM
To: Kaplan, Peter P.
Subject: Bloomberg

I talked with a reporter out of Atlanta from Bloomberg on pyramid/MLM issues. I told him I would not comment on Herbalife but did speak with him on background only, regarding pyramid analysis.

Witherington, James

From: Kaplan, Peter P.
Sent: Wednesday, July 17, 2013 1:41 PM
To: Dorman, Frank
Subject: RE: LA Times inquiry re Herbalife

Great, thanks....

From: Dorman, Frank
Sent: Wednesday, July 17, 2013 1:38 PM
To: Kaplan, Peter P.
Subject: RE: LA Times inquiry re Herbalife

I'm on it already.

From: Kaplan, Peter P.
Sent: Wednesday, July 17, 2013 1:37 PM
To: Dorman, Frank
Subject: FW: LA Times inquiry re Herbalife

Duplicate

From: Pfeifer, Stuart [mailto:Stuart.Pfeifer@latimes.com]
Sent: Wednesday, July 17, 2013 1:17 PM
To: Kaplan, Peter P.
Subject: LA Times inquiry re Herbalife

Duplicate

Consumer Sentinel Network Complaints

Record # 1 of 2 / Consumer Sentinel Network Complaints			
Reference Number:	39989334	**Originator Reference Number:**	
Language:	English	**Contact Type:**	Complaint
Source:	Consumer	**DNC?**	N
Comments:	Consumer was looking for an apartment on craigslist. She started to submit her credit info on-line and didn't do so. Later she discovered that someone has pulled her credit.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	BROSS	**Entry Date:**	8/27/2012
Updated By:		**Updated Date:**	
Complaint Source:	FTC Call Center	**Product Service Code:**	Shop-at-Home\Catalog Sales
Amount Requested:	$0.00	**Amount Paid:**	$0.00
Payment Method:	Unknown	**Agency Contact:**	Phone
Complaint Date:	8/27/2012	**Transaction Date:**	8/22/2012
Initial Contact:	I Initiated Contact	**Initial Response:**	Unknown
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:	N	**Dispute with Credit Bureau - Resolved to Satisfaction?:**	N
Member of armed forces or dependent?:	No		
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Washington	**State:**	District of Columbia
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	30 - 39
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Cynthia Robinson		
Address:			

City:		**State/Prov:**	
ZIP:		**Country:**	
Email:	cynthiarobinsonproperties@gmail.com	**URL:**	www.creditcheckusa.net
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Record # 2 of 2 / Consumer Sentinel Network Complaints			
Reference Number:	38016342	**Originator Reference Number:**	I1205311215091662
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: My debit card attached to my bank account was charged. The bank displayed a phone number but no address. I called the number and they said that the charge would be reversed , but it would take 3-5 business days. I told them that this time frame was unacceptable and asked to speak to a supervisor. At this point she disconnected my call. I called the bank again and had my debit card cancelled I tried to file a **complaint** with the BBB, but I needed an address. I tried to call the company back and my number had been blocked. The email address is "consgamehere.com.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:	More Information on Data Contributor Complaints?		
Entered By:	IC3-USER	**Entry Date:**	5/31/2012
Updated By:		**Updated Date:**	
Complaint Source:	Internet Crime Complaint Center	**Product Service Code:**	Credit Cards
Amount Requested:		**Amount Paid:**	$10.11
Payment Method:	Bank Account Debit	**Agency Contact:**	External Agency
Complaint Date:	5/31/2012	**Transaction Date:**	
Initial Contact:	Internet Web Site	**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	BIRMINGHAM	**State:**	Alabama
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	50 - 59
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: **View Similar Complaints**	**Cynthia Robinson**		
Address:	(b)(6)		

City:	Birmingham	**State/Prov:**	Alabama
ZIP:	(b)(6)	**Country:**	United States
Email:		**URL:**	
Area Code:		**Phone Number:**	(b)(6)
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Cynthia Robinson	**Title:**	

Consumer Sentinel Network Complaints

Record # 1 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	42425152	**Originator Reference Number:**	595749
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	I was looking for a work from home opportunity sometime last July 2012. I was surfing online and landed on careerbuilders.com and found there this job title 'work from home BBB accredited'. When I saw that it was BBB accredited, somehow it gave me apositive thought about this online job posting and so i went on and gave it a try. I paid $9.95 and then the next day, one of the coaches called me and introduced herself to me and gave me the instructions what to do next while waiting for myDecision Pack. I am still hoping this will work for me. When the **decision pack** arrived, I watched the Video presenttion and reviewed the materials and everything looked so promising and inspirational. After the instructions and the BusinessIntroduction calls from the coaches, I joined the Online Business Systems for $399.00 which turned out to be Herbalife which was never disclosed on the Job Posting. It was like a mystery or a puzzle that they will call you 3 or 4 times until theydisclose that they are Herbalife. Since I like Herbalife I was still optimistic that this might work for me...again. I jumped to the Supervisor's level because they said to maximize and leverage the power of the internet and that cost nearly		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	CLGC-USER	**Entry Date:**	9/18/2012
Updated By:		**Updated Date:**	
Complaint Source:	National Consumer League	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:	$0.00	**Amount Paid:**	$10,000.00
Payment Method:	Bank Account Debit	**Agency Contact:**	External Agency
Complaint Date:	9/18/2012	**Transaction Date:**	
Initial Contact:	Internet Web Site	**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	RESEDA	**State:**	California
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	

Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:			
City:		**State/Prov:**	
ZIP:		**Country:**	Unknown Location
Email:		**URL:**	
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Record # 2 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	37307159	**Originator Reference Number:**	07850037025555
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	The website claims that if you pay $9.99 you get a package of decision making information. the package is nothing more than testimonials from different people, the same information that is on the website and at myobspack.com. There is no information about what the business is to make a decision on. I offer is very deceptive and is not worth anything.Product_ Or_ Service: **Decision Pack** --- Additional Comments: DesiredSettlementID: RefundI request that my $9.99 be mailed back to me within one week. That package is a scam.'		
Was the complaint resolved?:	Yes	**Complaint Resolution:**	RESOLVED. The consumer has verified that the complaint has been settled to his/her satisfaction.
Data Reference:			
Entered By:	BBBCOCO-USER	**Entry Date:**	4/23/2012
Updated By:		**Updated Date:**	
Complaint Source:	BBB CO Colorado Springs	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:		**Amount Paid:**	$9.99
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	4/23/2012	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	CARMICHAEL	**State:**	California
Zip:		**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: **View Similar Complaints**	Online Business Systems		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States

Email:		**URL:**	www.incomeathome.com
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	President

Record # 3 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	37018617	**Originator Reference Number:**	07640000125064
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	The website claims that if you pay $9.99 you get a package of decision making information. the package is nothing more than testimonials from different people, the same information that is on the website and at myobspack.com. There is no information about what the business is to make a decision on. I offer is very deceptive and is not worth anything.Product_ Or_ Service: **Decision Pack** --- Additional Comments: DesiredSettlementID: RefundI request that my $9.99 be mailed back to me within one week. That package is a scam.'		
Was the complaint resolved?:	No	**Complaint Resolution:**	TRANSFERRED TO ANOTHER BBB. This complaint is about a business that is located in another BBB's service area.
Data Reference:			
Entered By:	BBBSPMO-USER	**Entry Date:**	3/23/2012
Updated By:	BBBSPMO-USER	**Updated Date:**	7/1/2012
Complaint Source:	BBB MO Springfield	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:		**Amount Paid:**	$9.99
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	3/23/2012	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	CARMICHAEL	**State:**	California
Zip:		**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:		**Country:**	United States

Email:		**URL:**	http://theonlinebusiness.com
Area Code:	888	**Phone Number:**	4214850
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Nicole Whelen	**Title:**	

Record # 4 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	37776936	**Originator Reference Number:**	07850037024966
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	The program states that you can try the business for 14 days and if you decide within 14 days that you don't want to proceed, they will refund all of your money with the exception of the initial shipping charge of $9.95 for the **'Decision Pack'**. I received the **Decision Pack** on Jan. 28th, 2012 and cancelled on Feb. 1st, 2012. My contact person Mandy Lewis called my home phone 2 times on Feb. 2, 2012 and left mssgs saying she would call back. I had given her my cell phone as well and asked that she contact me on that # if she couldn't reach me at home as I have 3 kids in 3 different schools and 3 different drop-off times in the mornings. I did not hear from her again that day. I called Mandy Lewis by phone 6 times leaving messages on an 800# voice mail and at her home phone #, I also sent her 3 e-mails and she did not respond. I then sent her 1 more e-mail and copied her supervisor Diane Masel and Shawn Dahl. I also contacted the Online Business Systems help desk via e-mail on Feb. 1, 2012 trying to get someone to respond to me. On Feb. 4, 2012 Mandy Lewis finally responded claiming she tried to contact me, but that is not the truth and I have proof from her voice mails with time and date on them and from e-mails with time and dates. Once Mandy Lewis responded, she said to send back the materials to her which I did on Feb. 4th, 2012. I then received a response from the help desk on Feb. 7th, 2012 to send the materials back to an address in NE, I responded to them that they were responding 6 days later and that I had already sent the materials back to Mandy Lewis, I also asked when I could expect of find out information about my refund and they responded on Feb. 8, 2012 stating that Mandy Lewis would deal with my refund. I received an e-mail on Feb. 14th from Mandy 'checking in to see if I would like some extra help for my Herbalife business...', I responded to her also on Feb. 14th that I was surprised to receive this e-mail and that maybe she did not remember, but I had cancelled and was waiting on my refunds. She responded on Feb. 15th and apologized about the e-mail and said my refund would come from Herbalife. I responded back to her on Feb. 15th and asked about the $399.00 refund, as there are 3 total refunds: $399.00 (charged from Mandy Lewis Hastings, MN) , $100.00 (charged from The Online Business) and $3,336.13 (charged from Herbalife) , all of which were charged to my American Express credit card. At this time, Herbalife has mailed me a form requesting more information for my refund. A very large shipment from Herbalife showed up at my house and was refused and never received and should have actually been cancelled by Mandy Lewis immediately on Feb. 1st but was not, that is the charge of $3,336.13 that Herbalife is insisting I submit a form in order for them to consider my refund. At this time, I feel as though I am not getting any answers to what is happening with my 3 refunds. I have done everything that has been asked of me and in the time frames specifically stated to qualify for a refund, even with the refusal of Mandy Lewis responding to me or anyone from Online Business Systems. The reason I chose to cancel in the first place is because each time I spoke with Mandy Lewis and her supervisor Diane Masel (that would also be on our calls sometimes w/o my prior knowledge and no introduction, just all of a sudden someone else was talking at me) , is that she did not inform me of all that was expected of me from the beginning, even after I asked many different ways, every time there was something new that would come up and I kept telling her that she should have given me the truth and the actual facts of whats expected of me with the business and if she had done so I would have never agreed to it. I also told her I felt that it was bad business practice to not provide all information upfront and that if she doesn't, she's going to end up with a lot of people canceling and unhappy. --- Additional Comments: I want a full ref		
Was the complaint resolved?:	Yes	**Complaint Resolution:**	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.
Data Reference:			
Entered By:	BBBCOCO-USER	**Entry Date:**	3/5/2012
Updated By:	BBBCOCO-USER	**Updated Date:**	9/26/2012
Complaint Source:	BBB CO Colorado Springs	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	3/5/2012	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit**	

		Bureau?:	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	NEWPORT BEACH	**State:**	California
Zip:		**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States
Email:		**URL:**	www.incomeathome.com
Area Code:	888	**Phone Number:**	4214850
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	President

Record # 5 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	37594293	**Originator Reference Number:**	07850037024963
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	Very deceptive practices. I have to give them my billing info, they will send me an info pack, I will pay $10 S&h, and if I cancel and send it back, within 14 days I will not be billed $50.00 for the (Testimonial Packet) . After the 14 days expire, they then tell me I can distribute Herbalife for $80.00 but I probably won't earn anything because I will have to sell by hand door-to-door, or $449.99 to put the business online. So I say well isn't this supposed to be an online business and tell them to go ahead and set me up (Feb 29/2012) . According to our bank statement, we were charged $451.26. After I hang up, I discuss with my wife and find we don't have that much money. We called them back and say to cancel the whole thing, we can't afford it. On Mar 2/2012, I checked my bank statement and find that $453.98 was credited, but later that day I checked again and find I was billed again, but this time for $455.85. So now they are into my bank account for $907.11. Here it is the weekend and I will be facing overdraft charges. I want to sue them for fraudulent misleading practices.I have since tried to call my (OBS) representative but they don't return my call.I went online to some other **complaint** cites and discovered I would have to buy 25 business leads for $2500.00, plus $30.00 or more for each package that I have to send to my leads & $100.00 set-up fee for the back-office. The people who went this far with the company say that the leads are usually dead. Not to mention the (800) phone number and business line installation and maintenance. Now we're talking $3500 or more per month that they haven't told me about. They didn't tell anybody until they were past their cancellation date.How can someone on $200.00/week unemployment afford this?What a SCAM.If the BBB represents this company, then I contend that the BBB is fakery also. --- Additional Comments: Refund the $907.11 and the international charges $13.67 & $13.53, and stop taking more out.Make them disclose the full amount of their business plan, before one is required to present credit card information.Instead of sending testimonials in the **decision pack**, they need to show the business structures one will encounter and what the costs will be for those decisions before they bill someone.No one likes to be tricked into UN-reversable charges. '		
Was the complaint resolved?:	Yes	**Complaint Resolution:**	ADMINISTRATIVELY CLOSED. The response from the business addresses the complaint to the BBB's satisfaction.
Data Reference:			
Entered By:	BBBCOCO-USER	**Entry Date:**	3/5/2012
Updated By:		**Updated Date:**	
Complaint Source:	BBB CO Colorado Springs	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	3/5/2012	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	STANFIELD	**State:**	Oregon

Zip:		**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States
Email:		**URL:**	www.incomeathome.com
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	President

Record # 6 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	33857025	**Originator Reference Number:**	07850037023715
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	97pct. of the **decision pack** leads requested total refunds. 100pct. of the Herbalife shake leads requested total refunds. Herbalife would not refund $99.00 for the Extravaganza ticket for Las Vegas that I did not attend. --- Additional Comments: I spent more then $14,000. I am requesting refunds for the leads, since they requested refunds for decision packs and shakes!'		
Was the complaint resolved?:	Yes	**Complaint Resolution:**	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.
Data Reference:			
Entered By:	BBBCOCO-USER	**Entry Date:**	11/10/2011
Updated By:		**Updated Date:**	
Complaint Source:	BBB CO Colorado Springs	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	11/10/2011	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	LAKEHILLS	**State:**	Texas
Zip:		**Country:**	UNITED STATES
Home Number:	(b)(6)	**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States

Email:		**URL:**	www.incomeathome.com
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	President

Record # 7 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	30388416	**Originator Reference Number:**	07850037020673
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	Ordered a **decision pack**. Had 14 days to return. If not returned 14 days they will charge credit card.Returned within 14-days, but charged my credit card for $39.95. Requested they reverse charges, said they would on March 17th, 2011. Charged have not been reverse. Was told charge would be reversed March 21, 2011. Not charge reversed yet.Dealing with Mark LiebermanIndependent Herbalife Distrbiutor718 650-1480 --- Additional Comments: Want my $39.95 back.'		
Was the complaint resolved?:	Yes	**Complaint Resolution:**	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.
Data Reference:			
Entered By:	BBB-USER	**Entry Date:**	4/12/2011
Updated By:	BBBCOCO-USER	**Updated Date:**	2/26/2012
Complaint Source:	BBB CO Colorado Springs	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	3/21/2011	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	ELGIN	**State:**	Texas
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado

ZIP:	80918	**Country:**	United States
Email:		**URL:**	www.incomeathome.com
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	President

Record # 8 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	28325719	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	When I first agreed to pay $9.95 for shipping my business package, I went through the online course and received a package in mail. I finished the process and was then contacted by the business coach, she asked if I was interested I told her no and that was it. No other mention of any kind of fee or return was mentioned, then going through e-mails I found a 90 day period to return business package. It was aproximatly two weeks, then a couple of weeks later there was a withdraw from my account of $39.95 witch overdrew my account and cost me another $36.00, At that time I maid several attempts to contact by e-mail and phone. One week later she told me she would refund my account the $39.95 which never should have been taken out and NOTHING for the overdraft charge? I still haven't received a penny! I have saved all corispondences with them, this was the original message received from them: 10/06/2010;We have successfully processed the order and payment for your Online Business Systems **Decision Pack**. Your **Decision Pack** is onits way and should arrive within 3-5 business days. Remember, your personal business coach --- Yvette Garel --- will be contacting you within the next 48 hours to set up an appointment tospeak with you as part of your Business Decision.Yvette will answer any questions you may have after you review all the materials in your **Decision Pack**, and will be able to walk you through the start-up process. We look forward to working with you! Best Regards,Your Friends At Online Business Systems This commercial e-mail has been sent through the Online Business Systems mail platform to (b)(6) from Onelove@theonlinebusinessnews.com. To stop receiving these emails or update your email address:http://theonlinebusinessnews.com/r.php?c= 9COFD3 Mailing address:104 Whitson Run, Stafford, Virginia 22554		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	11/19/2010
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$10.00	**Amount Paid:**	$50.00
Payment Method:	Bank Account Debit	**Agency Contact:**	Internet
Complaint Date:	11/19/2010	**Transaction Date:**	10/6/2010
Initial Contact:	Internet/E-mail	**Initial Response:**	Internet/E-mail
Statute/Rule:	Telemarketing Sales Rule	**Law Violation:**	TSR: Unauthorized billing
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	North Branch	**State:**	Michigan
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	40 - 49

Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems-nat'l Customer Svc Ctr		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States
Email:	Onelove@theonlinebusinessnews.com	**URL:**	www.incomeathome.com
Area Code:	888	**Phone Number:**	4214850
Ext:	88828	**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Yevette Garel	**Title:**	personal business coach

Record # 9 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	25730340	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	I cancelled 2/16/10 via e-mail and received information that I will need to pay for reshipping & restocking fees which I should just consider the $399 as a business loss. I said no I want a full refund. The packages were refused for shippment I returned the **decision pack** back to OHIO. Craycraft is charging a total of $203.58 for reshipping restocking & misc. I want a full refund since on Herbalifes website states no reshipping and restocking fee.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	3/15/2010
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$399.00	**Amount Paid:**	$399.00
Payment Method:	Visa Credit Card	**Agency Contact:**	Internet
Complaint Date:	3/15/2010	**Transaction Date:**	2/15/2010
Initial Contact:	Phone Call: Landline	**Initial Response:**	Phone: 800/888 number
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	N
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Perris	**State:**	California
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	50 - 59
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: **View Similar Complaints**	Partner With Paul = Online Business Systems = Herbalife		
Address:			
City:		**State/Prov:**	
ZIP:		**Country:**	United States
Email:	contact@partnerwithpaul.com	**URL:**	www.partnerwithpaul.com

Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Doug Craycraft	**Title:**	Mentor
Associated Subjects			
Company: View Similar Complaints	Online Business System = Herbalife		
Company Type:	Other		
Address:	7057 TR 551		
City:	Holmesville	**State/Prov:**	Ohio
ZIP:	44633	**Country:**	United States
Email:	dougcraycarft@theonlinebusiness.com	**URL:**	www.craycraft.theonlinebusiness.com
Area Code:	330	**Phone Number:**	5672220
Ext:			

Record # 10 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	32884737	**Originator Reference Number:**	652290
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	NOTE: In addition to the **complaint** notes immediately below, the Ohio Attorney General's Office provided additional information in fields whose header titles are quoted and follow the **complaint** notes. --- Refund to my account of the $144.40 and costs of the overdraft charges due to the withdrawal. No contact from this business or anyone associated with them permanently. Thank you, (b)(6) -- Topic Description: I requested the **Decision Pack** for $1.98; this amt was withdrawn from my acct on 3/13/10.I DID NOT ORDER ANY OTHER PRODUCT. On 3/18/10 this company withdrew $144.40 from my account WITHOUT AUTHORIZATION. I contacted 1-866-465-4562 on 4/7/10 after reviewing my bank statement to dispute the charges as no product was order at any time. I was provided Cancellation Confirmation No. (b)(6) and told by a man the amount of $144.40 would be returned to my checking account within 7-10 business days. On 4/12/10 I received a call from a foreign speaking man stating they were not able to reimbursement acct the $144.40 due to a problem on their end; the man told me to dispute the issue with my bank. When I started questioning him as to why this company was unable to correct the problem and that it was not the problem of my bank to reimburse me money Online Business Systems took from my account without my authorization, the man hung up on me. The number the man was calling from was not available through my caller ID. I have not talked to my bank; however, I am going to today. I am out of work with no income and knew I could not afford to purchase anything more than the **Decision Pack** on information about working from home. This has caused overdraft charges on outstanding checks that I am unable to cover. I would appreciate any assistance you can offer and to stop this from happening to other people in my situation. Additionally, I received to e-mails asking me to contact Fatina Reising as they were having problems getting my "credit card" (it was my debit card) to process. I did not respond to any of the e-mails as I did not want the services.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	OH01-USER	**Entry Date:**	3/12/2010
Updated By:		**Updated Date:**	
Complaint Source:	Ohio, Attorney General	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:	$144.40	**Amount Paid:**	$1.98
Payment Method:	Bank Account Debit	**Agency Contact:**	External Agency
Complaint Date:	3/12/2010	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	WILMINGTON	**State:**	Ohio
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	

Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:	5010 LONG KNIFE RUN		
City:	Louisville	**State/Prov:**	Kentucky
ZIP:	40207-1175	**Country:**	United States
Email:		**URL:**	HTTPS://THEONLINEBUSINESSNEWS.COM
Area Code:	502	**Phone Number:**	8948419
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Consumer Sentinel Network Complaints

Record # 2 of 4 / Consumer Sentinel Network Complaints			
Reference Number:	27159160	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	Potential Predatory Lending on my Equity loan, Loan originated with PNC bank **Dreambuilders** purchased loan and has been trying to foreclosed four years. I am to be evicted tomorrow morning at ten. I have tried to get anyone to pay attention to my issue, but all has fallen on deaf ears. This is a private equity firm on wall street buying mortgages for pennies on the dollar, and making a big profit. I have tried to get any and all info and when if annly asked for specific financial documents,and license or regulator details they stopped communicating with me, after researching i found a potential link to Goldman Sachs... all documents from attorney indicate one address while they reside at another. I am looking or an attorney and have been fighting on my own since 2006.I do not even know if they hold my original note, and they have had my financial data income taxes, etc since 2007 where has it gone they have never acknowledged that they have it or have destroyed it..... now they are bullying me out. Something is not right looking for advice and to please flag this organization others who are in the same situation UPD/MAIL: 08/18/10 The Office of the Comptroller of the Currency forwarded a copy of the consumer's **complaint**. LKilpatrick UPD/MAIL: 09/27/10 The state of NY, AG office forwarded a copy of the consumer's **complaint**. lKilpatrick UPD/MAIL: 10/28/10 The state of NY, AG office forwarded a copy of the consumer's **complaint**. lKilpatrick		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	7/28/2010
Updated By:	LKILPRATRICK	**Updated Date:**	10/28/2010
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Lending: Mortgage
Amount Requested:	$30,000.00	**Amount Paid:**	
Payment Method:		**Agency Contact:**	Phone
Complaint Date:	10/28/2010	**Transaction Date:**	8/1/2007
Initial Contact:	I Initiated Contact	**Initial Response:**	Mail
Statute/Rule:		**Law Violation:**	Creditor Fails or Inaccurately Discloses Taking of Security Interest Other Written Disclosure\Written Violations Creditor Fails to Retain Copies of Consumer Disclosure\Contract Documents
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:	N	**Dispute with Credit Bureau - Resolved to Satisfaction?:**	N
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	

City:	Millington	**State:**	New Jersey
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	50 - 59
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	**Dreambuilders** Investments, Llc.		
Address:	60 Wall Street 6th Floor		
City:	New York	**State/Prov:**	New York
ZIP:	10005	**Country:**	United States
Email:		**URL:**	Dreambuilders.net
Area Code:	866	**Phone Number:**	5615600
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Greg Palmer	**Title:**	unknown

Record # 3 of 4 / Consumer Sentinel Network Complaints			
Reference Number:	26329604	**Originator Reference Number:**	I1004162011072792
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	ICCC Ref #:I1004162011072792. 4:10pm - 5:20pm Friday April 16th: David Hoang presented me (b)(6) (b)(6) with a business proposition. Mr Hoang claimed that the business was an E-Commerce franchise. All (b)(6) would have to do is pay $339.00 and recruit at least three new people to register under the website. The web site is designed to promote online sales of certain products and groceries. A share of each sale would go to the person you are registered under. Mr Hoang claimed that eventually this money would be paid back to (b)(6) especially after the recruitment of more and more users. Mr Hoang then pressured to register (b)(6) with the corporation next week. (b)(6) refused to comply and agreed to meet with Mr Hoang again seven days later. SUMMARY: Mr Hoang employed persuasive speech to make the business proposition sound very legitimate. However, he could not logically explain why this was not a pyramid scheme. The business does not sell any of its own products. The original founder pulls a share of all subsequently registered users' profits or sales. Other known associates of Mr Hoang are Greg Duncan and Scott Killian.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:	More Information on Data Contributor Complaints?		
Entered By:	IC3-USER	**Entry Date:**	4/16/2010
Updated By:		**Updated Date:**	
Complaint Source:	Internet Crime Complaint Center	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:		**Amount Paid:**	$0.00
Payment Method:	Not Reported	**Agency Contact:**	External Agency
Complaint Date:	4/16/2010	**Transaction Date:**	
Initial Contact:	In Person	**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	MADISON	**State:**	Wisconsin
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	20 - 29
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar	World Wide **Dreambuilders**		

Complaints			
Address:			
City:	Madison	**State/Prov:**	Wisconsin
ZIP:		**Country:**	United States
Email:	dthoang@wisc.edu	**URL:**	http://www.worldwidedreambuilders.com/
Area Code:	608	**Phone Number:**	7122462
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	David Hoang	**Title:**	

Record # 4 of 4 / Consumer Sentinel Network Complaints			
Reference Number:	22477756	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	I wish to report fraud. I was approached by a co worker and told there was a great way to make extra money. I was invited to the conference in the Spokane arena this weekend. This 3 day conference was glitzy, and was intense brain washing. Amazed what I experienced, the promise of lavish income, $20,000 a month, Diamonds making millions for just working hard to build up a multi level operation in two years. The mind control, repetitive chants, songs, and films were all orchestrated not to sell product, they emphasized "personal use". There were many concepts including upline, downline, "rule of 6" "legs"etc. It was the references to marriage and relationships and God, and Christ that really got me wondering about this organization. I was skeptical and mesmerized all at once. The profits the promise are brain washing and feed on our dreams, and greed.I researched the internet and have realized now that of course it is a pyramid scheme of which I asked about right off but was dismissed. I read about all the lawsuits, the class action suit, the fraud of the "tool business" tapes and the income for the top 1/2 of 1/16th of 1%. Millions and millions of recruits are required to keep the top millionaires in business. They only are flown around the country and the world to speak to add to the fraud they are perpetrating. At the end of the conference, my co worker's brother in law, nice people, gave me tapes to listen to. It is all just as I am reading on the internet. The mind control, the rich Diamonds making and selling tapes on a regular basis. I feel bad that I was being brain washed to believe in a pyramid scheme. This was done on thousands of people in Spokane. These go on all over the country. If it is in fact a pyramid scheme and therefore illegal, how can this continue on a global level?I have a really strong feeling it is all very sinister, involved with organized crime.Ron and Georgia Puryear, introduced at the end of the gala as the top Kingpins of this are local to me here. They live only 5 miles away. I could read of many many lawsuits over the fraud even racketeering.What is going on? (b)(6)		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	4/22/2009
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$120.00	**Amount Paid:**	
Payment Method:		**Agency Contact:**	Internet
Complaint Date:	4/22/2009	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	N
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Spokane Valley	**State:**	Washington
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	

Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	50 - 59
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Amway Global, Worldwide **Dreambuilders**		
Address:	Pines		
City:	Spokane	**State/Prov:**	Washington
ZIP:	99016	**Country:**	United States
Email:		**URL:**	
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Do Not Call Complaints

Record # 1 of 4 / Do Not Call Complaints			
Reference Number:	46610408	**Is Phone in Registry?:**	Yes
Complaint Date:	6/13/2013	**Product Service Code:**	National Do Not Call Registry
Complaint Source:	National Do Not Call Registry	**Complaint Channel:**	Phone
Transaction Date:	6/13/2013	**Transaction Time:**	12:00:00 AM
Existing Business Relationship?:	No	**Pre-recorded message?:**	No
Requested entity to stop calling?:	Yes		
Comments:			
Consumer			
First Name:		**Last Name:**	
Address 1:		**Address 2:**	
City:		**State/Prov:**	California
ZIP:		**Phone Number:**	(b)(6)
Subject			
Company Name: View Similar Complaints	Energy **Dreambuilders**	**State:**	
Country Code:		**Phone Number:**	(800) 5557777

Consumer Sentinel Network Complaints

Record # 1 of 1 / Consumer Sentinel Network Complaints			
Reference Number:	43835493	**Originator Reference Number:**	12860019039758
Language:	English	**Contact Type:**	Complaint
Source:	Organization	**DNC?**	N
Comments:	This company is advertising as if hiring for employment at their store, yet they are not. They are attempting to recruit people to sell Herbal Life and advertising on Craigslist and other places under false pretenses. They advertise as 'Smoothie_ making' and Shake Bar. They are a shake bar though There are multiple people involved in this operation from this store. --- Additional Comments: DesiredSettlementID: No settlement requested - forNo settlement required only that they be truthful		
Was the complaint resolved?:	No	**Complaint Resolution:**	BEYOND SCOPE. This complaint is outside the general BBB purview.
Data Reference:			
Entered By:	BBBTUAZ-USER	**Entry Date:**	2/8/2013
Updated By:	BBBTUAZ-USER	**Updated Date:**	3/5/2013
Complaint Source:	BBB AZ Tucson	**Product Service Code:**	Health Care: Diet Products\Centers\Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	2/8/2013	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	TUCSON	**State:**	Arizona
Zip:		**Country:**	UNITED STATES
Home Number:	(b)(6)	**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar	Fab-u-life		

Complaints			
Address:	1720 E Speedway Blvd		
City:	Tucson	**State/Prov:**	Arizona
ZIP:		**Country:**	United States
Email:		**URL:**	
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Consumer Sentinel Network Complaints

Record # 1 of 3 / Consumer Sentinel Network Complaints			
Reference Number:	42201958	**Originator Reference Number:**	02510009295602
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	The service at this nutrition shop was beyond unacceptable. The worker suggested that I had a problem and needed their services in order to control myself. When I told him that I was offended he told me that this was simply my own opinion and that I should listen to his advice. I would never return to this place of business due to the extreme lack of respect and insults I received while there. --- Additional Comments: I would like others to know how terrible the customer service at this place of business is and urge them to try other places in order to fulfill their nutrition needs.',		
Was the complaint resolved?:	No	**Complaint Resolution:**	INFORMATION ONLY. This consumer communication does not require a business response.
Data Reference:			
Entered By:	BBBDEL-USER	**Entry Date:**	11/14/2012
Updated By:		**Updated Date:**	
Complaint Source:	BBB DE Wilmington	**Product Service Code:**	Health Care: Diet Products\Centers\Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	11/14/2012	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	NEWARK	**State:**	Delaware
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject:			

View Similar Complaints	Mainstream **Nutrition Club** - Herbalife		
Address:	163 E. Main Street		
City:	Newark	**State/Prov:**	Delaware
ZIP:	19711	**Country:**	United States
Email:		**URL:**	http://www.mainstreamnutrition.com/
Area Code:	302	**Phone Number:**	4444974
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Stephen Fangman	**Title:**	

Record # 2 of 3 / Consumer Sentinel Network Complaints			
Reference Number:	37596040	**Originator Reference Number:**	06740008863556
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	This is not a real company. --- Additional Comments: I would like for them to stop advertising a false company. '		
Was the complaint resolved?:	No	**Complaint Resolution:**	INFORMATION ONLY. This consumer communication does not require a business response.
Data Reference:			
Entered By:	BBBKCKS-USER	**Entry Date:**	12/30/2011
Updated By:		**Updated Date:**	
Complaint Source:	BBB MO Kansas City	**Product Service Code:**	Health Care: Diet Products\Centers\Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	12/30/2011	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	KANSAS CITY	**State:**	Missouri
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	**Nutrition Club** Pro		
Address:	9227 N Oak Tfwy		
City:	Kansas City	**State/Prov:**	Missouri
ZIP:	64155	**Country:**	United States
Email:		**URL:**	http://www.TheMatrixPlan.com
Area Code:	816	**Phone Number:**	5470288
Ext:		**Subject ID**	

		Type:	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Record # 3 of 3 / Consumer Sentinel Network Complaints			
Reference Number:	30711362	**Originator Reference Number:**	02510008552942
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	I went into this business just assuming they provided nutritional shakes/supplements to the general public. Once inside, they tried to sell me on their line of products and nutritional counseling. The problem is that none of the employees are formally trained in nutrition, or are Registered Dietitians or Nutritionists. None of the employees actually had a background in nutrition, all they learned was from the literature from the company that provided their products. In an establishment such as this, I feel that it it unfair to the public to have uneducated people advising others on nutritional counseling, with no factual knowledge of actual nutrition. As an individual who holds a bachelors degree in Nutrition, this was vary disturbing and felt unethical to me because the information that the individuals were giving me was inaccurate and misleading. --- Additional Comments: I would implore the business to acquire knowledgable staff with nutritional backgrounds, as to not feed incorrect information to consumers. It's unethical.		
Was the complaint resolved?:	No	**Complaint Resolution:**	INFORMATION ONLY. This consumer communication does not require a business response.
Data Reference:			
Entered By:	BBBDEL-USER	**Entry Date:**	4/4/2011
Updated By:		**Updated Date:**	
Complaint Source:	BBB DE Wilmington	**Product Service Code:**	Health Care: Diet Products\Centers\Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	4/4/2011	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	NEWARK	**State:**	Delaware
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Mainstream **Nutrition Club** - Herbalife		

Address:	163 E. Main Street		
City:	Newark	**State/Prov:**	Delaware
ZIP:	19711	**Country:**	United States
Email:		**URL:**	http://www.mainstreamnutrition.com/
Area Code:		**Phone Number:**	302444
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Stephen Fangman	**Title:**	

Consumer Sentinel Network Complaints

Record # 1 of 4 / Consumer Sentinel Network Complaints			
Reference Number:	44493723	**Originator Reference Number:**	I1302111807045101
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: I am putting an ad on Craigslist just like any one else. I put on there to adopt my dogs out because I am going to open an **Nutrition club** in my resident and to do so I can no longer have dogs. I do not want to throw them to the streets so I put them for adoption on Craigslist just like so many other people do. Now she is putting bad ad about me which is not right. That is harassment what she did about me and I do want something done about it like right now. --- Specified Other Payment: What I am adopting my dogs for		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:	More Information on Data Contributor Complaints?		
Entered By:	IC3-USER	**Entry Date:**	2/11/2013
Updated By:		**Updated Date:**	
Complaint Source:	Internet Crime Complaint Center	**Product Service Code:**	Other (Note in Comments)
Amount Requested:		**Amount Paid:**	$550.00
Payment Method:	Other Payment Method (Note in Comments)	**Agency Contact:**	External Agency
Complaint Date:	2/11/2013	**Transaction Date:**	
Initial Contact:	Internet Web Site	**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	MEMPHIS	**State:**	Tennessee
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:		**Age Range:**	30 - 39
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject			
Subject: View Similar Complaints	Not Provided By Org		
Address:			
City:		**State/Prov:**	
ZIP:		**Country:**	United States
Email:		**URL:**	Craigslist
Area Code:		**Phone Number:**	9013170722
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Record # 3 of 4 / Consumer Sentinel Network Complaints			
Reference Number:	42590223	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	I had been part of what Herbalife calls Tabulators Team and was with the company for almost 20 years, I have witnessed several injustices from the company to its distributors since the death of the founder and with no way for an "Independent Distributor" to get any justice from the damage the company inflicts to them and that is why I am providing information that might aid in your research of the Herbalife Ltd Company as they are "Fooling Some of the People All of the Time". 1.- How much of the sales that you'd make in terms of final sales are sold outside the network and how much are consumed within the distributor base? There are not real sales outside the network The **Nutrition Club** Clubs originated precisely out of the NECESSITY to try to move some product. The product is very overpriced and thats what gave way to the nutrition clubs, distributors having to break down the products in servings to to be able to sale it because the CUSTOMERS REFUSED to buy whole canisters and bottles. What is happening now is customers stopped buying canisters and bottles and distributors are barely covering their monthly quota just to support the pyramid without making any money. (Fouders Circle Members, Chirmans Club Members and Executive Presidents Team Members ARE NOT SELLING ANY PRODUCT OUTSIDE THE NETWORK, they just buy the product from the company and donate it to some charity (Herbalife Houses from the Herbalife family foundation, etc) DISTRIBUTORS DO NOT GET PAID "ROYALTIES" UNLESS THEY BUY $2,500.00 OF PRODUCTS EVERY SINGLE MONTH, and to protect themselves they have a so called 70 Customer Rule in case regulators or people like you start asking questions. That is why HLF says they dont have an exact percentage because they know very well what is going on and not because HLF does not have visibility to that level of detail. Also from time to time HLF will impose hefty fines to its distributors in an effort to not pay royalties and keep this earnings for their bottom line and even go as far as to suspend its distributors and not pay to the upline the proper amount of royalties (AS THEY ARE THE ONES WHO CALCULATE THE PAYMENTS WITHOUT ANY OUTSIDE OVERSIGHT TO THE WHOLE PROCESS) and if a distributor inquires about it, he or she might get fined or suspended. 2.- What is the incentive for supervisor to sign somebody up to become a distributor as opposed to – if they're just going to consume for themselves as opposed to just selling them the product for the markup. How does the distributor – how does the supervisor come out better? There is no incentive other than "new distributors" helping to support the Ponzi scheme. HLF definitely is a Ponzi scheme with very high legal bills (Herbalife has been ruled an illegal pyramid scheme by a court in Belgium) and a fraudulent operation that pays returns to its DISTRIBUTORS from their own "PURCHASE" of the "PRODUCTS" paid by subsequent DISTRIBUTORS, rather than from profit earned by the "SELL" of the "PRODUCTS", HLFS Ponzi scheme usually entices new DISTRIBUTORS by offering higher profits, in the form of short-term returns that are either abnormally high or unusually consistent. DISTRIBUTORS DO NOT GET PAID UNLESS THEY BUY $2,500.00 OF PRODUCTS EVERY SINGLE MONTH, on ebay, amazon and craigslist you will find thousands of distributors trying to unload their inventory. I hope this helps and if I can provide any additional information please do not hesitate to contact me.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	1/3/2013
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$2,500.00	**Amount Paid:**	$2,500.00
Payment Method:	Credit Card	**Agency Contact:**	Internet
Complaint Date:	1/3/2013	**Transaction Date:**	10/23/2012
Initial Contact:	Internet/E-mail	**Initial Response:**	Internet/E-mail
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	

Member of armed forces or dependent?:	No		
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Anaheim	**State:**	California
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:		**Age Range:**	30 - 39
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Herbalife Ltd		
Address:	800 W. Olympic Blvd, Suite 406		
City:	Los Angeles	**State/Prov:**	California
ZIP:	90015	**Country:**	United States
Email:		**URL:**	http://www.herbalife.com
Area Code:	213	**Phone Number:**	7450500
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Angie Ramirez	**Title:**	Distributor Business

Record # 4 of 4 / Consumer Sentinel Network Complaints			
Reference Number:	25028701	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	I use to own a Cold Fusion **Nutrition Club** that sold Herbalife products to members. Their are several of these little shops all over town and some people are investing thousands of dollars opening these smoothie shops without proper knowledge of legal process. None of these clubs are registered as clubs with the state of Minnesota, do not pay sales or employee tax, and have been deceived to believe this investment will pay itself back. Many of my friends have spent there savings in only finding out these cannot be successful without cheating the system. Many of these clubs use employees and pay them under the table to avoid paying taxes. When reported to my accountant and attorney, they both informed me to get away from these clubs and Herbalife Multi Level Marketing. But I am lucky to have had good representation to warn me before spending more than I already have. I request that someone investigate these clubs, make them correct their ways or shut their doors. I pay my all my taxes the right way and we are tired of seeing them cheat the system.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	1/3/2010
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$5,000.00	**Amount Paid:**	$20,000.00
Payment Method:	Other Credit Card	**Agency Contact:**	Internet
Complaint Date:	1/3/2010	**Transaction Date:**	9/3/2007
Initial Contact:	In Person	**Initial Response:**	In Person
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	N
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Hermantown	**State:**	Minnesota
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	40 - 49
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Cold Fusion Duluth		

Address:	31 West Superior Street		
City:	Duluth	**State/Prov:**	Minnesota
ZIP:		**Country:**	United States
Email:	amberjwick@yahoo.com	**URL:**	coldfusionduluth.com
Area Code:	218	**Phone Number:**	7224088
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Amber Wick	**Title:**	Owner

Identity Theft Complaints

Record # 2 of 4 / Identity Theft Complaints					
FTC Reference Number:	42668830	**Contact Type:**	Complaint	**Originator Reference Number:**	
Complaint Source:	FTC Online Complaint Assistant (IDT)	**Source:**		**Language:**	English
Agency Contact Method:	Internet	**Entered Date:**	1/5/2013 1:42:19 PM	**Entered By:**	FTCCIS-FTCUSER
Complaint Details					
Verified IDT Complaint?:		**Updated Date:**		**Updated By:**	
Number of Accounts Affected:		**First Occurred Date:**	1/4/2013	**First Noticed Date:**	1/4/2013
Total Amount Obtained by Subject:		**Total Amount Lost by Victim:**		**Theft Via Internet?:**	Yes
Did You Authorize Anyone to Use Your ID? :		**Did You Receive Any Benefits?:**		**Are You Willing to Press Charges?:**	
Inaccurate Credit Report Info.1:		**Inaccurate Credit Report Info.2:**		**Inaccurate Credit Report Info.3:**	
Credit Inquiry 1:		**Credit Inquiry 2:**		**Credit Inquiry 3:**	
Member of armed forces or dependent?:	No				
Non-Monetary Harm:	Other (describe in comment field) Time Lost to Resolve Problems (specify amount in comment) I'll have to change email accounts. Spam was sent to all of my contacts, many of which are/were potential employers or professors. 2+				
Comments:	The following is text from the suspects' most recent post to craigslist.com, jobs category:Wellness Coaches NEEDED IMMEDIATELY! (Auburn, Grass Valley, Nevada City) --Date: 2013-01-04, 9:14AM PST Reply to this post 35m3t-3507740921@job.craigslist.org[?] --Current Openings for Wellness Coaches Looking for enthusiastic, self-motivated people to work with people interested in improving their health through nutrition and fitness.. Provide assessment, education, behavior management and community support. Must be 18 years or older. Earn an additional stream of income Part time or Full Time Please email resumes attn "Coach" While in training, Korri from Auburn earned $2,700 last month p/t._ Learn to Become a "Wellness Coach"Earn P/T-F/T - flexible hrs/work from the Nutrition Club or at home.Bi-Lingual / Spanish/Chinese/Vietnamese is a PLUSLooking for leaders. Many promotion levels of higher income are available.On your resume include your Phone # and the best time to reach you and we will contact you to schedule your interview if you qualify.A Wellness Coach is responsible for:1. Coordinating and providing systematic instruction and positive behavior management strategies.2. Developing adaptations. Create positive group environment.3. Providing support services within the consumers needs.4. Facilitating the integration of consumers with obesity disabilities in natural and preferred environments.5. Must always be positive and a team player. Becoming a Wellness Coach has many benefits: 1. You are your own boss and control your time and income. 2. You can learn while you earn.3. Full training is provided for your business. Requirements: Must at least 18 years of age. A valid California Drivers License is required as well as at least minimum California auto insurance coverage. Business Compensation Averages: P/T-F/T up to $1,500 - $5,900 per monthPrincipals only. Recruiters, please don't contact this job poster. Hiring Organization: Endurance Nutrition & FITClub Hiring Contact: Coach •Location: Auburn, Grass Valley, Nevada City•Compensation: P/T-F/T up to $1,500 - $5,900 per month•Telecommuting is ok.•This is a part-time job.•Principals only. Recruiters, please don't contact this job poster.•Please, no phone calls about this job!•Please do not contact job poster about other services, products or commercial interests. PostingID:3507740921Copyright © 2013 craigslist, inc. terms of use privacy feedback Next is part of my email correspondence with the suspect:Hello AlyseThank you for showing interest in this position. We have received an overwhelming amount of responses, so we created a video for everyone to better understand what we are					

	looking for before we go to the next step. Please take about 20 minutes to watch the video, and then email me back if you are still interested.http://vimeo.com/24634188Thank you,Sarah Desimone On Fri, Dec 21, 2012 at 4:02 PM, (b)(6) wrote:To whom it may concern: Hello, my name is (b)(6) I'm 22 years old, and I am applying for the Health and Nutrition Coach position. My resume is attatched, thank you for your consideration.
Additional Comments:	

Consumer

First Name:	(b)(6)	**Last Name:**	(b)(6)	**Middle Name:**	(b)(6)
Business Name:		**Address 1:**	(b)(6)	**Address 2:**	
City:	Placerville	**State/Province:**	California	**ZIP:**	(b)(6)
Country:	UNITED STATES	**Lived Here Since:**		**Driver License/State ID - Issued State:**	California
Work Number:		**Work Phone Extension:**		**Home Number:**	(b)(6)
Fax Number:		**Cell Number:**		**Email:**	
Date of Birth:	(b)(6)	**Military Service Branch:**		**Soldier Status:**	
Soldier Station:					

Subject

Suspect

Alias First Name(s): View Similar Complaints	Sarah	**Alias Last Name(s):**	Desimone	**Alias Middle Name(s):**	
Company Name(s):	Endurance Nutrition & Fitclub				
Address 1:		**Address 2:**		**City:**	
State:		**Zip:**		**Country:**	
Email:					
Phone Area Code:		**Number:**		**Extension:**	
Victim Relationship:	Otherwise Known	**Method of Obtaining Information:**	Internet - Solicitation, Purchase or Hacking	**Additional Information:**	Posted ads on Craigslist offering positions of employment as wellness coach. Our correspondence was limited, as I became suspicious of the legitimacy of the offer. Yesterday evening a spam email was sent out to all of my contacts.

Incidents

Incident

Theft Type:	Internet or E-Mail - Internet Account Takeover	**Date of Theft:**	1/4/2013	**Theft Amount:**	

Associated Institution

Name:	Yahoo! Inc.	**Type:**	Service Provider	**Contact Person:**	
Address 1:	701 First Avenue	**Address 2:**		**City:**	Sunnyvale
State:	California	**Country:**	UNITED STATES	**ZIP:**	94089
Email:		**URL:**	www.yahoo.com	**Phone Number:**	408-3493300
Notified?:		**Written Notified?:**		**Have Dispute?:**	
Product(s):	- IDT Other			**Statute(s):**	

Violation(s):	- ID Theft - Security Procedures Inadequate				
Law Enforcement					
LE 1 - Department:		**Contact Person:**		**State/Province:**	
Phone Number:		**Notified Law Enforcement?:**	No	**Report Taken?:**	
Report Number:		**Report Taken Date:**			
Credit Bureau					
CB 1 - Name:					
Notified?:		**Fraud Alert on File?:**		**Credit Report Ordered?:**	
Have Dispute?:		**Violation(s):**			

CONSUMER

NETWORK

The enforcement's source for consumer complaints

CIS COMPLAINT

Record 101 of 192	
Reference Number	35216661
Created Date	01/31/2012
Complaint Source	BBB MO Kansas City
Originator Reference Number	06740008897708
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBKCKS-USER
Entered Date	01/31/2012
Updated By	BBBKCKS-USER
Updated Date	05/22/2012
Agency Contact	External Agency
Complaint Date	01/31/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	KANSAS CITY
Consumer Address, State Code	MO
Consumer Address, State Name	Missouri
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	

Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	10030 N Ambassador Dr
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	KANSAS CITY
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	64153
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	816
Company Phone, Number	5841327
Company Phone, Extension	
Company Email	bharris@kc.rr.com
Company Website	http://www.kcnutrition.com
Company Rep First Name	Brad
Company Rep Middle Name	

Company Rep Last Name	Harris
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	(b)(6)

	(b)(6) (b)(6) The reason why I am reporting this issue to the Better Business Bureau is to make other potential customers and prospective employees aware of the lack of communication and execution on KC Nutrition's part. KC Nutrition does not behave professionally, negotiate, compromise, or return phone calls or e-mails. KC Nutrition employees do not follow through on their promises. (b)(6) (b)(6) Additional Comments: At this point, it does not matter to me if I am paid $140.00. I hope to prevent others from making the same mistake I made by doing business with KC Nutrition.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 102 of 192	
Reference Number	35225554
Created Date	01/20/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098665103
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	01/20/2012
Updated By	Rushen, Mary
Updated Date	05/09/2012
Agency Contact	External Agency
Complaint Date	01/20/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DENTON

Consumer

Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I thought I was being recruited as a wellness coach. Turned into sales pitch and pressure to buy product. Hard time shutting down account. --- Additional Comments: I would like for Herbalife to refund the $107.43 I put on my credit card to open up a business kit. I would also like them to promptly shut down my online distributor account so that no future billing and transactions can be made without my permission.'
Complaint Info CRA Dispute Flag	
Complaint Info	

CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 104 of 192	
Reference Number	35709984
Created Date	03/14/2012
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	03/14/2012
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	03/14/2012
Transaction Date	03/12/2012
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer	

Address, City	Oakland
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer	

Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	18 - 19
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International, Inc. |Wellness Depot
Company Address, Line 1	800 West Olympic Blvd|1611-B Douglas Blvd
Company Address, Line 2	Suite 406|
Company Address, Line 3	|
Company Address, City	Los Angeles|Roseville
Company	

Address, State Code	CA|CA
Company Address, State Name	California|California
Company Address, Country Code	USA|USA
Company Address, Country Name	UNITED STATES|UNITED STATES
Company Address, ZIP Code	90015|95661
Company Address, ZIP Code Extension	|
Company Phone, Country Code	|
Company Phone, Area Code	866|916
Company Phone, Number	8664744|8717450
Company Phone, Extension	|
Company Email	|
Company Website	https://www.myherbalife.com/Home/Default1.aspx|http://www.rosevillewellnessdepot.com
Company Rep First Name	Terri
Company Rep Middle Name	
Company Rep Last Name	Gunter
Company Rep Salutation	
Company Rep Comments	Independent Distributor

Complaint Info Initial Contact Method	In Person
Complaint Info Initial Contact Date	03/12/2012
Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	03/12/2012
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$67.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$60.00
Complaint Info Product Service Code	4007
Complaint Info Product Service Description	Franchises\Distributorships
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P

Complaint

Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was told this was a job interview to be an nutrition coach. When I got there I did not get an interview, I was given a pitch on the Herbalife products. I talked to a representative and was pressured to sign up. I was not told I would have to pay. There was a long line of people behind me to register so I felt pressured to enter my information as quickly as possible. After giving my credit card information for the 59.99 payment and my social security number I decided to cancel. I was told I could not get a refund. I was tricked into thinking I was going to be a nutrition coach, when it was really a distributor position for Herbalife products that costs 59.99 to be a part of.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 105 of 192	
Reference Number	35717267
Created Date	10/31/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098647985
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	10/31/2011
Updated By	Adam D asmitley
Updated Date	03/13/2012
Agency Contact	External Agency
Complaint Date	10/31/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)||
Consumer Middle Name	||
Consumer Last Name	b(6)|b(6)|b(6)
Consumer Salutation	||
Consumer Address, Line 1	b(6)||
Consumer Address, Line 2	||
Consumer Address, Line 3	||
Consumer Address, City	PALM COAST||

Consumer

Address, State Code	FL||
Consumer Address, State Name	Florida||
Consumer Address, Country Code	USA||
Consumer Address, Country Name	UNITED STATES||
Consumer Address, ZIP Code	b(6)||
Consumer Address, ZIP Code Extension	||
Consumer Home Phone, Country Code	||
Consumer Home Phone, Area Code	||
Consumer Home Phone, Number	||
Consumer Work Phone, Country Code	||
Consumer Work Phone, Area Code	b(6)||
Consumer Work Phone, Number	b(6)||
Consumer Work Phone, Extension	||
Consumer Fax, Country Code	||
Consumer Fax, Area Code	||
Consumer Fax, Number	||
Consumer Cell	

Phone, Country Code	‖
Consumer Cell Phone, Area Code	‖
Consumer Cell Phone, Number	‖
Consumer Email	b(6)‖
Consumer Age range	‖
Consumer Military Status	‖
Consumer Military Station	‖
Consumer Complaining Company/Org	‖
Consumer Military Service Branch	‖
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Company used bait and switch tactics and is refusing to issue a refund. --- Additional Comments: I would like a full refund of all monies spent to any indivdual who lost and reported money to you that was lost to them in above stated fashion. Also any and all local, state, and federal prosecution to all parties involved in said complaintltbr/gtltbgt Desired Settlement: Other (requires explanation)lt/bgt'
Complaint Info CRA Dispute Flag	
Complaint Info	

CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 106 of 192	
Reference Number	35719450
Created Date	01/23/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098665246
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	01/23/2012
Updated By	Adam D asmitley
Updated Date	06/11/2012
Agency Contact	External Agency
Complaint Date	01/23/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WEST JORDAN

Consumer

Address, State Code	UT
Consumer Address, State Name	Utah
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I had a sales rep scam me...didnapost know there was a return policy...got PROMISED a refund for my product amp only got refunded MY shipping money! --- Additional Comments: I want my money back for the product amp NOT just the money that I put into providing proof for them to get a refund! The $38.45 that was refunded to me did NOT cover the product I bought and disliked...it ONLY refunded the money I forked out for my shipping!! I would also like their sales rep fired from selling product anymore! She is not a good sales rep.'
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 107 of 192	
Reference Number	35722998
Created Date	02/03/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098668354
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	02/03/2012
Updated By	Adam D asmitley
Updated Date	06/12/2012
Agency Contact	External Agency
Complaint Date	02/03/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	FAIR OAKS

Consumer

Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was charged $39.95 for materials that I did not want or knowingly agree to pay $39.95 for. --- Additional Comments: Credit back the $39.95 they charged my credit card on 1/26/2012.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	

Complaint Info

CRA Dispute Resolved	

Record 108 of 192	
Reference Number	35792875
Created Date	02/13/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098670677
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	02/13/2012
Updated By	Adam D asmitley
Updated Date	06/12/2012
Agency Contact	External Agency
Complaint Date	02/13/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WATERLOO

Consumer

Address, State Code	IN
Consumer Address, State Name	Indiana
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife has resorted to deceptive marketing practices. --- Additional Comments: Identify in the business starter pack and first part of the DVD presentation that Herbalife is the company sponsor.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 109 of 192	
Reference Number	36614293
Created Date	02/16/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098671734
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	02/16/2012
Updated By	Adam D asmitley
Updated Date	06/11/2012
Agency Contact	External Agency
Complaint Date	02/16/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SORRENTO

Consumer

Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I feel I was mislead by the sponsor Kairrie McClain and the advertisement on the website. www.incomeathome.com and Herbalife. --- Additional Comments: I want my full refund for the products purchased and the Ehome Business Network training I paid for. I feel I was mislead by Kairrie McClain when I spoke to her. I was talked into purchasing product and starting training before I received a distributors kit which provided all the information I need to start this business. I received my distributors kit 3 weeks after I received my products. I filled out the application mailed it then watched the DVD in the kit to find out I was mislead.'
Complaint Info	

CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 110 of 192	
Reference Number	36617184
Created Date	02/16/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098671612
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	02/16/2012
Updated By	Adam D asmitley
Updated Date	06/12/2012
Agency Contact	External Agency
Complaint Date	02/16/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	CANDLER

Consumer

Address, State Code	NC
Consumer Address, State Name	North Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Not fully representing all costs involved in becoming a distributor --- Additional Comments: All money refunded'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 111 of 192	
Reference Number	36617566
Created Date	02/23/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098673005
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	02/23/2012
Updated By	Adam D asmitley
Updated Date	06/12/2012
Agency Contact	External Agency
Complaint Date	02/23/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DECATUR

Consumer

Address, State Code	AL
Consumer Address, State Name	Alabama
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	sent back merchandie, yet no refund issued. --- Additional Comments: I just want my refund credited back to my debit card for $400.56 and close out the agreement.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 112 of 192	
Reference Number	36618174
Created Date	03/08/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098676328
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	03/08/2012
Updated By	Adam D asmitley
Updated Date	06/12/2012
Agency Contact	External Agency
Complaint Date	03/08/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DUBLIN

Consumer

Address, State Code	OH
Consumer Address, State Name	Ohio
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	REsponded to a quotLegitimate At Home Businessquot ad online. They sent packet to me. They were to refund my money if I sent packet back. no refund so far --- Additional Comments: I would like Herbalife to refund $49.90 to me.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 113 of 192	
Reference Number	36618260
Created Date	03/14/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098677683
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	03/14/2012
Updated By	BBBCOCA-USER
Updated Date	04/11/2012
Agency Contact	External Agency
Complaint Date	03/14/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	GROVETOWN

Consumer

Address, State Code	GA
Consumer Address, State Name	Georgia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	NR
Company Address, State Name	Location Not Reported
Company Address, Country Code	LNR
Company Address, Country Name	LOCATION NOT REPORTED

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife charged my credit card 199.99 without my knowledge and never got any start up in the company. I donâÂ?Â?t wish to work for this company at all. --- Additional Comments: I would like for my 199.99 to be refunded to me being as I donâÂ?Â?t wish to take part in this. 199.99 should have covered a start up package to get me started instead all it got me was a 2nd DVD training and another call from a mentor asking me for more money. if iaposm trying to make money its obvious I donâÂ?Â?t have money to spend. not 4000.00 anyway. or 1450.00 '
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 114 of 192	
Reference Number	36693365
Created Date	02/13/2012
Complaint Source	BBB MO Saint Louis
Originator Reference Number	07340001444519
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSAMO-USER
Entered Date	02/13/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	02/13/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	KANSAS CITY
Consumer Address, State Code	MO
Consumer Address, State Name	Missouri
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)

Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	The Online Business Systems Herbalife
Company Address, Line 1	6086 Germania Rd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	PARK HILLS
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	

Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	Manager
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$12.92
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	

Details not fully disclosed and the details that are

Complaint Info Comments	mentioned fare false. They claim to be BBB certified and they are not. More in the summary.The main Online Business System at (address) via the internet URL of http://www.myobspack.com/pack.php?a=steps and the package that they forward out claims that they are BBB approved. In talking with another business partner in Kansas described what he is doing is simply recruiting and getting paid for those that sign up, in other words a PYRAMID SCAM.Please investigate or let me know what reports you have on The Online Business Systems to date,thanks. --- Additional Comments: Refund of initial $9.95 + $2.97 for return shipping and do not charge an additional $39.95 to VISA card.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 115 of 192	
Reference Number	36707422
Created Date	06/02/2011
Complaint Source	BBB MI Detroit
Originator Reference Number	03320008602237
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBDEMI-USER
Entered Date	06/02/2011
Updated By	BBBDEMI-USER
Updated Date	10/11/2012
Agency Contact	External Agency
Complaint Date	06/02/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	STONEVILLE
Consumer Address, State Code	NC
Consumer Address, State Name	North Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Independent Distributors of Herbalife
Company Address, Line 1	934 Hilldale Dr
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	ROYAL OAK
Company Address, State Code	MI
Company Address, State Name	Michigan
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	48067
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	248
Company Phone, Number	5475524
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Becky
Company Rep Middle Name	
Company Rep Last Name	Beegen
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	ordered info regarding work from home program. Told complete program was 39.95, once received they want mor3e and more money for program. Also told would not be selling directly. This program is also boarder line pyramid scheme. Would like to get my money back due to false advertisement and misleading information given on radio regarding program. --- Additional Comments: would like a total refund.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 116 of 192	
Reference Number	36838345
Created Date	04/02/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098681907
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	04/02/2012
Updated By	Adam D asmitley
Updated Date	06/07/2012
Agency Contact	External Agency
Complaint Date	04/02/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	JACKSONVILLE

Consumer

Address, State Code	NC
Consumer Address, State Name	North Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	They sent a so-called training package, but it was just a info commercial. --- Additional Comments: Refund of shipping charges'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 117 of 192	
Reference Number	36843111
Created Date	01/06/2012
Complaint Source	BBB ON Kitchener/Toronto
Originator Reference Number	01070001245117
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBMWON-USER
Entered Date	01/06/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	01/06/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	BOLTON
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife Online Business Systems
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	http://ozzygirl.theonlinebusiness.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$540.95
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I originally sign up to become a member of BOL distributor team with the stipulation of having my money back if I would cancel my membership within 90 days. I talk to my instructor Lucy Keogh around Chistmas, and notify her of my change of mind and cancellation of my membership.I have been calling her a dozen times to have her credit my account of the money she charged before. Lucy is not returning my calls.I left a message to the office of BOL of Colorado and I am still waiting for a response. I also notify the office in California, they told me that they will stop charging me any further fees, but for the refunds I have to deal with Lucy Keogh.I e-mailed a note to her and still no response.I think the company or Lucy Keogh need to refund a charge of $39.95 + $100 + $401 a total of $540.95 --- Additional Comments: a refund of $540.95'
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 118 of 192	
Reference Number	36923326
Created Date	04/18/2012
Complaint Source	BBB NJ Trenton
Originator Reference Number	02210080235602
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBTRNJ-USER
Entered Date	04/18/2012
Updated By	-
Updated Date	-
Agency Contact	External Agency
Complaint Date	04/18/2012
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	WANAQUE
Consumer Address, State Code	NJ
Consumer Address, State Name	New Jersey
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	-
Consumer Home Phone, Number	-
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-
Consumer Work Phone, Number	-
Consumer Work Phone, Extension	-

Consumer Fax, Country Code	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	b(6)
Consumer Age range	-
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	Herbalife
Company Address, Line 1	24 Birch Street
Company Address, Line 2	-
Company Address, Line 3	-
Company Address, City	PORT READING
Company Address, State Code	NJ
Company Address, State Name	New Jersey
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	07064
Company Address, ZIP Code Extension	-
Company Phone, Country Code	-
Company Phone, Area Code	-
Company Phone, Number	-
Company Phone, Extension	-
Company Email	-
Company Website	-
Company Rep First Name	-
Company Rep Middle Name	-
Company Rep Last Name	-
Company Rep Salutation	-
Company Rep Comments	-
Complaint Info Initial Contact Method	-
Complaint Info Initial Contact Date	-
Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-

Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	$436.72
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	After making 1 purchase with Herbalife, months later they charged me over $400.00 for products that I did not authorize to be purchased. I tried to contact Herbalife but none of my emails where returned and when I called I could not get a customer rep to speak to.Product_Or_Service: Herbalife ProductsOrder_Number: Order # : (b)(6) --- Additional Comments: DesiredSettlementID: RefundContacted the bank where the card is with and filed a fraud report.'
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 119 of 192	
Reference Number	37018571
Created Date	03/08/2012
Complaint Source	BBB AB Calgary
Originator Reference Number	00170001167115
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCAAB-USER
Entered Date	03/08/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/08/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LANGLEY
Consumer Address, State Code	BC
Consumer Address, State Name	British Columbia, Canada
Consumer Address, Country Code	CAN
Consumer Address, Country Name	CANADA
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife of Canada Ltd.
Company Address, Line 1	120, 4550 - 25 Street SE
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CALGARY
Company Address, State Code	AB
Company Address, State Name	Alberta, Canada
Company Address, Country Code	CAN
Company Address, Country Name	CANADA
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	dominiques@herbalife.com
Company Website	http://www.herbalifeww.com/ca/
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact

Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was dealing with Herbalife USA, wanting to be a distributor. Ordered the $216 cdn start up package which was to arrive in a week. 3 weeks later, I received package which I immediately sent back.Left an e-mail for the two sponsors I had, saying wanted refund, they both ignored me. E-mailed again and still no response. Contacted US head office and was told they would look into matter.A month went by, e-mailed US office again and they replied that the matter had been turned over to the Canadian office in Calgary.I received a call from Calgary to call them back which I did the following day. Left my number etc to call me back, they never did. Called again 5 days later, left the same message adding that if no response I was going to file a complaint the next day if I do not hear anything. So, here it is the next day and still nothing. --- Additional Comments: $216 cdn refund to my visa card'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	

Complaint Info CRA Dispute Resolved	

Record 120 of 192	
Reference Number	37022044
Created Date	04/02/2012
Complaint Source	BBB MB Winnipeg
Originator Reference Number	00570000055960
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBWIMB-USER
Entered Date	04/02/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	04/02/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ATLANTA
Consumer Address, State Code	GA
Consumer Address, State Name	Georgia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	Box 92, Grp 20, RR2
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	STE ANNE
Company Address, State Code	MB
Company Address, State Name	Manitoba, Canada
Company Address, Country Code	CAN
Company Address, Country Name	CANADA
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	See attached complaint. --- Additional Comments: '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 121 of 192	
Reference Number	37077234
Created Date	04/28/2012
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	ASMITLEY
Entered Date	04/28/2012
Updated By	
Updated Date	
Agency Contact	Mail
Complaint Date	04/28/2012
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	
Consumer Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	
Consumer Address, Country Name	
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	BEL
Company Address, Country Name	BELGIUM
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	EMAIL:deaar Sirif everyone knows that Monavie and herbalife like products and way of business are a pyramid ilegal scheme, why dont you end it?thousands of people are being scammed and losing lots of money under the permise and lure of making millions and riding Mercedes S class and cruises over Hawaii.Herbalife in Belgium was considered an ilegal pyramid by court.when will we learn from history that scammers need a lesson? They destroy peoples lifes and with peoples ignorance they are driving bentleys and have more than one in the garage.I had to say and ask this because I have friends who were misleaded by cheaters and they are losing big their hard earned cash, because they have to buy loads of bottles of juices every month.do something, pleasethank youbest regards(b)(6) Sent from my iPad
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Record 122 of 192	
Reference Number	37092259
Created Date	04/11/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098683831
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	04/11/2012
Updated By	Adam D asmitley
Updated Date	06/13/2012
Agency Contact	External Agency
Complaint Date	04/11/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	FORT WORTH

Consumer

Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I have asked for a refund and am getting the run around. --- Additional Comments: Refund my money'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 123 of 192	
Reference Number	37092322
Created Date	04/10/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098683706
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	04/10/2012
Updated By	Adam D asmitley
Updated Date	06/13/2012
Agency Contact	External Agency
Complaint Date	04/10/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	HAMMONTON

Consumer

Address, State Code	NJ
Consumer Address, State Name	New Jersey
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was told that I would have coaches that would help me succeed. (b)(6) my coach missed several calls. (b)(6) was not there for any. Multiple iss --- Additional Comments: I want someone to take responsibility for their lack of responsibility and false advertising. Robin shultz one of the upper line coaches said to me quotthat should not have happened.quot but it did. I want to ship my products back and not pay any fees to ship back or to restock. Also I want them to give me back $1000. in advertising money. I have bought a new computer for this job but I will eat the cost on that because I still use it. I also have spent a few hundred on web sites and a merchant acct.'
Complaint Info	

CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 124 of 192	
Reference Number	37268331
Created Date	03/05/2012
Complaint Source	Washington, Attorney General
Originator Reference Number	404215
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	WA01-USER
Entered Date	03/05/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/05/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MALAGA
Consumer Address, State Code	WA
Consumer Address, State Name	Washington
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	-
Complaint Info Product Service Code	0318
Complaint Info Product Service Description	Shop-at-Home\Catalog Sales
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Resolution: Resolution-CLOSED INQUIRY/INFORMATION --- Status: Closed --- Estimated Savings: 0.00 --- Actual Savings: 0.00 --- WAG Resolution Date: 3/6/2012 2:21:40 PM
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 125 of 192	
Reference Number	37306910
Created Date	04/03/2012
Complaint Source	BBB MO Saint Louis
Originator Reference Number	07340001447579
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSAMO-USER
Entered Date	04/03/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	04/03/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	CENTENNIAL
Consumer Address, State Code	CO
Consumer Address, State Name	Colorado
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	The Online Business Systems Herbalife
Company Address, Line 1	6086 Germania Rd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	PARK HILLS
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	Manager
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	$179.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	I was charged a set-up fee and a monthly fee after I decided not to proceed with the company and cancelled my membership with in the alloted time.On January 02, 2012 (NAME) paid his $399 and joined OBS> On January 13 2012 he changed his mind, and was refunded $379 > After he had left OBS he was charged $100 in January $79.95 in February. And almost $79.95 in March. Since you give 15 days free trial, and he was only in OBS for 11 days he should not have been charged.> Please refund OBS charges made for January and February.They said I was not getting any refund --- Additional Comments: I want a refund of $179.95'
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 126 of 192	
Reference Number	37504491
Created Date	04/23/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098686128
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	04/23/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	04/23/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	NORWALK
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife Nutritional Center
Company Address, Line 1	14435 Pioneer Blvd.
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	NORWALK
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90650
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Company failed to honor agreement. --- Additional Comments: Consumer is seeking a refund of the $20.00 for the lose weight contest as well as a refund of the remainder balance for this month. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 127 of 192	
Reference Number	37602376
Created Date	05/04/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098688947
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	05/04/2012
Updated By	Adam D asmitley
Updated Date	06/13/2012
Agency Contact	External Agency
Complaint Date	05/04/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	FLEMING ISLAND

Consumer

Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Product was returned but Herbalife refuse to issue a credit --- Additional Comments: Credit issued.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 128 of 192	
Reference Number	38114438
Created Date	06/15/2012
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	06/15/2012
Updated By	CRSS\tiacobucci
Updated Date	06/15/2012
Agency Contact	Internet
Complaint Date	06/15/2012
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Grass Valley
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	40 - 49
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Helen Garland - Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	(b)(6)
Company Website	
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	9044
Complaint Info Product Service Description	Unsolicited Email
Complaint Info Law Violation Code	CS1|CS4|CS6
Complaint Info Law Violation Description	SPAM: 'Remove Me' is missing, broken, or ignored|SPAM: Subject or From line is false or misleading|SPAM: Other\general annoyance
Complaint Info Statute Code	CS
Complaint Info Statute Description	CAN-SPAM Act
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I have repeatedly requested to be removed from her e-mail list and that only increased the traffic. Other-Other Update
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 129 of 192	
Reference Number	38425391
Created Date	05/04/2012
Complaint Source	BBB MO Saint Louis
Originator Reference Number	07340001449331
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSAMO-USER
Entered Date	05/04/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	05/04/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	EASTMAN
Consumer Address, State Code	GA
Consumer Address, State Name	Georgia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	The Online Business Systems Herbalife
Company Address, Line 1	6086 Germania Rd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	PARK HILLS
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	573
Company Phone, Number	2253137
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	Manager
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$400.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I have call my coach with this online business systems/Herbalife... to get my money back from them and haven't herd anything out of anybody about itI paid $400.00 to get into this Online business systems/Herbalife and I haven't sold anything so all I want is my money back is all I want but every time I call my coach all I get is she waiting 2 here from her coachs(yeah right) I have no money to promote this and they want me 2 pay another $100 to have a so call back office I spent my last $400.00 just to get into this and now I got 2 seend more(don't think so) I cancalled my back office and now I want my hard earn money I payed these people is all I want --- Additional Comments: i just want my $400.00 back is all I want nothing more.... I have call my coach with Online business systems/Herbalife and ask her several times about getting my money back and yet I haven't herd a word out of these people, I just want my money back'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute	

Resolved	

Record 130 of 192	
Reference Number	38598078
Created Date	06/29/2012
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	EQUINONEZ
Entered Date	06/29/2012
Updated By	
Updated Date	
Agency Contact	Phone
Complaint Date	06/29/2012
Transaction Date	06/28/2012
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Los Angeles
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	13900 Marina Pointe
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Marina Del Rey
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Karen
Company Rep Middle Name	
Company Rep Last Name	Feiger Kolehmainen
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Phone
Complaint Info Initial Contact Date	06/28/2012
Complaint Info Initial Response	

Method	Phone: other
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer says that she signed up with Herbalife and says that they hacked into her computer. Consumer says they are trying to use and might be using her pictures. Consumer called them and asked them not to use her pictures and they threatened her to call the police. Consumer says they haven't used her information.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Record 131 of 192	
Reference Number	38800297
Created Date	06/18/2012
Complaint Source	Oregon, Department of Justice
Originator Reference Number	FF6035-12
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	OR01-USER
Entered Date	06/18/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	06/18/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MEDFORD
Consumer Address, State Code	OR
Consumer Address, State Name	Oregon
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	HERBALIFE INTERNATIONAL OF AMERICA, INC.
Company Address, Line 1	1800 CENTURY PARK EAST
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90067
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	5329638
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	

Complaint Info Initial Contact Date	-
Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	$9.99
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	--- Oregon DOJ comments: Consumer Pursuing Own Resolution --- Consumer description: False or misleading representations regarding future income --- Case closed --- Case closed date: 2012-06-18 00:00
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 132 of 192	
Reference Number	38864345
Created Date	06/19/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098698333
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	06/19/2012
Updated By	Adam D asmitley
Updated Date	07/17/2012
Agency Contact	External Agency
Complaint Date	06/19/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	BRISTOL

Consumer

Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	There was so much deceit especially since after I invested the $3,626.11 she didn?t tell me that I would have to buy my leads $60 to $500 for leads! --- Additional Comments: Give me my money back and I will return the products to the nearest Herbalife Office, which is Boston, MA. I want the buy back offer. I will write ltr. amp have it notarized then you can return my money to me. $399 for products, $19.95 for packet, $39.95 after 15 days, $3,307.16 to be a quotSupervisorquot. $3,666.06 total should be returned to me as I made zero dollars as a quotSupervisorquot I made no money with Herbalife.Mycontract was signed by me 5/11/12 amp today is 6/14/12.I told my coach last week no'
Complaint Info	

CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 133 of 192	
Reference Number	39032941
Created Date	06/04/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098695187
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	06/04/2012
Updated By	Adam D asmitley
Updated Date	07/18/2012
Agency Contact	External Agency
Complaint Date	06/04/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	RED LION

Consumer

Address, State Code	PA
Consumer Address, State Name	Pennsylvania
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I got for 39.95 plus 25.00 s/h a booklet that was sent back, after paying 25.00 to FedEx to return, I was told by Heidi Craig to kiss off. --- Additional Comments: I would like my 39.95 back plus the 25.00 for ship/hand to send back. I would also wish for the company to dismiss this person as they were fraudulent in all correspondence.'
Complaint Info CRA Dispute Flag	
Complaint Info	

CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 134 of 192	
Reference Number	39033363
Created Date	06/08/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098696432
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	06/08/2012
Updated By	Adam D asmitley
Updated Date	07/18/2012
Agency Contact	External Agency
Complaint Date	06/08/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	EAGLE POINT

Consumer

Address, State Code	OR
Consumer Address, State Name	Oregon
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Received an email about an on line business. The email claimed I would be working with quotGooglequot NOT Herbal Life. False Advertising! --- Additional Comments: Stop their false advertising! '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 135 of 192	
Reference Number	39125939
Created Date	07/27/2012
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	07/27/2012
Updated By	CRSS\tiacobucci
Updated Date	07/30/2012
Agency Contact	Internet
Complaint Date	07/27/2012
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	New Bern
Consumer Address, State Code	NC
Consumer Address, State Name	North Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	9044
Complaint Info Product Service Description	Unsolicited Email
Complaint Info Law Violation Code	CS1
Complaint Info Law Violation Description	SPAM: 'Remove Me' is missing, broken, or ignored
Complaint Info Statute Code	CS
Complaint Info Statute Description	CAN-SPAM Act
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I have unsubscribed from Herbalifes emails 3 or 4 time and they continue to send me emails. Other-Other Update
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 136 of 192	
Reference Number	39151315
Created Date	06/09/2012
Complaint Source	BBB CA Oakland
Originator Reference Number	11160057226956
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBOACA-USER
Entered Date	06/09/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	06/09/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ANNANDALE
Consumer Address, State Code	VA
Consumer Address, State Name	Virginia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	(b)(6) Herbalife: Independent Distributor
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	BENICIA
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	94510
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	707
Company Phone, Number	7450535
Company Phone, Extension	
Company Email	(b)(6)
Company Website	www.herbalife.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	This Herbalife company (WFH International)has charged an unauthorized transaction of my credit card $39.95 today. I have never heard of this company before and I do not know why and how they received my bank card information. This promted me to take another look at my statements, only to find another charge on April 7, 2012 for $9.95. This is a COMPLETE violation!!!! I am contacting my bank and I am going to continue to do what I can to OUT this company on EVERY NEWS CHANNEL POSSIBLE!!! This is beyond FRAUD, this is CRIMINAL, THIS COMPANY IS CRIMINAL AND I WILL WORK HARD TO GET EVERYONE INVOLVED JAILED FOR A VERY LONG TIME!!!!!!!! --- Additional Comments: I demand a refund of all funds STOLEN from me! April 7, 2012 $9.95 and today, Saturday June 9, 2012 $39.95, a total of $49.95. You were able to take it from me without my knowledge or authorization... PUT IT BACK!'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 137 of 192	
Reference Number	39154451
Created Date	06/25/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098699463
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	06/25/2012
Updated By	Adam D asmitley
Updated Date	07/24/2012
Agency Contact	External Agency
Complaint Date	06/25/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SAN JOSE

Consumer

Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	High Pressure Sales on the benefit of Herbalife --- Additional Comments: Refund of 1949.25 + 248.00 interest = $ 2197.25'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 138 of 192	
Reference Number	39193630
Created Date	07/13/2012
Complaint Source	Internet Crime Complaint Center
Originator Reference Number	I1207131639029021
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	IC3-USER
Entered Date	07/13/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	07/13/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	EDEN
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	60 - 64
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	b(6)
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	19775 Hwy. 52N
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	DURANGO
Company Address, State Code	IA
Company Address, State Name	Iowa
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	52039
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	563
Company Phone, Number	5522641
Company Phone, Extension	
Company Email	(b)(6)
Company Website	
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	Other Credit Card
Complaint Info Amount Paid Value	$428.00
Complaint Info Product Service Code	9000
Complaint Info Product Service Description	Other (Note in Comments)
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: It say and ad on the internet which was $9.95 for information about an at home business. I paid the $9.95 and was contacted my (b)(6) who described the business at medical in nature. I agreed to learn more and she said that would cost $39.95 which I paid. I contacted (b)(6) and said I wanted to learn more and she said to sign up for more infomation that would be $399.00 which I paid. I received 3 packages in the mail,there were approximately 6 telephone conversations with various people who work for Herbalife. The last conversaton was giving them $4,000. plus another $500.00 to $5,000.00 for advertising. At that moment I said I am not doing this and I want my money back, I did not sign any contract with them for anything. (b)(6) Sahm said just return everything and I will make sure that you are refunded all your money immediate. All the packages were returned and I and signed for my them on 7/12/2012 and I have contacted (b)(6) Sahm by email for my funds and she keeps coming up with excuses none of which are

	pertain to the matter.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 139 of 192	
Reference Number	39553889
Created Date	07/11/2012
Complaint Source	Oregon, Department of Justice
Originator Reference Number	FF6786-12
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	OR01-USER
Entered Date	07/11/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	07/11/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PORTLAND
Consumer Address, State Code	OR
Consumer Address, State Name	Oregon
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	HERBALIFE INTERNATIONAL OF AMERICA, INC.
Company Address, Line 1	1800 CENTURY PARK EAST
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90067
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	5329638
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	--- Oregon DOJ comments: Information Only --- Consumer description: False or misleading representations regarding future income --- Case closed --- Case closed date: 2012-07-11 00:00
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 140 of 192	
Reference Number	39563044
Created Date	07/06/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098701840
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	07/06/2012
Updated By	Adam D asmitley
Updated Date	08/07/2012
Agency Contact	External Agency
Complaint Date	07/06/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	HOBE SOUND

Consumer

Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I got a business packet with a 14 day free trial and I returned it prior to the trial expiring, but have yet to receive a refund of the funds deducted --- Additional Comments: I want a full refund of all monies wrongfully deducted from my bank account, and I want a refund of the shipping and handling fees as well. I have spent weeks trying to get this resolved and feel I need compensation for my time and troubles.'
Complaint Info CRA Dispute Flag	
Complaint Info	

CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 141 of 192	
Reference Number	40269555
Created Date	08/14/2012
Complaint Source	BBB AB Edmonton
Originator Reference Number	00270001645368
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCNAB-USER
Entered Date	08/14/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/14/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	BRANTFORD
Consumer Address, State Code	ON
Consumer Address, State Name	Ontario, Canada
Consumer Address, Country Code	CAN
Consumer Address, Country Name	CANADA
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	602-15503 87 Ave
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	EDMONTON
Company Address, State Code	AB
Company Address, State Name	Alberta, Canada
Company Address, Country Code	CAN
Company Address, Country Name	CANADA
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.herbalife.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	This complaint is for Derbalife, a division of Herbalife run by Wyanita Fath out of Alberta. They were running a new years challenge to lose weight and improve skating speed and I paid an entry fee to participate in the challenge. I was never invited to the challenge by my coach and was given no instructions. I complained about the service and they offered to add me to the summer 2012 challenge late to make up for not being invited to the first challenge. I joined the challenge late and my coach did not send me the instructions for the challenge or an guidance. Her only 'coaching' was that I should eat more protein and never gave any other advice. She failed to respond to multiple emails and had to be harassed greatly to finally reply to my concerns. When the challenge completed we were to send in after photos and results to be posted online and voted on. I submitted my details and they never went up on the website. No one was able to vote for me and I was ineligible to win because of it. I asked several times during voting why my pictures and results were not posted and got no reply. After the contest closed and winners were announced, my coach finally contacted me and said she wasn't able to submit my details because she was away on vacation with family. So I paid for this challenge

	only to receive no benefit from it. No coaching, no chance to win. --- Additional Comments: A refund of my $20 participation fee for the challenge.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 142 of 192	
Reference Number	40351007
Created Date	08/06/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098709789
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	08/06/2012
Updated By	Adam D asmitley
Updated Date	09/10/2012
Agency Contact	External Agency
Complaint Date	08/06/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DALY CITY

Consumer

Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Want transactions reversed immediately due to their system error. --- Additional Comments: I would like them to reverse transaction immediately. It was their system error and my card should have not been charged. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 143 of 192	
Reference Number	40351691
Created Date	08/10/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098711094
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	08/10/2012
Updated By	Adam D asmitley
Updated Date	09/10/2012
Agency Contact	External Agency
Complaint Date	08/10/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WALSH

Consumer

Address, State Code	CO
Consumer Address, State Name	Colorado
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife is a SCAM. DO NOT FALL FOR THIS SCAM. They are a bunch of liars. They just keep asking you for money. --- Additional Comments: Refund me my money.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 144 of 192	
Reference Number	40352082
Created Date	04/04/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098682618
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	04/04/2012
Updated By	Adam D asmitley
Updated Date	09/10/2012
Agency Contact	External Agency
Complaint Date	04/04/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	HUNTINGTON

Consumer

Address, State Code	IN
Consumer Address, State Name	Indiana
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was charged for a product that was misrepresented and I cannot get a hold of anyone to voice my issue. --- Additional Comments: I want the $39.95 refunded back to my account, and all my banking information they have on file to be deleted.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 145 of 192	
Reference Number	40375774
Created Date	03/21/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098679284
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	03/21/2012
Updated By	Adam D asmitley
Updated Date	09/11/2012
Agency Contact	External Agency
Complaint Date	03/21/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MULBERRY GROVE

Consumer

Address, State Code	IL
Consumer Address, State Name	Illinois
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I joind the company to sell, and after delving more into the company, I decided against it, and asked for a refund on my registation fee. --- Additional Comments: I would like the $199, back for the Registration, Licensing Fee, and the products sent to me. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	

Complaint Info CRA Dispute Resolved	

Record 146 of 192	
Reference Number	40377997
Created Date	05/10/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098690091
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	05/10/2012
Updated By	Adam D asmitley
Updated Date	09/11/2012
Agency Contact	External Agency
Complaint Date	05/10/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	CHESAPEAKE

Consumer

Address, State Code	VA
Consumer Address, State Name	Virginia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	everything about herbalife from prescreening and watching initial videos to sign up, through training process have been nothing but a scam. --- Additional Comments: Refund the $2k I invested in good faith. Have an exec go through training videos so discrepancies can be corrected; provide a list of costs inclusively rather than adding fees at every step, most importantly hire someone as an actual help desk company representative and provide contact information at startup.'
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 147 of 192	
Reference Number	40378008
Created Date	05/10/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098690104
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	05/10/2012
Updated By	Adam D asmitley
Updated Date	09/11/2012
Agency Contact	External Agency
Complaint Date	05/10/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SPOKANE

Consumer

Address, State Code	WA
Consumer Address, State Name	Washington
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I signed up for Herbalife and per website eligible for 30-day money back guarantee. Returned product less than 30 days, now wonapost refund. --- Additional Comments: Return ALL of my money NOW! They have all of my products, materials, and EVERYTHING. They do NOT correctly advertise their refund policy. False advertising. False guarantee. I expect to see a FULL refund made IMMEDIATELY back to my visa debit card on file to comply with the 30-day money back GUARANTEE. I am NOT a distributor and am now not a customer anymore. All of the items sent to me have been returned to the Carson, CA warehouse. All I want is my money and will never contact them again'
Complaint Info	

CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 148 of 192	
Reference Number	40378187
Created Date	04/25/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098686801
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	04/25/2012
Updated By	Adam D asmitley
Updated Date	09/11/2012
Agency Contact	External Agency
Complaint Date	04/25/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SPRINGFIELD

Consumer

Address, State Code	OH
Consumer Address, State Name	Ohio
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I requested that the money that was debited from my account to be put back in. --- Additional Comments: All I would like is a refund of the money debited from my account, which is $399 plus tax.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 149 of 192	
Reference Number	40378465
Created Date	05/14/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098690630
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	05/14/2012
Updated By	Adam D asmitley
Updated Date	09/11/2012
Agency Contact	External Agency
Complaint Date	05/14/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	NORTH FT. MYERS

Consumer

Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I decided against there Trainee program due to financial issues so I sent the package back on April 17, 2012. I want my money back in my account ASAP --- Additional Comments: I would like for Herbalife to be more upfront on how much this program is to be successful in it, also the main reason to RETURN my money to my account!'
Complaint Info CRA Dispute Flag	
Complaint Info	

CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 150 of 192	
Reference Number	40527093
Created Date	08/06/2012
Complaint Source	BBB IL Chicago
Originator Reference Number	06540094411167
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCHIC-USER
Entered Date	08/06/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/06/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ELMIRA HGTS
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	3836 S Hermitage Ave
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CHICAGO
Company Address, State Code	IL
Company Address, State Name	Illinois
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$200.00
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Approx. July 16th I received and e-mail asking if I would like to earn money from home. I answered the ad and on July 19th I was contacted By Ann Boe representing the OnLineBusiness.We exchanged a couple of emails and phone conversations. Getting back to the original video not once did they state what I would be doing but did state that I would not have to bother family members or friends. I told Ann I would like to start. Three dvd's were sent and 'low' anad behold one of the first things mentioned was to contact/sell to friends and family. The business us quite involved. I used to sell Avon and had a large clientel, but I did not want the pressure anymore.I emailed Ann on July 25th telling her how I felt and requested my money back. I also told her I would be very happy to return any information and/or products. To date I haven't heard nor have I been able to contact Ann. Hopefully you can help. (b)(6) --- Additional Comments: I just want a refund nothing more.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 151 of 192	
Reference Number	40529137
Created Date	08/29/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098716051
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	08/29/2012
Updated By	Adam D asmitley
Updated Date	09/21/2012
Agency Contact	External Agency
Complaint Date	08/29/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ROBARDS

Consumer

Address, State Code	KY
Consumer Address, State Name	Kentucky
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Costing me more money and no profits being made --- Additional Comments: Reimburse me my money for all I have put into herbalist, online credit card companies to be able to except credit cards on line, and the money I have laid out on Domain names to have my own web sites'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	

Complaint Info CRA Dispute Resolved	

Record 152 of 192	
Reference Number	40701721
Created Date	09/05/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098717367
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	09/05/2012
Updated By	Adam D asmitley
Updated Date	09/25/2012
Agency Contact	External Agency
Complaint Date	09/05/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ROSEVILLE

Consumer

Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife has posted a web page that is made to look like a legitimate msnbc.msn.com page but it is actually a promotion for Herbalife. --- Additional Comments: THIS IS FRAUD. Herbalife needs to cease and desist.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 153 of 192	
Reference Number	40762120
Created Date	10/06/2012
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	10/06/2012
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	10/06/2012
Transaction Date	09/12/2012
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Sun City
Consumer Address, State Code	AZ
Consumer Address, State Name	Arizona
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	-
Consumer Fax, Country Code	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	b(6)
Consumer Age range	40 - 49
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	The online businessMLM Herbalife International, INC
Company Address, Line 1	800 West Olympic BLVD
Company Address, Line 2	406
Company Address, Line 3	-
Company Address, City	Los angeles
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90015
Company Address, ZIP Code Extension	-
Company Phone, Country Code	-
Company Phone, Area Code	866
Company Phone, Number	8664744
Company Phone, Extension	-
Company Email	-
Company Website	myherbalife.com
Company Rep First Name	Ana
Company Rep Middle Name	-
Company Rep Last Name	Arias
Company Rep Salutation	-
Company Rep Comments	Mentor
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	09/12/2012

Complaint Info Initial Response Method	Phone: 800/888 number
Complaint Info Initial Response Date	09/12/2012
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$10000.00
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$7600.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	My disrtibutor # was (b)(6) - I was sold on the Global internet marketing system where I was told if I paid 9.95 for a training package I would be shown how to rin MY OWN internet business. I purchased the pakage and was then scheduled a follow up apointment. I interviewed with Ana Arias of Scottsdale Arizona who told me how wonderful I was in the same state and that I could get more information by purchasing the IBP package for 199.00. I did that and was shceduled another appointment to see if I was a good fit for HER team. She told me she was making 8800.00 per month and it was so easy and she did this around her family life. I received the IBP package and a password to access the rest of the original training pqack where I then found put it was Herbalife. They company Herbalife has been amking and marketing health and wellness products for over 30 years. Did some research and they came up smelling like a rose. I had my appointment with Ana as scheduled and was pitched that If I was going to fast track to wealth that I seemed to have what it took to jump many levels to success if I bought in as a suprvisor. In my nieve state I did that. I

Complaint Info Comments	asked her how much that would cost and she said 1299.00 plusw shipping and handlin.g which totaled an additional 1400 plus. I was then told I had to complete the online training, set up and pay for the costs of Merchant accounts to accept credit card, web urls, and countless more. In total It cost me close to if now more than 4000.00 just to get to that point. Then I 2was told I had to purchase recruiting leads if I was to Truley be successful and that that is where u make your best income potential. I did that and invested another 5200.00 roughly and still had to market my retail base. Once I became live I w2as told I have to run my credit card for 29.95 everytime I sold a 9.95 training package to another poor soul like myself. I believed the hype and worked the leads I had purchased and nedded 9.95 LESS 29.95 PER ORDER. I quickly beagn to realize I got dupped into a pyramid wscheme and immediatly resigned my distributorship. I contacted my so called Mentor Ana arias and she was so upset with me because I was so so good at this. What I was good at was giving countless dollars to a wscam with negative return of close to 10k. I called all the people that bought the training pack known as a PP or Paid Pack and told them to get there money back..in the end I have to refund them thus losing more money. The process entailed using an auto dailing system called Lead Blazer. It sends mass emails (spam) and harrassing voice messages recorded of scripts that u are not allowed to divert from basically conning people the way I was conned. It involed 12 to 14 hours of what is know as hourly dails session where the first call shows your phone # and the rest you *67 to block the # and call at the bottom of every hour until you reach the lead and book their first pack appointment. After 1 day of this I was sick. I realized I have been suckered into a pyramid and that I was basically going to go bankrupt if I continue never mind the moral and ethical issue as I was told to tell them a story of my wealth and business success and how easy it was and how I worked around my life part time and was making oodls of money. They wanted me to lie and sucker more people like me...I

	immediatly resighed on 100412. I called the credit card companies to report the scam and they said to report to FTC. I need help.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 154 of 192	
Reference Number	40789446
Created Date	09/26/2012
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260009210521
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	09/26/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/26/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MESA
Consumer Address, State Code	AZ
Consumer Address, State Name	Arizona
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife Nutritional Club
Company Address, Line 1	1120 S. Country Club Dr. #103
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	MESA
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85210
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	602
Company Phone, Number	4596059
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Margarita
Company Rep Middle Name	
Company Rep Last Name	Perez-Castillo
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was sexually harassed by one of the owners friends who happens to be an herbalife distributor.when I complained both owners of the herbalife nutritional club did not believe me.Only when I asked for my registration fee back did one of the owners call and apologize.She said she'd call back to apologize to my husband but she never has and it has been now 2 weeks.I fear when she gets my money for the refund of my registration she will not give it to me.I spent close to 300 or 400 dollars at their nutritional club only to be treated like a lair and a fool.The man who sexually harassed me knew I was married and knew I was not interested. Meanwhile he made up an excuse why he continuously called me till 2 o'clock in the evening sending text messages and blocking his number so I'd answer my cell.This man is still working at that nutritional club among the female public. --- Additional Comments: I want the money I spent at that club back.I'd settle for 300 dollars.Or I am planning to sue.Thank you (b)(6)
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 155 of 192	
Reference Number	41166365
Created Date	10/08/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098725574
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	10/08/2012
Updated By	Adam D asmitley
Updated Date	10/15/2012
Agency Contact	External Agency
Complaint Date	10/08/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MILFORD

Consumer

Address, State Code	OH
Consumer Address, State Name	Ohio
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Reps Jim/Isabel Denman did NOT tell me Iaposd need $2000 front, but FIRST DATA charged me $500 to withdraw early, in between many training videos. --- Additional Comments: Have FIRST DATA return to US BANK the $500 it took from a zero-balanced checking account. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	

Complaint Info CRA Dispute Resolved	

Record 156 of 192	
Reference Number	41168239
Created Date	10/09/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098725876
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	10/09/2012
Updated By	Adam D asmitley
Updated Date	10/15/2012
Agency Contact	External Agency
Complaint Date	10/09/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SUN CITY

Consumer

Address, State Code	AZ
Consumer Address, State Name	Arizona
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife Interntional is involved in an MLM pyramid work from home scam hiding behind there 30 bus/product history. --- Additional Comments: Stop fraudulent advertising. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 157 of 192	
Reference Number	41216523
Created Date	09/27/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098723149
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	09/27/2012
Updated By	Adam D asmitley
Updated Date	11/14/2012
Agency Contact	External Agency
Complaint Date	09/27/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	HOUSTON

Consumer

Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	The product made me super sick. I asked for a refund months ago and now everyone involved is ignoring my phone calls and emails. --- Additional Comments: I would like for them to refund my money.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 158 of 192	
Reference Number	41557306
Created Date	10/23/2012
Complaint Source	BBB CA Colton
Originator Reference Number	11760098729043
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	10/23/2012
Updated By	Adam D asmitley
Updated Date	10/31/2012
Agency Contact	External Agency
Complaint Date	10/23/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	VANCOUVER

Consumer

Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	GBR
Consumer Address, Country Name	UNITED KINGDOM
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	upset at the starter pack only have enough meal replacement for 15 days while everything else is 30days. very misleading. tried email no success --- Additional Comments: Change there advertisement to say you need to purchase another meal replacement container. ',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 159 of 192	
Reference Number	41755859
Created Date	11/09/2012
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	RMUNOZ
Entered Date	11/09/2012
Updated By	
Updated Date	
Agency Contact	Phone
Complaint Date	11/09/2012
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Waltham
Consumer Address, State Code	MA
Consumer Address, State Name	Massachusetts
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	30 - 39
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	Herbalifesubscriptions@herbalife.com
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	9044
Complaint Info Product Service Description	Unsolicited Email
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer state sthat has been receiving unsolicited emails from Herbalife consumer has asked to stop sending emails and he keeps receiving them.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Record 160 of 192	
Reference Number	41766030
Created Date	11/16/2012
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	11/16/2012
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	11/16/2012
Transaction Date	
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Salem
Consumer Address, State Code	OR
Consumer Address, State Name	Oregon
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International, Inc.
Company Address, Line 1	800 West Olympic Blvd., Suite 406
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Los Angeles
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90015
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	866
Company Phone, Number	8664744
Company Phone, Extension	
Company Email	
Company Website	www.herbalife.com
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b) (6)
Company Rep Salutation	
Company Rep Comments	Independent Distributor
Complaint Info Initial Contact Method	Internet (Other)
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	Internet/E-mail
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	Credit Card
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I responded to a website about working at home. I was contacted by (b)(6) an Herbalife Independent Distributor. I dont remember how much money I paid to have an information kit sent to me. After I reviewed the information I was again contacted by Ms. (b)(6) and her mentor, (b)(6). I dont remember how much money I paid to have additional information sent to me. I decided to join the company as a supervisor, which required a fee of how much I dont remember, and I was required to purchase an inventory of products for around $3,000. I was not told up front the additional charges that would be required to start up my business as an independent distributor. I had to set up 3 websites, and join their internet communication network. I never was able to sell any products or sign up any distributors and ended up selling my inventory on Amazon at a considerable loss. I purchased sales leads that went nowhere. At every turn I just was required to spend more money, and I never was able to make any money. The company was not forthright and honest about making money at home. It was represented to be an internet business, when in fact it is just internet marketing.

Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 161 of 192	
Reference Number	42035505
Created Date	10/01/2012
Complaint Source	BBB CA Oakland
Originator Reference Number	11160057236354
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBOACA-USER
Entered Date	10/01/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	10/01/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	OWASSO
Consumer Address, State Code	OK
Consumer Address, State Name	Oklahoma
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	(b)(6) Herbalife: Independent Distributor
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	BENICIA
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	94510
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	707
Company Phone, Number	7450535
Company Phone, Extension	
Company Email	(b)(6)
Company Website	www.herbalife.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I'm recieving solicitations via my cell phone in the middle of the night. I did not authorize anyone to use my number and they did call the previous day to 'scout' my number out to see if it was real (9:29 am). Now I have recieved 2 messages from this company, one at 3am on 9/30 & just now at 11:30pm on 9/30. Please note they have contacted me, despite my request for them to 'stop', and that contact was done not only at times that are unreasonable, but twice within a 24 hour period and on the same day! The person contacting me for this company is at (b)(6). I am tired of the harassment. --- Additional Comments: If they will not take me off their call/email/text listing, I will persue damages for harassment. I should not be contacted by this organization, as a whole. I will not tolerate harassment & will seek the maximum damages allowable for an organization disturbing me at unreasonable hours, and against my will & after I notified them to stop contacting me.',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 162 of 192	
Reference Number	42201958
Created Date	11/14/2012
Complaint Source	BBB DE Wilmington
Originator Reference Number	02510009295602
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBDEL-USER
Entered Date	11/14/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	11/14/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	NEWARK
Consumer Address, State Code	DE
Consumer Address, State Name	Delaware
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	MainStream Nutrition Club - Herbalife
Company Address, Line 1	163 E. Main Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	NEWARK
Company Address, State Code	DE
Company Address, State Name	Delaware
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	19711
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	302
Company Phone, Number	4444974
Company Phone, Extension	
Company Email	
Company Website	http://www.mainstreamnutrition.com/
Company Rep First Name	Stephen
Company Rep Middle Name	
Company Rep Last Name	Fangman
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	The service at this nutrition shop was beyond unacceptable. The worker suggested that I had a problem and needed their services in order to control myself. When I told him that I was offended he told me that this was simply my own opinion and that I should listen to his advice. I would never return to this place of business due to the extreme lack of respect and insults I received while there. --- Additional Comments: I would like others to know how terrible the customer service at this place of business is and urge them to try other places in order to fulfill their nutrition needs.',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 163 of 192	
Reference Number	42483910
Created Date	12/11/2012
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260009331561
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	12/11/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	12/11/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ROANOKE
Consumer Address, State Code	VA
Consumer Address, State Name	Virginia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International Inc.
Company Address, Line 1	1800 Century Park East
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CENTURY CITY
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90067
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Rep First Name	Stephen
Company Rep Middle Name	
Company Rep Last Name	Whittington
Company Rep Salutation	
Company Rep Comments	Contact
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	i received an e-mail for a home-based business that promised a great income but before i could view the video i had to remit $199.99. after i had opened the video i realized it was a pyramid scam thru herbalife. i contacted molly scott and informed her that i did not want to participate with her or herbalife. with many e-mails to molly scottand telephone calls to herbalife i was promised a refund if i sent all materials and products back. I did so. i talked to herbalife with them talking to molly scott and was promised a refund 12/07/2012. it has not arrived and now the refuse my telephone calls. i believe this to be a huge pyramid scam and only want my original $199.99 --- Additional Comments: $199.99',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 164 of 192	
Reference Number	42567526
Created Date	11/27/2012
Complaint Source	Iowa, Attorney General
Originator Reference Number	2012-142801
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	IA01-USER
Entered Date	11/27/2012
Updated By	IA01-USER
Updated Date	12/20/2012
Agency Contact	External Agency
Complaint Date	11/27/2012
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	FAIRFIELD
Consumer Address, State Code	IA
Consumer Address, State Name	Iowa
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	-
Consumer Home Phone, Number	-
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-
Consumer Work Phone, Number	-
Consumer Work Phone, Extension	-
Consumer Fax, Country Code	

	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	-
Consumer Age range	-
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	Herbalife International of America
Company Address, Line 1	950 W 190th Street
Company Address, Line 2	-
Company Address, Line 3	-
Company Address, City	TORRENCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	-
Company Phone, Country Code	-
Company Phone, Area Code	866
Company Phone, Number	8664744
Company Phone, Extension	-
Company Email	-
Company Website	-
Company Rep First Name	-
Company Rep Middle Name	-
Company Rep Last Name	-
Company Rep Salutation	-
Company Rep Comments	-
Complaint Info Initial Contact Method	-
Complaint Info Initial Contact Date	-
Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested	

Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	-
Complaint Info Product Service Code	1603
Complaint Info Product Service Description	Health Care: Other Products\Supplies
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Note: the Iowa Attorney General's Office is able to transmit only the company and consumer information but no other comments at this time.
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 165 of 192	
Reference Number	42821990
Created Date	12/12/2012
Complaint Source	Internet Crime Complaint Center
Originator Reference Number	I1212120027058622
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	IC3-USER
Entered Date	12/12/2012
Updated By	-
Updated Date	-
Agency Contact	External Agency
Complaint Date	12/12/2012
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	HONOLULU
Consumer Address, State Code	HI
Consumer Address, State Name	Hawaii
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-
Consumer Work Phone, Number	-
Consumer Work Phone, Extension	-

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	60 - 64
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	herbalife international
Company Address, Line 1	kept on file by herballfe interna-
Company Address, Line 2	tional
Company Address, Line 3	
Company Address, City	
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	2144184629
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Gary
Company Rep Middle Name	
Company Rep Last Name	Spergeon
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$500.00
Complaint Info Product Service Code	0346
Complaint Info Product Service Description	Spyware\Adware\Malware
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	NOTE: To prevent interference with pending law enforcement action, prior to any investigative action, please contact the IC3 at SEARCH@IC3.GOV. Please check the "CSN Record Details page - Data Reference field" link for further details on IC3 data. --- Incident description: I received an email from gary spergeon in the first part of september, the relationship is hostile and he is not supposed to be communicating with me, but I was singled out for an email soliciting a home based business and when I clicked on it my computer froze and an FBI page covered the screen asking for $200 to unblock the screen. the repairs cost a total of $450-500.00 including lost time from business and repairs from two computer companies. He admitted doing it but when I asked for payment of damages he ran away.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

DNC COMPLAINT

Record 166 of 192	
Reference Number	41768936
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	New Orleans
Consumer Address, State	LA
Consumer Address, State Name	Louisiana
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife
Company State	CA
Company Phone, Country Code	
Company Phone, Area Code	949
Company Phone, Number	2766513
Other Information Created Date	11/07/2012
Other Information Complaint Date	11/07/2012
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	11/07/2012
Other Information Transaction Time	00:00:00
Other Information Comments	This was a representative of Herbalife, asking me if I'd like to make $14000 per month selling Herbalife. I asked where she got my info, she claimed from another Herbalife rep. I informed her that I informed this other Herbalife rep. OVER SIX YEARS AGO to never call me again, and NEVER give my number out again as this was not the first time she's allegedly done so. This was the last contact I've had with Herbalife.
Other Information Existing Business	

Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 167 of 192	
Reference Number	38056030
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Bozeman
Consumer Address, State	MT
Consumer Address, State Name	Montana
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Incomeathome.com (Herbalife Distributors)
Company State	WA
Company Phone, Country Code	
Company Phone, Area Code	206
Company Phone, Number	3503987
Other Information Created Date	06/04/2012
Other Information Complaint Date	06/04/2012
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	12/11/2011
Other Information Transaction Time	00:00:00
Other Information Comments	This obnoxious scam has been operating on many of the talk radio shows nationwide. They charge $9.95 for information about what turns out to be a multi-level marketing scam and then won't take you off their robo call list unless we return the sales literature that WE paid for! They need to be stopped.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	Yes

Other Information Requested Entity to Stop Calling	Yes

Record 168 of 192	
Reference Number	34389852
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	-
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Address, Line 1	-
Consumer Address, Line 2	-
Consumer Address, City	-
Consumer Address, State	NC
Consumer Address, State Name	North Carolina
Consumer Address, ZIP Code	-
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife / Herbal Group
Company State	TF
Company Phone, Country Code	-
Company Phone, Area Code	800
Company Phone, Number	4717168
Other Information Created Date	01/10/2012
Other Information Complaint Date	01/10/2012
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	01/10/2012
Other Information Transaction Time	09:00:00
Other Information Comments	According to Internet phone websites, this company has been harassing a lot of people with telemarketing calls. Please stop them.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	No

Record 169 of 192	
Reference Number	25143067
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Tucson
Consumer Address, State	AZ
Consumer Address, State Name	Arizona
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Patricia Molina Herbalife.
Company State	FL
Company Phone, Country Code	
Company Phone, Area Code	941
Company Phone, Number	7298135
Other Information Created Date	01/18/2010
Other Information Complaint Date	01/18/2010
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	01/13/2010
Other Information Transaction Time	16:00:00
Other Information Comments	This is a business phone and fax machine. I work from home for an insurance company. One day they called every 3 minutes for hours. Until I took the phone off the hook. Now they are faxing me.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	No

Record 170 of 192	
Reference Number	27533416
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Las Vegas
Consumer Address, State	NV
Consumer Address, State Name	Nevada
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	herbalife
Company State	FL
Company Phone, Country Code	
Company Phone, Area Code	786
Company Phone, Number	8379055
Other Information Created Date	09/02/2010
Other Information Complaint Date	09/02/2010
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	09/01/2010
Other Information Transaction Time	09:00:00
Other Information Comments	It was about I won I $1000.00 prize but I have to paid $130.00 to claim my Prize, so I told the how I will cash my prize so they couldn't answer that, but now they are calling me stated that I have to pay them $600.00 becouse I did not pick up my "package" from the mail. It was a COD... How they got my number is a good question.. thnks for your help...
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to	

Stop Calling	Yes

Record 171 of 192	
Reference Number	38056198
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Bozeman
Consumer Address, State	MT
Consumer Address, State Name	Montana
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife
Company State	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	310410960043510
Other Information Created Date	06/04/2012
Other Information Complaint Date	06/04/2012
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	12/11/2011
Other Information Transaction Time	00:00:00
Other Information Comments	This obnoxious scam has been operating on many of the talk radio shows nationwide. They charge $9.95 for information about what turns out to be a multi-level marketing scam (Herbalife) and then won't take people off their robo call list unless we return the sales literature that WE paid for! They need to be stopped.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	Yes

Other Information Requested Entity to Stop Calling	Yes

Record 172 of 192	
Reference Number	34443955
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Westport
Consumer Address, State	CT
Consumer Address, State Name	Connecticut
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Some Herbalife type of company
Company State	NJ
Company Phone, Country Code	
Company Phone, Area Code	201
Company Phone, Number	3834870
Other Information Created Date	01/12/2012
Other Information Complaint Date	01/12/2012
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	01/12/2012
Other Information Transaction Time	15:00:00
Other Information Comments	When I asked to be removed from their call list, she hung up on me.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 173 of 192	
Reference Number	34640340
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, City	
Consumer Address, State	IL
Consumer Address, State Name	Illinois
Consumer Address, ZIP Code	
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife
Company State	TF
Company Phone, Country Code	
Company Phone, Area Code	800
Company Phone, Number	4717168
Other Information Created Date	01/26/2012
Other Information Complaint Date	01/26/2012
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	01/26/2012
Other Information Transaction Time	09:00:00
Other Information Comments	
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	No

Record 174 of 192	
Reference Number	36937858
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Bozeman
Consumer Address, State	MT
Consumer Address, State Name	Montana
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	IncomeAtHome.com (Herbalife Distributor)
Company State	WA
Company Phone, Country Code	
Company Phone, Area Code	425
Company Phone, Number	6065130
Other Information Created Date	04/23/2012
Other Information Complaint Date	04/23/2012
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	04/22/2012
Other Information Transaction Time	19:00:00
Other Information Comments	I have tried multiple times to get these calls to stop. I've left multiple messages with the distributor (Bob & Jan at www.turboatm.com) and have called Herbalife corporate HQ multiple times. I'm being ignored by everyone. They should be fined until they get the message that they are violating people's privacy. This is a nationwide marketing campaign by a group of independent Herbalife distributors. They advertise on several conservative talk radio shows (Rush Limbaugh, Sean Hannity, Michael Savage,

	etc.) Please investigate and you will find that you probably have many complaints about their tactics, which are to collect a phone number through their website. If you tell them you're not interested in their MLM scheme they leave you on their robo-call list and call you weekly regardless of your requests to stop. What they do is not just unethical, it is illegal. Thank you. (b)(6)
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	Yes
Other Information Requested Entity to Stop Calling	Yes

Record 175 of 192	
Reference Number	10954774
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Temecula
Consumer Address, State	CA
Consumer Address, State Name	California
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife Distr.
Company State	CA
Company Phone, Country Code	
Company Phone, Area Code	951
Company Phone, Number	4910145
Other Information Created Date	07/02/2007
Other Information Complaint Date	06/29/2007
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	WEB
Other Information Transaction Date	06/29/2007
Other Information Transaction Time	23:00:00
Other Information Comments	
Other Information Existing Business Relationship	
Other Information Pre-Recorded Message	
Other Information Requested Entity to Stop Calling	

Record 176 of 192	
Reference Number	11407317
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	napa
Consumer Address, State	CA
Consumer Address, State Name	California
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife
Company State	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Other Information Created Date	08/28/2007
Other Information Complaint Date	08/27/2007
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	WEB
Other Information Transaction Date	08/10/2007
Other Information Transaction Time	00:00:00
Other Information Comments	
Other Information Existing Business Relationship	
Other Information Pre-Recorded Message	
Other Information Requested Entity to Stop Calling	

Record 177 of 192	
Reference Number	25096312
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, City	
Consumer Address, State	MI
Consumer Address, State Name	Michigan
Consumer Address, ZIP Code	
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Kelly Heffernan Herbalife
Company State	MI
Company Phone, Country Code	
Company Phone, Area Code	269
Company Phone, Number	7688623
Other Information Created Date	01/12/2010
Other Information Complaint Date	01/12/2010
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	01/08/2010
Other Information Transaction Time	12:00:00
Other Information Comments	
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 178 of 192	
Reference Number	25138905
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	clearwater
Consumer Address, State	FL
Consumer Address, State Name	Florida
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife Ind. Dist/Patricia Molina
Company State	FL
Company Phone, Country Code	
Company Phone, Area Code	941
Company Phone, Number	7298135
Other Information Created Date	01/17/2010
Other Information Complaint Date	01/17/2010
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	01/16/2010
Other Information Transaction Time	17:00:00
Other Information Comments	These are phone FAXES being sent. We've taken our Phone # off mailing list online like they suggested. The call before this one was at 3:30am about a week ago and woke us out of a deep sleep. We don't know how they got our number to begin with. Thanks for any help you can provide!
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 179 of 192	
Reference Number	27283434
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Miami
Consumer Address, State	FL
Consumer Address, State Name	Florida
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Justin - Herbalife
Company State	FL
Company Phone, Country Code	
Company Phone, Area Code	305
Company Phone, Number	4329918
Other Information Created Date	08/09/2010
Other Information Complaint Date	08/09/2010
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	08/09/2010
Other Information Transaction Time	09:00:00
Other Information Comments	When I told him I was on the Do Not Call Registry he wanted to argue and ask if I paid for the service, etc.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 180 of 192	
Reference Number	13754244
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	norfolk
Consumer Address, State	NE
Consumer Address, State Name	Nebraska
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	herbalife ind d
Company State	NE
Company Phone, Country Code	
Company Phone, Area Code	402
Company Phone, Number	8418080
Other Information Created Date	05/07/2008
Other Information Complaint Date	05/06/2008
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	WEB
Other Information Transaction Date	05/06/2008
Other Information Transaction Time	12:00:00
Other Information Comments	
Other Information Existing Business Relationship	
Other Information Pre-Recorded Message	
Other Information Requested Entity to Stop Calling	

Record 181 of 192	
Reference Number	27562897
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, City	Phoenix
Consumer Address, State	AZ
Consumer Address, State Name	Arizona
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife
Company State	AZ
Company Phone, Country Code	
Company Phone, Area Code	520
Company Phone, Number	5826337
Other Information Created Date	09/03/2010
Other Information Complaint Date	09/03/2010
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	09/03/2010
Other Information Transaction Time	14:00:00
Other Information Comments	This company always calls twice 1. First call hangs up on my voice mail message 2. Second call leaves a recorded message asking to call the number provided for information about their products.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	Yes
Other Information Requested Entity to Stop Calling	No

Record 182 of 192	
Reference Number	30121659
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	West Bend
Consumer Address, State	WI
Consumer Address, State Name	Wisconsin
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Some marketing company for some Herbalife
Company State	WI
Company Phone, Country Code	
Company Phone, Area Code	414
Company Phone, Number	4463791
Other Information Created Date	04/19/2011
Other Information Complaint Date	04/19/2011
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	04/19/2011
Other Information Transaction Time	14:00:00
Other Information Comments	I've asked this company and it's parent company countless times to stop calling you. Now I wish to file a complaint.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 183 of 192	
Reference Number	24322798
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	
Consumer Address, Line 2	
Consumer Address, City	Sunnyvale
Consumer Address, State	CA
Consumer Address, State Name	California
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife in Mexico
Company State	CA
Company Phone, Country Code	
Company Phone, Area Code	916
Company Phone, Number	9338837
Other Information Created Date	10/15/2009
Other Information Complaint Date	10/15/2009
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	10/15/2009
Other Information Transaction Time	10:00:00
Other Information Comments	This is a recorded message in Spanish so I don't know for sure what is being said. I do not use Herbalife products. I get 1 - 7 call a week This is a company phone.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	Yes
Other Information Requested Entity to Stop Calling	No

Record 184 of 192	
Reference Number	41241453
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Carlsbad
Consumer Address, State	CA
Consumer Address, State Name	California
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife (or something like that)
Company State	CA
Company Phone, Country Code	
Company Phone, Area Code	619
Company Phone, Number	6005691
Other Information Created Date	10/16/2012
Other Information Complaint Date	10/16/2012
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	10/16/2012
Other Information Transaction Time	00:00:00
Other Information Comments	
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 185 of 192	
Reference Number	33553568
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Sahuarita
Consumer Address, State	AZ
Consumer Address, State Name	Arizona
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	HERBALIFE
Company State	CA
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Other Information Created Date	11/17/2011
Other Information Complaint Date	11/17/2011
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	11/17/2011
Other Information Transaction Time	12:00:00
Other Information Comments	I asked this company to stop calling us via email on 11/16/2011. I have records to prove so. However, they called back today. I refused to answer and sent them another email to stop calling me and, instead, email me. Thank you.
Other Information Existing Business Relationship	Yes
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 186 of 192	
Reference Number	25421967
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	clearwater
Consumer Address, State	FL
Consumer Address, State Name	Florida
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Herbalife Ind. Dist/Patricia Molina
Company State	FL
Company Phone, Country Code	
Company Phone, Area Code	941
Company Phone, Number	7298135
Other Information Created Date	02/12/2010
Other Information Complaint Date	02/12/2010
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	02/11/2010
Other Information Transaction Time	17:00:00
Other Information Comments	
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 187 of 192	
Reference Number	27026298
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, City	Highlands Ranch
Consumer Address, State	CO
Consumer Address, State Name	Colorado
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Tony from Herbalife
Company State	CO
Company Phone, Country Code	-
Company Phone, Area Code	303
Company Phone, Number	5008785
Other Information Created Date	07/15/2010
Other Information Complaint Date	07/15/2010
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	07/15/2010
Other Information Transaction Time	21:00:00
Other Information Comments	The person that called was completely arrogant and told me the the do not call registry is a pay service, constantly interrupted me telling me about male enhancement products and then hung up on me when I told him I would be filing a complaint against him and the company. If there is any way to pursue further action against this company I would like to do so.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No

Other Information Requested Entity to Stop Calling	Yes

Record 188 of 192	
Reference Number	19344056
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	hallandale
Consumer Address, State	FL
Consumer Address, State Name	Florida
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	herbalife
Company State	TF
Company Phone, Country Code	
Company Phone, Area Code	877
Company Phone, Number	6983261
Other Information Created Date	06/19/2008
Other Information Complaint Date	06/19/2008
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	06/19/2008
Other Information Transaction Time	12:00:00
Other Information Comments	SPEAK SPANISH
Other Information Existing Business Relationship	
Other Information Pre-Recorded Message	
Other Information Requested Entity to Stop Calling	

Record 189 of 192	
Reference Number	29147115
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, City	Augusta
Consumer Address, State	KS
Consumer Address, State Name	Kansas
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Income at home herbalife
Company State	AZ
Company Phone, Country Code	
Company Phone, Area Code	520
Company Phone, Number	3031340
Other Information Created Date	02/09/2011
Other Information Complaint Date	02/09/2011
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	02/09/2011
Other Information Transaction Time	18:00:00
Other Information Comments	I originally contacted the company about earning money from home but once I found out that it was selling Herbalife I requested that they remove my information and not call me. I have received several calls from them and have requested each time that they not call. The caller this evening made some rude noises and hung up when I told him that I had requested his company not to call several times and that my number was on the do not call list. I believe that the company may have sold my information to others.

Other Information Existing Business Relationship	Yes
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 190 of 192	
Reference Number	21146668
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	Berkeley
Consumer Address, State	CA
Consumer Address, State Name	California
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Lissa Munson - Home-Based Business (Herbalife?)
Company State	MT
Company Phone, Country Code	
Company Phone, Area Code	406
Company Phone, Number	5492509
Other Information Created Date	12/13/2008
Other Information Complaint Date	12/13/2008
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	12/13/2008
Other Information Transaction Time	10:00:00
Other Information Comments	This person said I requested information from a web-site. I never did. She refused to give me the e-mail address on her "list." A company named Quinstreet, Inc. appears to be selling "fake" e-mail addresses attached to real phone numbers and addresses to allow businesses to call and do solicitation. This happened in Nov. with a number of window replacement companies, all said they got an e-mail request from me. One finally told me the e-mail it was NOT even close to my e-mail. He named the firm that he

	bought the list from as "Quinstreet".
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 191 of 192	
Reference Number	30121650
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	West Bend
Consumer Address, State	WI
Consumer Address, State Name	Wisconsin
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	Some herbalife marketing company
Company State	WI
Company Phone, Country Code	
Company Phone, Area Code	414
Company Phone, Number	4463791
Other Information Created Date	04/19/2011
Other Information Complaint Date	04/19/2011
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	04/19/2011
Other Information Transaction Time	14:00:00
Other Information Comments	I've asked this company and it's parent company countless times to stop calling you. Now I wish to file a complaint.
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	No
Other Information Requested Entity to Stop Calling	Yes

Record 192 of 192	
Reference Number	31731872
Complaint Source	National Do Not Call Registry
Phone In Registry?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, City	aberdeen
Consumer Address, State	WA
Consumer Address, State Name	Washington
Consumer Address, ZIP Code	b(6)
Consumer Phone, Area Code	b(6)
Consumer Phone, Number	b(6)
Company Name	herbalife (indpendent distributor)
Company State	PA
Company Phone, Country Code	
Company Phone, Area Code	267
Company Phone, Number	2857666
Other Information Created Date	07/29/2011
Other Information Complaint Date	07/29/2011
Other Information Product Service Description	National Do Not Call Registry
Other Information Organization	National Do Not Call Registry
Other Information Complaint Channel	Web
Other Information Transaction Date	07/29/2011
Other Information Transaction Time	14:00:00
Other Information Comments	This annoying person left 2 very long messages on my machine today. I want him stopped!!! Thank you
Other Information Existing Business Relationship	No
Other Information Pre-Recorded Message	Yes
Other Information Requested Entity to Stop Calling	Yes

As a Consumer Sentinel Network member, you must properly protect any information printed, downloaded, or otherwise removed from the Network as stated in OMB Memo M-06-16. Please delete or destroy this information within 90 days unless its use is still required for law enforcement purposes. When destroying the information you should burn, pulverize, or shred the information saved in paper format and destroy or erase information that has been saved electronically so that it cannot practicably be read or reconstructed. Proper erasure of electronic information must include the overwriting or "wiping" of the information from the electronic media on which it is stored.

Provided by the Federal Trade Commission

CONSUMER

NETWORK

Law enforcement's source for consumer complaints

CIS COMPLAINT

Record 1 of 192	
Reference Number	9685067
Created Date	01/03/2007
Complaint Source	FTC Call Center
Originator Reference Number	-
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	BMORGAN
Entered Date	01/03/2007
Updated By	-
Updated Date	-
Agency Contact	Phone
Complaint Date	-
Transaction Date	01/07/2006
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	Brampton
Consumer Address, State Code	ON
Consumer Address, State Name	Ontario, Canada
Consumer Address, Country Code	CAN
Consumer Address, Country Name	CANADA
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-

Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	40 - 49
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	

Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	01/07/2006
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$290.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer wants to know if a company Herbalife is a legitimate company. Consumer states he found them in an internet search. Consumer states they are offering him a multilevel marketing plan. Consumer was asked to pay 290.00 to join.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 2 of 192	
Reference Number	9978524
Created Date	02/08/2007
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	WFRIDAY
Entered Date	02/08/2007
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	02/06/2007
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Stilwater
Consumer Address, State Code	OK
Consumer Address, State Name	Oklahoma
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	TV/Radio
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	$2000.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$30.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	After seeing a TV ad that promoted Home based business by Internet I logged into the site and was astonished to find it was Herbalife only after paying $30 for a booklet that came in the mail. I was not able to discover this from the website that I logged into. Seems to me that the TV ads ought to be regulated by federal law which would require truth in advertising, whereby companies were required to state up front their business name in the initial TV/Radio/Internet ad or print media.
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 3 of 192	
Reference Number	10213230
Created Date	03/13/2007
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	JXHEINY
Entered Date	03/13/2007
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	03/11/2007
Transaction Date	01/27/2007
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Boca Raton
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	b(6)
Consumer Age range	30 - 39
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	Herbalife
Company Address, Line 1	-
Company Address, Line 2	-
Company Address, Line 3	-
Company Address, City	-
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	-
Company Address, ZIP Code Extension	-
Company Phone, Country Code	-
Company Phone, Area Code	-
Company Phone, Number	-
Company Phone, Extension	-
Company Email	-
Company Website	-
Company Rep First Name	Kayra
Company Rep Middle Name	-
Company Rep Last Name	Nieves
Company Rep Salutation	-
Company Rep Comments	-
Complaint Info Initial Contact Method	In Person
Complaint Info Initial Contact Date	01/27/2007
Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	$145.50
Complaint Info Amount Paid Method	MasterCard Credit Card
Complaint Info Amount Paid Value	$145.50
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	LJD
Complaint Info Law Violation Description	Prompt Refund Not Received
Complaint Info Statute Code	UU
Complaint Info Statute Description	Mail or Telephone Merchandise Order Rule
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	(Product Name: Herbalife Weight Loss Products) I purchased Herbalife weight loss products from Representative Kayra Nieves on February 8, 2007. My credit card was billed on February 9, 2007. After two weeks after taken these products I started having stomach pains, and my skin turned yellow-orange. I e-mailed Ms. Nieves on February 27, 2007 to explain what was going on, and to request my money back. Ms. Nieves responded to my e-mail saying it was over the 30-day period to get my money back. The fact is that I was within the 30-day period to have my money refunded. Now I have to go to a skin doctor and pay from my pocket for what these products did to me.
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 4 of 192	
Reference Number	10244124
Created Date	02/06/2007
Complaint Source	BBB MO Saint Louis
Originator Reference Number	07340001314755
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	BBBSTL
Entered Date	02/06/2007
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	02/06/2007
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DRAYTON VALLEY
Consumer Address, State Code	AB
Consumer Address, State Name	Alberta, Canada
Consumer Address, Country Code	CAN
Consumer Address, Country Name	CANADA
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	The Online Business Systems Herbalife
Company Address, Line 1	6086 Germania Rd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	PARK HILLS
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	636019331
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	573
Company Phone, Number	2253137
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Advertising Issues
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 5 of 192	
Reference Number	10503971
Created Date	04/26/2007
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	LSHARP
Entered Date	04/26/2007
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	04/25/2007
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Rockford
Consumer Address, State Code	IL
Consumer Address, State Name	Illinois
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	e-Team Online Fulfillment--Herbalife, Agustin Pascual
Company Address, Line 1	2029 Westgate Dr. #120
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Carrollton
Company Address, State Code	TX
Company Address, State Name	Texas
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	75006
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	909
Company Phone, Number	899-7821
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Aqustin(Sandy)
Company Rep Middle Name	
Company Rep Last Name	PASCUAL
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Mail
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$9.95
Complaint Info Amount Paid Method	Discover Credit Card
Complaint Info Amount Paid Value	$9.95
Complaint Info Product Service Code	0318
Complaint Info Product Service Description	Shop-at-Home\Catalog Sales
Complaint Info Law Violation Code	LJD
Complaint Info Law Violation Description	Prompt Refund Not Received
Complaint Info Statute Code	UU
Complaint Info Statute Description	Mail or Telephone Merchandise Order Rule
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	(Product Name: Free Training Package from Home Bussiness Solutions) On Saturday, April 07,2007 I ordered "Free Training Package from Bussiness Solutions". And I received my order, on Tuesday, April 10,2007. On Thursday, April 12,2007 I returned my package to e-team Online Fulfillment(please see their address). I sent a few e-mails to Sandy Pascual and I made a few phone calls. To date, my request for reimbursement have been ignored. Please help me to get my money back +interest. Thank you for your attention to this matter. Thank you for your cooperation. Sincerely, (b)(6)
Complaint Info CRA Dispute Flag	Y
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 6 of 192	
Reference Number	10552269
Created Date	05/03/2007
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	RLOPER
Entered Date	05/03/2007
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	05/02/2007
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Gridley
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Torrance
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502-1001
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Gordon
Company Rep Middle Name	
Company Rep Last Name	Townsend
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	TV/Radio
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	$800.00
Complaint Info Amount Paid Method	MasterCard Credit Card
Complaint Info Amount Paid Value	$800.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	(Product Name: Distributor start up kit) Spoke to Mr. Townsend about becoming a distributor for Herbalife. Ordered the starter kit. Changed my mind and asked to return the starter kit for a refund on 2/12/07. Was told I needed an authorization to return merchandise. Finally received authorization on 4/4/07. Returned merchandise same day. They received it on 4/9/07. Still have not received a refund for the merchandise.
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 7 of 192	
Reference Number	11007151
Created Date	07/11/2007
Complaint Source	Federal Trade Commission
Originator Reference Number	-
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	EANDERSON
Entered Date	07/11/2007
Updated By	JOB: Set_TCS_Flag
Updated Date	08/01/2007
Agency Contact	Mail
Complaint Date	07/10/2007
Transaction Date	06/22/2007
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	Ozark
Consumer Address, State Code	AL
Consumer Address, State Name	Alabama
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Torrance
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502-1001
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	06/22/2007

Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Consumer has a complaint regarding a request got a refund for products returned to the company. They state that the company is guilty of the sin of omission by not telling the entire story prior to taking money from uninformed individuals. The first thing is nondisclosure before signing of contract and costs for advertising of $2500 per month minimum for building and $107 per week for retail sales. Regarding the scripts provided by Herb life, they were compelled to use these verbatim which did not disclose all of the hidden costs. They have enclosed copies of all related documents.
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 8 of 192	
Reference Number	11416889
Created Date	03/28/2007
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260097012009
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	BBBPHAZ
Entered Date	03/28/2007
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/28/2007
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PHOENIX
Consumer Address, State Code	AZ
Consumer Address, State Name	Arizona
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International Inc.
Company Address, Line 1	1800 Century Park East
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CENTURY CITY
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90067
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Advertising Issues
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 9 of 192	
Reference Number	11421753
Created Date	03/23/2007
Complaint Source	BBB MO Saint Louis
Originator Reference Number	07340001309733
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	BBBSTL
Entered Date	03/23/2007
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/23/2007
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	COVINGTON
Consumer Address, State Code	LA
Consumer Address, State Name	Louisiana
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	The Online Business Systems Herbalife
Company Address, Line 1	6086 Germania Rd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	PARK HILLS
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	636019331
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	573
Company Phone, Number	2253137
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$399.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Refund or Exchange Issues
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 10 of 192	
Reference Number	11435714
Created Date	04/25/2007
Complaint Source	BBB IL Chicago
Originator Reference Number	06540094115633
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	BBBCHIC
Entered Date	04/25/2007
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	04/25/2007
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PALMDALE
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Online Business Systems/Herbalife
Company Address, Line 1	2512 Bordeaux Lane
Company Address, Line 2	#207
Company Address, Line 3	
Company Address, City	NAPERVILLE
Company Address, State Code	IL
Company Address, State Name	Illinois
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	60540
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	630
Company Phone, Number	3553758
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$438.90
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Refund or Exchange Issues
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 11 of 192	
Reference Number	11467095
Created Date	05/10/2007
Complaint Source	BBB BC Vancouver
Originator Reference Number	00370001212419
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	BBBVABC
Entered Date	05/10/2007
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	05/10/2007
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	TUCSON
Consumer Address, State Code	AZ
Consumer Address, State Name	Arizona
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife Distributor Dollina Rodocker
Company Address, Line 1	2 27090 32 Ave
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LANGLEY
Company Address, State Code	BC
Company Address, State Name	British Columbia, Canada
Company Address, Country Code	CAN
Company Address, Country Name	CANADA
Company Address, ZIP Code	V4W1A1
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	604
Company Phone, Number	8579591
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Refund or Exchange Issues
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 12 of 192	
Reference Number	11534222
Created Date	08/10/2007
Complaint Source	BBB IL Chicago
Originator Reference Number	06540094130025
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	BBBCHIC
Entered Date	08/10/2007
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/10/2007
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	NORTH LAUDERDALE
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Online Business Systems/Herbalife
Company Address, Line 1	2512 Bordeaux Lane
Company Address, Line 2	#207
Company Address, Line 3	
Company Address, City	NAPERVILLE
Company Address, State Code	IL
Company Address, State Name	Illinois
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	60540
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	630
Company Phone, Number	3553758
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$39.99
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Refund or Exchange Issues
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 13 of 192	
Reference Number	11845799
Created Date	10/12/2007
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	ASMITLEY
Entered Date	10/12/2007
Updated By	JOB: Upd_internet_related
Updated Date	10/13/2007
Agency Contact	Internet
Complaint Date	10/09/2007
Transaction Date	04/01/2007
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Walla Walla
Consumer Address, State Code	WA
Consumer Address, State Name	Washington
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	b(6)
Consumer Fax, Country Code	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	Herbalife International
Company Address, Line 1	P.O. Box 80210
Company Address, Line 2	-
Company Address, Line 3	-
Company Address, City	Los Angeles
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90080-0210
Company Address, ZIP Code Extension	-
Company Phone, Country Code	-
Company Phone, Area Code	866
Company Phone, Number	866-4744
Company Phone, Extension	-
Company Email	-
Company Website	-
Company Rep First Name	Ann
Company Rep Middle Name	-
Company Rep Last Name	Gallup
Company Rep Salutation	-
Company Rep Comments	-
Complaint Info Initial Contact Method	Internet (Other)
Complaint Info Initial Contact Date	04/01/2007

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	$2300.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$4088.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	(Product Name: Herbalife International of America, Inc.) After researching home-based businesses on the internet, I received a telephone call from Ann Gallup who, after calling me several times, convinced me to try a home business in which I would be selling health and nutrition products according to her. I was skeptical but she convinced me to join at the supervisor level and told me that I would not be calling anyone or going out in the public to sell but that my customers would come to my website and that I would make a lot of money. She lead me to believe that the total cost would be 2300. I found out later that I would have to do a great deal of telemarketer type calling, purchase expensive internet leads and many other expenses would be included as well. I was charged 4088.42 instead of 2300 and I immediately asked her about it and told her that I needed to return the large amount of product she sent me, that I needed to be at the basic distributor level. She only tried to change my mind and then never heard from her again. This seems like a pyramid scheme and a scam to me. She had told me that I would receive a complete refund if I was

	dissatisfied and that I could work very part-time. All lies. She convinced me to try the products so could not return the opened ones. There were more expenses through the ioffice on the internet which provides training for home business. I had set up and pay for a website, merchant account, business cards, new phone line, new phone, ehome business network charge, buttons to wear in public, etc.. After returning 3500.00 worth of product total, I was credited only 2100 on my visa and was informed my herbalife that I was charged a 10 % fee for restocking and that I would not be credited for shipping and handling. That 3500 did not include s & h , only product costs. I paid the s & h cost to return all of it.
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 14 of 192	
Reference Number	11860755
Created Date	10/17/2007
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	WFRIDAY
Entered Date	10/17/2007
Updated By	JOB: Upd_internet_related
Updated Date	10/18/2007
Agency Contact	Internet
Complaint Date	10/15/2007
Transaction Date	07/10/2007
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Santa Maria
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	-
Consumer Fax, Country Code	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	Herbalife International
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	-
Company Address, Line 3	-
Company Address, City	Torrance
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502-1001
Company Address, ZIP Code Extension	-
Company Phone, Country Code	-
Company Phone, Area Code	310
Company Phone, Number	410-9600
Company Phone, Extension	-
Company Email	-
Company Website	-
Company Rep First Name	Claudya
Company Rep Middle Name	-
Company Rep Last Name	Galvan
Company Rep Salutation	-
Company Rep Comments	-
Complaint Info Initial Contact Method	Internet (Other)
Complaint Info Initial Contact Date	07/10/2007

Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$3200.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$3200.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	(Product Name: Products Returned-No Refund honored - Denied Refund) Through a webswite I contacted what turned out to a an Herbalife representative in 6/21/2007. I purchased after signing up with Herbalife online with Kathy Wasko, inventory amount $3132.86, received by me on 6/23/2007. After initial training I decided that this wasn't for me. on 7/2/07 I requested a refund from Herbalife, all within the 30-DY MONEY BACK GUAR time frame. I contacted Herbalaife, Claudya Galvan-Refund/Repurchase Dept. and followed all instructions, including shipping back four lrg. boxes of inventory at my expense. After 3 months, on Oct 10, 2007 I received a letter denying my refund of over $3000 due to "Other: No Distributor Application returned". Never was asked for this form, fully complied with their request, and now I am making formal complaint and demand for my $3,132.86 from Herbalife immediately!
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute	

Resolved	

Record 15 of 192	
Reference Number	12135397
Created Date	10/10/2007
Complaint Source	Internet Crime Complaint Center
Originator Reference Number	ICCC571593
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	IC3-USER
Entered Date	10/10/2007
Updated By	IC3-USER
Updated Date	02/20/2008
Agency Contact	External Agency
Complaint Date	10/10/2007
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	PINE CITY
Consumer Address, State Code	MN
Consumer Address, State Name	Minnesota
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-
Consumer Work Phone, Number	-
Consumer Work Phone, Extension	-

Consumer Fax, Country Code	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	b(6)
Consumer Age range	-
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	Herbalife Textile CO. LTD INT Textiles Company
Company Address, Line 1	Ivy Mill, Lorne Street Bolton BL47L
Company Address, Line 2	-
Company Address, Line 3	-
Company Address, City	-
Company Address, State Code	-
Company Address, State Name	-
Company Address, Country Code	GBR
Company Address, Country Name	UNITED KINGDOM
Company Address, ZIP Code	-
Company Address, ZIP Code Extension	-
Company Phone, Country Code	-
Company Phone, Area Code	-
Company Phone, Number	-
Company Phone, Extension	-
Company Email	-
Company Website	-
Company Rep First Name	Benjamin
Company Rep Middle Name	-
Company Rep Last Name	Taylor
Company Rep Salutation	-
Company Rep Comments	-
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	-
Complaint Info Initial Response Method	-

Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	9000
Complaint Info Product Service Description	Other (Note in Comments)
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	ICCC Ref # I0710101009365782:On Monday, 10-8-07, I received an email from an individual supposedly from the UK asking me to take part in his company by working part-time doing check cashing and sending funds back to him/her via Western Union. I knew this was a fraudulent offer, seeing as how he/she names their company "Herbalife Textile...", as I have worked for the legitamit "Herbalife" company for the past 2 years or so. However, I responded to his offer so as to get more information from this individual in the event that further correspondence with him/her would help you investigate the matter more effectively. Please note that no money has changed hands in this matter. However, I suspect that I am not the only target in this situation, and that there are folks out there that would likely or have already taken part in this scheme without the knowledge that it is fraudulent. You will see in my email correspondence with this individual that I used a bogus name for myself so he/she would not be able to accurately identify me by name, and I did receive a response from him/her. Below you will see that I have copied and pasted the entire correspondence from the initial email through to my latest response from just this morning, and I suspect I will receive more

	from him/her in the next 24-48 hours. I am hoping that I can assist you in some way in tracking down the individual(s) who is/are attempting this fraud. Please let me know if there is any other information you might need from me. I would also be interested in learning what action is being taken against this/these criminal(s) if that would be possible. I hope this information proves beneficial to
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 16 of 192	
Reference Number	12432890
Created Date	11/06/2007
Complaint Source	BBB TX Austin
Originator Reference Number	08250090113181
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	BBBCSCTX
Entered Date	11/06/2007
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	11/06/2007
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	AUSTIN
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International Monica Wells
Company Address, Line 1	9624 Woody Ridge View
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	AUSTIN
Company Address, State Code	TN
Company Address, State Name	Tennessee
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	78730
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	512
Company Phone, Number	2585564
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$464.88
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	-
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 17 of 192	
Reference Number	12562271
Created Date	12/09/2007
Complaint Source	BBB IL Chicago
Originator Reference Number	06540094152467
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	BBBCHIC
Entered Date	12/09/2007
Updated By	-
Updated Date	-
Agency Contact	External Agency
Complaint Date	12/09/2007
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	STOCKBRIDGE
Consumer Address, State Code	GA
Consumer Address, State Name	Georgia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	-
Consumer Home Phone, Number	-
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Online Business Systems/Herbalife
Company Address, Line 1	2512 Bordeaux Lane
Company Address, Line 2	#207
Company Address, Line 3	
Company Address, City	NAPERVILLE
Company Address, State Code	IL
Company Address, State Name	Illinois
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	60540
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	630
Company Phone, Number	3553758
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$48.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Refund or Exchange Issues
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 18 of 192	
Reference Number	13186238
Created Date	03/07/2008
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	RLOPER
Entered Date	03/07/2008
Updated By	JOB: Upd_internet_related
Updated Date	03/08/2008
Agency Contact	Mail
Complaint Date	09/09/2007
Transaction Date	04/22/2007
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Norfolk
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet Web Site
Complaint Info Initial Contact Date	04/22/2007

Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	$1204.00
Complaint Info Amount Paid Method	Other Credit Card
Complaint Info Amount Paid Value	$1204.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	MAIL: This complaint was filed with the NY AG's Office and has been forwarded to the FTC. Consumer complains that he signed up to start an online business for the Herbalife System. He was asked to buy a starter pack for $385.00 which was billed to his credit card. Later, he was asked to pay $819.00, and he did. Consumer then concluded that he could not make anything at the business. Consumer wants his money back. No phone number or e-mail is listed for the consumer.
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 19 of 192	
Reference Number	13201409
Created Date	03/10/2008
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	RBROWN1
Entered Date	03/10/2008
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	03/09/2008
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	oaklnad park
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	30 - 39
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	13794 th nw 4 st suite 206
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	sunrise
Company Address, State Code	FL
Company Address, State Name	Florida
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	33325
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Maria Helena Ramos
Company Rep Middle Name	
Company Rep Last Name	03/08/2008
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Phone
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$65.00
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0617
Complaint Info Product Service Description	Non-Alcoholic Beverages
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	(Product Name: 1 meregade, aloe vera drink , rusberry drink) i went to a mysterious job meetting, the person to contact never was there, but somebody called her and she gave me the excuse, im sick, no matter because somebody get her place to introduce the company, so we went to a room to talk about the product..benefices, testimonies, food piramide, etc after a while everybody was testing of Herbalife products and from that time, around 2 hour later i stared to had experienced headache, constipation, nausea, lightheadedness, palpitations, and/or other transient symptoms that might be attributable to Herbalife products. thank and if you need more info about it, im here to do it.
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 20 of 192	
Reference Number	13261683
Created Date	03/14/2008
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	LKILPATRICK
Entered Date	03/14/2008
Updated By	
Updated Date	
Agency Contact	Mail
Complaint Date	11/26/2007
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	College Park
Consumer Address, State Code	MD
Consumer Address, State Name	Maryland
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	2587155
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Phone
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	Phone: 800/888 number
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$40.00
Complaint Info Amount Paid Method	Other Credit Card
Complaint Info Amount Paid Value	$40.00
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	MAIL: The consumer wrote that she decided to rejoin Herbalife and contacted a rep who told her that it would cost $10 to rejoin. The consumer had been a member in 2003 and was charged the $10 for each of the years 2004, 2005, and 2006 plus the current year of 2007. When the consumer told the company that they couldn't charge her for the years that she didn't use the service she for the three years, but the company didn't agree. No alternate ph # or email address for consumer.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 21 of 192	
Reference Number	13702999
Created Date	04/30/2008
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	RBROWN1
Entered Date	04/30/2008
Updated By	
Updated Date	
Agency Contact	Mail
Complaint Date	03/12/2008
Transaction Date	03/12/2008
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Oakland Park
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	03/12/2008
Complaint Info Initial Response	

Method	In Person
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	MAIL: The consumer writes that he visited Herbalife to obtain herbal remedies. The consumer notes that after taking them, he felt sick. The consumer also feels that Herbalife is trying to brainwash people with a food pyramid. No home #, work # or email address was provided.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 22 of 192	
Reference Number	13791147
Created Date	05/12/2008
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	JHART
Entered Date	05/12/2008
Updated By	JOB: Upd_internet_related
Updated Date	05/13/2008
Agency Contact	Internet
Complaint Date	05/08/2008
Transaction Date	05/07/2008
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Gainesville
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	30 - 39
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Laurent Trust (LT) Ltd, t/a 60minute money. / Herbalife
Company Address, Line 1	10391 e hwy 120
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	manteca city
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	95336
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	209
Company Phone, Number	8235968
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	05/07/2008
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$45.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$45.00
Complaint Info Product Service Code	0334
Complaint Info Product Service Description	Internet Access Services
Complaint Info Law Violation Code	CS1
Complaint Info Law Violation Description	SPAM: 'Remove Me' is missing, broken, or ignored
Complaint Info Statute Code	CS
Complaint Info Statute Description	CAN-SPAM Act
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	(Product Name: cannot unsubscribe from e-mail list) Cannot unsubscribe from e-mail marketing list.
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 23 of 192	
Reference Number	13961776
Created Date	06/03/2008
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	SSCHWARTZ
Entered Date	06/03/2008
Updated By	JOB: Set_TCS_Flag
Updated Date	06/04/2008
Agency Contact	Phone
Complaint Date	
Transaction Date	06/03/2008
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Cleveland
Consumer Address, State Code	OH
Consumer Address, State Name	Ohio
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	06/03/2008

Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	$500.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$500.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Consumer states that he has ordered abunch of material to distribute for his job. Consumer states that he did this through the on-line system. Consumer states that they ave put new materials out and now will not take the old materials back
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 24 of 192	
Reference Number	19568692
Created Date	07/16/2008
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	
DNC?	N
Entered By	lkilpratrick
Entered Date	07/16/2008
Updated By	lkilpratrick
Updated Date	07/16/2008
Agency Contact	Mail
Complaint Date	07/16/2008
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Hartsdale
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International Inc
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	866
Company Phone, Number	8664744
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Unknown
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$50.00
Complaint Info Amount Paid Method	Unknown
Complaint Info Amount Paid Value	$50.00
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	MAIL: The state of NY AG office forwarded the consumer's complaint against Herbalife International Inc. The consumer became a sales rep for the company and never rcv'd his kit until after he signed the contract. Consumer found out after he signed that the company has a no refund policy, only exchanges. No email address for consumer. - Consumer requested additional fulfillment.
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 25 of 192	
Reference Number	20494548
Created Date	10/06/2008
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	10/06/2008
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	10/06/2008
Transaction Date	10/03/2008
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Waukee
Consumer Address, State Code	IA
Consumer Address, State Name	Iowa
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)

Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	20 - 29
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	(b)(6) : Independent Herbalife Distributors
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	

Company Address, ZIP Code

Extension	
Company Phone, Country Code	
Company Phone, Area Code	515
Company Phone, Number	7208696
Company Phone, Extension	
Company Email	(b)(6)
Company Website	www.SoLongInches.com
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	Independent Herbalife Dis
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	10/03/2008
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	10/03/2008
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0334
Complaint Info Product Service Description	Internet Access Services
Complaint Info Law Violation Code	CS6
Complaint Info Law Violation Description	SPAM: Other\general annoyance
Complaint Info Statute Code	CS
Complaint Info Statute Description	CAN-SPAM Act
Complaint Info Topic Code	
Complaint Info Topic	

Description	
Complaint Info Comments	Here is the body of the SPAM email in its entirety. It was unsoolicited, I have no relationship with this company, and there is no opt out option:Dear Future Customer, (b)(6) and I are Herbalife Independent Distributors. We are the leading health and nutrition company and have been for the past 28 years. We are now currently in 66 countries and expanding rapidly. In our first year we achieved more than $2 million in sales. Last year, we almost reached the $3.5 BILLION mark. Herbalife has truly life changing inner nutrition products. They can help with many diet related issues including: Obesity, High Blood Pressure, Cholesterol and Triglycerides levels, Migraines, Diabetes, Allergies, Asthma, Ulcers, Sleep Disorders, Arthritis, Fibromyalgia, Osteoporosis, HRT, PMS and ADD (to name a few). We are offering you 5% up to 25% discount on your next product order for each referral that places an order within the next 30 days. If you are not interested at this time in our products, we would still extend an offer for referrals. We will give you 5% of any first time order from a referral that mentions your name. We are eager to begin working with people who would like to improve their health and wellness. If you know of anyone who would to have more energy, feel better, gain needed weight or lose weight, please give him or her our number. Our number one attraction is our ability to help people lose weight while improving their health through better nutrition. Our average customer loses from 15 – 30 pounds in a month… safely!! Call us at (b)(6) (b)(6) or visit www.SoLongInches.com for more information. Or…are you interested in Working From Home? We will be glad to send you some information about our incredible home-based business that everybody can start part-time around their schedule without interrupting what they are currently doing. The company is currently running a special promotion. It allows us to loan our training package to anyone we know FREE of charge for a three-day period. I don't know if this would interest you at all, but I did think that since it was free, I would extend that offer to you. You can earn $500 - $1,500 part-time! We look forward to hearing from you! (b)(6) Herbalife Distributors (b)(6) www.SoLongInches.com
Complaint Info CRA Dispute Flag	N

Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 26 of 192	
Reference Number	20787428
Created Date	07/28/2008
Complaint Source	BBB TN Nashville
Originator Reference Number	05730037046769
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	07/28/2008
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	07/28/2008
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ELK RIVER
Consumer Address, State Code	MN
Consumer Address, State Name	Minnesota
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	2836 Sharpie Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CLARKSVILLE
Company Address, State Code	TN
Company Address, State Name	Tennessee
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	37041
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	931
Company Phone, Number	5425720
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Complaint Type: - Sales Practice Issues
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 27 of 192	
Reference Number	21102613
Created Date	11/21/2008
Complaint Source	BBB IL Chicago
Originator Reference Number	06540094209812
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	11/21/2008
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	11/21/2008
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ANTIOCH
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Online Business Systems/Herbalife
Company Address, Line 1	2512 Bordeaux Lane
Company Address, Line 2	#207
Company Address, Line 3	
Company Address, City	NAPERVILLE
Company Address, State Code	IL
Company Address, State Name	Illinois
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	60540
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	630
Company Phone, Number	3553758
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	$3500.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Complaint Type: - Advertising Issues
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 28 of 192	
Reference Number	21264277
Created Date	12/31/2008
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	12/31/2008
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	12/31/2008
Transaction Date	12/29/2008
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Culver City
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Merelle Worldwide (Herbalife distributor)
Company Address, Line 1	804 Port America
Company Address, Line 2	Suite 400
Company Address, Line 3	
Company Address, City	Grapevine
Company Address, State Code	TX
Company Address, State Name	Texas
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	76051
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	228
Company Phone, Number	2163335
Company Phone, Extension	
Company Email	(b)(6)
Company Website	
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	I Initiated Contact
Complaint Info Initial Contact Date	12/29/2008
Complaint Info Initial Response	

Method	Internet/E-mail
Complaint Info Initial Response Date	12/29/2008
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$10.00
Complaint Info Amount Paid Method	MasterCard Credit Card
Complaint Info Amount Paid Value	$10.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	The information is presented as an at home business called Global Home Business Systems. One pays $9.95 to receive a DVD, FedExed overnight, to look at before being contacted via telephone for a pre-set appointment, where one is "evaluated". Unless one cancels, there is an additional charge of $39.95. At no time during any of the initial emails or first call is one told this is Herbalife or MLM. Neither the DVD, accompanying booklet, or cover letter sent with the DVD mention this is Herbalife or MLM. Not until the phone call do they mention it is Herbalife.Afterwards, I Googled "Global Home Business Systems" and found many complaints about this practice. Had I known this was Herbalife and MLM upfront, I would not have spent any time or money with this company.
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 29 of 192	
Reference Number	21298080
Created Date	12/19/2008
Complaint Source	BBB TX Dallas
Originator Reference Number	08750091098867
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	12/19/2008
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	12/19/2008
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LAKE ANN
Consumer Address, State Code	MI
Consumer Address, State Name	Michigan
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International
Company Address, Line 1	1800 Century Park East
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CENTURY CITY
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90067
Company Address, ZIP Code Extension	1501
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	1409600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$199.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Complaint Type: - Refund or Exchange Issues
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 30 of 192	
Reference Number	22172283
Created Date	03/26/2009
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	03/26/2009
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	03/26/2009
Transaction Date	12/04/2008
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Barrie
Consumer Address, State Code	ON
Consumer Address, State Name	Ontario, Canada
Consumer Address, Country Code	CAN
Consumer Address, Country Name	CANADA
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife & Global Home Business System
Company Address, Line 1	32 Chase
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Christina Lake
Company Address, State Code	BC
Company Address, State Name	British Columbia, Canada
Company Address, Country Code	CAN
Company Address, Country Name	CANADA
Company Address, ZIP Code	V0H1E2
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	250
Company Phone, Number	4479056
Company Phone, Extension	
Company Email	(b)(6)
Company Website	
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	Upline
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	12/04/2008
Complaint Info Initial Response	

Method	Internet/E-mail
Complaint Info Initial Response Date	12/04/2008
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$4200.00
Complaint Info Amount Paid Method	MasterCard Credit Card
Complaint Info Amount Paid Value	$6511.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I want to ensure that others are not harmed in the way that I was. In December 2008, I foolishly fell into the online trap of a Work at Home Program through Herbalife. The people were smooth talkers and said all the right things that attracted me to the business. All the motions to put the plan into action had to happen quickly. I had to purchase $4,200.00 worth of product in order to start the business. It is now March, I cancelled my association with Herbalife/Global Home Business System on January 30th (approx 1 month after commencing) when I saw discrepancies in what they had promised would happen and what was reality. I was told to lie to others (mostly US citizens) to recruit members for the pyramid. I had to pay for leads to recruit others into the pyramid and was to be compensated for bringing them in. In total, I had approximately 30 people who I was selling or recruiting and they in turn, have lost money. In total, I lost about $8,000.00, I do not know what the others lost. Like others, I had lost my job and was looking to get myself back into the work force. I was told that you had to spend money to make money to be self employed and I believed in

	that. I am educated and was in the insurance business for over 25 years and yes, I should have known better. I did receive a refund of approximately $2,900.00 for my returned products from Herbalife but that was a battle unto its own. I did not get any refund for the balanced of the money spent. I want to pursue this further and to ensure others are not harmed in this way. As the government recently said, "Canadians and Americans are already victims in many ways with the economic downturn and we don't want anyone in a position to exploit them further". I am looking for compensation from Herbalife of my additional costs(I've been told to get in the line behind the others who are claiming the same). I am writing to you in hopes to take it further to help others who get caught in this trap. I feel Herbalife and Global Home Business Systems operate as a Pyramid Scheme Sincerely, (b)(6)
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 31 of 192	
Reference Number	22669735
Created Date	05/07/2009
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	05/07/2009
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	05/07/2009
Transaction Date	03/25/2009
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Maricopa
Consumer Address, State Code	AZ
Consumer Address, State Name	Arizona
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	65 - 69
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America Inc.
Company Address, Line 1	P.O.Box 80210
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Los Angeles
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90080
Company Address, ZIP Code Extension	0210
Company Phone, Country Code	
Company Phone, Area Code	866
Company Phone, Number	6174273
Company Phone, Extension	
Company Email	
Company Website	www.herbalifesitemap.com
Company Rep First Name	Jan / Lynda
Company Rep Middle Name	
Company Rep Last Name	Allison / Cromar
Company Rep Salutation	
Company Rep Comments	Ind. Distributor / Manage
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	03/25/2009
Complaint Info Initial Response	

Method	Internet/E-mail
Complaint Info Initial Response Date	03/25/2009
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$3884.00
Complaint Info Amount Paid Method	Discover Credit Card
Complaint Info Amount Paid Value	$3884.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	On 02/25/09 signed up as an Independent Distributor and paid with debit card an amount of $299.00. Next day over phone talks with Manager, Lynda Cromar, because of 50% commission on each sale,upgraded to Supervisor and paid with my Discover credit card $3,484.28.With my visa debit/credit card I paid $24.95 on 03/26/09 for PTI Registration,on 03/30/09 paid Herbalife yearly pro-pay $29.95, $12.99 domain purchase,$12.95 herbalife Touch Tone phone and on 04/20/09 $19.95 PTI monthly auto debit from my bank's checking account.Cancelled distributorship on April 23,2009(since March 25,2009)well within 30 days legal cancellation time.When upgraded to Supervisor,the company send supplies of 20 customers. Lynda Cromar over phone assured that she would help sell those five boxes of supplies.Company's reply to my resignation say no words about taking back the unopned boxes of supplies and refund of money paid.
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute	

Resolved	

Record 32 of 192	
Reference Number	23410583
Created Date	07/01/2009
Complaint Source	Internet Crime Complaint Center
Originator Reference Number	I0907011327513961
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	IC3-USER
Entered Date	07/01/2009
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	07/01/2009
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	HOUSTON
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	1107 Brundage Road
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CHEYENNE
Company Address, State Code	WY
Company Address, State Name	Wyoming
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	82009
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	307
Company Phone, Number	4324341
Company Phone, Extension	
Company Email	karen@leadingincome.com
Company Website	karenaur@millect.com
Company Rep First Name	Karen
Company Rep Middle Name	
Company Rep Last Name	Aurand
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$49.90
Complaint Info Product Service Code	0334
Complaint Info Product Service Description	Internet Access Services
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	ICCC Ref #:I0907011327513961. I thought this business would be a way to make an income, at least that what she said & at the time I was unemployed & she made it sound like this could happen if I agreed to the purchase of Herbalife products. My credit/debit card was 1st charged for $299 in late Feb. beginning of March which was refunded because I never received this package, in addition to a $9.95 for S/H. I first responded to Herbalife back in 02/09, but this amount was credited back into my account in early part of 06/09, because I relayed to Karen Aurand that I never received this package, but recently in June she charged my credit/debit card $39.95 for a DVD she claims was shipped to me when the supposedly $299 package was also shipped to me, which I never received either. After several email attempts in trying be refunded this $39.95 that was just done in June, Karen claims I had 14 days to be refunded this amount from back in Feb./March & at that time since I never received this DVD & wasn't charged for it I never knew about this supposedly DVD I was suppose to receive, but now 3 months later Karen charged my credit/debit card for

	$39.95 & refuses to refund me back this money, because according to her, I should had returned the DVD 14 days later after receiving back in March in order to be refunded this amount, but 3 months later Karen now charged my credit/debit card & will not refund this amount.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 33 of 192	
Reference Number	23450200
Created Date	07/21/2009
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	07/21/2009
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	07/21/2009
Transaction Date	05/15/2009
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Carson
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America
Company Address, Line 1	930 East 231st St
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Carson
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90745
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	50487
Company Email	
Company Website	www.herbalife.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	In Person
Complaint Info Initial Contact Date	05/15/2009
Complaint Info Initial Response	

Method	In Person
Complaint Info Initial Response Date	05/15/2009
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	I joined Herbalife International of America, Inc in Los Angeles California area around May 17, 2009 Member (b)(6) .Its a pyramid business. Due to the Financial crisis, unemployment, not having legal status to live in this Country THOUSANDS OF HISPANIC people are being "invited to join" this company to earn some money.You have to pay $105.00 Dlls, I paid CASH.You have to spend at least $3,000 Dlls in the same monthe, either alone or with others to qualify for 50% discount on products, vitamins and natural herbs.Most of the transactions are paid in CASH at this location, I always see HISPANIC people in there, working and as Distribuitors like myself.I am getting discourage because we are being charge extra fees:A 3.5%(three and half percent) for PICKIN UP the products, using our own cars, gas, time of traveling, time waiting in line to purchase products.AN ADDITIONAL 7.0% (seven percent) for "PACKING AND HANDLING" besides the 9.75% of sales taxes in California. ARE THESE FEES LEGAL when we are PICKING THEM UP at their Wherehouse?..This happend to me and others while waiting in line at their

Complaint Info Comments	Carson, CA wherehouse:I got there around 2:30pm on July 18, 2009, my number was 07, and 60 people were ahead of me. After waiting patiently for two hours I wanted to go to the restroom when they were calling number 00, I only walked a few steps towards the bathroom afraid they call my number and missed it. I approach the woman on window five around 4:45pm who was availabe and no one wasn't at the window yet, I asked her about my number not being called, she YIELD at me: "WE ALREADY WARNED EVERYONE NOT TO MISS THEIR NUMBER... I WON'T HELP YOU! YOU MISSED YOUR TURN, GET ANOTHER NUMBER AND GO BACK IN LINE" I said "It's only number 7, I've been here for almost two hours waiting, I asked her: Who is your Supervisor? she pointed at the woman at the next window number 6. I went over to window six when the number eleven had just being called, ans she refused to help me, too. No other client was at the window six. I begged this woman to sale me only the two items I needed for a cliente who lives 2 hrs away from Los Angeles. She asked me: YOU ONLY HAVE TWO ITEMS? I said: Yes! (b)(6) (as the receipt says) yield to everyone in there while at was at her window: "YOU BETTER HAVE YOUR ORDER READY, NOT MAKE CHANGES AT THE WINDOW BECAUSE YOU ARE GOING TO HAVE TO TAKE A NEW NUMBER AND START THE LINE ALL OVER AGAIN, WE WARNED YOU (b)(6) She continue yieling at me at the window and said to me: "ONLY THIS TIME!, I AM GOING TO PLACE A NOTE ON YOUR RECORD FOR NEXT TIME". Today july 20, 2009, I went in person to purchase a bigger order and DianaCA kept looking at the window I was standing at. You should send a poor Hispanic woman to Investigate the CASH sales, the EXTRA FEES charge to THOUSAND OF HISPANICS who daily purchase products from M-F 9:00am-7:00pm Sat 9am to 5pm.. PS9000: Pyramid business Other-Other Update
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute	

Responded	
Complaint Info CRA Dispute Resolved	

Record 34 of 192	
Reference Number	23997919
Created Date	08/03/2009
Complaint Source	BBB OK Tulsa
Originator Reference Number	10250038021748
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	08/03/2009
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/03/2009
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DE SOTO
Consumer Address, State Code	MO
Consumer Address, State Name	Missouri
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Online Business systems AKA Herbalife
Company Address, Line 1	9923 N Ashfield Road
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	OWASSOOWASSO
Company Address, State Code	OK
Company Address, State Name	Oklahoma
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	74055
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	918
Company Phone, Number	6714154
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	$39.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Complaint Type: - Product Issues
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 35 of 192	
Reference Number	24200453
Created Date	09/24/2009
Complaint Source	Internet Crime Complaint Center
Originator Reference Number	I0909241305117531
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	IC3-USER
Entered Date	09/24/2009
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/24/2009
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	b(6)
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MIAMI
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	

Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	30 - 39
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	b(6)
Consumer Military Service Branch	
Company Name	Herbalife Intncal.
Company Address, Line 1	unknow
Company Address, Line 2	unknow
Company Address, Line 3	unknow
Company Address, City	VALENCIA
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	ESP
Company Address, Country Name	SPAIN
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	3
Company Phone, Area Code	495
Company Phone, Number	4788748
Company Phone, Extension	
Company Email	(b)(6)
Company Website	http://adwordsx1centimo.ning.com/
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$5000.00
Complaint Info Product Service Code	3912
Complaint Info Product Service Description	Internet Information & Adult Services
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	ICCC Ref #:I0909241305117531. (b)(6) (b)(6) bought from www.DominandoAdwords.com/1centavo our product and now he is selling it online http://adwordsx1centimo.ning.com/ without authorization.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 36 of 192	
Reference Number	24274885
Created Date	09/03/2009
Complaint Source	BBB MN Saint Paul
Originator Reference Number	07040057156469
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	09/03/2009
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/03/2009
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	KANSAS CITY
Consumer Address, State Code	MO
Consumer Address, State Name	Missouri
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	8517 Mitchell Rd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	EDEN PRAIRIE
Company Address, State Code	MN
Company Address, State Name	Minnesota
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	55347
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	952
Company Phone, Number	3035769
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$39.95
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Complaint Type: - Refund or Exchange Issues
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 37 of 192	
Reference Number	24274948
Created Date	09/11/2009
Complaint Source	BBB MN Saint Paul
Originator Reference Number	07040057158416
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	09/11/2009
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/11/2009
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LIVINGSTON
Consumer Address, State Code	MN
Consumer Address, State Name	Minnesota
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International
Company Address, Line 1	9800 S La Cienega Blvd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	INGLEWOOD
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90301
Company Address, ZIP Code Extension	4440
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Complaint Type: - Advertising Issues
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 38 of 192	
Reference Number	24540489
Created Date	09/02/2009
Complaint Source	National Consumer League
Originator Reference Number	569808
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	CLGC-USER
Entered Date	09/02/2009
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/02/2009
Transaction Date	04/18/2008
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	EXTON
Consumer Address, State Code	PA
Consumer Address, State Name	Pennsylvania
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	HERBALIFE
Company Address, Line 1	P.O. Box 80210
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90080
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	2167770
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Maggie
Company Rep Middle Name	
Company Rep Last Name	Ringle
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet Web Site
Complaint Info Initial Contact Date	04/18/2008

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	$3.00
Complaint Info Amount Paid Method	Check (Personal)
Complaint Info Amount Paid Value	$300.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	It was explained to me that buying the premium package wouldcause the best return.After the initial check I was required to set up my own website,download certain material and buy a head set and phone.After complications downloading the material and setting up my
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 41 of 192	
Reference Number	25719038
Created Date	03/12/2010
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	
DNC?	N
Entered By	GSIMPSON
Entered Date	03/12/2010
Updated By	GSIMPSON
Updated Date	03/12/2010
Agency Contact	Phone
Complaint Date	03/12/2010
Transaction Date	03/10/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	El Paso
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	40 - 49
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	Donavon Drive
Company Address, Line 3	
Company Address, City	Elpaso
Company Address, State Code	TX
Company Address, State Name	Texas
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	In Person
Complaint Info Initial Contact Date	03/10/2010
Complaint Info Initial Response	

Method	Other
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer went to a club to lose weight. When he got there he found out it was a pyramid scheme.
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 42 of 192	
Reference Number	25730340
Created Date	03/15/2010
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	03/15/2010
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	03/15/2010
Transaction Date	02/15/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	

Consumer

Address, City	Perris
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer

Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Partner With Paul = Online Business Systems = Herbalife|Online Business System = Herbalife
Company Address, Line 1	|7057 TR 551
Company Address, Line 2	|
Company Address, Line 3	|
Company Address, City	|Holmesville
Company	

Address, State Code	|OH
Company Address, State Name	|Ohio
Company Address, Country Code	USA|USA
Company Address, Country Name	UNITED STATES|UNITED STATES
Company Address, ZIP Code	|44633
Company Address, ZIP Code Extension	|
Company Phone, Country Code	|
Company Phone, Area Code	|330
Company Phone, Number	|5672220
Company Phone, Extension	|
Company Email	contact@partnerwithpaul.com|dougcraycarft@theonlinebusiness.com
Company Website	www.partnerwithpaul.com|www.craycraft.theonlinebusiness.com
Company Rep First Name	Doug
Company Rep Middle Name	
Company Rep Last Name	Craycraft
Company Rep Salutation	
Company Rep Comments	Mentor
Complaint	

Info Initial Contact Method	Phone Call: Landline
Complaint Info Initial Contact Date	02/15/2010
Complaint Info Initial Response Method	Phone: 800/888 number
Complaint Info Initial Response Date	02/15/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$399.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$399.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P

Complaint

Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I cancelled 2/16/10 via e-mail and received information that I will need to pay for reshipping & restocking fees which I should just consider the $399 as a business loss. I said no I want a full refund. The packages were refused for shippment I returned the decision pack back to OHIO. Craycraft is charging a total of $203.58 for reshipping restocking & misc. I want a full refund since on Herbalifes website states no reshipping and restocking fee.
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 43 of 192	
Reference Number	26094738
Created Date	03/22/2010
Complaint Source	BBB WA DuPont
Originator Reference Number	12960022237908
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	03/22/2010
Updated By	-
Updated Date	-
Agency Contact	External Agency
Complaint Date	03/22/2010
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	SEATTLE
Consumer Address, State Code	WA
Consumer Address, State Name	Washington
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	-
Consumer Home Phone, Number	-
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-
Consumer Work Phone, Number	-
Consumer Work Phone, Extension	-
Consumer Fax, Country Code	

	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	-
Consumer Age range	-
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	Herbalife
Company Address, Line 1	2816 NW Walder Dr
Company Address, Line 2	-
Company Address, Line 3	-
Company Address, City	CAMAS
Company Address, State Code	WA
Company Address, State Name	Washington
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	98607
Company Address, ZIP Code Extension	-
Company Phone, Country Code	-
Company Phone, Area Code	360
Company Phone, Number	8342916
Company Phone, Extension	-
Company Email	-
Company Website	-
Company Rep First Name	-
Company Rep Middle Name	-
Company Rep Last Name	-
Company Rep Salutation	-
Company Rep Comments	-
Complaint Info Initial Contact Method	-
Complaint Info Initial Contact Date	-
Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested	

Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	1603
Complaint Info Product Service Description	Health Care: Other Products\Supplies
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Complaint Type: - Service Issues
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 44 of 192	
Reference Number	26097059
Created Date	03/21/2010
Complaint Source	BBB MN Saint Paul
Originator Reference Number	07040057172207
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	03/21/2010
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/21/2010
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MC LEANSVILLE
Consumer Address, State Code	NC
Consumer Address, State Name	North Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Complaint Type: - Refund or Exchange Issues
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 45 of 192	
Reference Number	26437036
Created Date	05/14/2010
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	05/14/2010
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	05/14/2010
Transaction Date	04/14/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Beech Island
Consumer Address, State Code	SC
Consumer Address, State Name	South Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	20 - 29
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife/Marney White
Company Address, Line 1	22422 Navasota Cir
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	San Antonio
Company Address, State Code	TX
Company Address, State Name	Texas
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	78259
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	(b)(6)
Company Website	http://www.cpk.theonlinebusiness.com
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	Mentor

Complaint Info Initial Contact Method	Phone Call: Mobile/Cell
Complaint Info Initial Contact Date	04/14/2010
Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	04/14/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$9.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$189.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I found the company on a website in which I clicked the links to pay 9.95 for the free information dvd. I was soon after called by (b)(6) (mentor) who told me I would be working for herbalife and 149.95 package to get started. At first I said no and told her I would call her when I had the money. She called me a day ahead to see if I had the money then and at that time I told her to charge the card on file. She did and I went through the training videos which gave a price, but after the videos and it was time to do actual so called training there was a different price for a large amount of this the company claimed I would need. I then cancelled and asked (b)(6) where can I return the products and how to be refunded. At first she refused to respond until I let her know i will report this as fraud in which she immediately gave me instructions on how to return. The item was returned days ago and still no refund on my card. She also decided to charge me an extra

	39.95 due to some 14 day trial she claimed i was under then there was no mention of that on the website and I read the site over and over again plus fine print. I went back and noticed the site changed a few days after I spoke with her showing the new 39.95 trial in the notes
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 46 of 192	
Reference Number	26653166
Created Date	05/07/2010
Complaint Source	BBB MN Saint Paul
Originator Reference Number	07040057175802
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	05/07/2010
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	05/07/2010
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ANDOVER
Consumer Address, State Code	OH
Consumer Address, State Name	Ohio
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Complaint Type: - Refund or Exchange Issues
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 47 of 192	
Reference Number	26662568
Created Date	06/07/2010
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	06/07/2010
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	06/07/2010
Transaction Date	05/14/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Milwaukee
Consumer Address, State Code	WI
Consumer Address, State Name	Wisconsin
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	60 - 64
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	www.herbalife.com
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Redmond
Company Address, State Code	WA
Company Address, State Name	Washington
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	98052
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	(b)(6)
Company Phone, Number	(b)(6)
Company Phone, Extension	
Company Email	(b)(6)
Company Website	www.onlineinfopack.com
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	05/14/2010
Complaint Info Initial Response	

Method	Internet/E-mail
Complaint Info Initial Response Date	05/14/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$10.00
Complaint Info Amount Paid Method	Bank Account Debit
Complaint Info Amount Paid Value	$200.00
Complaint Info Product Service Code	0335
Complaint Info Product Service Description	Internet Web Site Design\Promotion
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was contacted by (b)(6) of Herbalife.com after being enticed to begin an Internet business selling health food products. She call me on my cell phone and explained a package of training materials would be shipped. I received them and found not only was it a scam but I was being charged by other related services, none of which I had signed up for. One charged my phone bill and another to my bank account. I would like to discuss this problem in detail with someone by phone as it is too lengthy to explain in this limited submission form. I have had one arm of this scam charge me $19.95 thru a name called onlinentrepreneur.com for webhosting, which I never authorized. Original culprits called Herbalife.com (not to be confused with the legitimate business in California) asked for $9.95 and then further charged my bank account a whopping $149.95 for a training course I never participated in. Unfortunately I don't have the street address of these swindlers. However, if you performe a google search, based on the email name above, you will find a now defunct web site from which to begin your investigation. The phone number for (b)(6)

	(b)(6) is a working cell phone. Please help me. If you can't reach me when you call, please call my friend, (b)(6) at (b)(6) (b)(6) or cell phone (b)(6) and he'll be happy to provide whatever additional details you would like.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 48 of 192	
Reference Number	26848765
Created Date	06/25/2010
Complaint Source	FTC Call Center
Originator Reference Number	
Language	Spanish
Contact Type	Complaint
Data Source	
DNC?	N
Entered By	DPEREZ
Entered Date	06/25/2010
Updated By	
Updated Date	
Agency Contact	Phone
Complaint Date	06/25/2010
Transaction Date	05/01/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Miami
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	65 - 69
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	In Person
Complaint Info Initial Contact Date	05/01/2010
Complaint Info Initial Response	

Method	In Person
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304|1712
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters|Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer was calling since when they give the presentation of the product of herbalife they don't provide the consumer's of that they need to pay for the shipping and for each box they they purches to sell.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Record 49 of 192	
Reference Number	26983402
Created Date	07/09/2010
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	07/09/2010
Updated By	CRSS\pwilliamson
Updated Date	07/12/2010
Agency Contact	Internet
Complaint Date	07/09/2010
Transaction Date	07/10/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Darling Downs Western Australi
Consumer Address, State Code	
Consumer Address, State Name	
Consumer Address, Country Code	AUS

Consumer Address, Country Name	AUSTRALIA
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	b(6)
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	40 - 49
Consumer Military Status	
Consumer Military Station	

Consumer

Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife Sharon Styth
Company Address, Line 1	996 Flower Glen Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Simi Valley
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	93065
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	pozte@nursing-the-nurse.com
Company Website	http://www.mental-health-information.info/p/unsubscribe.html
Company Rep First Name	Sharon
Company Rep Middle Name	
Company Rep Last Name	Styth
Company Rep	

Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	07/10/2010
Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	07/10/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	9044
Complaint Info Product Service Description	Unsolicited Email
Complaint Info Law Violation Code	CS1|CS4|CS6
Complaint Info Law Violation Description	SPAM: 'Remove Me' is missing, broken, or ignored|SPAM: Subject or From line is false or misleading|SPAM: Other\general annoyance
Complaint Info Statute Code	CS
Complaint Info Statute Description	CAN-SPAM Act
Complaint Info Topic Code	
Complaint Info Topic Description	

Complaint Info Comments	The unsubscribe link they have (http://www.mental-health-information.info/p/unsubscribe.html) makes people sign up for services they do not want before they can unsubscribe (although I did not get that far) which is a violation of the terms of the can spam act. Other-Other Update
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 50 of 192	
Reference Number	27053447
Created Date	06/16/2010
Complaint Source	BBB MN Saint Paul
Originator Reference Number	07040057178434
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	06/16/2010
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	06/16/2010
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WICHITA
Consumer Address, State Code	KS
Consumer Address, State Name	Kansas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Complaint Type: - Refund or Exchange Issues
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 51 of 192	
Reference Number	27217720
Created Date	08/03/2010
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	
DNC?	N
Entered By	TIACOBUCCI
Entered Date	08/03/2010
Updated By	
Updated Date	
Agency Contact	Phone
Complaint Date	08/03/2010
Transaction Date	02/01/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Rochester
Consumer Address, State Code	MN
Consumer Address, State Name	Minnesota
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	40 - 49
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife|E Home|Global Media Solutions
Company Address, Line 1	950 W 190th St|15333 N Pima Rd|
Company Address, Line 2	|Ste 235|
Company Address, Line 3	||
Company Address, City	Torrance|Scottsdale|
Company Address, State Code	CA|AZ|
Company Address, State Name	California|Arizona|
Company Address, Country Code	USA|USA|
Company Address, Country Name	UNITED STATES|UNITED STATES|
Company Address, ZIP Code	90502|85260|
Company Address, ZIP Code Extension	||
Company Phone, Country Code	||
Company Phone, Area Code	310|480|
Company Phone, Number	4109600|2198705|
Company Phone, Extension	||
Company Email	||
Company Website	||
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet Web Site
Complaint Info Initial Contact Date	02/01/2010
Complaint Info Initial Response	

Method	Internet/E-mail
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$4300.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$4300.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer became involved with a multi-level company, Herbalife. Consumer was told he would receive help and coaching to sell his product and he was not. Consumer had to also deal with 2 of their affiliates: E Home & Global Media Solutions. Global Media provides leads & advertise to get people to sign up and EHome is the recruiting company.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Record 52 of 192	
Reference Number	27258020
Created Date	08/05/2010
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	08/05/2010
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	08/05/2010
Transaction Date	08/04/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	Carrollton
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	20 - 29
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	herbalife/merellworldwide
Company Address, Line 1	804 portamerica
Company Address, Line 2	400
Company Address, Line 3	
Company Address, City	grapevine
Company Address, State Code	TX
Company Address, State Name	Texas
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	76051
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	(b)(6)
Company Phone, Number	
Company Phone, Extension	
Company Email	(b)(6)
Company Website	www.tlpsunshinehealth.com
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	buissness coach?
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	08/04/2010
Complaint Info Initial Response	

Method	Phone: other
Complaint Info Initial Response Date	08/04/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$200.00
Complaint Info Amount Paid Method	MasterCard Credit Card
Complaint Info Amount Paid Value	$10.00
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	this transaction was done online as a credit card. How did this guy make it a debit transaction? am i at risk of him knowing more? For the record the package i received was less than one pound. with it no real information of what it was supposed to contain. i told tom peters i was not interested in the work at home buissness, after i found out herbalife was the company. wick they withhold that information until the package had arrived at my house. then the supposed bulkiness mentor calls to see if i have watched the dvd and to say that mi ready for the next step wick will cost me 149.00$. i simply said mi not interested i don't have the money then he wants me to pay out of my own pocket again to send the package BACK.or ill be charged 39.99 for absolutely nothing just people exclaiming there success story's on this dvd wich are fabricated im sure,i don't think this man or his herbalife co. should get this ten dollars nor any other monetary gain of mine for they have provided me with no service or product. i have no way to afford an attorney to get ten dollars back he can keep it for all i care.... i do however want to keep the rest of my hard earned cash,instead of let theives

	have it.Looking for advice on my situation if at all possible. . i also have a unknown charge the same day i ordered that package from GLOBAL MEDIA SOLUTIONS i have no idea what that is but in my research found global online systems is linked to herbalife and may be connected with global media solutions..needles to say i already reported my card lost so they cant use the number i provided or charge me again,the company's adress i gave you is where he wanted me to send or return the b.s i received i think i should keep it for evidence.if any one can help stop these peoples evil scheme's is the FTC thank you whomever puts there effort into this. scincerly, (b)(6)
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 53 of 192	
Reference Number	27262775
Created Date	07/21/2010
Complaint Source	BBB CO Denver
Originator Reference Number	08850075119911
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	07/21/2010
Updated By	-
Updated Date	-
Agency Contact	External Agency
Complaint Date	07/21/2010
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	WINTER HAVEN
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	-
Consumer Home Phone, Number	-
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-
Consumer Work Phone, Number	-
Consumer Work Phone, Extension	-
Consumer Fax, Country Code	

	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	-
Consumer Age range	-
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	HerbaLife Distributor
Company Address, Line 1	9623 Grand Ave.
Company Address, Line 2	-
Company Address, Line 3	-
Company Address, City	LITTLETON
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80123
Company Address, ZIP Code Extension	-
Company Phone, Country Code	-
Company Phone, Area Code	303
Company Phone, Number	9481323
Company Phone, Extension	-
Company Email	-
Company Website	-
Company Rep First Name	-
Company Rep Middle Name	-
Company Rep Last Name	-
Company Rep Salutation	-
Company Rep Comments	-
Complaint Info Initial Contact Method	-
Complaint Info Initial Contact Date	-
Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested	

Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	1603
Complaint Info Product Service Description	Health Care: Other Products\Supplies
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Complaint Type: - Service Issues
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 54 of 192	
Reference Number	27263004
Created Date	07/12/2010
Complaint Source	BBB AB Edmonton
Originator Reference Number	00270001636003
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	07/12/2010
Updated By	BBB-USER
Updated Date	09/14/2010
Agency Contact	External Agency
Complaint Date	08/12/2010
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	TOCCOA
Consumer Address, State Code	GA
Consumer Address, State Name	Georgia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America Inc
Company Address, Line 1	PO Box 80210
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90080
Company Address, ZIP Code Extension	0210
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Complaint Type: - Refund or Exchange Issues
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 55 of 192	
Reference Number	27635816
Created Date	08/12/2010
Complaint Source	BBB AB Edmonton
Originator Reference Number	00270001636382
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	08/12/2010
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/12/2010
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	KEREMEOS
Consumer Address, State Code	BC
Consumer Address, State Name	British Columbia, Canada
Consumer Address, Country Code	CAN
Consumer Address, Country Name	CANADA
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America Inc
Company Address, Line 1	PO Box 80210
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90080
Company Address, ZIP Code Extension	0210
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Complaint Type: - Advertising Issues
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 56 of 192	
Reference Number	27640889
Created Date	08/05/2010
Complaint Source	BBB MN Saint Paul
Originator Reference Number	07040057181807
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	08/05/2010
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/05/2010
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	HOLLYWOOD
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Complaint Type: - Refund or Exchange Issues
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 57 of 192	
Reference Number	27720129
Created Date	09/21/2010
Complaint Source	FTC Call Center
Originator Reference Number	
Language	Spanish
Contact Type	Complaint
Data Source	
DNC?	N
Entered By	VCASTILLO
Entered Date	09/21/2010
Updated By	
Updated Date	
Agency Contact	Phone
Complaint Date	09/21/2010
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	PEEKSKILL
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	30 - 39
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	HerbaLife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	-
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Consumer states that he was selling HerbaLife products he states that he was never compensated what he was intially informed he would get. Consumer states that the products that that the company sells are misleading.
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Record 58 of 192	
Reference Number	27728364
Created Date	09/21/2010
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	09/21/2010
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	09/21/2010
Transaction Date	08/06/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Schertz
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	30 - 39
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	HERBALIFE INTERNATIONAL OF AMERICA
Company Address, Line 1	930 E. 233RD ST
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CARSON
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90745
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	24650
Company Email	DS_CSSUPPORT@HERBALIFE.COM
Company Website	WWW.MYHERBALIFE.COM
Company Rep First Name	STEPHEN
Company Rep Middle Name	
Company Rep Last Name	REHRIG
Company Rep Salutation	
Company Rep Comments	MENTOR

Complaint Info Initial Contact Method	Internet (Other)
Complaint Info Initial Contact Date	08/06/2010
Complaint Info Initial Response Method	Answer cold call
Complaint Info Initial Response Date	08/06/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$159.00
Complaint Info Amount Paid Method	Bank Account Debit
Complaint Info Amount Paid Value	$159.00
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	LJB
Complaint Info Law Violation Description	Never Received Merchandise
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	I have been given a run around with regards to the cancellation and refund for the payments that they charge me for joining the HERBALIFE DISTRIBUTORSHIP. I spoke with the customer service back in August 30th informing them that I would like to cancel my membership and she gave me the instruction to send a fax to your department. I tried several times on September 1st but unfortunate my fax couldn't’t go thru to your fax # 310-258-7155 so I resorted to calling customer service again and requested for alternate fax # where it can be forwarded to your department. I am getting confused as to the information that were given to me by your representative and by the person who called me to sign me up when I applied online for the DVD 1st pack. I don’t know Stephen Rehrig personally; he was the one who called me after I filled up the information online and paid the $9.95; I have been dealing

Complaint Info Comments	with this person since then the Aug 6, 2010. The next thing he told me is that he will call me to set up appointment after I receive the package (which I wasn't inform it was only the DVD and the folder) and he wants to charge my credit card for $149.95, I advise Mr. Rehrig that I don't have that money that time but I will have it on Aug 20. He did not explain to me what the $149.95 is for – he informs me in order for me to start with the business I have to pay $149.95. In short I did pay him the amount on Aug 19. After going thru the black bag package that I received on Aug 22 I find it that the business of your company is not the one for me. So I immediately send Mr. Rehrig an email on Aug 30 that I am canceling my HERBALIFE distributorship and requested from him to advise me as to how to return the merchandise. He did not contact me that day (Aug 30) so I called your customer service and request as to how to cancel my distributorship. The lady advises me to send the cancellation notice thru fax including the CUSTOMER REQUEST FOR REFUND FORM; PRODUCT I WISH TO RETURN FORM; LITERATURE/PROMOTIONAL ITEMS FOR RETURN. The rep told me that once the fax is received that they will give me instructions as to where to return the items. Mr. Rehrig replies to my cancellation email on Aug 31st and advice me to send to the address he stated in the email. I send the COMPLETE BLACK BAG HERBALIFE together with the rest of the items in it to the address MERELLE WORLDWIDE 804 PORT AMERICA SUITE 400, GRAPEVINE TX 76051. Now as I have been dealing with him since Aug 6, I felt confident that he gave me the correct information as to where to send it. Here is where the confusion starts; According to your representative that the BLACK HERBALIFE BAG SHOULD only is to be returned to the CORP. the only amount that should be charge to me was $54. First and foremost, your distributor by the name of Stephen Rehrig is the one who told me that the amount is $149.95 and it must be paid in full. And he told me to send it to that address in Grapevine. Now I have been monitoring the progress of this cancellation since day 1. I made a follow up to Mr. Rehrig on September 7 and he told me that HE DID NOT RECEIVED ANY PACKAGE. I

	have forwarded to his email the status of the tracking and he informed me that the address he gave me was his personal residence for 40 years. Now if he has been living in that community for 40 years you will be informed by the local post office that there was a package delivered to your place and he can figure it out with the local postal office since you
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 59 of 192	
Reference Number	27792496
Created Date	09/28/2010
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	09/28/2010
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	09/28/2010
Transaction Date	03/17/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Franklin
Consumer Address, State Code	PA
Consumer Address, State Name	Pennsylvania
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	30 - 39
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	P.O. Box 80210
Company Address, Line 3	
Company Address, City	Los Angeles
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90080
Company Address, ZIP Code Extension	0210
Company Phone, Country Code	
Company Phone, Area Code	866
Company Phone, Number	8664744
Company Phone, Extension	
Company Email	
Company Website	www.herbalifecentral.com
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	I Initiated Contact
Complaint Info Initial Contact Date	03/17/2010
Complaint Info Initial Response	

Method	Phone: other
Complaint Info Initial Response Date	03/17/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$7500.00
Complaint Info Amount Paid Method	MasterCard Credit Card
Complaint Info Amount Paid Value	$7500.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	This is most of a letter I sent to my contacts within the company. They did not respond at all to my complaints:"Hi, (b)(6) and (b)(6) ! I have been in a real dilemma regarding what to do about this business. I am unhappy about a few things. I guess this letter is not directed so much at you as you to whoever heads up this organization in the business. I want to voice my concerns. First of all, I do not like the deception present. It's one thing not to reveal every detail; it's another to outright lie and encourage others to do so. (b)(6) , you encourage lying...Even in the scripts there are lies. Ex: "We only have a few openings left." Yeah, right! Lies in one aspect mean there are lies in other aspects. If I can't be upfront with people, I can't participate. I'd rather be poor and honest than rich and dishonest and manipulative. I am also upset about the level of money required to run this business. One lady last week was interested in the business because the advertisement states little-no money is needed upfront. Hmmm...first $9.95, then $39.95, then $149.95, then $20, then $$$$$$. Now, here I am a lady with NO money to invest; who, in order to make the money I came here for,

Complaint Info Comments	is encouraged to spend $2580-$6450 a MONTH on top of operating costs. It's laughable! Okay, so I've already spent thousands that I did not have and have made minimal profits. I have NO customers from the retail leads I ordered, and I have ONE distributor left from the recruiting leads I ordered. I have called, e-mailed, put out flyers, etc., etc. Then, (b)(6) you made the statement that if we did not have money to purchase leads it was in part due to the fact that we were not charging the $39.95. Hmmm...it takes 7 of those charges to purchase 1 lead! My husband works VERY hard and, in a good month these days, might bring in $4000 in a month. How in the world am I going to expend this kind of money? It's not possible! I feel I've been taken advantage of. I believed what was stated: that if I just followed the step-by-step process I would be successful. I've tried to follow the process. I enrolled in most of the suggested tools because I believed I was setting myself up for success. Now, the next step in the process is to spend $2580-$6450 a MONTH. I CAN'T. Good night! In order to have that kind of money to invest, I'd have to be wealthy already. It's unbelievable! So, I can't purchase any more internet leads. I'm left to putting up flyers, passing out flyers, telling my family and friends, etc. That's not what I came here for. If I wanted to do that I would have done Avon or some other such thing. I wanted an ONLINE business so I could be home with my kids and not looking at all my family and friends as customers. I'm left in an awful predicament. If I quit I have no hope of paying off the $7000 left on the credit card (from trying to get this off the ground); if I don't quit I have no money to advertise anyway and hundreds in monthly operating costs to pay."Sirs:I am beginning the process of closing down websites, ending contacts, etc. I have debated, stressed, and been in desperation for quite some time over what to do about all this. I have come to the conclusion I should try to warn others never to steer from "If it is too good to be true: it probably is." Then, go back to where I started.Thank you for your time.

Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 60 of 192	
Reference Number	28195089
Created Date	10/07/2010
Complaint Source	BBB ON Kitchener/Toronto
Originator Reference Number	01070001218013
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	10/07/2010
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	10/07/2010
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ETOBICOKE
Consumer Address, State Code	ON
Consumer Address, State Name	Ontario, Canada
Consumer Address, Country Code	CAN
Consumer Address, Country Name	CANADA
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife Online Business Systems
Company Address, Line 1	205 Joseph St. Box 2325
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	WALKERTON
Company Address, State Code	ON
Company Address, State Name	Ontario, Canada
Company Address, Country Code	CAN
Company Address, Country Name	CANADA
Company Address, ZIP Code	N0G 2V0
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	519
Company Phone, Number	8811300
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$39.95
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Complaint Type: - Billing or Collection Issues
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 61 of 192	
Reference Number	28382703
Created Date	11/27/2010
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	11/27/2010
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	11/27/2010
Transaction Date	08/29/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Conway
Consumer Address, State Code	AR
Consumer Address, State Name	Arkansas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	NV
Company Address, State Name	Nevada
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	866
Company Phone, Number	8664744
Company Phone, Extension	
Company Email	(b)(6)
Company Website	MyHerbalife.com
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	Supervisor
Complaint Info Initial Contact Method	TV/Radio
Complaint Info Initial Contact Date	08/29/2010
Complaint Info Initial Response	

Method	Internet/E-mail
Complaint Info Initial Response Date	08/29/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$3350.00
Complaint Info Amount Paid Method	Bank Account Debit
Complaint Info Amount Paid Value	$4500.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	Responded to radio ad for Income at Home, charged $9.95 for company info. Contacted within 2 days by (b)(6) Asked to pay additional $39.95 for additional info, as well as $149.95 for personal diet products (1 month's worth.) Was not informed until that time that the company was Herbalife. Encouraged by (b)(6) as well as her supervisor Dick Tosh to enter the company as a Supervisor so that I would get 50% profit on sales. (b)(6) informed me that she had been with the company for 3 weeks and had made $12,000. Asked to pay $3,000 for company investment as a supervisor, and was sent 6 cases of products to sell. It was my intent to recruit rather that to sell retail, as I was told there was much more money to be made in recruiting. Underwent hundreds of hours in training--I was not informed until training almost completed that I would have to pay $130/each lead for recruiting. Retail sales leads much cheaper, but still had to pay. Informed (b)(6) that I had spent my entire savings, was unable to pay for leads. He told me I would need to sell all of my product inventory to make enough money in profit to buy leads. Multiple

Complaint Info Comments	monthly/recurrent company charges of $59, $19.95, $99, $9.95 for services I was told were not necessary to do business with them as a distributor; however, it would have been VERY difficult to do business without these services. Multiple calls by company president Anthony Powell urging me to do "whatever it takes to get to the next level." Each level in the company promised more financial gains--to get to each successive level, you had to recruit more people/sell more product. By this time, I felt like I was "stuck"--I had invested so much money and time, I felt like I couldn't quit. It was at this time that I received an email from (b)(6) (b)(6) informing me that she was unable to handle Herbalife, was cancelling her account with the company, and I was referred to (b)(6) (her supervisor) for further assistance. I asked her why she was cancelling her account. Her exact words from her email response:"I decided that the only ones making any money were those at the top. I invested almost $15,000 into the business and only made $1,500. A 10% return was not what I was led to expect. They told me that I would have to continue the investment of money for at least 18-24 months in order to make any more! That means, that they wanted me to invest over $75,000 and get only about $7,500 for 2 years, and then, maybe, get more money-depending on how many more people I could get to invest. I felt like a con artist. I apologize for "conning" you into this and I just could not do it anymore. They said that nothing ordered could be returned at this time. It would have had to have been rejected upon delivery for an 85% return of cost. I am still trying to sell the inventory I have left, but it does not look good. Again, I apologize for getting you involved in this. It certainly was not what I expected. I now see why they don't tell you everything up front! You would never get involved!" At that time, I cancelled all of my accounts through them, online as well as via telephone.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	

Complaint Info CRA Dispute Resolved	

Record 62 of 192	
Reference Number	28456858
Created Date	12/03/2010
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	12/03/2010
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	12/03/2010
Transaction Date	10/19/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Grandview
Consumer Address, State Code	WA
Consumer Address, State Name	Washington
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America Inc
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Torrence
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	24650
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	24650
Company Email	ds_cssuport@herbalife.com
Company Website	www.herbalife.com
Company Rep First Name	Tiffany armstrong,
Company Rep Middle Name	
Company Rep Last Name	cellia galicia
Company Rep Salutation	
Company Rep Comments	customer service
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	10/19/2010
Complaint Info Initial Response	

Method	Internet/E-mail
Complaint Info Initial Response Date	10/19/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$4237.00
Complaint Info Amount Paid Method	Visa Cash Advance
Complaint Info Amount Paid Value	$4237.00
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	LJB
Complaint Info Law Violation Description	Never Received Merchandise
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife advertised their product and I answered an ad. 10-19-10 I started taking the product and was stopped from taking it by my doctor. 11-8-10 (Per agreement-refund for return within 30 days) I returned the product under the company guidelines. Now the company is telling me there is a paperwork problem preventing them from returning my money as agreed.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 63 of 192	
Reference Number	29084484
Created Date	02/07/2011
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	02/07/2011
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	02/07/2011
Transaction Date	12/10/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Leawood
Consumer Address, State Code	KS
Consumer Address, State Name	Kansas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	40 - 49
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	950 West 190th St.
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Torrance
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	1001
Company Phone, Country Code	
Company Phone, Area Code	650
Company Phone, Number	4777217
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Danny
Company Rep Middle Name	
Company Rep Last Name	Singson
Company Rep Salutation	
Company Rep Comments	Sales
Complaint Info Initial Contact Method	I Initiated Contact
Complaint Info Initial Contact Date	12/10/2010
Complaint Info Initial Response	

Method	Internet/E-mail
Complaint Info Initial Response Date	12/10/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$209.00
Complaint Info Amount Paid Method	Discover Credit Card
Complaint Info Amount Paid Value	$209.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	I was interested in earning income from home so I purchased for $9.95 a DVD from incomeathome.com website to find additional information. Then, Danny Singson contacted me and they have you listen to these phone tapes about how much money you can make from home and they give you all of these testimonials. They never tell you what the product is or what you would be doing from home. Prior to the first phonecall from your "sales mentor" they have you listen to the DVD and do workbook pages. Then, you have your phone call. They have you listen to some more testimonials about the product (you still don't know what it is you would be selling or doing from home). Then, they tell you that to move on they need to send you the "start up package" for $199.95. At the end of this call, they tell you it is Herbalife. Then, you still don't know what you would be doing for them. So, they set up an online "mentor" session to show you how to make money. There are 3 levels - you can be a senior consultant (for $275 more dollars) or you can be Success Builder (for $580 more) and last you can be a Supervisor (for $4000 more). They push the supervisor level

Complaint Info Comments	because this is where you find other people to sell the product and you are paid a % of their sales. Then, each person you find can find three additional people and you get paid a % of all of those sales as well. It is a pyramid scheme but they limit your depth to three deep, but then those three can find three more, and so on and so on. They also won't show you their online system for generating leads to sell the product and/or to find people to sell until you pay the next fee. I really was investigating what this was as I have heard the ads over and over on radio/TV. I was very skeptical going into it. As soon as I received the "start-up" kit which was a giant box of Herbalife product, I returned the product and asked Danny Singson for a refund on 12/20/2010. I have proof of delivery of the product back to them on 1/3/2011. I asked for a refund again on 1/7/2011. At the point that I told Danny Singson on 12/15/2010 that I was not interested in this pyramid type scheme where they are more interested in making you sign other people up than they are in the product, he has not responded to any of my emails or request for refund. I had point blank asked him if this was 100% refundable if I did not want to do whatever it was and he said "absolutely". The problem with this is they are so pushy and they make sure they don't tell you anything until that "start-up kit" has already been shipped. Then, it goes into limbo. Herbalife isn't responsible for Danny Singson's actions and Danny is not responsible for Herbalife. It is as if Danny Singson's first goal was to get that "start-up" box in the mail so there is no turning back or they make you think that. Then, the whole return process is such a pain they think I am going to give up. I am sure there is a small percentage that goes to the next level of purchasing enough product (listed above-consultant, builder, supervisor) that they just try to keep pushing you along. I did receive today (2/7/11) a "refund request form" from Herbalife where they are asking me to show proof of purchase. I had asked Discover to do a charge back on 1/18/2011 so I am sure this is in response to that. I think their marketing practices are

	misleading & the way they want money in order to find out what the product is and what you would be doing is unethical.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 64 of 192	
Reference Number	29419215
Created Date	12/16/2009
Complaint Source	Oregon, Department of Justice
Originator Reference Number	FF12486-09
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	OR01-USER
Entered Date	12/16/2009
Updated By	-
Updated Date	-
Agency Contact	External Agency
Complaint Date	12/16/2009
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	TROUTDALE
Consumer Address, State Code	OR
Consumer Address, State Name	Oregon
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-
Consumer Work Phone, Number	-
Consumer Work Phone, Extension	-

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	HERBALIFE INTERNATIONAL OF AMERICA, INC.
Company Address, Line 1	1800 CENTURY PARK EAST
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90067
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	5329638
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$9.95
Complaint Info Product Service Code	3600
Complaint Info Product Service Description	Invest: Other (note in comments)
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	DETAILS ---- THIS BUSINESS COMES UNDER THE DIGUISE OF INCOME AT HOME A WEBSITE I LEARNED ABOUT VIA DR. LAURAS RADIO PROGRAM FOR MOMS WHO DESIRE TO STAY AT HOME WITH THEIR KIDS. I SENT FOR THE INFORMATION AS IT IS BBB ACCREDITED. I HAD NO IDEA AND WAS UNABLE TO OBTAIN ANY INFORMATION UP FRONT AS TO WHAT THIS INCOME AT HOME WAS ALL ABOUT. A CONFERENCE CALL WAS SET UP FOR MY DAUGHTER (MOTHER OF 14 MONTH OLD TWINS WHO NEEDS A JOB) AND I. THE CALL HAD TO BE RE-SCHEDULED, FIRST FOR LACK OF A DIAL TONE ON MY END, 2ND NO CALL CAME IN & 3RD, KATHYE CAULWELL SUPPOSEDY MY 3RD PERSONAL MENTOR. HER CALL CAME IN, SHE ASKED ME QUESTIONS, BUT NOT MY DAUGHTER (APPARENTLY THERE IS NO COMMUNICATIONS BETWEEN THE MAIN GUY ANTHONY AND THE OTHERS WHO CALL). KATHYE HAD US LISTEN TO AN AUDIO RECORDING OVER THE PHONE THAT FINALLY REVEALED THE ACTUAL NAME OF THE

Complaint Info Comments	COMPANY AND THE COSTS TO GET STARTED. KATHYE WAS RUDE TO MY DAUGHTER WHEN SHE ASKED FOR A FEW MINUTES TO TALK TO HER HUSBAND ABOUT THE $149 START UP FEE. THEY ARE STRUGGLING WITH JUST HIS INCOME. THE INFORMATION REGARDING WHAT THIS INCOME AT HOME IS ACTUALY ALL ABOUT IS WITHHELD UNTIL THIS PHONE CALL. IT WOULD SEEM THAT THIS MIGHT BE THE ONLY WAY TO SUCK PEOPLE IN. THIS IS A BUSINESS OPPORTUNITY AND NOT A WORK FROM JOB AS IM GUESSING MANY FOLKS MIGHT THINK, AND THEREFORE, YOU HAVE TO HAVE FUNDS TO INVEST BEFORE YOU CAN MAKE ANY MONEY. WITH SO MANY OREGONIANS OUT OF WORK AND HOPING FOR SOMETHING TO BRING IN MONEY - THIS IS MISLEADING AND UNFORTUNATELY, WITH THE CARROT OF AT LEAST $1,500 PER MONTH, IS ALSO A DOWNER FOR THOSE TRYING TO HOLD ONTO HOPE. THIS, I FEEL, IS JUST ANOTHER OF THOSE IF IT LOOKS TO GOOD TO BE TRUE, IT PROBABLY IS. I FEEL THAT THIS BUSINESS NEEDS TO BE STRAIGHT UP FRONT THAT THIS IS SOEMTHING YOU HAVE TO INVEST IN AND NOT WITH HOLD THIS INFORMATION NOT ALLOWING AMPLE TIME TO RESEARCH BEFORE THE CALL TO SAY YES AND ALLOW THE COMPANY TO CHARGE MORE ON YOUR CARD. ALSO, YOU HAVE TO PAY $9.95 FOR THE SHIPMENT OF THE INFORMATION PACKET, IF YOUR DO NOT SEND BACK WITHIN 2 WEEKS, YOU ARE CHARGED AN ADDITIONAL $39.95 FOR THE PACKET. IT STATES THAT IF DIS-SATISFIED AFTER 90 DAYS YOU CAN GET THE $39.95 BACK. NOTHING IS EVER STATED ABOUT GETTING THE $149 GET STARTED FEE BACK IF NOT SATIFIED AFTER 90 DAYS. THIS ENDS UP COSTING

	ABOUT $200 JUST TO GET STARTED. I WOULD SAY THIS IS A BUYER BEWARE ISSUE. THANKS, (b)(6) --- Oregon DOJ comments: Consumer Did Not Request Action --- Consumer description: False or misleading representations regarding future income --- Case closed --- Case closed date: 2009-12-16 00:00
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 65 of 192	
Reference Number	29439142
Created Date	10/29/2010
Complaint Source	Oregon, Department of Justice
Originator Reference Number	FF9631-10
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	OR01-USER
Entered Date	10/29/2010
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	10/29/2010
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SPRINGFIELD
Consumer Address, State Code	OR
Consumer Address, State Name	Oregon
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	HERBALIFE INTERNATIONAL OF AMERICA, INC.
Company Address, Line 1	1800 CENTURY PARK EAST
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90067
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	5329638
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$9.95
Complaint Info Product Service Code	3600
Complaint Info Product Service Description	Invest: Other (note in comments)
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	DETAILS ---- GOOD MORNING. MY WIFE AND I HAVE HEARD THE RADIO ADS FOR WORK FROM HOME.COM FOR THE PAST FEW MONTHS. WE DECIDED TO SEE WHAT IT WAS ALL ABOUT. WE WENT ON- LINE TO THEIR WEB PAGE AND WE PAID THE $9.95 FEE TO GET MORE INFO. (THEY WONT GIVE YOU ANY INFO UNLESS YOU PAY.) WE WERE CONTACTED BY A WOMAN IN KENNEWICK, WA WHO IDETIFIED HERSELF AS AN INTAKE HANDLER. WE WERE TOLD THAT A FEDEX PACKAGE WAS COMING AND WE HAD TO READ THE INFORMATION ETC. AND PARTICIPATE IN A TELEPJHONE INTERVIEW IN A FEW DAYS. I FOUND SOME INFO ON THE INTERNET THAT THIS IS A FRONT FOR HERBALIFE VITAMINS THIS COMPANY WILL TAKE THE INITIAL MONEY FROM YOU THEN COAX YOU INTO BUYING ANOTHER PACKET BEFORE TELLING YOU THAT YOU WILL BE SELLING VITAMINS. MY WIFE AND I FEEL THAT CONSUMERS ARE BEING DECIEVED BY THESE ADS AND THIS IS A SCAM. WE FEEL THAT OREGON CONSUMERS SHOULD BE WARNED

	BEFORE THEY TOO SPEND ANY MONEY OR TIME ON THIS. I CAN PROVIDE MORE INFO TO YOUR INVESTIGATOR. THANK YOU. --- Oregon DOJ comments: Information Only --- Consumer description: False or misleading representations regarding future income --- Case closed --- Case closed date: 2010-10-29 00:00
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 66 of 192	
Reference Number	30238822
Created Date	04/28/2011
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	04/28/2011
Updated By	CRSS\bsturm
Updated Date	05/18/2011
Agency Contact	Internet
Complaint Date	04/28/2011
Transaction Date	09/01/2010
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Round Lake
Consumer Address, State Code	IL
Consumer Address, State Name	Illinois
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	09/01/2010
Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	09/01/2010
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	9044
Complaint Info Product Service Description	Unsolicited Email
Complaint Info Law Violation Code	CS1|CS6
Complaint Info Law Violation Description	SPAM: 'Remove Me' is missing, broken, or ignored|SPAM: Other\general annoyance
Complaint Info Statute Code	CS
Complaint Info Statute Description	CAN-SPAM Act
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I have continued to receive emails from the domain i-office.com for a number of years (going on 3 now) and have requested on no less than 4 occassions to be removed from contact lists as I am no longer affiliated with Herbalife. The emails that I have received are obviously mass-generated, with no information as to how to opt-out, or who to contact to affect the subscriber status. Other-Other Update
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 67 of 192	
Reference Number	30361783
Created Date	03/29/2011
Complaint Source	U.S. Postal Inspection Service
Originator Reference Number	1560711
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	USPS-USER
Entered Date	03/29/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/29/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	CONWAY
Consumer Address, State Code	AR
Consumer Address, State Name	Arkansas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	b(6)
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America
Company Address, Line 1	PO BOX 80210
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90080
Company Address, ZIP Code Extension	0210
Company Phone, Country Code	
Company Phone, Area Code	866
Company Phone, Number	6174273
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	TV/Radio
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	Not Reported
Complaint Info Amount Requested Value	$3375.00
Complaint Info Amount Paid Method	Not Reported
Complaint Info Amount Paid Value	$4500.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	3/29/2011 AEasterling Responded to radio ad for Income at Home. Paid initial $9.95 for broad overview of the company. Paid $149 for required 1st months personal weight loss products. It was not until this time that Herbalife was the company I was dealing with. Paid $39.95 for more information about the company. Urged to act right away in decision to become a Supervisor distributor--"You don't want to leave any money on the table." Success was guaranteed if I would just follow their training methods and was willing to work hard. Paid $3,175 (includes tax/shipping) upfront for "supervisor" distributorship status. Was sent 6 cases of weight-loss product for resale/reshipping. Company business practices/continued financial investment revealed very methodically during training. Not informed until training almost completed that sales leads would cost me $130 each. Felt that I had to continue in the business due to the time/money invested. Discussed my concerns with (b)(6) in October 2010. Notified by mentor (b)(6) (b)(6) 11/22 that she could no longer handle Herbalife and was cancelling her account. that the only ones making any

	money were those at the too (of this MLM business.) She invested almost $15K into the business and made only $1500--when I was contemplating becoming a distributor and was told how much it could cost up front, she told me--only because I asked her--that she had made $12K her first money, and a 1-% return was not what she (and I) had been led to expect. They told her she would have to continue financial investment for at least 18-24 months in order to make any more money depending on how many people she could get to invest in the co. Initial product inventory can't be returned--would have had to have been rejected upon delivery for an 85% return of cost. I cancelled my account on 11/25.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 68 of 192	
Reference Number	30362705
Created Date	04/07/2011
Complaint Source	U.S. Postal Inspection Service
Originator Reference Number	1561802
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	USPS-USER
Entered Date	04/07/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	04/07/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	COSTA MESA
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	2850 S ROOSEVELT STE 102
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TEMPE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85282
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	877
Company Phone, Number	6726225
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	Kelley
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Mail
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0318
Complaint Info Product Service Description	Shop-at-Home\Catalog Sales
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	4/7/2011 AEasterling When I received the materials and products and told the merchant I did not want them and was invoking his return guarantee, the merchant refused to return my money and refuses to talk to me or return my calls and e-mails
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 69 of 192	
Reference Number	30508092
Created Date	05/05/2011
Complaint Source	BBB BC Vancouver
Originator Reference Number	00370001238968
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBVABC-USER
Entered Date	05/05/2011
Updated By	BBBVABC-USER
Updated Date	11/03/2011
Agency Contact	External Agency
Complaint Date	05/05/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ONEIDA
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International
Company Address, Line 1	210 9250 120 St
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SURREY
Company Address, State Code	BC
Company Address, State Name	British Columbia, Canada
Company Address, Country Code	CAN
Company Address, Country Name	CANADA
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Tejinder Singh
Company Rep Middle Name	
Company Rep Last Name	Matharu
Company Rep Salutation	
Company Rep Comments	Distributor
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Cythia Robinson uses high pressure imature selling-business practices. I never seen in business this kind of nonsence. Going on about giveing her money. Forcing me to take a loan. Very imature child like. She is a thief and she is stealing from people left and right. These Herbalife Distributors should be watched. --- Additional Comments: Refunding people's money.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 70 of 192	
Reference Number	30525117
Created Date	02/22/2011
Complaint Source	BBB IN Fort Wayne
Originator Reference Number	03520026035116
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBFTWN-USER
Entered Date	02/22/2011
Updated By	BBBFTWN-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	02/22/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LAS VEGAS
Consumer Address, State Code	NV
Consumer Address, State Name	Nevada
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	9805 Secluded Lane
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	FORT WAYNE
Company Address, State Code	IN
Company Address, State Name	Indiana
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	46835
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$334.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was under the impression that they would supply a list of customers. I wrote to Mr. Locker that I did not want to sell Herbalife and returned the $299.00 plus I paid with my debit card. It cost an additional $35.00 to return his products. I asked him to credit my account and to advise me that he received the products and how long would it take to process the credit. I wrote him several times without a word from him. --- Additional Comments: I want my money credited back to my debit card for the products I returned. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 71 of 192	
Reference Number	30624763
Created Date	11/18/2010
Complaint Source	BBB CA Oakland
Originator Reference Number	11160057182164
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBOACA-USER
Entered Date	11/18/2010
Updated By	BBBOACA-USER
Updated Date	02/25/2012
Agency Contact	External Agency
Complaint Date	11/18/2010
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	GREELEY
Consumer Address, State Code	CO
Consumer Address, State Name	Colorado
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	-
Consumer Home Phone, Number	-
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	-

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Online Herbalife Recruiter
Company Address, Line 1	225 E Santa Inez Ave, Apt 6
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SAN MATEO
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	94401
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.onlineinfopack.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0318
Complaint Info Product Service Description	Shop-at-Home\Catalog Sales
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I paid 10 dollars for their introductory cd...only had 2 minute video...I DID NOT wish to continue with this business. They took credit card number from introductory cd and used it to continue to charge me for a product that I do not want or did NOT order. two minute video was about motivation NOT the product...total ripoff I do not want to sale herbalife products...my choice. He has NO right to make charges since I did not continue training bs. This is a scam reported numerous times on the internet. Surely you have had to deal with him before...or herbalife.He charged me 40 dollars for what I dont know and according to internet scam they charge 200 dollars for their first supply of products..or hes charging me by installments..which is an excuse for thief. If he doesnt return monies...I will file criminal charges...but looking at his pictures online he looks like a criminal already hiding from the law! Please make a request to stop and refund...I know his children would not like to see him go to jail!you can google this scam and find numerous complaints already by other herbalife criminals. --- Additional Comments: Immediate refund of my funds that are illegally stolen. If not returned immediately, law enforcement will be the next step!'
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 72 of 192	
Reference Number	30711362
Created Date	04/04/2011
Complaint Source	BBB DE Wilmington
Originator Reference Number	02510008552942
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBDEL-USER
Entered Date	04/04/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	04/04/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	NEWARK
Consumer Address, State Code	DE
Consumer Address, State Name	Delaware
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	MainStream Nutrition Club - Herbalife
Company Address, Line 1	163 E. Main Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	NEWARK
Company Address, State Code	DE
Company Address, State Name	Delaware
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	19711
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	302444
Company Phone, Extension	
Company Email	
Company Website	http://www.mainstreamnutrition.com/
Company Rep First Name	Stephen
Company Rep Middle Name	
Company Rep Last Name	Fangman
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I went into this business just assuming they provided nutritional shakes/supplements to the general public. Once inside, they tried to sell me on their line of products and nutritional counseling. The problem is that none of the employees are formally trained in nutrition, or are Registered Dietitians or Nutritionists. None of the employees actually had a background in nutrition, all they learned was from the literature from the company that provided their products. In an establishment such as this, I feel that it it unfair to the public to have uneducated people advising others on nutritional counseling, with no factual knowledge of actual nutrition. As an individual who holds a bachelors degree in Nutrition, this was vary disturbing and felt unethical to me because the information that the individuals were giving me was inaccurate and misleading. --- Additional Comments: I would implore the business to acquire knowledgable staff with nutritional

	backgrounds, as to not feed incorrect information to consumers. It's unethical.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 73 of 192	
Reference Number	30777181
Created Date	04/04/2011
Complaint Source	Washington, Attorney General
Originator Reference Number	384949
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	WA01-USER
Entered Date	04/04/2011
Updated By	-
Updated Date	-
Agency Contact	External Agency
Complaint Date	04/04/2011
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	PASCO
Consumer Address, State Code	WA
Consumer Address, State Name	Washington
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	30 - 39
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$450.00
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	9000
Complaint Info Product Service Description	Other (Note in Comments)
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	I am a 64 year old woman, who is disabled with many diseases, including Type-1 Diabetes for which I am currently taking insulin up to four times a day depending on my sugar levels. Yesterday, Saturday, April 2, 2011 two neighbors who are private distributors for Herbalife came to my home after my son (b)(6) (b)(6) noticed the logo of Herbalife (which neither I nor (b)(6) were familiar with,) on the back of their van and asked one of the distributors if they sold anything that was good for the pancreas. The guy's name, who my son spoke to is Jesus, and they currently have a business that sells Herbalife Products located at 1320 N. 4th Ave., Suite A-1, Pasco, WA 99301. Their phone numbers are (509) 987-0178 & (509) 987-8082. Both Jesus and Rosalinda spent about an hour in my home located at (b)(6), Pasco, WA (b)(6) Eventhough my son only asked for a product which could help my diabetes, and all

Complaint Info Comments	that my son was thinking was trying to help me feel better and fight this dangerous disease, the two distributors acted like doctors and "prescribed me" a bunch of supplements for every disease that I have and they told me not to tell our doctors at all. They even managed to entangle my son into buying a lot of products for constipation. Everything ended up costing us $450. They left us a hand-written receipt with the prices of each product along with the dosages that my son and I were supposed to take on daily basis up to three times a day. As they were leaving, they asked if we had had lunch and we said no, so they recommended that we started our treatments right away, which we did. A few minutes later we noticed that the recommended use on the bottles was much less than what Jesus & Rosalinda told us to take. Also on the bottles it says "30 day money back guarantee." Jesus and Rosalinda had said that all the supplements were supposed to last us a month, however, with the dosages they recommended, each bottle didn't have enough quantity of the product to last that long. That's when we started getting suspicious, and we obviously relized that what this two individuals were trying to do, was sell us as much product as possible, which compared with the prices of everything they sold us that we found online, were much higher than what other distributors are selling them for. So my son started researching the company and we found out that many unsatisfied customers were claiming that Herbalife is just a scam, that the company has had several "Fraud Lawsuits" against them which Herbalife settled out of court and without taking responsibility. "In 1985, the California Attorney General sued the company for making inflated claims about the efficacy of its products. The company settled the suit for USD 850,000 without admitting wrongdoing.[6] In 1986 Herbalife became a publicly traded company on the NASDAQ, and in 1996 Herbalife reached USD 1 billion in annual sales." (http://en.wikipedia.org/wiki/Herbalife.) We also found out that Herbalife Products contain high leverls of lead. We found this information in various places by typing "lead in herbalife products." There are several reports made by scientists who tested Herbalife products and

	found that their products contain up to 6,000% of lead which is allowed by law. Anyway, since on the bottles it says, "30 day money back guarantee," we immediately called Jesus & Rosalinda. At first, they would not answer their phones, but I, (b)(6) left them messages saying that we did not want their products and that we wanted our $450 back. It wasn't even an hour later when Jesus actually answered his phone and when we told him we wanted our $450 back, he stated that he and Rosalinda had already spent the money. After many phone calls Jesus told my son that Herbalife was a legitimate company and that he would give us back our money by Wednesday. However after all their ignoring our phone calls, then trying to convince us to keep the products, then saying that t
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 74 of 192	
Reference Number	30962900
Created Date	07/22/2010
Complaint Source	Michigan, Attorney General
Originator Reference Number	2010-0020887-A
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	MI01-USER
Entered Date	07/22/2010
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	07/22/2010
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ROCKFORD
Consumer Address, State Code	MI
Consumer Address, State Name	Michigan
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	b(6)
Consumer Age range	-
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	HERBALIFE INTERNATIONAL
Company Address, Line 1	P.O. Box 20810
Company Address, Line 2	-
Company Address, Line 3	-
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90080
Company Address, ZIP Code Extension	0210
Company Phone, Country Code	-
Company Phone, Area Code	866
Company Phone, Number	8664744
Company Phone, Extension	-
Company Email	-
Company Website	-
Company Rep First Name	-
Company Rep Middle Name	-
Company Rep Last Name	-
Company Rep Salutation	-
Company Rep Comments	-
Complaint Info Initial Contact Method	-
Complaint Info Initial Contact Date	-
Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	9000
Complaint Info Product Service Description	Other (Note in Comments)
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 75 of 192	
Reference Number	30985052
Created Date	04/26/2011
Complaint Source	BBB MO Saint Louis
Originator Reference Number	07340001426289
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSAMO-USER
Entered Date	04/26/2011
Updated By	BBBSAMO-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	04/26/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MILWAUKEE
Consumer Address, State Code	WI
Consumer Address, State Name	Wisconsin
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	The Online Business Systems Herbalife
Company Address, Line 1	6086 Germania Rd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	PARK HILLS
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	Manager
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	On April 20, 2011 an agent for this company (_____)made an unauthorized charge to my checking account Via Debit transaction. On or about Febuary 21, 2011 _____ a representative of Online Business Systems Herbalife International; made an approved by me debit charge to my checking account in the amount of $39.95 usd. This transaction was supposed to be a one time charge for an information package about the online business system and how it works. Shorty after receiving the packet I was contacted by _____. During a phone interview he proceeded to try to recruit me to join the Herbalife International business family. I refused at the time due to the lack of information given at the time of our phone conversation. He continued to try to get me to join by using the company's BBB accreditation to among other things to influence me to proceed with a start up deal that required me to send him $399.00 usd to begin a business. I refused. I continued to receive emails from him up until on or about March 5, 2011 in an attempt to get me to buy into the business. I never replied to his emails. On 4/20/2011 _____ completed another debit charge to my checking account

	for the amount of $39.95 that was in no way authorized by me or anyone representing me. I have attempted to contact _____ buy phone (877-684-6457)and buy email with no response at all. I have since closed out the debit card used it the original transaction but I was informed that there maybe more attempts that may be charged to me. This must not happen again. He must be stopped. I attempted to contact Herbalife International by phone today by the listed number on the BBB website but was told I had the wrong number (573-225-3137). This company boldly posts by banner on their website that they are accredited by the BBB, and they are not. I feel that the site should be shutdown on that fact alone. I am not sure if this is a isolated incident or not, but it is clearly intentional. --- Additional Comments: I would like the return of all monies taken without authorization. '
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 76 of 192	
Reference Number	31000951
Created Date	05/23/2011
Complaint Source	BBB MN Saint Paul
Originator Reference Number	07040057202040
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSPMN-USER
Entered Date	05/23/2011
Updated By	BBBSPMN-USER
Updated Date	04/21/2012
Agency Contact	External Agency
Complaint Date	05/23/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SAN ANTONIO
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 W 190th St
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Sal
Company Rep Middle Name	
Company Rep Last Name	Cordova
Company Rep Salutation	
Company Rep Comments	Administrator
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	will not give my refundall I was trying to do was to find home bass job,because I can not work, I'm handy cap, and wheele chair bound,and I am on SSI so I call them to get started I had to pay start up for the book and c d, and I give them my card no. to get started. but when I told by a mentor welcome to the team.they would send me some stuff to get going, they would back with me and hung up. then I had bad filing about it, so I went on line yo check my checking acc. and they out $295905. so I called back, I was told thatI knew what I was getting to. I try to stop the shipment, but was all ready ship and not stop it, but when I got the load I refused it and sent it back. as of fedex tracking they got the load back on the 23rd of april. now they say it has to go through a bunch of dept. before they could it back in my bank acc. all they are doing is draging there feet. the fedex tracking is (b)(6) and there case no is (b)(6) all I have right now 11.00 in the bank,and my power is over due,and I can not pay it,until I get money back in the bank, and they are going cut off unless I can something on it --- Additional Comments: I just my money back in my bank acc., and they go there way and I go mine'
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 77 of 192	
Reference Number	31016827
Created Date	06/01/2011
Complaint Source	BBB AB Calgary
Originator Reference Number	00170001163772
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCAAB-USER
Entered Date	06/01/2011
Updated By	BBBCAAB-USER
Updated Date	02/26/2012
Agency Contact	External Agency
Complaint Date	06/01/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SARNIA
Consumer Address, State Code	ON
Consumer Address, State Name	Ontario, Canada
Consumer Address, Country Code	CAN
Consumer Address, Country Name	CANADA
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife of Canada Ltd.
Company Address, Line 1	120, 4550 - 25 Street SE
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CALGARY
Company Address, State Code	AB
Company Address, State Name	Alberta, Canada
Company Address, Country Code	CAN
Company Address, Country Name	CANADA
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	dominiques@herbalife.com
Company Website	http://www.herbalifeww.com/ca/
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact

Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	I joined Herbalife around apr 3/11. I joined as a distributor to get 50% off the products when I sell to a customer. They want you to buy leads with out explaining that these are unrefundable and the company is in Barbados, so no chance of getting your money back. First I ordered a canadian lead which my coach did not tell me to not to order so I lost $500.00 when I quit but he told me oh do not worry just order 2 more leads from the states.So there went another $1000.00 so now I am out 1500.00 dollars. Then they make you order all these starter packs around 2000.00 and 1400 dollars of stock. At this time they never issue proper receipts the order is all done with your coach on the phone. Of course by this time they have your credit card #. It was constantly having to pay for this or that and leads never amounting to anything. As far as I am concerned this is a pyramid scheme. So around 3 weeks I just felt I was getting scammed and left to flounder in this business. The coaching I was promised was never really there cause the coach is to busy

Complaint Info Comments	trying to pump up his leads and find another person to spend 5000 dollars to be a supervisor. I decided to quit before it maxed out my credit card and they had me jump through hoops to get back 90% of the products I had on hand and am still waiting for my money. They have had my product for over 10 days now and no money has been credited to my card BUT they have taken two withdrawals off my credit card recently one for $100 and one for $40 and change. I contacted my credit card and have cancelled my card and these amounts are being investigated by PC Mastercard. I have sent an e-mail to return and refund herbalife in Quebec who is supposed to refund my money from Herbalife in Calgary.Are you confused I am! Please help to resolve this issue and I am concerned another hard working person will be scammed in this very elaborate system to have spend and spend and spend with promises of making a lot of money. My biggest complaint is the lack of proper paper work and receipts so that I may file a loss through the government for a business venture that did not work out and I would like as much as my money back as possible. My file # with repurchase request is #(b)(6) Herbalife contact # is 1-866-622-1222. --- Additional Comments: 90% of the stock I have in the United States and 90% of the stock I sent back by UPS to Calgary Alberta.The original amount of stock was $4500 I expect the 90% of that amount is expected back.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 78 of 192	
Reference Number	31339975
Created Date	07/01/2011
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	07/01/2011
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	07/01/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Lawrence
Consumer Address, State Code	KS
Consumer Address, State Name	Kansas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International
Company Address, Line 1	PO BOX
Company Address, Line 2	90080
Company Address, Line 3	
Company Address, City	Los Angelos
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90080
Company Address, ZIP Code Extension	0210
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Annie
Company Rep Middle Name	
Company Rep Last Name	Hsu
Company Rep Salutation	
Company Rep Comments	customer service
Complaint Info Initial Contact Method	I Initiated Contact
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	Phone: international call
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$14477.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$14477.00
Complaint Info Product Service Code	1603
Complaint Info Product Service Description	Health Care: Other Products\Supplies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife charged my debit card for a standing order that I did not place. It took me hours on the phone, long distance, to straighten this out. I cancelled the order, but they took the money from my account, then sat on it. I had to contact them, repeatedly, three times total, they kept telling me they refunded it, and the bank had it, and on and on and on in an effort to force me to give up and let them keep the money, and the money is still not in my account. I kept checking with the bank, of course, they had everything in order, and are just as upset about this as I am. I canceled my distributorship, the card, everything I could to to prevent them from taking the money, but it failed. I got more song and and dance about how they refunded it, but they didnt!!! I kept printed records of their activity, and I have to proof that this happened to me. Only after I repeatedly threatened them that I intended to contact you and the KS attorney general, did they finally send the money. They sent it back to the card I TOLD THEM I had invalidated, again, in an effort to prevent me from getting my money back!!! I called my bank and they will manually transfer it sometime today. I

	burned tons of minutes on my cell phone, and COULD have bounced checks, had I not carefully checked my account on a regular basis. This company does not deserve to even do on line business as this is how they treat their workers. I returned my distributorship, cancelled everything that I could to prevent this, and it happened anyway. I want is to make it impossible in the US for any merchant to do this to anyone else!!! If possible I would like a law passed to prevent standing orders on credit cards, as dont want anyone else to go through what I have with this company, or any other crooks that are out there!
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 79 of 192	
Reference Number	31809946
Created Date	07/30/2011
Complaint Source	BBB IL Chicago
Originator Reference Number	06540094355692
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCHIC-USER
Entered Date	07/30/2011
Updated By	BBBCHIC-USER
Updated Date	02/22/2012
Agency Contact	External Agency
Complaint Date	07/30/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	RENO
Consumer Address, State Code	NV
Consumer Address, State Name	Nevada
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	3836 S Hermitage Ave
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CHICAGO
Company Address, State Code	IL
Company Address, State Name	Illinois
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	When I first started with this company I asked several questions I ask if this is a pyramid and did I have to stock merchandise in my house and both questions were no. Then I was asked witch plan I wanted and there were two different plans and I went to the larges plan witch was $399.00 and so after that we had our first call back and It started out like this you can order $3000.00 worth of products and you can be a supervisor and stock you house with products but with the Health board you can not stock any products for sale in nevada. One of the distributers was name Teresa Dietz and the other was Irena. I am not working at this time and could not afford it. It was a pyramid and they wanted me to stock merchandise witch that was one of the first question, we gave them $400.00 and only received $125.00 with charges of restocking fees, and other charges. We think we got two not good distributers because we were lied to alot. The pryamid the stocking in our house also having someone cut you down and the other one not saying anything and telling you should grow up in so many words. --- Additional Comments: Look into Irena (world Team Member) and people that are working fraudulent with Herbalife mainly look into people that treat others with no respect '

Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 80 of 192	
Reference Number	31930686
Created Date	01/22/2010
Complaint Source	Tennessee, Department of Commerce and Insurance, Consumer Affairs Division
Originator Reference Number	10-00463
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	TN34-USER
Entered Date	01/22/2010
Updated By	TN34-USER
Updated Date	08/30/2011
Agency Contact	External Agency
Complaint Date	01/22/2010
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	LOS ANGELES
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	-
Consumer Home Phone, Number	-
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-
Consumer Work Phone, Number	-
Consumer Work Phone, Extension	-

Consumer Fax, Country Code	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	-
Consumer Age range	-
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	Herbalife
Company Address, Line 1	1106 South Vancouver Avenue
Company Address, Line 2	-
Company Address, Line 3	-
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90022
Company Address, ZIP Code Extension	-
Company Phone, Country Code	-
Company Phone, Area Code	323
Company Phone, Number	7803805
Company Phone, Extension	-
Company Email	-
Company Website	-
Company Rep First Name	Lucilla
Company Rep Middle Name	-
Company Rep Last Name	Naranjo
Company Rep Salutation	-
Company Rep Comments	-
Complaint Info Initial Contact Method	-
Complaint Info Initial Contact Date	-
Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested	

Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	$3.00
Complaint Info Product Service Code	1603
Complaint Info Product Service Description	Health Care: Other Products\Supplies
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	NOTE: In addition to the complaint notes immediately below, the Tennessee Division of Consumer Affairs provided additional information in fields whose header titles are quoted and follow the complaint notes. In these notes, C stands for Consumer and R for Respondent. --- Complainant claims company is running an illegal health drink store out of their garage. --- Date Complaint Closed: 28-Jan-10 --- Closure Code: Referred to Another Government Agency --- Amount Recovered: 0.00
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 81 of 192	
Reference Number	32121321
Created Date	08/22/2011
Complaint Source	BBB ON Kitchener/Toronto
Originator Reference Number	01070001236387
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBMWON-USER
Entered Date	08/22/2011
Updated By	BBBMWON-USER
Updated Date	04/19/2012
Agency Contact	External Agency
Complaint Date	08/22/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WEST MEMPHIS
Consumer Address, State Code	AR
Consumer Address, State Name	Arkansas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife Online Business Systems
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	http://ozzygirl.theonlinebusiness.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	I responded to an email for online work from home today 8/20/11. The website link took me to a page that listed a woman's ((b)(6) (b)(6) success story of online work at home, it also stated that this online business opportunity was advertised on MSNBC,CNN,ABC,USA Today and BBC. It also showed the BBB symbol and stated that it was a BBB approved business. The article instructed the viewer to fill out a short form which I did. The information given in the article stated that the form was to receive a starter kit that cost $3.00 (actually $2.97) and that was the entire cost; it also stated that this work at home opportunity was performed online only and that there was nothing to buy and nothing to sell. If it had not made that statement, I would not have gone any further, as I have checked into these offers before soon to find they were just scams. When I filled out the form to order the work at home kitthe cost for the kit was suddenly offered for freebut

Complaint Info Comments	the shipping had been upgraded to priority mail for $9.95 for faster delivery. This article also stated there was a money back guarantee. I proceeded with the order thinking it must be genuine since it was BBB approved. While filling out the order pages I was informed that I would be receiving an email as confirmation of the orderbut I never got the email confirmation. What I didget was a phone call from a woman named (b)(6) whointroduced herself as my mentor for the work at home business I wished to start. She confirmed myname, address and other information listed on myonline form. That's when things changed. She started asking about the amount of time I would be able to commit to the business, the lists of contacts that would be provided by the company, and that I would receive my intro.kit in a few days so I could look it over before they charged my card $39. I told her at that point I was not interested in anything involving sales and I was sorry I had wasted her time but don't send the kit. She informed me that the kit was on the wayand the only way I could get my money back was to take it back to the post office as soon as it was delivered. I informed her that the statements made on the website were not the same as what she was telling me. She said she did not know of any website that offered what I told her about and that I must have gotten onto the wrong site. So I ended the conversation by telling her that I planned to contact the BBB as it was listed on thewebsite. The conversation ended, but about 30 mins. later I got another phone call from the same person which I did not answer. Then while I was filling out this complaint I received an email telling me my $9.95 was being refunded. I am not out anything now but my time thankfully, but the next guy may not be so lucky. These peopleare not truthful in their advertising. They misrepresented the fees, the fact that the business is entirely about sales, and I doubt thatthese people are approved by the BBB. I copied the pages with information in question to my computer if you should want to see them. --- Additional Comments: I want the statement 'truth in advertising' to stand for something. I realize that online websites are a difficult media to govern and we are all warned about the

	dangers of using them.But misrepresentation is the same anywhere. The Herbalife company needs to be responsible for whatthe associates that sell their products are sayingand doing.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 82 of 192	
Reference Number	32595938
Created Date	09/02/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098635468
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	09/02/2011
Updated By	Kishor Gangavarapu
Updated Date	10/10/2011
Agency Contact	External Agency
Complaint Date	09/02/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	JACKSONVILLE

Consumer

Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	They began taking money out of my bank account after I was no longer a subscriber to Herbalife with no warning. Just went in account and took it. --- Additional Comments: Give me my money back and take my name, phone number, address, and bank account off of their records. Within 30 days this company has taken 15.95 on 3 separate intervals right out of my account without even letting me know.'
Complaint Info CRA Dispute Flag	
Complaint Info	

CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 83 of 192	
Reference Number	32800408
Created Date	09/26/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098640191
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	09/26/2011
Updated By	Kishor Gangavarapu
Updated Date	10/10/2011
Agency Contact	External Agency
Complaint Date	09/26/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	JAMAICA

Consumer

Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Fake cnbc site used in deceptive advertising to promote distributorship of their products and other services --- Additional Comments: Destroy my credit card information and do not use it for the $39.00 within the two week period like the distributor Victoria Zalesky, recruitingvzonlinebiz.Com and her mentor threatened me with, based on deceptive advertising, and to take down the fake news site at cnbc-news.Co/news/home-bizopp-0357.Html?Qhcq and to refund my $9.95 after the return of the so called starter package.'
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 84 of 192	
Reference Number	32883829
Created Date	02/25/2010
Complaint Source	Ohio, Attorney General
Originator Reference Number	646775
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	OH01-USER
Entered Date	02/25/2010
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	02/25/2010
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	COLUMBUS
Consumer Address, State Code	OH
Consumer Address, State Name	Ohio
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	b(6)
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International Of America
Company Address, Line 1	1800 CENTURY PARK E FL 15
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90067
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	TERESAA@HERBALIFE.COM
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact

Method	Internet Web Site
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$822.93
Complaint Info Amount Paid Method	Bank Account Debit
Complaint Info Amount Paid Value	$822.93
Complaint Info Product Service Code	9000
Complaint Info Product Service Description	Other (Note in Comments)
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	NOTE: In addition to the complaint notes immediately below, the Ohio Attorney General's Office provided additional information in fields whose header titles are quoted and follow the complaint notes. --- i want my $822.93 returned for the products i tryurned to them. --- Topic Description: I went on the website to start up this business couldn't do it because it was so time consuming and expensive and frustrating. they promised to reimburse me, I've been waiting all this time and still don't have my money back. although it only took them a matter of minutes to trake it. I want my money back for the products taht i returned to them equaling $822.93
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 85 of 192	
Reference Number	32963622
Created Date	08/31/2011
Complaint Source	BBB MO Saint Louis
Originator Reference Number	07340001434709
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSAMO-USER
Entered Date	08/31/2011
Updated By	BBBSAMO-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	08/31/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	BOOTHBAY
Consumer Address, State Code	ME
Consumer Address, State Name	Maine
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	4628 Meramec Blvd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	EUREKA
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	314
Company Phone, Number	7325776
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	Manager
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$455.95
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	On or around 8-5-11 I contacted an online business which seemed right for me. It advertised taking orders over the internet for a business. I contacted the company. It had no information as to who the business was. I received a call from _____ stating she would be sending me out a package in the mail with all the details. I received the package on or around the 7th of August. In that information package their again was no information to the business. It wasn't until August 10th when _____ called that I found out the business was Herbalife. I still was under the impression that I would be taking orders over the internet from this company and getting paid for it. When she called on the 10 she ask me for a credit card number so that she could send me out more products so I could try them out. Her words were if you are going to sell the products you need to know how they work. Which is very true. But I still felt a little hesitatant. The stupidity on my part was 399.00. She then set me up to look at other information and training on the computer. And at that point I realized that I would have to advertise and sell these products. I expressed my concern with ____ because I felt I was being pressured into going to the supervisor level immediately which would involve me spending more money. I have no idea how much because I put a stop to

	it shortly thereafter. Upon talking with ____ and _____ I told them I felt pressured into going to the next level. and in her e-mail sent to me on 8/15 she stated I told her that I felt no pressure which I had stated to her several times. So she lied to me in that e-mail I then wrote to _____ o August 18 and told her I was not interested in this business. I had tried call FEDEX to have the products back but they would not pick it up without permission from Herbalife. I ended up sending the package back myself on Saturday the 26th of August. I have not heard from ____ or _____ since my last e-mail and explained that I felt a tre --- Additional Comments: I would like the entire 399.00 refunded because it cost me over 17.00 to send the products back. I would also like the 39.95 refunded for the information kit that I have sent back. I would like the entire truth told in the packages that they send out to the potential clients. Like I said I felt a tremendous amount of pressure that they put on me going to the supervisor level. Cheryl has indeed lied in the e-mail she sent to me and I would like an apology for that lie.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 86 of 192	
Reference Number	33034540
Created Date	10/03/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098641809
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	10/03/2011
Updated By	Kishor Gangavarapu
Updated Date	10/20/2011
Agency Contact	External Agency
Complaint Date	10/03/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ESCONDIDO

Consumer

Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	They wonapost give me my money back!!! --- Additional Comments: I would like my money back minus the product of course.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 88 of 192	
Reference Number	33320418
Created Date	10/12/2011
Complaint Source	BBB BC Vancouver
Originator Reference Number	00370001245057
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBVABC-USER
Entered Date	10/12/2011
Updated By	BBBVABC-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	10/12/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	HOUSTON
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International
Company Address, Line 1	210 9250 120 St
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SURREY
Company Address, State Code	BC
Company Address, State Name	British Columbia, Canada
Company Address, Country Code	CAN
Company Address, Country Name	CANADA
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	604
Company Phone, Number	5802111
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Tejinder Singh
Company Rep Middle Name	
Company Rep Last Name	Matharu
Company Rep Salutation	
Company Rep Comments	Distributor
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$418.60
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Robin Schultz charged my credit card when i told her i did not want her to. I had returned the products that was sent to me and told her not to charge my card. I now have over drawn fees because of her.She lives in Canada and i returned the box i received back to her there.All I want is my money back.Product_Or_Service: Herbalife Products --- Additional Comments: DesiredSettlementID: Refund405.90 12.70I want 418.60 back into my account by Friday, October 14,2011'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 89 of 192	
Reference Number	33320840
Created Date	10/04/2011
Complaint Source	BBB UT Salt Lake City
Originator Reference Number	11660022120561
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSAUT-USER
Entered Date	10/04/2011
Updated By	BBBSAUT-USER
Updated Date	03/03/2012
Agency Contact	External Agency
Complaint Date	10/04/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)||
Consumer Middle Name	||
Consumer Last Name	b(6)|b(6)|b(6)
Consumer Salutation	||
Consumer Address, Line 1	b(6)||
Consumer Address, Line 2	||
Consumer Address, Line 3	||
Consumer Address, City	WEST JORDAN||
Consumer Address, State Code	UT||
Consumer Address, State Name	Utah||
Consumer Address, Country Code	USA||
Consumer Address, Country Name	UNITED STATES||
Consumer Address, ZIP Code	b(6)||
Consumer Address, ZIP Code Extension	||
Consumer Home Phone, Country Code	||
Consumer Home Phone, Area Code	||
Consumer Home Phone, Number	||
Consumer Work Phone, Country Code	||
Consumer Work Phone, Area Code	||
Consumer Work Phone, Number	||
Consumer Work Phone, Extension	||
Consumer Fax, Country Code	||

Consumer Fax, Area Code	||
Consumer Fax, Number	||
Consumer Cell Phone, Country Code	||
Consumer Cell Phone, Area Code	||
Consumer Cell Phone, Number	||
Consumer Email	b(6)||
Consumer Age range	||
Consumer Military Status	||
Consumer Military Station	||
Consumer Complaining Company/Org	||
Consumer Military Service Branch	||
Company Name	Herbalife
Company Address, Line 1	105 S State St PMB 304
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	OREM
Company Address, State Code	UT
Company Address, State Name	Utah
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Jaime
Company Rep Middle Name	
Company Rep Last Name	Winn
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I'm very unhappy with Herba life's product. I also feel that the sales person was NOT care at all about if I liked it or not!I've boughten Herba Life products from Ilene Nelson. I haven't had any good results...the tea made me SICK...but Ilene will sell you the product & than take your money. She never once called nor got in touch - period - to ask if I needed anything or disliked anything! That is rude customer service & highly unprofessional I feel of an Herba Life representative. I feel used, I feel like I've wasted my money on product that sits on my shelf. I've thrown 2 full bottles on the tea away! And the shake mix - well Carnation Instant Breakfast is cheaper...tastes better & has NO lumps!! I would like to see myself get my money back...and I would like to see that Ilene Nelson no longer sales Herbalife or is TRAINED on being a better & more caring sales person! I will never recommend Herbalife products to anyone! I feel they are overpriced with NO results! --- Additional Comments: I want my money refunded of product wasted. I want to see Ilene Nelson get trained to be more professional...or to not be able to sell it at all!'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute	

Responded	
Complaint Info CRA Dispute Resolved	

Record 90 of 192	
Reference Number	33325391
Created Date	10/14/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098644421
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	10/14/2011
Updated By	Kishor Gangavarapu
Updated Date	11/20/2011
Agency Contact	External Agency
Complaint Date	10/14/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	HASTINGS

Consumer

Address, State Code	MN
Consumer Address, State Name	Minnesota
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I pulled out of Herbalife, they have a 30 day money back guarantee to try their services. I want my $200 dollars back. --- Additional Comments: I want my $200 dollars back like what it said on their site.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 91 of 192	
Reference Number	33526084
Created Date	10/11/2011
Complaint Source	BBB MO Saint Louis
Originator Reference Number	07340001437571
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSAMO-USER
Entered Date	10/11/2011
Updated By	BBBSAMO-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	10/11/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PITTSBURGH
Consumer Address, State Code	PA
Consumer Address, State Name	Pennsylvania
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	The Online Business Systems Herbalife
Company Address, Line 1	6086 Germania Rd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	PARK HILLS
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	Manager
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	$9.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
	I was interested in working for home, I purchased a packet that was refundable for $9.95. I was not interested returned packet and didnt get a refundI was listening to a radio show and heard about the company. I then looked it up on my computer, and paid a refundable $9.95 to get the starter packet. This purchase was made 8/16/11. I do have my bank statements to show that this amount was taken out of my account. I used my debit card to make this purchase. About few days later my coach I was assigned to ____(i'm not sure if that is spelled right)called to the discuss starting the business, but I hadn't received my packet yet so it set up a time to call me again the following week, which I can show on my phone bill call log. He then told how much it was going to cost to start the business, and I then lost interest which I voiced to him. He then told me that that was find and just to send the packet back and I would receive my money back. I never opened the packet so I took it back to the post office and they marked the packet refused and returned it to the sender. I went to the post office on 9/3/11. On 9/23/11 I submitted a complaint via their website about not receiving my

Complaint Info Comments	money back. I do have the emails to show the back and forth dialogue. They responded saying that they didn't have any record of me in their system. I then told them I have my bank statements to prove that they took the money out of my account. I got a response on 9/26/11 that they were going to have my coach contact me about the refund because the coaches are who take the fee out of your account. On 10/7/11 I sent another email because my coach still haven't been in contact with me about my refund, and I told them that I was filing a complaint with the BBB. They responded on 10/7/11 and said my coach would be contacting me that day. On 10/7/11 my coach called my cell phone at 1:07pm and said that He didn't have any record of my payment being taken. I knew that wasn't true because you aren't assigned a coach until you pay the initial fee of $9.95 to get your starter packet. He then proceeded to tell me that I should have gotten a return id and I said that he never told me that. I also told him that I had proof he took the money out of my account. He started to raise his voice which lead to an argument and I terminated the phone call. I then sent another email on 10/7/11 to explain everything that happened. I have since then not heard from the company or coach. All I want is my money back. --- Additional Comments: All I want is for my $9.95 to be refunded back to me.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 92 of 192	
Reference Number	33638808
Created Date	11/23/2011
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	
DNC?	N
Entered By	ELOUDERMILK
Entered Date	11/23/2011
Updated By	
Updated Date	
Agency Contact	Phone
Complaint Date	11/23/2011
Transaction Date	10/15/2011
Member of armed forces or dependant?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Whitehouse
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	20 - 29
Consumer Military Status	Military Retiree/Veteran
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	U.S. Army
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	877
Company Phone, Number	8680891
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Jason
Company Rep Middle Name	
Company Rep Last Name	Montier
Company Rep Salutation	
Company Rep Comments	Distributor
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	10/15/2011
Complaint Info Initial Response	

Method	Phone: other
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$5.00
Complaint Info Amount Paid Method	Bank Account Debit
Complaint Info Amount Paid Value	$45.00
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer responded to an ad on "Craigs List" for a diet suppliment advertised for $4.95 by Herbalife . Consumer decided not to go thru with this order because it also stated that $39.95 would be also be debited to their account. Consumer was contacted by phone by the distributor who promised if she tries this product, her account would not be charged any more than $4.95. Today she says the $39.95 is on her debit account and she has been unable to contact the distributor. Says she did get the sample but does not know what the $39.95 charge is for.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Record 93 of 192	
Reference Number	33657198
Created Date	11/25/2011
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	11/25/2011
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	11/25/2011
Transaction Date	11/07/2011
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Winston Salem
Consumer Address, State Code	NC
Consumer Address, State Name	North Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife distributor dba Amy Montgomery
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	801
Company Phone, Number	9389212
Company Phone, Extension	
Company Email	(b)(6)
Company Website	
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	home business

Complaint Info Initial Contact

Method	Phone
Complaint Info Initial Contact Date	11/07/2011
Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	11/07/2011
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$10.00
Complaint Info Amount Paid Method	Bank Account Debit
Complaint Info Amount Paid Value	$50.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	I initially responed to a pop up internet advertisement on a home business opportunity and agreed to purchase a "Start up home business package" for $9.95 and also gave my mailing address, debit card information. I was unaware of this only being a "trial" for some 10 days according to the response I got from miss (b)(6) (b)(6) when I asked for my money back after being charge an additional $39.95 for this so called start up package I received in the mail.She called me after I received the "package" and asked me to review the cd/and read the booklet and write down the answers to the questions on 1 particular page in the booklet and then return her emails. The booklet which is mostly vague advertisement(the dvd was the same thing vague advertisement), I was instructed to call my "mentor" who would "hold my hand" in starting my own business provided the company felt I could follow simple instructions and "would fit " into their "team". When I played the dvd that was in a booklet sent to me in the mail(this was the

Complaint Info Comments	so-called "start ip package")It consisted of nothing more than a sales pitch of how much money I could make in the health suppliment industry though had never been disclosed the company was a multilevel marketing company nor the company's name being Herbalife products before I purchased the original start up package and even in this initial "business starter package" sent to me for the $9.95 I paid with my debit card. I was also called by (b)(6) (my supposed personal "mentor" who asked me to watch the dvd then I was instructed by (b)(6) and the booklet to set an appointment with her for a phone interview to "see if I would fit into their company". I finally did so after she cancelled once and had to listen to another sales pitch (this happened on my instucted appointment set up with (b)(6) (b)(6) after I had followed her instructions to read the booklet, watch the dvd, and call her to set up an appointment for a "phone interview"), I listened to a recording on this phone conversation which in the end announced they were herbalife and that I would need to spend $299.00 to actually get the distributorship(which was only now being disclosed) home business. When she got back on the phone I declined after asking her if this was a multilevel marketing business of which I was not interested.She asked if she could call back in another week and I agreed that I would think about it but at the time I was not interested at all.She called me again approximately a week later and I again said I wasn't interested. I was not told then that she would be withdrawing an additional $39.95 from my bank account in another week or so. When I called to demand this $39.95 be credited back to my bank account she claimed I "agreed" online if I did not "return" the business startup package(which she also told me to write in the booklet answering questions they asked as following instructions"to see if I was fit for the company". I do not recall ever seeing anything online about the additional charge and that Id have to have this package back in 10 days! It took me at least 7 days to get an appointment with her so I was set up to pay and she never spoke this to me until I called

	to complain. This was extremely deceptive and sort of bait and switch. They never disclosed this was multilevel marketing in their online add nor in the initial package. I want my money back cause this is a ripoff!
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 94 of 192	
Reference Number	33741796
Created Date	11/18/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098651597
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	11/18/2011
Updated By	Kishor Gangavarapu
Updated Date	01/05/2012
Agency Contact	External Agency
Complaint Date	11/18/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SIOUX FALLS

Consumer

Address, State Code	SD
Consumer Address, State Name	South Dakota
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Tried to be part of their business and did not like it and wanted to cancel my membership but they continue to charge me for the last four months --- Additional Comments: Refund the money charged to me and cancel my membership.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 95 of 192	
Reference Number	33765469
Created Date	12/02/2011
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	
DNC?	N
Entered By	LSHROPSHIRE
Entered Date	12/02/2011
Updated By	
Updated Date	
Agency Contact	Phone
Complaint Date	12/02/2011
Transaction Date	10/28/2011
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Anchor Point
Consumer Address, State Code	AK
Consumer Address, State Name	Alaska
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	60 - 64
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	403
Company Phone, Number	2550822
Company Phone, Extension	
Company Email	awalchuk@theonlinebusiness.com
Company Website	
Company Rep First Name	Arthur
Company Rep Middle Name	
Company Rep Last Name	Kowalchuk
Company Rep Salutation	
Company Rep Comments	Coach

Complaint Info Initial Contact

Method	Internet Web Site
Complaint Info Initial Contact Date	10/28/2011
Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$399.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$399.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer responded to a work at home plan with Herbalife. Consumer used her cc to pay for work plan. Consumer thinks that this may be a scam. Consumer was referred to website for further info.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Record 96 of 192	
Reference Number	33803581
Created Date	12/06/2011
Complaint Source	FTC Call Center
Originator Reference Number	-
Language	English
Contact Type	Complaint
Data Source	-
DNC?	N
Entered By	EQUINONEZ
Entered Date	12/06/2011
Updated By	-
Updated Date	-
Agency Contact	Phone
Complaint Date	12/06/2011
Transaction Date	12/05/2011
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	Laredo
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-
Consumer Work Phone, Number	-
Consumer Work Phone, Extension	-
Consumer Fax, Country Code	

	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	b(6)
Consumer Age range	40 - 49
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	Herbalife
Company Address, Line 1	-
Company Address, Line 2	-
Company Address, Line 3	-
Company Address, City	-
Company Address, State Code	-
Company Address, State Name	-
Company Address, Country Code	-
Company Address, Country Name	-
Company Address, ZIP Code	-
Company Address, ZIP Code Extension	-
Company Phone, Country Code	-
Company Phone, Area Code	754
Company Phone, Number	3001591
Company Phone, Extension	-
Company Email	-
Company Website	-
Company Rep First Name	Eduardo|Jose
Company Rep Middle Name	|
Company Rep Last Name	Reyes|Lopez
Company Rep Salutation	-
Company Rep Comments	|
Complaint Info Initial Contact Method	Phone
Complaint Info Initial Contact Date	12/05/2011
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	-
Complaint Info Amount Requested	

Method	-
Complaint Info Amount Requested Value	$130.00
Complaint Info Amount Paid Method	Cash
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	9001
Complaint Info Product Service Description	Telemarketing, Other
Complaint Info Law Violation Code	TR11|TR25
Complaint Info Law Violation Description	TSR: Other Deception or Abuse (note in comments)|TSR: Threats, improper language
Complaint Info Statute Code	TR
Complaint Info Statute Description	Telemarketing Sales Rule
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	Consumer says that she got a call from someone claiming to be with Herbalife telling her that she won $1000, but will have to pay them $130 for insurance. Consumer has not sent anything. Consumer also says that they have threatened to sue her.
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Record 97 of 192	
Reference Number	33907917
Created Date	11/29/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098653039
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	11/29/2011
Updated By	Kiran Singireddy
Updated Date	01/11/2012
Agency Contact	External Agency
Complaint Date	11/29/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PORT TOWNSEND

Consumer

Address, State Code	WA
Consumer Address, State Name	Washington
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was duped by herbalife, lost $10 once I realized it was a scam have to send materials at my own expense, threatened with $40 for materials. HELP. --- Additional Comments: I want my money back.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 98 of 192	
Reference Number	34237431
Created Date	12/20/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098657663
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	12/20/2011
Updated By	Adam D asmitley
Updated Date	03/13/2012
Agency Contact	External Agency
Complaint Date	12/20/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)||
Consumer Middle Name	||
Consumer Last Name	b(6)|b(6)|b(6)
Consumer Salutation	||
Consumer Address, Line 1	b(6)||
Consumer Address, Line 2	||
Consumer Address, Line 3	||
Consumer Address, City	FORT WORTH||

Consumer

Address, State Code	TX||
Consumer Address, State Name	Texas||
Consumer Address, Country Code	USA||
Consumer Address, Country Name	UNITED STATES||
Consumer Address, ZIP Code	b(6)||
Consumer Address, ZIP Code Extension	||
Consumer Home Phone, Country Code	||
Consumer Home Phone, Area Code	||
Consumer Home Phone, Number	||
Consumer Work Phone, Country Code	||
Consumer Work Phone, Area Code	b(6)||
Consumer Work Phone, Number	b(6)||
Consumer Work Phone, Extension	||
Consumer Fax, Country Code	||
Consumer Fax, Area Code	||
Consumer Fax, Number	||
Consumer Cell	

Phone, Country Code	‖
Consumer Cell Phone, Area Code	‖
Consumer Cell Phone, Number	‖
Consumer Email	b(6)‖
Consumer Age range	‖
Consumer Military Status	‖
Consumer Military Station	‖
Consumer Complaining Company/Org	‖
Consumer Military Service Branch	‖
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	One of their representatives, Carl, took money out of my checking account without authorization or notification that he was doing so. --- Additional Comments: To refund my $39.95 via company check mailed to me immediately.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 99 of 192	
Reference Number	34882849
Created Date	01/26/2012
Complaint Source	BBB TX Houston
Originator Reference Number	09150008894920
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBHOTX-USER
Entered Date	01/26/2012
Updated By	-
Updated Date	-
Agency Contact	External Agency
Complaint Date	01/26/2012
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	SOUTH HOUSTON
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	-

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc (HQ)
Company Address, Line 1	950 West 190th St
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Additional Comments: '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 100 of 192	
Reference Number	35014841
Created Date	02/13/2012
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	02/13/2012
Updated By	CRSS\rmiller
Updated Date	02/15/2012
Agency Contact	Internet
Complaint Date	02/13/2012
Transaction Date	03/02/2010
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Little Rock
Consumer Address, State Code	AR
Consumer Address, State Name	Arkansas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America Inc.
Company Address, Line 1	950 W. 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Torrance
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	1001
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	24650
Company Email	
Company Website	
Company Rep First Name	Monica
Company Rep Middle Name	
Company Rep Last Name	Munoz
Company Rep Salutation	
Company Rep Comments	Sr. Refund Representative

Complaint Info Initial Contact

Method	Phone Call: Mobile/Cell
Complaint Info Initial Contact Date	03/02/2010
Complaint Info Initial Response Method	Phone: 800/888 number
Complaint Info Initial Response Date	03/02/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$3700.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$3700.00
Complaint Info Product Service Code	0308
Complaint Info Product Service Description	Employ Agencies\Job Counsel\Overseas Work
Complaint Info Law Violation Code	DDM|TR20
Complaint Info Law Violation Description	Deception/Misrepresentation|TSR: Unauthorized billing
Complaint Info Statute Code	TR|P
Complaint Info Statute Description	Telemarketing Sales Rule|FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	Herbalife International Of America Inc. contact me for a job, of which I needed to pay for my son medicine which is $700.00 a month. Gray J Nakayama, is the trainer who a gave me this so call training and it did not add up to any training at all. Missed phone conferencing, set appointments not kept on time, sometime 3 days later with very little explanation. The products were sent to me by Gray J. Nakayama, she took my credit card and charged $3,700.00 on my card with no follow up training for a week and two weeks went by and I tryed the products and be came very ill when taking them. I explain this to her and made a request for my money back and she refuse to credit my account. All the products that she sent me through the company have all been returned and I took pictures of every item I returned and labeled every item and wrote down every item that I returned. I have made 5 request for my money back on my account. I made a dispute with the credit card company and they refuse to even listen to me. The credit company told

Complaint Info Comments	me I had to send them back All their products before I could get a refund and I did, even a few containers that used in two weeks. Til this date, the Herbalife company still send me a letter asking for the products listing of all the products I sent back to the company. I have sent what they wanted and they still refuse to credit my account back properly. Herbalife refuse to to communicate with me about their products I had and finally on July 12, 2010, I spoke with Toby and he instructed me to send the products to this address:Herbalife International Attention: Refund & Repurchase Dept., 5025 Crumpler Rd, Memphis, Tenn 38141. All the product were sent on September 8, 2010 the with USRF on each box through UPS Shipping. To resolve this: I want my account credit back, because I did not use their products long enough to make any kind of profit and I would be justified when they refund my account back with the $3,700.00. Every bottle, every name of each product was accounted for. I also have letters that Ive sent to the company asking for my refund and a address to send products that I have. I spoke with Oscar on May 4, 2010 and he stated that he would send me some papers to fill out first, which was a itemized list of all my products I have. I have in good faith returned all of their products and I have not gained a dime but I would like my account credit back for what they took from me. $3,700.00 is what they charged me for their products and I would like my money back on my credit card for all the wrong they did. Other-Other Update
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

CONSUMER

NETWORK

Law enforcement's source for consumer complaints

PRINT

Consumer Sentinel Network Complaints

Record # 1 / Consumer Sentinel Network Complaints

Reference Number:	42992409	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	I was approached while christmas shopping by someone trying to sign me up for **Herbalife**. I am familiar with these types of schemes, as my mom has lost of a hundred thousand to a different scheme. Xango. so because of this i am aware of the FTC regulations, and i listened carefully to everything the distributor said, she made express claims of income, that i could be "rich beyond my dreams" that if i invested 10,000 into it it wouldnt matter because I would be making a million within a year. that the products cure cancer etc. i informed her that she was making illegal statements, and she she insisted that everything she had said was true and that i just had a negative attitude. I since learned about Bill Ackmans presentation on **Herbalife**, and learned that things are FAR WORSE than my parking lot conversation. it is IMPERATIVE that you conduct and thorough investigation of this company and this industry		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	1/18/2013
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$10,000.00	**Amount Paid:**	$0.00
Payment Method:	Not Reported	**Agency Contact:**	Internet
Complaint Date:	1/18/2013	**Transaction Date:**	12/15/2012
Initial Contact:	In Person	**Initial Response:**	
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:	No		

Consumer Information

Consumer Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Mount Vernon	**State:**	Washington
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	

Military Service Branch:

Soldier Station:

Soldier Status:

Subject

Subject: Herbalife

Address: 1800 Century Park E

City: Los Angeles

State/Prov: California

ZIP: 90067

Country: United States

Email: georgef@herbalife.com

URL: www.herbalife.com

Area Code: 866

Phone Number: 6174273

Ext:

Subject ID Type:

Subject ID Issuer State:

Subject ID Issuer Country:

Representative Name: n/a n/a

Title: distributor

Record # 2 / Consumer Sentinel Network Complaints

Reference Number:	43046486	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N

Comments: I have been researching business opportunities and discovered **Herbalife**. This company appears to be a pyramid scheme. I read through the companys financial filings and discovered: 1) A high percentage of new recruits quit the company every year. 2) The company promises great wealth and riches for those who sign-up even as the average participant would seem to generate less than $1,500 per year in sales. 3) The incentive plan promotes the purchase of volume points without regard for retail demand. 4) The company wants recruitment...this has all of the hallmarks of an "endless chain scheme". I am coninced that if i were to sign-up to sell **Herbalife** that i would lose money and fear for others who do not have the means nor knowledge to conduct this kind of due diligence due to relatively weak levels of financial sophistication. **Herbalife** appears to have all of the indicia of a slick Pyramid Scheme... a) an altruistic product masking a diabolical compaensation scheme b) all commissions paid are for wholesale purchases c) major incentives for ongoing recruitment d) inevitable saturation due to zero limitations placed on distributorships e) inability totrack and measure "retail sales" outside the network. f) a slick marketing face wrapped around an incentive plan that takes form the guy at the end of the chain to pay those "upline" g) deliberate marketing to low-income, financially unsophisticated customers around the world...

Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	1/15/2013
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	Internet
Complaint Date:	1/15/2013	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:	No		

Consumer Information

Consumer

Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Short Hills	**State:**	New Jersey
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject

Subject: **Herbalife**

Address:			
City:	Torrance	**State/Prov:**	California
ZIP:		**Country:**	United States
Email:		**URL:**	
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Record # 3 / Consumer Sentinel Network Complaints

Reference Number:	42722752	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N

Comments: **Herbalife** advertised to me a business opportunity that I have every reason to be a pyramid scheme. After soon simple research, I saw that **Herbalife** had sales of 4 billion dollars with 3.2 million sale people, meaning the average member only had $1250 sales a year, or $104 a month, and at a 10 commission rate you would earn only $125 a year, compared to the $500 membership fee, plus other expenses. It should seem obvious to the FTC that this is a pyramid scheme, where most people loss money not make.

Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	1/10/2013
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$499.00	**Amount Paid:**	$0.00
Payment Method:	Other Payment Method (Note in Comments)	**Agency Contact:**	Internet
Complaint Date:	1/10/2013	**Transaction Date:**	1/10/2013
Initial Contact:	Internet Web Site	**Initial Response:**	Internet/E-mail
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:	No		

Consumer Information

Consumer Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Denver	**State:**	Colorado
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	30 - 39
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject

Subject:	**Herbalife** International		
Address:	800 West Olympic Blvd.		
City:	Los Angeles	**State/Prov:**	California
ZIP:	90015	**Country:**	United States
Email:	CorporateSecretary@herbalife.com	**URL:**	http://ir.herbalife.com/contactus.cfm
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	

Subject ID
Issuer State:
Representative Name:

Subject ID
Issuer Country:
Title:

Record # 5 / Consumer Sentinel Network Complaints

Reference Number:	42590223	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N

Comments: I had been part of what **Herbalife** calls Tabulators Team and was with the company for almost 20 years, I have witnessed several injustices from the company to its distributors since the death of the founder and with no way for an "Independent Distributor" to get any justice from the damage the company inflicts to them and that is why I am providing information that might aid in your research of the **Herbalife** Ltd Company as they are "Fooling Some of the People All of the Time". 1.- How much of the sales that you'd make in terms of final sales are sold outside the network and how much are consumed within the distributor base? There are not real sales outside the network The Nutrition Club Clubs originated precisely out of the NECESSITY to try to move some product. The product is very overpriced and thats what gave way to the nutrition clubs, distributors having to break down the products in servings to to be able to sale it because the CUSTOMERS REFUSED to buy whole canisters and bottles. What is happening now is customers stopped buying canisters and bottles and distributors are barely covering their monthly quota just to support the pyramid without making any money. (Fouders Circle Members, Chirmans Club Members and Executive Presidents Team Members ARE NOT SELLING ANY PRODUCT OUTSIDE THE NETWORK, they just buy the product from the company and donate it to some charity (**Herbalife** Houses from the **Herbalife** family foundation, etc) DISTRIBUTORS DO NOT GET PAID "ROYALTIES" UNLESS THEY BUY $2,500.00 OF PRODUCTS EVERY SINGLE MONTH, and to protect themselves they have a so called 70 Customer Rule in case regulators or people like you start asking questions. That is why HLF says they dont have an exact percentage because they know very well what is going on and not because HLF does not have visibility to that level of detail. Also from time to time HLF will impose hefty fines to its distributors in an effort to not pay royalties and keep this earnings for their bottom line and even go as far as to suspend its distributors and not pay to the upline the proper amount of royalties (AS THEY ARE THE ONES WHO CALCULATE THE PAYMENTS WITHOUT ANY OUTSIDE OVERSIGHT TO THE WHOLE PROCESS) and if a distributor inquires about it, he or she might get fined or suspended. 2.- What is the incentive for supervisor to sign somebody up to become a distributor as opposed to – if they're just going to consume for themselves as opposed to just selling them the product for the markup. How does the distributor – how does the supervisor come out better? There is no incentive other than "new distributors" helping to support the Ponzi scheme. HLF definitely is a Ponzi scheme with very high legal bills (**Herbalife** has been ruled an illegal pyramid scheme by a court in Belgium) and a fraudulent operation that pays returns to its DISTRIBUTORS from their own "PURCHASE" of the "PRODUCTS" paid by subsequent DISTRIBUTORS, rather than from profit earned by the "SELL" of the "PRODUCTS", HLFS Ponzi scheme usually entices new DISTRIBUTORS by offering higher profits, in the form of short-term returns that are either abnormally high or unusually consistent. DISTRIBUTORS DO NOT GET PAID UNLESS THEY BUY $2,500.00 OF PRODUCTS EVERY SINGLE MONTH, on ebay, amazon and craigslist you will find thousands of distributors trying to unload their inventory. I hope this helps and if I can provide any additional information please do not hesitate to contact me.

Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	1/3/2013
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$2,500.00	**Amount Paid:**	$2,500.00
Payment Method:	Credit Card	**Agency Contact:**	Internet
Complaint Date:	1/3/2013	**Transaction Date:**	10/23/2012
Initial Contact:	Internet/E-mail	**Initial Response:**	Internet/E-mail
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:	No		

Consumer Information

Consumer

Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(
Address 1:		**Address 2:**	
City:	Anaheim	**State:**	California
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	30 - 39
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject

Subject:	**Herbalife** Ltd		
Address:	800 W. Olympic Blvd, Suite 406		
City:	Los Angeles	**State/Prov:**	California
ZIP:	90015	**Country:**	United States
Email:		**URL:**	http://www.herbalife.com
Area Code:	213	**Phone Number:**	7450500
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Angie Ramirez	**Title:**	Distributor Business

Record # 6 / Consumer Sentinel Network Complaints

Reference Number:	42522454	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N

Comments: I was with **Herbalife** International for 12 years. I was one of the few people that achieved one of the top levels in the company (less than 1 of all distributors) called Presidents Team. I have a document received from **Herbalife** that shows **Herbalife** pays royalty and production bonuses on sales volume completely unrelated to retail customers. This does substantiate Bill Ackmans claim that **Herbalife** is a illegal pyramid scheme. How do I file this with FTCs legal department? UPDATE:12/27/2012 Consumer wants to send an excel file to FTC. LMaruca

Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	12/27/2012
Updated By:	LMARUCA	**Updated Date:**	12/27/2012
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	Phone
Complaint Date:	12/27/2012	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:	N	**Dispute with Credit Bureau - Resolved to Satisfaction?:**	N
Member of armed forces or dependent?:	No		

Consumer Information

Consumer

Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(
Address 1:		**Address 2:**	
City:	Cumming	**State:**	Georgia
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject

Subject:	**Herbalife** International		
Address:			
City:		**State/Prov:**	
ZIP:		**Country:**	United States
Email:		**URL:**	
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	

Subject ID		**Subject ID**	
Issuer State:		**Issuer Country:**	
Representative Name:		**Title:**	

Associated Subjects

Company:	H I		
Company Type:	Other		
Address:	1800 Century Park E		
City:	Los Angeles	**State/Prov:**	California
ZIP:	90067	**Country:**	United States
Email:		**URL:**	
Area Code:	310	**Phone Number:**	4109600

Record # 7 / Consumer Sentinel Network Complaints

Reference Number:	42886096	**Originator Reference Number:**	08850075186194
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	please see attached pdf. --- Additional Comments: please see attached pdf.',		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	BBBDENV-USER	**Entry Date:**	12/27/2012
Updated By:		**Updated Date:**	
Complaint Source:	BBB CO Denver	**Product Service Code:**	Health Care: Dietary Supplements\Herbal Remedies
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	12/27/2012	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:			

Consumer Information

Consumer

Complaining Company/Org:			
First Name:	Thomas	**Last Name:**	Carrigan
Address 1:	2320 S Quebec Street	**Address 2:**	
City:	DENVER	**State:**	Colorado
Zip:	80231	**Country:**	UNITED STATES
Home Number:		**Work Number:**	720-2735025
Fax Number:		**Ext:**	
Email:	Tom_Carrigan@hotmail.com	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject

Subject:	**Herbalife** Distributor		
Address:	9623 Grand Ave.		
City:	Littleton	**State/Prov:**	Colorado
ZIP:	80123	**Country:**	United States
Email:		**URL:**	workathomeplan.com
Area Code:	303	**Phone Number:**	9481323
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Tena Curtis Golesh	**Title:**	Owner/Manager

Do Not Call Complaints

Record # 4 / Do Not Call Complaints

Reference Number: 42961603
Is Phone in Registry?: Yes
Complaint Date: 1/9/2013
Product Service Code: National Do Not Call Registry
Complaint Source: National Do Not Call Registry
Complaint Channel: Internet
Transaction Date: 1/9/2013
Transaction Time: 3:00:00 PM
Existing Business Relationship?: No
Pre-recorded message?: Yes
Requested entity to stop calling?: Yes
Comments: I have called **Herbalife** many times over the years and told them nobody here is interested in their products and were not sales reps for the company and they know that. Yet almost every week somebody from **Herbalife** calls and harasses me about signing up to be a scammer-salesman for their company.

Consumer

First Name: (b)(6)
Last Name: (b)(6)
Address 1:
Address 2:
City: GREENWOOD
State/Prov: California
ZIP: (b)(6)
Phone Number: (b)(6)

Subject

Company Name: Herbalife
State: California
Country Code:
Phone Number: (209) 9577084

Provided by the Federal Trade Commission

Chender, Julian M. FOIA-2012-00806

From: Apache httpd <apache@hq1-webdmz-s1.ftc.gov>
Sent: Wednesday, April 18, 2012 10:49 AM

FEDERAL TRADE COMMISSION
RECEIVED

APR 18 2012

FOIA BRANCH
GENERAL COUNSEL

name = Karina Frayter
staddr = 900 Sylvan Avenue
city = Englewood Cliffs
state = NJ
zipcode = 07632
telno = 201-735-3117
faxno =
email = karina.frayter@nbcuni.com
coinfo = Dear Sir/Madam:This is a request under the Freedom of Information Act. I request information on the number of complaints filed with the FTC against Herbalife, located at 950 West 190th Street, Torrance, CA 90502, in the years 2000-2012 (pls breakdown numbers for each year). I request a waiver of all fees for this request. Disclosure of the requested information to me is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not in my commercial interest.If you need to discuss this request, I can be reached at 201-735-3117. Thank you for your consideration of my request.This is a time sensitive inquiry and if you expedite the request, I would greatly appreciate it.Sincerely,Karina Frayter CNBC| Markets Producer Office: (201)735-3117 Email: Karina.Frayter@nbcuni.com
EdSciName =
privatelawname =
describe = News Media
medianame = CNBC
money = None
B13 = Submit

Chender, Julian M. FOIA-2012-01131

From: KEVIN LOW (b)(6)
Sent: Sunday, July 15, 2012 4:27 PM
To: FOIA
Subject: Information Request - Herbalife Consumer Complaints

FEDERAL TRADE COMMISSION
RECEIVED

JUL 16 2012

FOIA BRANCH
GENERAL COUNSEL

Freedom of Information Act Request
Office of General Counsel
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Dear Sir/Madam:

This is a request under the Freedom of Information Act. I request that a copy of the following document(s) be provided to me: any Complaint Detail Reports, or similar reports if the name has changed, regarding Herbalife International Inc. for the years 2011-2012 as of July 15, 2012. This request is similar to request "FOIA Request No. 2002-324" but covers a different time period.

In order to help determine fees, you should know that I am a an individual. I have removed the optional fee section in the hope this request would avoid any fees, but please let me know if fees are required.

I request a waiver of all fees for this request. Disclosure of the requested information to me is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in my commercial interest.

If you need to discuss this request, I can be reached at (b)(6) Thank you for your consideration of my request.

Sincerely,

Kevin Low

(b)(6)

Foster City, CA (b)(6)

FOIA 2012-01252

Gray, Nathaniel

From: Dong Han <Dong.Han@qvt.com>
Sent: Friday, August 17, 2012 2:10 PM
To: FOIA
Subject: information request - Herbalife

I would like to request all the investigatory records for the company Herbalife.

Name: Dong Han
My phone number is 212 705 6281
Address is:
1177 6th Avenue New York, NY 10036

Thank you

FEDERAL TRADE COMMISSION
RECEIVED

AUG 17 2012

FOIA BRANCH
GENERAL COUNSEL

FOIA-2013-00280

Bajorek, Rosemary

From: Apache httpd <apache@hq1-webdmz-s2.ftc.gov>
Sent: Wednesday, December 26, 2012 11:40 AM

FEDERAL TRADE COMMISSION
RECEIVED
DEC 26
FOIA BRANCH
GENERAL COUNSEL

name = Michelle Celarier
staddr = 1 Nordica Drive
city = Croton on Hudson
state = NY
zipcode = 10520
telno = 917 971 0279
faxno =
email = mcelarier@nypost.com
coinfo = I am looking for any data on consumer complaints about Herbalife, including the number of consumer complaints against the company.
EdSciName =
privatelawname =
describe = News Media
medianame = New York Post
money = Up to $100
B13 = Submit

FOIA-2013-00321

Peterson, Mark D.

From: Patrick Quinn (b)(6)
Sent: Wednesday, January 09, 2013 12:29 PM
To: FOIA
Subject: FOIA request

FEDERAL TRADE COMMISSION
RECEIVED

JAN 09 2013

FOIA BRANCH
GENERAL COUNSEL

Dear Sir/Madam:

This is a request under the Freedom of Information Act. I request that electronic copies of the following document(s) be provided to me:

1. All consumer complaints and investigative complaints related to Herbalife.

In order to help determine fees, you should know that I am an individual.

I am willing to pay fees up to $100. If you expect the fees will exceed this, please contact me before proceeding.

If you need to discuss this request, I can be reached at (b)(6) Thank you for your consideration of my request.

Sincerely,

Patrick Quinn

(b)(6)

New York, NY (b)(6)

Kelly, Andrea

From: Apache server <apache@hq1-webdmz-s3.ftc.gov>
Sent: Monday, January 14, 2013 1:24 PM

FOIA-2013-00339

FEDERAL TRADE COMMISSION
RECEIVED

JAN 14 2013

FOIA BRANCH
GENERAL COUNSEL

name = Yitzchak Jacobovitz
staddr = 300 Independence Ave.
city = Washington
state = DC
zipcode = 20003
telno = 2024499859
faxno =
email =
coinfo = Herbalife1800 Century Park ELos Angeles, CA I am requseting information on any investigative actions related to Herbalife, any consumer complaints that FTC received reagrding Herbalife, and information on meetings between FTC and the SEC relating to Herbalife. Thanks for your help.
EdSciName =
describe = Private Corporation or Law Firm
privatelawname = Capstone LLC
medianame =
money = Up to $100
B13 = Submit

(b)(6)

Arlington, VA (b)(6)

January 4, 2013

FOIA-2013-00341

Office of General Counsel
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

FEDERAL TRADE COMMISSION
RECEIVED

JAN 14 2013

FOIA BRANCH
GENERAL COUNSEL

Re: FOIA Request

To Whom It May Concern:

Under the provisions of the Freedom of Information Act, I would like to request copies of all publicly releasable complaints made against Herbalife, located in Los Angeles and Torrance, California, and any of its distributors nationwide since December 17, 2001.

I agree to pay reasonable duplication fees for the processing of this request. If my request is denied in whole or part, I ask that you provide references to the specific exemptions under the Freedom of Information Act.

Should you have any questions regarding this request, I can be reached by phone at (b)(6) or by e-mail at (b)(6) (b)(6)

Thank you for your assistance.

Sincerely,

Caroline Graham

Caroline Graham

FOIA-2013-00376

January 17, 2013

FEDERAL TRADE COMMISSION
RECEIVED

JAN 17 2013

FOIA BRANCH
GENERAL COUNSEL

VIA E-MAIL

Freedom of Information Act Request
Office of General Counsel
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: Freedom of Information Act Request: Herbalife International

Dear Sir/Madam:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552 et seq., I hereby request copies of the following information: *all correspondence, documents, and data records from 2003 through 2013 regarding investigations into Herbalife International, located at 800 W. Olympic Boulevard, Suite 406, Los Angeles, California. This company is a multi-level marketing company that sells nutrition, weight management and skin-care products.*

I am willing to pay fees up to $200. If you expect the fees will exceed this, please contact me before proceeding. Please send all available records to my attention at:

(b)(6)

Alexandria, Virginia (b)(6)

I can be reached at (b)(6) Thank you for your consideration of my request.

Sincerely,

Natalie N. Ofoche

FOIA - 2013-00398

Mischler, Erin

From: Vera, Elena R.
Sent: Friday, January 25, 2013 11:29 AM
To: Mischler, Erin
Subject: FW: FOIA request

From: Christine Muchanic [mailto:cmuchanic@heightanalytics.com]
Sent: Friday, January 25, 2013 11:22 AM
To: Vera, Elena R.
Subject: FOIA request

Elena,

As discussed, please see below my amended/new FOIA request for information and records related to:

Consumer complaints related to the following companies: Herbalife (HLF) and Nature's Sunshine Products (NATR)

Correspondence between the FTC and any external parties related to the following companies. Please limit the search to a five year period.
Avon (AVP)
Blyth, Inc. (BTH)
Medifast (MED)
Mannatech (MTEX)
Nature's Sunshine Products (NATR)
Natural Health Trends Corp (NHTC)
Primerica (PRI)
Reliv International (RELV)
Tupperware Brands Corp (TUP)

Correspondence between the FTC and any external parties related to the companies listed below. Please do not put a time exclusion/limitation on the search for these companies.
Herbalife (HLF),
Nu Skin Enterprises (NUS)
USANA Health Sciences (USNA)

As discussed, for all the companies listed above, we are particularly interested in any correspondence or other records related to discussion of the companies' business practices.

We agree to pay fees of up to $300. Should the estimated fees exceed this amount, please contact me again.

Thank you for your help and please let me know if I can provide any further information.

Best,
Christine

Christine Muchanic
Special Situations

Height Analytics, LLC
1775 Pennsylvania Avenue NW, 11th Floor
Washington, DC 20006
Office: (202) 629-0038
Email: cmuchanic@heightanalytics.com
http://www.heightllc.com/

Seery, Alexander

FOIA-2013-00416

From: Apache httpd <apache@hq1-webdmz-s1.ftc.gov>
Sent: Tuesday, January 29, 2013 8:47 AM

FEDERAL TRADE COMMISSION
RECEIVED
JAN 29 2013
FOIA BRANCH
GENERAL COUNSEL

name = Andrew L. Sole
staddr = 1330 Avenue of Americas
city = New York
state = NY
zipcode = 10019
telno = 9173495930
faxno =
email = Andrewsole@ecvlp.com
coinfo = I wish to obtain all copies of consumer complaints filed against Herbalife for years 2006 through 2012. I agree to pay any reasonable fee associated with this request.
EdSciName =
describe = Private Corporation or Law Firm
privatelawname = Esopus Creek Advisors
medianame =
money = Contact me if above $200
B13 = Submit

Seery, Alexander FOIA-2013-00417

From: Apache httpd <apache@hq1-webdmz-s2.ftc.gov>
Sent: Tuesday, January 29, 2013 12:55 PM

FEDERAL TRADE COMMISSION
RECEIVED
JAN 29 2013
FOIA BRANCH
GENERAL COUNSEL

name = Krish B Daftary
staddr = 787 7th Avenue, 49th Floor
city = New York
state = NY
zipcode = 10019
telno = 2122204255
faxno =
email = kdaftary@newmountaincapital.com
coinfo = Can we please have a record of all consumer complaints filed against Herbalife from calendar year 2011-today (Jan 2013)? Thank you.
EdSciName =
describe = Private Corporation or Law Firm
privatelawname = New Mountain Capital
medianame =
money = Contact me if above $100
B13 = Submit

Seery, Alexander

FOIA-2013-00426

From: Apache httpd <apache@hq1-webdmz-s2.ftc.gov>
Sent: Tuesday, January 29, 2013 5:09 PM

FEDERAL TRADE COMMISSION
RECEIVED
JAN 30 2013
FOIA BRANCH
GENERAL COUNSEL

name = Peter J. Eavis
staddr = The New York Times, 620 Eighth Avenue,
city = New York
state = New York
zipcode = 10018
telno = 212 556 7493
faxno =
email = peter.eavis@nytimes.com
coinfo = Please send me any documents that show:1/ The number of complaints submitted to the FTC about Herbalife in each calendar year from 2000 to 2012.2/ Please state the nature of the complaints. Namely, were they related to i) allegedly false claims by Herbalife about the opportunity to make a certain level of earnings; ii) allegedly misleading claims about Herbalife products, or allegedly poor quality of Herbalife products; iii) or sales practices of Herbalife members?3/ Please send documents that show how many investigations that the FTC has made of Herbalife since 2000. Thanks!
EdSciName =
privatelawname =
describe = News Media
medianame = The New York Times
money = Contact me if above $200
B13 = Submit

FOIA-2013-00429

Seery, Alexander

From: Apache httpd <apache@hq1-webdmz-s1.ftc.gov>
Sent: Wednesday, January 30, 2013 3:52 PM

FEDERAL TRADE COMMISSION
RECEIVED
JAN 30 2013
FOIA BRANCH
GENERAL COUNSEL

name = Carol Tang
staddr = 11 West 19th Street 2nd Floor
city = New York
state = NY
zipcode = 10011
telno = 2126865063
faxno =
email = carol.tang@dealreporter.com
coinfo = Freedom of Information Act RequestOffice of General CounselFederal Trade Commission600 Pennsylvania Avenue, N.W.Washington, D.C. 20580Dear FOIA officer, This is a request under the Freedom of Information Act. I would like to place a request for all documents in the last five years (2009-2013) relating to investigative records concerning Herbalife, including all complaints that have been made to the FTC in regards to the company. Herbalife is based at Ugland House, South Church Street, P.O. Box 309GT in Grand Cayman, Cayman Islands.In order to help determine fees, I am a member of the press at dealReporter with the Financial Times group and am requesting these documents as part of my continual coverage of the company as the reporter for consumer and retail companies. I am willing to pay fees up to $25. If you expect the fees will exceed this, please contact me through email or phone before proceeding. My contact information is in the signature below if there are any questions about my request. Thank you for your consideration, and I appreciate your help. Hope you have a wonderful day. Best, Carol Tang11 West 19th Street, Floor 2New York, NY 10011(212) 686 - 5063
EdSciName =
privatelawname =
describe = News Media
medianame = dealReporter, Financial Times group
money = Up to $25
B13 = Submit

Seery, Alexander FOIA-2013-00434

From: Apache httpd <apache@hq1-webdmz-s1.ftc.gov>
Sent: Thursday, January 31, 2013 1:21 PM

FEDERAL TRADE COMMISSION
RECEIVED
JAN 31 2013
FOIA BRANCH
GENERAL COUNSEL

name = Michelle Celarier
staddr = 1 Nordica Drive
city = Croton on Hudson
state = NY
zipcode = 10520
telno = 917 971 0279
faxno =
email = mcelarier@nypost.com
coinfo = Herbalife:I am seeking all consumer complaints between Dec. 20, 2012 and Jan. 31, 2013
EdSciName =
privatelawname =
describe = News Media
medianame = New York Post
money = Contact me if above $100
B13 = Submit

Seery, Alexander FOIA-2013-00436

From: Aubrey Wise <awise@oneeastcap.com>
Sent: Thursday, January 31, 2013 2:48 PM
To: Seery, Alexander
Subject: One East Partners FOIA Request - Herbalife Ltd.

FEDERAL TRADE COMMISSION
RECEIVED
JAN 31 2013
FOIA BRANCH
GENERAL COUNSEL

Alex,

Thanks for your call earlier. We would like to establish an initial budget of $1,000 for our FOIA request regarding Herbalife Ltd. Please let me know if you need a credit card or other form of deposit.

In order of priority, we would like to have our request processed in this order:

1) All emails between the FTC and Dr. Peter Vander Nat regarding Herbalife over the past three years
2) All records related to any ongoing or closed FTC investigations of Herbalife over the past ten years.
3) All emails among FTC Commissioners and FTC Senior Staff regarding Herbalife over the past three years
4) All correspondence between FTC and Herbalife over the past ten years
5) Any inter-government letters between the FTC and other federal agencies or offices of state attorneys general over the past three years
6) Any correspondence between FTC and international government agencies over the past three years
7) List of all FOIA requests made to the FTC regarding Herbalife over the past two years
8) Generic question: does the FTC advise against investing in Herbalife?
9) Consumer complaints against Herbalife over the past three years
10) Procedural question: if the FTC were conducting an active civil or criminal investigation into Herbalife, would the existence of such investigation be a matter of public record?

As I mentioned during our conversation, this FOIA request is being made by "One East Partners".

Thanks for your help,
Aubrey

Aubrey Wise
One East Partners
551 Madison Avenue, 10th Floor
New York, NY 10022
212-230-4525
awise@OneEastCap.com

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Seery, Alexander

From:	Aubrey Wise <awise@oneeastcap.com>
Sent:	Wednesday, January 30, 2013 12:17 PM
To:	FOIA
Subject:	FOIA Request - Herbalife, Ltd.

January 30, 2013

Freedom of Information Act Request
Office of General Counsel
Federal Trade Commission
600 Pennsylvania Ave, N.W.
Washington, D.C. 20580

Dear FTC Staff,

We would like to make a request under the Freedom of Information Act. Please find below a precise list of the information we are requesting. All of the items relate to Herbalife, Ltd. (hereafter "Herbalife", corporate headquarters located at 800 West Olympic Boulevard, Suite 406, Los Angeles, CA 90015).

1) All records related to any ongoing or closed FTC investigations of Herbalife over the past ten years.

2) All emails among FTC Commissioners and FTC Senior Staff regarding Herbalife over the past three years

3) All emails between the FTC and Dr. Peter Vander Nat regarding Herbalife over the past three years

4) All correspondence between FTC and Herbalife over the past ten years

5) Any inter-government letters between the FTC and other federal agencies or offices of state attorneys general over the past three years

6) Any correspondence between FTC and international government agencies over the past three years

7) Consumer complaints against Herbalife over the past three years

8) List of all FOIA requests made to the FTC regarding Herbalife over the past two years

9) Generic question: does the FTC advise against investing in Herbalife?

10) Procedural question: if the FTC were conducting an active civil or criminal investigation into Herbalife, would the existence of such investigation be a matter of public record?

Thank you very much for your help in fielding this request under the Freedom of Information Act. Please call me directly at (212) 230-4525 to discuss fees.

Regards,

Aubrey Wise

Note: an identical copy of this letter is attached in PDF format.

The information contained in this message (including any attachment) is confidential and may be legally privileged or otherwise protected from disclosure. This message is not an offer to sell or the solicitation of an offer to buy any security or other investment or to provide investment services or advice of any kind. If you have received this message in error, please notify the sender immediately and delete the message from your computer. Any unauthorized use, reproduction, or dissemination of this message is strictly prohibited and may be in violation of law. All messages sent to or from this address are subject to electronic storage and review by One East Capital Advisors, LP.

Chender, Julian M. FOIA-2013-00456

From: Jason Miller <Jason.Miller@ioniccap.com>
Sent: Monday, February 04, 2013 10:44 AM
To: FOIA
Subject: foia request

FEDERAL TRADE COMMISSION
RECEIVED

FEB 04 2013

FOIA BRANCH
GENERAL COUNSEL

Freedom of Information Act Request
Office of General Counsel
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Dear Sir/Madam:

This is a request under the Freedom of Information Act. I request that a copy of the following document(s) be provided to me:

File Request log from 2005 through 2013 for Herbalife International.

The number of complaints from 2012 through 2013 filed against Herbalife International.

The number of complaints from 2006 through 2013 filed against Avon Products (produces cosmetics and beauty related products via direct selling)

The number of complaints from 2006 through 2013 filed against GNC Holdings (produces nutritional products and sells on line and via retail stores)

In order to help determine fees, you should know that I am a financial analyst.

I am willing to pay fees up to $100.00. If you expect the fees will exceed this, please contact me before proceeding.

If you need to discuss this request, I can be reached at 212 294 8585. Thank you for your consideration of my request.

Sincerely,

Jason Miller

Ionic Capital

366 Madison Avenue 9th Floor

New York, NY 10017

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Chender, Julian M. FOIA-2013-00484

From: Apache server <apache@hq1-webdmz-s3.ftc.gov>
Sent: Thursday, February 07, 2013 4:58 PM

FEDERAL TRADE COMMISSION
RECEIVED
FEB 07 2013
FOIA BRANCH
GENERAL COUNSEL

name = Michelle Celarier
staddr = 1 Nordica Dr
city = Croton on Hudson
state = NY
zipcode = 10520
telno = 917-971-0279
faxno =
email = mcelarier@nypost.com
coinfo = I am requesting all investigations and regulatory actions against Herbalife
EdSciName =
privatelawname =
describe = News Media
medianame = New York Post
money = Contact me if above $100
B13 = Submit

FOIA-2013-00568

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, NY 10004-2498

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MELBOURNE • SYDNEY

FEDERAL TRADE COMMISSION
RECEIVED

FEB 27 2013

FOIA BRANCH
GENERAL COUNSEL

February 22, 2013

Via Certified Mail

Freedom of Information Act Request,
Office of General Counsel,
Federal Trade Commission,
600 Pennsylvania Avenue, N.W.,
Washington, D.C. 20580.

Re: FOIA Request re Herbalife Lead Generation Firms

Dear Sir or Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, I respectfully request an opportunity to review and copy all consumer complaints, investigatory records and administrative records concerning any of the following persons or entities, which I believe are involved in selling leads and other business tools to Herbalife distributors:

1. Shawn Dahl
2. Centurion Media Group
3. Herbal Hub
4. Online Business Systems
5. IncomeAtHome.com
6. IncomeAtHomeTV.com
7. Income@home.com
8. Great Shape Today
9. Networx Online
10. The Lead Store
11. Deborah Stoltz
12. Global Online Systems
13. Doran Andry
14. HB International Group, Inc.
15. Financial Success System
16. Financial Success System, LLC

17. FSSDomains.com
18. BusinessCenter.com
19. Ignite Global Communications LLC
20. The Nutrition Coach
21. Dan Waldron
22. Michael Burton
23. Michelle Burton
24. Sydney Mercedes
25. Atomic Nutrition
26. Nutrition Addiction
27. Merelle Worldwide
28. Line Logix
29. Nutrition Clubs Worldwide
30. OBTDomains.com
31. Global Home Business System
32. iOffice
33. Anthony Powell
34. John Beall
35. Carla Berg
36. Rick Berg
37. eTeam Marketing
38. Crazy Fox
39. Home Based Business (HBB.com)
40. Home Sweet Income
41. Kurt O'Connell
42. Cindy O'Connell
43. Herbalink
44. Touchfon International Inc.
45. DWS International
46. Susan Peterson
47. John Peterson
48. Recruit System
49. Peak Success System
50. Success Connection
51. Steve Combs
52. Debbie Combs
53. 96billion.com
54. David DeSaegher
55. Karen DeSaegher
56. Home Employed
57. A&A International
58. Donte Andry

59. John Tartol
60. Leslie Stanford
61. Herbal-leads.net
62. Geri Cvitanovich
63. Small Planet Online
64. Work At Home Tycoon
65. Elkton Nutrition Inc.
66. First Data
67. GoHerbalife
68. CCS Services
69. www.theonlinebusiness.com
70. www.incomeforever.com
71. www.theonlinebusinesspro.com
72. www.14incomeathome.com
73. www.growyourincome.com
74. www.growyourincome48.com
75. www.online-business-systems.shopmybbb.com
76. online-business-systems.com
77. www.incomeathomela.com
78. www.incomeathomeradio.com
79. www.earnincomeonline.com
80. www.homeincomematch.com
81. www.earnrealincome.com
82. www.homebusinessmatch.com
83. At Home Business System
84. Body Basics
85. Cash Mail Box
86. CWIG Health
87. Discount Club New Jersey
88. eHome Business Network
89. eHome Distribution
90. Freedom Connection System
91. Freedom Lifestyles Group
92. Gateway2Wealth
93. Kay-Lee Enterprises
94. Magnetic Sponsoring
95. My Diet Basics
96. My Success System, LLC
97. Network Consultants
98. O'Connell System
99. Online Business Mentors
100. Online System

101. Power Queue Inc.
102. Premiere Team International
103. 60 Minute Money
104. Skip Ahead Tech
105. The Home Business Solution
106. VSM
107. Work From Home Business Center
108. Work From Home, Inc.

Please send copies of all documents satisfying this request to me at 125 Broad Street, Room 2842, New York, New York 10004. I am prepared to reimburse the reasonable costs of searching for and copying these documents.

Please do not hesitate to contact me at (212) 558-4737 if I can provide any additional information about this request.

Thank you in advance for your assistance.

Sincerely,

Steven L. Holley

FOIA-2013-00740

Bajorek, Rosemary

From: Vera, Elena R.
Sent: Monday, April 08, 2013 3:25 PM
To: Bajorek, Rosemary
Subject: FW: FOIA request

FEDERAL TRADE COMMISSION
RECEIVED
APR 09 2013
FOIA BRANCH
GENERAL COUNSEL

From: Aubrey Wise [mailto:awise@oneeastcap.com]
Sent: Monday, April 08, 2013 3:23 PM
To: Vera, Elena R.
Subject: FOIA request

Hi Elena,

Thanks again for all your help with our original FOIA request. We would like to amend it / submit a new request to view more recent records. Please see details below.

FOIA Request on behalf of One East Partners regarding Herbalife, Ltd. (hereafter "Herbalife", corporate headquarters located at 800 West Olympic Boulevard, Suite 406, Los Angeles, CA 90015).

1) All emails between the FTC and Dr. Peter Vander Nat regarding Herbalife since February 1, 2013
2) All records related to any FTC investigation of Herbalife that has been opened since February 1, 2013
3) All email among FTC Commissioners and FTC Staff regarding Herbalife since February 1, 2013 but EXCLUDING any emails that are generated by the FTC's automated Daily Clips program for media stories
4) All correspondence between the FTC and Herbalife since February 1, 2013
5) Any inter-government letters between the FTC and other federal agencies or state attorneys general regarding Herbalife since February 1, 2013
6) A list of all FOIA requests made to the FTC regarding Herbalife since February 1, 2013.

Please send the completed requests and associated invoice to me at the address below (USPS is fine). Please use a cap of $1,000 for this request.

Thank you again.

Regards,
Aubrey

Aubrey Wise
One East Partners
551 Madison Avenue, 10th Floor
New York, NY 10022
212-230-4525
awise@OneEastCap.com

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FOIA-2013-00741

Bajorek, Rosemary

FEDERAL TRADE COMMISSION
RECEIVED
APR 10 2013
FOIA BRANCH
GENERAL COUNSEL

From: Stearns, Dione J.
Sent: Wednesday, April 10, 2013 10:29 AM
To: Bajorek, Rosemary
Subject: FW: fact checking something
Attachments: FOIA 02.22.2013 Request to FTC re Lead Generation[2].pdf; Lead generators Herbalife FOIA.pdf

Rose,

I spoke with Frank and the reporter. He is requesting the same material we released in request number 2013-568.

Dione

From: Dorman, Frank
Sent: Wednesday, April 10, 2013 8:51 AM
To: Stearns, Dione J.
Subject: FW: fact checking something

Good morning, Dione

Herbalife, again. This reporter asked the question below, and he later asked me if the FOIA office can directly send him the two attached docs he he can say it came from the FTC. He said he would still say who made the FOIA request.

Thanks

Frank

From: Eavis, Peter [mailto:Peter.Eavis@nytimes.com]
Sent: Tuesday, April 09, 2013 5:02 PM
To: Dorman, Frank
Subject: fact checking something

Hi Frank,

I am working on a Herbalife story and it involves some material that was apparently obtained through a Freedom of Information Act request to the FTC. I have attached the two documents relating to the request. I didn't see them posted in your FOIA reading room. So I am coming to you to ask if the attached documents are genuine and were issued by the FTC. I'd need to hear back by 3PM tomorrow.

I am on 212 556 7493, if you want to chat.

Many thanks,
Peter

--

Office phone: 212 556 7493

Vera, Elena R. FOIA 2013-00752

From: Vera, Elena R.
Sent: Friday, April 12, 2013 9:25 AM
To: 'Christine Muchanic'
Subject: RE: article

FEDERAL TRADE COMMISSION
RECEIVED
APR 15 2013
FOIA BRANCH
GENERAL COUNSEL

Christine,

This email confirms our April 12, 2013 discussion narrowing your request to seek all consumer complaints regarding Herbalife from January 14, 2013 through April 12, 2013.

Thanks,
Elena Vera

Paralegal Specialist
Office of the General Counsel
Federal Trade Commission
202-326-3368

From: Christine Muchanic [mailto:cmuchanic@heightanalytics.com]
Sent: Friday, April 12, 2013 9:18 AM
To: Vera, Elena R.
Subject: RE: article

Please, if it is not posted on the FTC website, consider this a FOIA request for the consumer complaints mentioned in the news article.

Thank you,
Christine

Christine Muchanic
Special Situations

Height Analytics, LLC
1775 Pennsylvania Avenue NW, 11th Floor
Washington, DC 20006
Office: (202) 629-0038
Email: cmuchanic@heightanalytics.com
http://www.heightllc.com/

From: Christine Muchanic
Sent: Friday, April 12, 2013 9:17 AM
To: evera@ftc.gov
Subject: article

http://dealbook.nytimes.com/2013/04/11/herbalife-ties-to-work-from-home-promoters-may-draw-new-scrutiny/?source=email_rt_mc_body

FOIA 2013-00764

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, NY 10004-2498

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.
FRANKFURT • LONDON • PARIS
BEIJING • HONG KONG • TOKYO
MELBOURNE • SYDNEY

April 8, 2013

FEDERAL TRADE COMMISSION
RECEIVED
APR 16 2013
FOIA BRANCH
GENERAL COUNSEL

Via Certified Mail

Freedom of Information Act Request,
Office of General Counsel,
Federal Trade Commission,
600 Pennsylvania Avenue, N.W.,
Washington, D.C. 20580.

Re: FOIA Request re Herbalife Lead Generation Firms

Dear Sir or Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, I respectfully request an opportunity to review and copy all consumer complaints, investigatory records and administrative records concerning any of the following persons or entities, which I believe are involved in selling leads and other business tools to Herbalife distributors:

1. Online Marketing Systems
2. Online Marketing Solutions
3. Online Business Solutions
4. Christopher Reese
5. Mayumi Reese
6. Mary Holloway
7. Alan Lorenz
8. United Marketing Partners
9. Russell Gain
10. David Bevan
11. Jane Clark
12. Michael Boyd
13. Craig Tsutakawa
14. Caroline Tsutakawa
15. Harry Johnson
16. Harold Johnson

17. Lee Johnson
18. Jack Gibson
19. John Gibson
20. FTS Marketing
21. Earn2ez.com
22. Automated Data Direct System
23. Bill Herron
24. William Herron
25. Clem Herron
26. Trey Herron
27. Mamie Smith Herron
28. Debi Katz
29. Debra Katz
30. Deborah Katz
31. Michael Katz
32. Sam Guerra
33. Samuel Guerra
34. Rodney Marcantel
35. Mary Ann Marcantel
36. I-Msuccess.com
37. I-Msuccess.biz
38. Nutrition Club Pro
39. Nutritionclubpro.com
40. Ryan Swanson
41. Glenn Kirkpatrick
42. Daniel Waldron
43. Richard Berg
44. Steven Combs
45. Deborah Combs
46. www.ticket2cash.com
47. www.ebusinessforyou.net
48. www.quickcashnow.net
49. Wellness Depot
50. Herbal Way Inc.
51. www.60minutemoney4u.net
52. Home Business Systems
53. Thrive Nutrition & FITClub
54. Wealth in Wellness Nutrition Club System
55. AzDiet.com
56. Michigan Success Training Seminars
57. www.wldwidebiz4u.com
58. www.steps2mill.net

59. www.morehomecash.net
60. Prospect Performance
61. Work from Home and Love It
62. www.vitaljetics.com
63. www.hbr11.com
64. www.morehomecash.net
65. www.steps2mill.net
66. www.checks4life.com
67. www.housewifesfortune.com
68. Newest Way to Wealth
69. Dream Builder & Associates
70. www.haveitallbiz.com
71. www.netbiz-4you.com
72. www.changeyourwork.com
73. www.richerfuture2002.com
74. www.dollarsigns4u.com
75. www.scorefreedom.com
76. www.amazingcashplus.com
77. www.work-from-home.net
78. www.lookandfeelgreat2.com
79. www.egoldenopportunity.com
80. www.beteachable.com
81. www.workingfrommyhome.com
82. www.workfromhome.com
83. www.bossnot.com
84. Mandi Adamson
85. Amanda Adamson
86. Vaughn Adamson
87. www.wfhbiz.com
88. www.ecommercesetsyoufree.com
89. www.adreamlife4u.com
90. Carin Hendrikz
91. www.4you4menow.com
92. www.60minsuccess.com
93. www.formula2success.org
94. Home Business System
95. Lifetimeopportunity.com
96. Leave the Rat Race
97. www.leave-the-rat-race.com
98. DreamTeam
99. www.dreamteamHQ.com
100. Financial Success System LLC

101. Financial Success System International LLC
102. FSS-America LLC
103. www.online-business-system.com
104. cmg.onlinebusinesssystem.com
105. gatewaytowealth.com
106. Karen Umstattd
107. Allstar Health & Nutrition
108. Allstar Nutrition & Fit Camp
109. www.karenu.clearlythebest.com
110. www.clearlythebest.com

Please send copies of all documents satisfying this request to me at 125 Broad Street, Room 2842, New York, New York 10004. I am prepared to reimburse the reasonable costs of searching for and copying these documents, including fees up to $500.

Please do not hesitate to contact me at (212) 558-4737 if I can provide any additional information about this request.

Thank you in advance for your assistance.

Sincerely,

Steven L. Holley

HUNTON& WILLIAMS

HUNTON & WILLIAMS LLP
2200 PENNSYLVANIA AVENUE, NW
WASHINGTON, D.C. 20037-1701

TEL 202 • 955 • 1500
FAX 202 • 778 • 2201

KYLE SAMPSON
DIRECT DIAL: 202 • 955 • 1587
EMAIL: ksampson@hunton.com

FILE NO: 78481.000004

April 29, 2013

FOIA 2013-00821

Via Facsimile (202) 326-2477
Via E-mail FOIA@FTC.gov

FEDERAL TRADE COMMISSION
RECEIVED

APR 29 2013

FOIA BRANCH
GENERAL COUNSEL

Freedom of Information Act Request
Office of General Counsel
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: FOIA Request for (1) Complaints, Inquiries, or Other Information Submitted to the FTC Related to Certain Dietary Supplement Manufacturers and (2) FOIA Requests Related to Such Complaints, Inquiries, and Other Information

Dear Sir or Madam:

This is a request under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, *et seq.* Hunton & Williams LLP hereby requests a copy of the following document(s):

1. Complaints, inquiries, or other information submitted to the Federal Trade Commission ("FTC") since January 1, 2007, and any exhibits or attachments to the same, regarding the following dietary supplement manufacturers:

    a. Herbalife International of America, Inc. and/or Herbalife International, Inc.;

    b. Melaleuca, Inc.; and

    c. Puritan's Pride, Inc.

2. FOIA requests submitted to the FTC since January 1, 2007, regarding complaints, inquiries, or other information about the above-listed dietary supplement manufacturers, and the FTC's responses to the same, if any.

Hunton & Williams LLP is prepared to pay the reasonable costs of search, review, and duplication of the requested records; if you estimate that fees will exceed $1,000, please contact me before proceeding. Hunton & Williams LLP requests that the FTC provide the

HUNTON& WILLIAMS

requested records in electronic format, to the above-referenced e-mail address. If you deny all or any part of this request, please cite each specific FOIA exemption that justifies your denial and notify me of appeal procedures available under the law.

Thank you in advance for your assistance. If you have any questions about this request or require further information, please do not hesitate to contact me.

Sincerely,

Kyle Sampson

Mischler, Erin

From: Apache server <apache@hq1-webdmz-s4.ftc.gov>
Sent: Saturday, May 04, 2013 3:43 PM

FOIA-2013-00849

name = Marshall P. Levine
staddr = 888 Seventh Avenue, 32nd Floor
city = New York
state = NY
zipcode = 10106
telno = 212-320-5167
faxno = 646-731-5167
email = marshall.levine@soros.com
coinfo = I would like to know how many consumer complaints have been filed against Herbalife Ltd. per year for the last ten years. If possible, I would like the complaints themselves. I would also like to know about allegations that Herbalife is a pyramid scheme.I would also like to know if the FTC is investigating Herbalife as a possible pyramid scheme.Herbalife's official address is:Ugland House, South Church StPO Box 309GTGrand Cayman 90015Cayman Islands1-213-745-0500Its headquarters seems to be:Herbalife Ltd.800 W. Olympic Blvd, Suite 406Los Angeles, CA 90015
EdSciName =
describe = Private Corporation or Law Firm
privatelawname = Soros Fund Management
medianame =
money = Contact me if above $200
B13 = Submit

FEDERAL TRADE COMMISSION
RECEIVED
MAY 06 2013
FOIA BRANCH
GENERAL COUNSEL

FOIA-2013-01002

Bajorek, Rosemary

From: Apache httpd <apache@hq1-webdmz-s1.ftc.gov>
Sent: Tuesday, June 11, 2013 12:46 PM

FEDERAL TRADE COMMISSION
RECEIVED
JUN 11 2013
FOIA BRANCH
GENERAL COUNSEL

name = Michelle Celarier
staddr = 1 Nordica Drive
city = Croton on Hudson
state = NY
zipcode = 10520
telno = 917 971 0279
faxno =
email = mcelarier@nypost.com
coinfo = Letter from Cong. Linda Sanchez requesting FTC open an investigation into Herbalife
EdSciName =
privatelawname =
describe = News Media
medianame = New York Post
money = Contact me if above $100
B13 = Submit

FOIA - 2013-01086

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, NY 10004-2498

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FRANKFURT • LONDON • PARIS
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MELBOURNE • SYDNEY

FEDERAL TRADE COMMISSION
RECEIVED
JUL 02 2013
FOIA BRANCH
GENERAL COUNSEL

June 24, 2013

Via Certified Mail

Freedom of Information Act Request,
Office of General Counsel,
Federal Trade Commission,
600 Pennsylvania Avenue, N.W.,
Washington, D.C. 20580.

Re: FOIA Request re Herbalife Lead Generation Firms

Dear Sir or Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, I respectfully request an opportunity to review and copy all consumer complaints, investigatory records and administrative records using the phrases "nutrition club," "decision pack" or "$39.95," or concerning any of the following persons or entities, which I believe are involved in selling leads and other business tools to Herbalife distributors:

1. 2moremoney
2. Berg Marketing
3. Brad Harris
4. Brett Bartholomew
5. Brunette Marketing
6. Burton Marketing
7. Cashmailbox.com
8. CRM Logix
9. Cynthia Robinson
10. Dare to Succeed
11. Dean Shafer
12. Dreambuilders
13. Fab-U-Life
14. Health Coach Mobile
15. Home Wealth International

16. Homeemployed.com
17. MyHCMTouch.com
18. S&C Marketing
19. Tanya McDowall
20. Wealth to Wellness
21. Yvonne Engelbrecht

Please send copies of all documents satisfying this request to me at 125 Broad Street, Room 2842, New York, New York 10004. I am prepared to reimburse the reasonable costs of searching for and copying these documents, including fees up to $500.

Please do not hesitate to contact me at (212) 558-4737 if I can provide any additional information about this request.

Thank you in advance for your assistance.

Sincerely,

Steven L. Holley

Chender, Julian M. FOIA-2013-01138

From: Jeffrey Gardner (b)(6)
Sent: Wednesday, July 17, 2013 2:06 PM
To: FOIA
Subject: FOIA Request

The most frequently requested categories of FTC records are consumer complaints, material relating to investigations, and administrative records.

FEDERAL TRADE COMMISSION
RECEIVED
JUL 17 2013
FOIA BRANCH
GENERAL COUNSEL

Freedom of Information Act Request
Office of General Counsel
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Dear Sir/Madam:

This is a request under the Freedom of Information Act. I request that a copy of the following document(s) be provided to me: 1.) all consumer complaints filed against Herbalife since the FTC's most recent disclosure in January 2013 of consumer complaints against Herbalife, 2.) all complaints filed against Herbalife Lead Generation Firms since the FTC's most recent disclosure in March 2013, 3.) a copy of the meeting minutes, (including attendees, discussion topics and FTC recommendations) as well as a transcript of Lois Greisman and Jessica Rich's meeting on Monday July 15, 2013 with the National Consumer League, the Hispanic Federation, the League of United Latin American Citizens, and Consumer Action, 4.) a copy of the meeting minutes, (including attendees, discussion topics and FTC recommendations) as well as a transcript of any FTC meetings with Herbalife and/or Herbalife representatives 5.) a copy of the meeting minutes, (including attendees, discussion topics and FTC recommendations) as well as a transcript of any FTC meetings with William Ackman and/or Pershing Square representatives 5.) a copy of all Herbalife related FTC correspondence from January 1, 2012 to July 17th, 2013 and 6.) a copy of all scheduled meeting dates and attendees the FTC has had or plans to have with external persons or entities from January 1, 2012 through December 31, 2013, that specifically relate to Herbalife 7.) a copy of all correspondence between Herbalife and/or Herbalife representatives 8.) and lastly I would like to request a copy of investigatory records of Herbalife, including, but not limited to commercial or financial information submitted to the FTC but that were not submitted by Herbalife, inter and intra-agency memoranda and letters, attorney opinions and notes, and decisions or orders regarding investigations and adjudicative proceedings specifically relating to Herbalife from January 1, 2012 through July 17, 2013.

In order to help determine fees, you should know that I am an individual that is not an attorney, company or news organization.

I am willing to pay fees up to $500. If you expect the fees will exceed this, please contact me before proceeding.

If you need to discuss this request, I can be reached at (b)(6) or (b)(6) Thank you for your consideration of my request.

Sincerely,

Jeffrey Gardner

(b)(6)

New York, NY (b)(6)

Chender, Julian M. FOIA - 2013-01148

From: Apache server <apache@hq1-webdmz-s4.ftc.gov>
Sent: Friday, July 19, 2013 10:45 AM

FEDERAL TRADE COMMISSION
RECEIVED
JUL 19 2013
FOIA BRANCH
GENERAL COUNSEL

name = Sandy Chin
staddr = 888 Seventh Avenue
city = New York
state = NY
zipcode = 10019
telno = 212.484.2716
faxno =
email = schin@visiumfunds.com
coinfo = Dear sir or madam, I would like to request a copy of any investigatory records of Herbalife specifically between the period of January 1, 2013 to July 19, 2013.
EdSciName =
describe = Private Corporation or Law Firm
privatelawname = Visium Asset Management
medianame =
money = Up to $100
B13 = Submit

Peterson, Mark D. FOIA - 2013-01228

From: Apache server <apache@hq1-webdmz-s3.ftc.gov>
Sent: Tuesday, August 06, 2013 1:55 PM

FEDERAL TRADE COMMISSION
RECEIVED

AUG 06 2013

FOIA BRANCH
GENERAL COUNSEL

name = Henry Becker
staddr = 409 Oak Ridge Ct
city = Southlake
state = TX
zipcode = 76092
telno = 214-296-4913
faxno =
email = hb@haymancapital.com
coinfo = Herbalife-I would like a list or simply the number of complaints filed against this company in the past 5 years. I would also like to know the number of support letters you have received on Herbalife's behalf. Thank you very much for your time.

describe = Individual
EdSciName =
privatelawname =
medianame =
money = Contact me if above $200
B13 = Submit

Kelly, Andrea

From: Apache httpd <apache@hq1-webdmz-s1.ftc.gov>
Sent: Monday, August 12, 2013 1:56 PM

FOIA-2013-01247

FEDERAL TRADE COMMISSION
RECEIVED

AUG 12 2013

FOIA BRANCH
GENERAL COUNSEL

name = Atossa
staddr = 3 times square
city = new york
state = ny
zipcode = 10036
telno = Abrahamian
faxno =
email = atossa.abrahamian@thomsonreuters.com
coinfo = Dear FOIA officer,I'm writing to request records of all communication (emails, letters, call logs, text messages, etc) on the subject of the direct-selling nutritional company Herbalife between the FTC and the following groups or individuals:a. New York hedge fund manager William Ackman and all individuals working for or associated with his firm, Pershing Square Capitalb. Representative Linda Sanchez (D-IL)and anyone working for her or with herc. The National Consumer's Leagued. The Hispanic Federatione. Herbalife or any firms or individuals acting on behalf of Herbalife. This includes the P.R. firm Joele Frank, the company's Board of Directors, any major shareholders in the company, and investor Carl Icahn.Kindly expedite this request for news purposes. Given all the noise and uncertainty in the media about Herbalife's products and business model, as well as the infighting among investors, we believe a greater understanding of the FTC's actions with regard to the company are of great public interest.Call anytime if you have questions.Thanks,Atossa Abrahamian
EdSciName =
privatelawname = 3 times square
describe = News Media
medianame = Thomson Reuters
money = Contact me if above $100
B13 = Submit

Seery, Alexander FOIA-2013-01318

From: Apache httpd <apache@hq1-webdmz-s2.ftc.gov>
Sent: Wednesday, August 28, 2013 2:54 PM

FEDERAL TRADE COMMISSION
RECEIVED
AUG 28 2013
FOIA BRANCH
GENERAL COUNSEL

name = Michelle Celarier
staddr = 1 Nordica Drive
city = Croton on Hudson
state = NY
zipcode = 10520
telno = 917 971 0279
faxno =
email = mcelarier@nypost.com
coinfo = All letters to the FTC requesting an investigation of Herbalife
EdSciName =
privatelawname =
describe = News Media
medianame = New York Post
money = Up to $100
B13 = Submit

Chender, Julian M. FOIA-2013-01330

From: Apache httpd <apache@hq1-webdmz-s2.ftc.gov>
Sent: Saturday, August 31, 2013 9:43 AM

FEDERAL TRADE COMMISSION
RECEIVED
SEP 03 2013
FOIA BRANCH
GENERAL COUNSEL

name = jeffrey gardner
staddr = (b)(6)
city = new york
state = New York
zipcode = (b)(6)
telno =
faxno =
email =
coinfo = Wall Street journal article claims Prof. William (Bill) Keep of the College of New Jersey has sent a letter on August 8th 2013 to the FTC regarding Herbalife in which he claims Herbalife lacks sufficient transparency for consumers and investors to make this critical assessment. I would like to request a copy of this letter that was sent by Professor Keep. I would also like a copy of the FTC's response sent to Proferssor Keep. I would like to request a copy of letters sent to the FTC reqeusting that the FTC conduct an investigation of Herbalife from January 1 2012 through August 29 2013. I would also like to request a copy of all investigatory records the FTC has gathered with respect to Herbalife from July 1 2012 through August 29 2013. Lastly, I would like to request a copy of FOIA requests submitted to the FTC from July 1, 2013 through August 29 2013.
describe = Individual
EdSciName =
privatelawname =
medianame =
money = Up to $100
B13 = Submit

Kelly, Andrea

From: Apache server <apache@hq1-webdmz-s3.ftc.gov>
Sent: Saturday, September 14, 2013 3:03 PM

FOIA-2013-01382

FEDERAL TRADE COMMISSION
RECEIVED

SEP 16 2013

FOIA BRANCH
GENERAL COUNSEL

name = Michelle Celarier
staddr = 1 Nordica Drive
city = Croton on Hudson
state = NY
zipcode = 10520
telno = 917-971-0279
faxno =
email = mcelarier@nypost.com
coinfo = All letters with the word investigate or investigation and Herbalife(I made this request on Aug. 28, but I know I did not receive all of the letters because you did not include some letters I already have. Please look again.)
EdSciName =
privatelawname =
describe = News Media
medianame = New York Post
money = Up to $100
B13 = Submit

DISTRICT OFFICE
105 EAST 116TH STREET
NEW YORK, NY 10029
(212) 828-9800
FAX: (212) 722-6378

CITY HALL OFFICE
250 BROADWAY, ROOM 1882
NEW YORK, NY 10007
(212) 788-6960
FAX: (212) 442-1564
mviverito@council.nyc.gov

THE COUNCIL OF
THE CITY OF NEW YORK

MELISSA MARK-VIVERITO

COUNCIL MEMBER, 8TH DISTRICT

CHAIR
PARKS & RECREATION

COMMITTEES
AGING
CIVIL SERVICE & LABOR
COMMUNITY DEVELOPMENT
CONTRACTS
HOUSING & BUILDINGS
PUBLIC HOUSING
YOUTH SERVICES

June 25th, 2013

The Honorable Edith Ramirez
Chairwoman, Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Dear Chairwoman Ramirez,

I am writing to urge the Federal Trade Commission (FTC) to open an investigation into allegations that the multi-level marketing company Herbalife Ltd. is a complex and abusive pyramid scheme. These allegations—which have already been raised by many, including Councilwoman Ferreras, Congresswoman Sanchez and the Hispanic Federation—suggest that Herbalife unfairly targets minority groups and falsely markets itself as an easy business opportunity. Consumers in my district have also been victimized by Herbalife's aggressive recruitment and illegal business practices.

Herbalife sells business opportunities to people in vulnerable communities. Herbalife executives have already admitted to targeting minority groups, openly boasting about the company's "African American initiative" and "Latino business". By recruiting vulnerable people in East Harlem and South Bronx with little or no business experience, Herbalife convinces new sellers to ignore the risks and high costs of their program. Herbalife's recruitment techniques promise financial freedom with only a few hours of work, an enticing offer to many lower income New Yorkers.

Unfortunately, once new recruits become Herbalife sellers they most often end up in debt and unable to make a profit. Due to Herbalife's above average costs, it is difficult for these people to sell enough of the product in order to realize a significant return on investment. Many of my constituents are ending up in serious debt as a result of Herbalife's recruitment and illegal business practices.

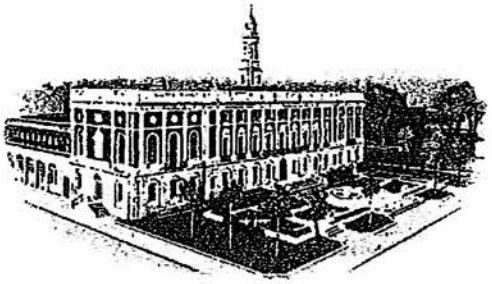
Given these allegations, we strongly urge the FTC to open a full investigation into Herbalife's recruitment and business practices. If they prove to be biased and unfair, Herbalife would be responsible for personal harm and financial distress throughout many minority communities. The FTC has a duty to protect these consumers.

Sincerely,

Melissa Mark-Viverito
Council Member - District 8

cc: Eric Schneiderman, New York Attorney General

NEIL M. O'LEARY
MAYOR



JOSEPH A. GEARY
CHIEF OF STAFF

OFFICE OF THE MAYOR
THE CITY OF WATERBURY
CONNECTICUT

July 2, 2013

The Honorable Edith Ramirez
Chairwoman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Re: Unfair marketing and recruitment tactics for Herbalife

Dear Chairwoman Ramirez:

I am writing to urge the Federal Trade Commission (FTC) to open an investigation into allegations that the multi-level marketing company Herbalife Ltd. is a complex and abusive pyramid scheme. These allegations—which have already been raised by many, including Congresswoman Linda Sanchez and the Hispanic Federation—suggest that Herbalife unfairly targets minority groups and falsely markets itself as an easy business opportunity. Instead of selling nutrition products, Herbalife sells these opportunities to people in vulnerable communities.

Herbalife executives have already admitted to targeting minority groups, openly boasting about the company's "African American initiative" and "Latino business". By recruiting vulnerable people in these communities with little or no business experience, they convince new recruits to join Herbalife as a distributor and purchase large amounts of product. As new recruits discover how difficult the product is to resell, they then are sold new 'leads', which can cost hundreds of dollars. Herbalife's recruitment techniques promise financial freedom with only a few hours of work, an enticing offer to immigrants and others struggling to find a job.

Unfortunately, once new recruits become sellers they most often end up in debt and unable to make a profit. Due to Herbalife's above average costs, it is difficult for these people to sell enough of the product in order to realize a significant return on investment.

235 GRAND STREET • WATERBURY, CONNECTICUT 06702 • (203) 574-6712

Given these allegations, we strongly urge the FTC to open a full investigation into Herbalife's recruitment tactics. If they prove to be biased and unfair, Herbalife would be responsible for personal harm and financial distress throughout minority communities. The FTC has a duty to protect these consumers. Thank you.

Sincerely,

Neil M. O'Leary
Mayor, City of Waterbury

cc: George Jepsen, Attorney General, State of Connecticut

DISTRICT OFFICE
5030 BROADWAY, SUITE 701
NEW YORK, NEW YORK 10033
(212) 544-0173
FAX: (212) 544-0256

ALBANY OFFICE
LEGISLATIVE OFFICE BUILDING
ROOM 513
ALBANY, NEW YORK 12247
(518) 455-2041
FAX: (518) 426-6847

E-MAIL: ESPAILLA@NYSENATE.GOV
WEB: WWW.ESPAILLAT.NYSENATE.GOV

THE SENATE
STATE OF NEW YORK

ADRIANO ESPAILLAT
SENATOR
31ST DISTRICT

RANKING MINORITY MEMBER
HOUSING
COMMITTEE MEMBER
CODES
ENVIRONMENTAL CONSERVATION
HIGHER EDUCATION
INSURANCE
FINANCE
JUDICIARY
RULES

July 8, 2013

The Honorable Edith Ramirez
Chairwoman, Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Chairwoman Ramirez:

I am writing to strongly encourage the Federal Trade Commission (FTC) to investigate the business practices of Herbalife, Ltd. Public debate has yielded evidence to suggest that Herbalife is an illegal pyramid scheme, using false income claims to lure vulnerable people from communities, like the ones I represent, into losing business deals.

I stand with the National Consumers League, the Hispanic Federation, elected officials, and many others in bringing these allegations against Herbalife to your attention.

This predatory behavior warrants a close look from your office. Herbalife's recruitment materials present itself as a lucrative business opportunity with no necessary, minimal startup costs and workplace flexibility. Yet expert analysis of Herbalife's "Statement of Average Gross Compensation" from 2012 reveals that 96% of Herbalife's Sales Leaders receive compensation equivalent to less than half of the minimum wage. And after the company's high purchase requirements and other fees are deducted, the Sales Leaders' compensation is actually a net loss.

Alarmingly, Herbalife's recruitment efforts appear to specifically target immigrants and Latinos. Company executives have admitted to this targeting, openly boasting about their "African American initiative" and "Latino business". Herbalife convinces new recruits to ignore the risks and high costs of their program.

As the Hispanic Federation has illustrated in a previous letter, Herbalife makes false promises of financial freedom to immigrants and others struggling to find a job. But after falling prey to Herbalife's assertions, most Herbalife participants end up in significant debt.

DISTRICT OFFICE
5030 BROADWAY, SUITE 701
NEW YORK, NEW YORK 10033
(212) 544-0173
FAX: (212) 544-0256

ALBANY OFFICE
LEGISLATIVE OFFICE BUILDING
ROOM 513
ALBANY, NEW YORK 12247
(518) 455-2041
FAX: (518) 426-6847

E-MAIL: ESPAILLA@NYSENATE.GOV
WEB: WWW.ESPAILLAT.NYSENATE.GOV

THE SENATE
STATE OF NEW YORK

ADRIANO ESPAILLAT
SENATOR
31ST DISTRICT

RANKING MINORITY MEMBER
HOUSING
COMMITTEE MEMBER
CODES
ENVIRONMENTAL CONSERVATION
HIGHER EDUCATION
INSURANCE
FINANCE
JUDICIARY
RULES

I am deeply concerned about Herbalife's aggressive tactics and protecting my constituents from exploitation. I urge the FTC to take immediate action on these allegations by opening a thorough investigation into Herbalife, its false income claims and minority targeting. With each passing day, more consumers from across the country and in my community are lured in and victimized by this scam.

Thank you for your consideration of this request.

Sincerely,

Adriano Espaillat
State Senator

CC: The Honorable Eric T. Schneiderman
Attorney General, New York State
The Capitol, Albany, NY 12224-0341

DISTRICT OFFICE
32-33A JUNCTION BLVD.
EAST ELMHURST, NEW YORK 11369
TEL: (718) 651-1917
FAX: (718) 565-5937

CITY HALL OFFICE
250 BROADWAY, RM 1805
NEW YORK, NEW YORK 100
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THE COUNCIL
OF
THE CITY OF NEW YORK

CHAIR
WOMEN'S ISSUES

COMMITTEES
CIVIL RIGHTS
CONSUMER AFFAIRS
ECONOMIC DEVELOPMENT
FINANCE
HEALTH
PARKS AND RECREATION

JULISSA FERRERAS

COUNCIL MEMBER, 21ST DISTRICT, QUEENS

The Honorable Edith Ramirez
Chairwoman, Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Dear Chairwoman Ramirez,

I am writing to urge the Federal Trade Commission (FTC) to take a look into Herbalife. Herbalife has been accused of operating an abusive pyramid scheme that targets minority groups, especially Latinos, and falsely promises large profits. As a Council Member in a heavily Hispanic district in Queens, I am especially concerned about the impact this company is having on my constituents and the Latino community in New York.

Latinos in my district, and across the country, are falling prey to Herbalife's targeted recruitment. Recruitment begins when victims are asked to join alleged nutrition and wellness clubs. In my district alone, there are dozens of such clubs. Herbalife representatives use these clubs to take advantage of people with little or no business experience. By making false promises of profit and ignoring all associated risk, Herbalife representatives "recruit" club members into becoming distributors of Herbalife products. Since Herbalife's success depends on this aggressive recruitment, new distributors are then pressured into recruiting additional members.

Latinos and others in my district are being unnecessarily harmed by these aggressive recruitment techniques. By promising large profits and minimal work, Herbalife preys on vulnerable immigrant communities. Since the evidence of consumer harm is widespread in my district and across the country, I believe it is critical for the FTC to conduct a thorough investigation and protect consumers from these malicious recruitment tactics and false promises. If Herbalife is acting illegally by making false income claims to vulnerable Latinos in my community, then they need to be held responsible.

I would welcome the opportunity to speak with officials at the FTC about this matter and can have my office assist in recruiting those who have been financially harmed.

Sincerely,

Julissa Ferreras
21st Council District, Queens
cc. AG Eric Schneiderman

The Commonwealth of Massachusetts
House of Representatives
State House, Boston 02133-1054

REPRESENTATIVE
TACKEY CHAN
SECOND NORFOLK DISTRICT

ROOM 26, STATE HOUSE
TEL. (617) 722-2080
FAX (617) 722-2339
Tackey.Chan@MAhouse.gov

COMMITTEES:
VICE CHAIR
COMMUNITY DEVELOPMENT AND SMALL BUSINESS

CONSUMER PROTECTION AND PROFESSIONAL LICENSURE
TELECOMMUNICATIONS, UTILITIES AND ENERGY

August 13, 2013

The Honorable Edith Ramirez
Commissioner
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Commissioner Ramirez,

I respectfully request that the Federal Trade Commission investigate the practices of Herbalife Ltd. It has been brought to my attention by groups such as the National Consumer League[1] and multiple news articles [2] alleging Herbalife. Ltd. is really a pyramid scheme. It is alleged that Herbalife, Ltd. targets the minority, immigrant and financially vulnerable to participate in their program. Herbalife, Ltd. promotes itself as a way to financial security and independence through the sale of their product from a person's own home and encourages the recruitment of others to join this business. Herbalife, Ltd. requires individuals to purchase a product for resale under the belief that the resale pricing scheme and product quality is competitive with the current marketplace. Given the volume of accusations about Herbalife, Ltd.'s business practices, there is a high risk to consumers and individuals on a national scale for those currently participating or seeking to participate in Herbalife, Ltd.

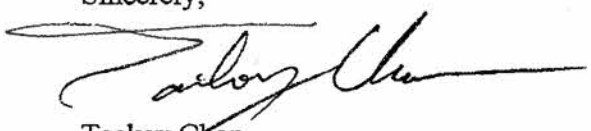
I represent a large diverse district in Quincy, Massachusetts. Over the past thirty years, the city has grown to be a large diverse culture of new immigrants and families, predominately of Asian descent, but representing all parts of the world. Many persons in Quincy are first generation immigrants and children of immigrants. They are all seeking the opportunity of the American Dream, where every person has a fair opportunity to achieve a better life. Unfortunately, there are companies such as Herbalife, Ltd. that target these individuals seeking a better life.

[1] National Consumer League correspondence to the Federal Trade Commission dated March 12, 2013
[2] http://www.marketwatch.com/story/ackman-alleges-soros-insider-trading-on-herbalife-2013-08-05
http://articles.latimes.com/2013/may/03/business/la-fi-herbalife-legal-20130504
http://articles.latimes.com/2013/may/07/business/la-fi-herbalife-stock-20130507
http://www.bizjournals.com/dallas/blog/morning_call/2013/05/herbalife-ackmans-allegations-are.html

It is essential that the Federal Trade Commission investigate Herbalife to ensure that it is not an illegal enterprise.

Thank you for your time and attention to my request.

Sincerely,



Tackey Chan
Massachusetts State Representative – 2nd Norfolk District

TC/br

cc: Martha Coakley, Massachusetts Attorney General

SER-Jobs for Progress National, Inc.
"Cultivating America's Greatest Resource: People"™
National Headquarters

14008895

Federal Trade Commission
Received
SEP 25 2013

September 17, 2013

Chairwoman Ramirez

The Honorable Edith Ramirez
Chairwoman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Chairwoman Ramirez,

SER-Jobs for Progress National, Inc. (SER National), was founded in 1964, as part of the national agenda to fight the "War on Poverty." SER National is a network of employment and training organizations that formulates and advocates initiatives resulting in the increased development and utilization of America's human resources, with special emphasis on the needs of Hispanics in the areas of education, training, employment, business and economic opportunity. Currently, we provide services in over 200 offices across the country.

Next year we will enter 50 years of providing employment and training opportunities to the Hispanic population and other underserved minority population across the country. Our job is to assist people who dream of a better tomorrow achieve those sueños. In addition, to protect them from companies such as Herbalife that prey on the minority population by proposing "Work from Home" get rich quick scheme, which in reality 80% of its distributors make little or no money at all.

We are requesting that the Federal Trade Commission conduct an investigation into allegations that Herbalife, a multilevel marketing company is a pyramid scheme. According to the Federal Trade Commission, "not all multilevel marketing plans are legitimate." If the money you make is based on your sales to the public, it may be a legitimate multilevel marketing plan. If the money you make is based on the number of people you recruit and your sales to them, it's not. It's a pyramid scheme. Pyramid schemes are illegal, and the vast majority of participants lose money.

100 E. Royal Lane, Suite 130, Irving, TX 75039 PHONE: 469-549-3600 FAX: 469-549-3687 WWW.SER-NATIONAL.ORG
FOUNDED BY THE AMERICAN GI FORUM AND THE LEAGUE OF UNITED LATIN AMERICAN CITIZENS, SER AND SER-JOBS FOR PROGRESS ARE REGISTERED SERVICE MARKS OF SER-JOBS FOR PROGRESS NATIONAL, INC.

On January 10, 2013 NBC News reported "For many Herbalife recruits, lost money and dashed dreams." All Nicole Lopez wanted was a crack at the American dream and a chance to work at home closer to her kids. Instead, she got a nightmare, losing thousands of dollars after trying to sell Herbalife. Unwilling to recruit other people to sell Herbalife, which is how most Herbalife representatives make money, she quit after 11 months and lost the $10,000 she invested. After a 10-month investigation, CNBC found dozens of people with similar stories.

Your investigation will make others aware of the difference between a good multilevel marketing company and a bad one. Let's help our minority population make good choices before they lose their life savings like Nicole Lopez.

Sincerely,

Ignacio Salazar

Ignacio Salazar
President & CEO

C: Jessica Rich, Director, Bureau of Consumer Protection
Lois Greisman, Assistant Director, Bureau of Consumer Protection

14008878

Federal Trade Commission
Received
SEP 23 2013

Chairwoman Ramirez

(b)(6) [redacted]

Hartford, CT (b)(6) [redacted]

September 9 2013

The Honorable Edith Ramirez
Chairwoman- Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Dear Chairwoman Ramirez,

As a merchant located in the heart of the city of Hartford, I come in contact with many people from the Hispanic community. The residents of this neighborhood, also know as Frog Hollow, are trying to do their best to provide for their families while serving as good citizens.

Recent stories about how a large company has tried to enlist these citizens into retail sales through Herbalife have been disturbing. One of my employees who has used the product and told me that she almost was enlisted by the Herbalife to sell its products with promises of easy money.

Many of these resellers, by design, are from the Hispanic and African American communities, who want their part of the American dream. But Herbalife demands a very high upfront financial commitment from its resellers, who are then left to their own devices to cover those upfront costs.

Too often, these types of business take advantage of people who don't have background or experience necessary to live through the ups and downs of this type of commerce. I hope the your agency will open a full investigation into Herbalife's recruitment tactics. If they prove to be biased and unfair, Herbalife would be responsible for personal harm and financial distress throughout minority communities.

(b)(6) [redacted]

CC: Connecticut Attorney General George Jepsen

(b)(6)

East Hampton, CT (b)(6)

14008877

Federal Trade Commission
Received
SEP 23 2013

Chairwoman Ramirez

September 4, 2013

The Honorable Edith Ramirez
Chairwoman- Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Dear Chairwoman Ramirez:

It is very sad when large companies take advantage of people who are sold a bill of goods. That is what I have discovered from newspaper reports about Herbalife, which I believe, has been engaged in ruthless marketing practices, particularly with minority groups.

There are people who do not have these experience needed to sell products like Herbalife before they actually see a profit. Often, it seems, those who are engaged in selling the Herbalife products have to put up large amounts of cash to get started. Without guidance, many people are left holding the bag, so to speak.

Some have called it a Pyramid scheme. That is not my area of expertise, but from a fairness perspective, the actions of this company have clearly crossed the line when it comes toward transparency.

In many cases with these green resellers, the promises often result in crushing debt. I hope your agency will investigate these allegations that Herbalife has been conducting these abusive recruitment schemes. Instead of having a transparent operation Herbalife sells these opportunities to people in vulnerable communities, takes large up front payments and doesn't offer proper support. Due to Herbalife's high, above-average costs, it is hard for these people to sell enough of the product in order to realize a significant return on investment.

I urge your agency will open an investigation into Herbalife's recruitment tactics It is the only fair thing to do.

Sincerely, (b)(6)

(b)(6)

CC: Connecticut Attorney General George Jepsen

(b)(6)

Middlefield, CT (b)(6)

14008873

Federal Trade Commission
Received

SEP 24 2013

Chairwoman Ramirez

September 4, 2013

The Honorable Edith Ramirez
Chairwoman- Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Dear Chairwoman Ramirez:

As a skilled craftsman, I am very sympathetic to hard work. Retail sales are very difficult and take time and support. That is why I am very worried about reports concerning Herbalife.

Many people who do not have these assets are often those who are victims of get rich quick gimmicks.

That is what has happened with the company Herbalife. From what I hear through the media, the management of this company has been pushing their products to people to act as resellers. Some have called it a Ponzi or Pyramid scheme. That is not my area of expertise, but from a humanitarian perspective, the actions of this company have clearly crossed the line when it comes toward transparency.

Herbalife, many of these stories indicate, has been using powerful techniques to enlist certain minority groups to resell their products.

In many cases with these green resellers, the promises often result in crushing debt. I hope your agency will investigate these allegations that Herbalife has been conducting a complex and abusive recruitment scheme. Instead of having a transparent operation Herbalife sells these opportunities to people in vulnerable communities, takes large up front payments and doesn't offer proper support. Due to Herbalife's high, above-average costs, it is hard for these people to sell enough of the product in order to realize a significant return on investment.

I hope your agency will open a full investigation into Herbalife's recruitment tactics It is the only fair thing to do. (b)(6)

Sincerely, (b)(6)

(b)(6)

CC: Connecticut Attorney General George Jepsen

(b)(6)

Marlborough, CT (b)(6)

14008902
Federal Trade Commission
Received
SEP 27 2013

Chairwoman Ramirez

August 19, 2013

The Honorable Edith Ramirez
Chairwoman- Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Dear Chairwoman Ramirez:

As someone who offers professional services to my patients, I understand the risks and rewards of my practice on a daily basis. It took many years of education, mentoring and hard work to build this opportunity. Many people who are not fortunate to have these assets are often those who fall prey to a get rich quick gimmick or someone who offers them an easy way toward prosperity.

Sadly, that is what has happened with the company Herbalife. From what I have learned through the media and Internet, the management of this company has been aggressively pushing their products to people to act as resellers. Some have called it a Ponzi or Pyramid scheme. That is not my area of expertise, but from a humanitarian perspective, the actions of this company have clearly crossed the line when it comes toward transparency.

Herbalife, many of these stories indicate, has been using powerful techniques to enlist certain minority groups to resell their products.

In many cases with these green resellers, the promises often result in crushing debt. I hope your agency will investigate these allegations that Herbalife has been conducting a complex and abusive recruitment scheme. Instead of having a transparent operation Herbalife sells these opportunities to people in vulnerable communities, takes large up front payments and doesn't offer proper support. Due to Herbalife's high, above-average costs, it is hard for these people to sell enough of the product in order to realize a significant return on investment.

I hope your agency will open a full investigation into Herbalife's recruitment tactics. If they prove to be biased and unfair, Herbalife would be responsible for personal harm and financial distress throughout minority communities.

Sincerely, (b)(6)

(b)(6)

CC: Connecticut Attorney General George Jepsen

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, DC 20580

Lois C. Greisman
Associate Director
Division of Marketing Practices

September 11, 2013

Ms. Alma Morales Riojas
President and CEO
MANA, A National Latina Organization
1140 19th Street, NW, Suite 550
Washington, DC 20036

Dear Ms. Riojas:

Chairwoman Ramirez asked me to reply to your recent letter on behalf of your organization, MANA, a National Latina Organization, regarding your concerns about Herbalife, Ltd.'s business practices. In the letter, you requested that the Federal Trade Commission ("FTC" or "Commission") investigate the company.

As you know, the Commission has been directed by Congress to act in the interest of all consumers to prevent deceptive or unfair acts or practices, pursuant to the Federal Trade Commission Act, 15 U.S.C. §§ 41-58. In interpreting Section 5 of that statute, 15 U.S.C. § 45, the Commission has determined that a representation, omission, or practice is deceptive if (1) it is likely to mislead consumers acting reasonably under the circumstances; and (2) it is material; that is, likely to affect consumers' conduct or decisions with respect to the product at issue.

The Commission takes seriously the harm illegal pyramid schemes have on consumers and has used its authority under Section 5 of the FTC Act in appropriate cases. For example, since 1996, the FTC has brought 15 cases alleging that purportedly legitimate multi-level marketing companies were in fact pyramid schemes in masquerade. Most recently, the FTC filed a case against Fortune Hi-Tech Marketing, Inc. and related entities. *See FTC v. Fortune Hi-Tech Marketing, Inc. et al.*, 13-CV-578 (N.D. Ill. Jan. 24, 2013). The FTC alleged, among other things, that the defendants operated an illegal pyramid scheme and falsely claimed consumers would earn significant income for selling various products and services. In reality, the FTC charged that nearly all consumers who signed up with the scheme lost more money than they ever made. The FTC further alleged that to the extent consumers could make any income, it was mainly for recruiting other consumers.

In addition, just last year, the FTC won a victory in another case: *FTC v. BurnLounge, Inc. et al.*, No. 2:07-03654 (C.D. Cal. June 6, 2007). The FTC sued BurnLounge, Inc. and its top promoters for operating a deceptive pyramid scheme, making deceptive earnings claims, and failing to disclose that most consumers who participated in the pyramid scheme would not receive substantial income, but instead would lose money. More than 56,000 consumers fell victim to the scheme. In March 2012, a judge for the Central District of California entered a

final judgment and order against BurnLounge, Inc. and several of its promoters. The final order requires the defendants to pay close to $17 million for consumer redress. The final order also prohibits the defendants from engaging in pyramid, Ponzi, or chain letter schemes or any schemes in which compensation for recruitment is unrelated to the sale of product to customers who are not participants. Among other things, the order also bars misrepresentations about multi-level marketing operations or business ventures. The case is currently on appeal to the United States Court of Appeals for the Ninth Circuit.

In determining whether to take enforcement or other action in any particular situation, the Commission may consider a number of factors, including the type of violation alleged; the likelihood of preventing future unlawful conduct and securing redress or other relief; and the nature and amount of consumer injury at issue and the number of consumers affected. However, a number of statutory provisions and the Commission Rules of Practice prevent me from discussing what action, if any, the Commission may take in any particular situation.

Complaints from consumers can provide valuable information that we frequently use to identify deceptive and unfair practices in the marketplace. Therefore, please encourage MANA's members to file their complaints with the FTC, in English or in Spanish, by visiting the FTC's online Complaint Assistant, available at https://ftccomplaintassistant.gov/ or by calling 1-877-FTC-HELP (1-877-382-4357).

I appreciate you alerting the Commission to this potential problem. Should you have any additional information on this matter, please contact me at lgreisman@ftc.gov.

Sincerely,

Lois C. Greisman

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, DC 20580

Lois C. Greisman
Associate Director
Division of Marketing Practices

September 27, 2013

Mr. Ignacio Salazar
President & CEO
SER-Jobs for Progress National, Inc.
100 E. Royal Lane
Suite 130
Irving, TX 75039

Dear Mr. Salazar:

Chairwoman Ramirez asked me to reply to your recent letter on behalf of your organization, SER-Jobs for Progress National, Inc., regarding your concerns about Herbalife, Ltd.'s business practices. In the letter, you requested that the Federal Trade Commission ("FTC" or "Commission") investigate the company.

As you know, the Commission has been directed by Congress to act in the interest of all consumers to prevent deceptive or unfair acts or practices, pursuant to the Federal Trade Commission Act, 15 U.S.C. §§ 41-58. In interpreting Section 5 of that statute, 15 U.S.C. § 45, the Commission has determined that a representation, omission, or practice is deceptive if (1) it is likely to mislead consumers acting reasonably under the circumstances; and (2) it is material; that is, likely to affect consumers' conduct or decisions with respect to the product at issue.

The Commission takes seriously the harm illegal pyramid schemes have on consumers and has used its authority under Section 5 of the FTC Act in appropriate cases. For example, since 1996, the FTC has brought 15 cases alleging that purportedly legitimate multi-level marketing companies were in fact pyramid schemes in masquerade. Most recently, the FTC filed a case against Fortune Hi-Tech Marketing, Inc. and related entities. *See FTC v. Fortune Hi-Tech Marketing, Inc. et al.*, 13-CV-578 (N.D. Ill. Jan. 24, 2013). The FTC alleged, among other things, that the defendants operated an illegal pyramid scheme and falsely claimed consumers would earn significant income for selling various products and services. In reality, the FTC charged that nearly all consumers who signed up with the scheme lost more money than they ever made. The FTC further alleged that to the extent consumers could make any income, it was mainly for recruiting other consumers.

In addition, just last year, the FTC won a victory in another case: *FTC v. BurnLounge, Inc. et al.*, No. 2:07-03654 (C.D. Cal. June 6, 2007). The FTC sued BurnLounge, Inc. and its top promoters for operating a deceptive pyramid scheme, making deceptive earnings claims, and failing to disclose that most consumers who participated in the pyramid scheme would not receive substantial income, but instead would lose money. More than 56,000 consumers fell

victim to the scheme. In March 2012, a judge for the Central District of California entered a final judgment and order against BurnLounge, Inc. and several of its promoters. The final order requires the defendants to pay close to $17 million for consumer redress. The final order also prohibits the defendants from engaging in pyramid, Ponzi, or chain letter schemes or any schemes in which compensation for recruitment is unrelated to the sale of product to customers who are not participants. Among other things, the order also bars misrepresentations about multi-level marketing operations or business ventures. The case is currently on appeal to the United States Court of Appeals for the Ninth Circuit.

In determining whether to take enforcement or other action in any particular situation, the Commission may consider a number of factors, including the type of violation alleged; the likelihood of preventing future unlawful conduct and securing redress or other relief; and the nature and amount of consumer injury at issue and the number of consumers affected. However, a number of statutory provisions and the Commission Rules of Practice prevent me from discussing what action, if any, the Commission may take in any particular situation.

Complaints from consumers can provide valuable information that we frequently use to identify deceptive and unfair practices in the marketplace. Therefore, please encourage consumers to file their complaints with the FTC, in English or in Spanish, by visiting the FTC's online Complaint Assistant, available at https://ftccomplaintassistant.gov/ or by calling 1-877-FTC-HELP (1-877-382-4357).

I appreciate you alerting the Commission to this potential problem. Should you have any additional information on this matter, please contact me at lgreisman@ftc.gov.

Sincerely,

Lois C. Greisman

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

EDITH RAMIREZ
CHAIRWOMAN

June 20, 2013

The Honorable Linda T. Sánchez
House of Representatives
Washington, DC 20515

Dear Representative Sánchez:

Thank you for your recent letter regarding your concerns about Herbalife, Ltd.'s business practices. You noted the allegations raised by the National Consumers League and the Hispanic Federation that Herbalife is an illegal pyramid scheme, and requested that the Federal Trade Commission ("FTC" or "Commission") investigate the company.

As you know, the Commission has been directed by Congress to act in the interest of all consumers to prevent deceptive or unfair acts or practices, pursuant to the Federal Trade Commission Act, 15 U.S.C. §§ 41-58. In interpreting Section 5 of that statute, 15 U.S.C. § 45, the Commission has determined that a representation, omission, or practice is deceptive if (1) it is likely to mislead consumers acting reasonably under the circumstances; and (2) it is material; that is, likely to affect consumers' conduct or decisions with respect to the product at issue.

The Commission takes seriously the harm illegal pyramid schemes have on consumers and has used its authority under Section 5 of the FTC Act in appropriate cases. For example, since 1996, the FTC has brought 15 cases alleging that purportedly legitimate multi-level marketing companies were in fact pyramid schemes in masquerade. Most recently, the FTC filed a case against Fortune Hi-Tech Marketing, Inc. and related entities. *See FTC v. Fortune Hi-Tech Marketing, Inc. et al.*, 13-CV-578 (N.D. Ill. Jan. 24, 2013). The FTC alleged, among other things, that the defendants operated an illegal pyramid scheme and falsely claimed consumers would earn significant income for selling various products and services. In reality, the FTC charged that nearly all consumers who signed up with the scheme lost more money than they ever made. The FTC further alleged that to the extent consumers could make any income, it was mainly for recruiting other consumers.

In addition, just last year, the FTC won a victory in another case: *FTC v. BurnLounge, Inc. et al.*, No. 2:07-03654 (C.D. Cal. June 6, 2007). The FTC sued BurnLounge, Inc. and its top promoters for operating a deceptive pyramid scheme, making deceptive earnings claims, and failing to disclose that most consumers who participated in the pyramid scheme would not

receive substantial income, but instead would lose money. More than 56,000 consumers fell victim to the scheme. In March 2012, a judge for the Central District of California entered a final judgment and order against BurnLounge, Inc. and several of its promoters. The final order requires the defendants to pay close to $17 million for consumer redress. The final order also prohibits the defendants from engaging in pyramid, Ponzi, or chain letter schemes or any schemes in which compensation for recruitment is unrelated to the sale of product to customers who are not participants. Among other things, the order also bars misrepresentations about multi-level marketing operations or business ventures. The case is currently on appeal to the United States Court of Appeals for the Ninth Circuit.

I have forwarded your letter to the appropriate staff in the FTC's Bureau of Consumer Protection. In determining whether to take enforcement or other action in any particular situation, the Commission may consider a number of factors, including the type of violation alleged; the likelihood of preventing future unlawful conduct and securing redress or other relief; and the nature and amount of consumer injury at issue and the number of consumers affected. However, a number of statutory provisions and the Commission Rules of Practice prevent me from discussing what action, if any, the Commission may take in any particular situation.

Complaints from consumers can provide valuable information that we frequently use to identify deceptive and unfair practices in the marketplace. Therefore, please encourage your constituents to file their complaints with the FTC, in English or in Spanish, by visiting the FTC's online Complaint Assistant, available at https://ftccomplaintassistant.gov/ or by calling 1-877-FTC-HELP (1-877-382-4357).

I appreciate your concerns about this matter and your commitment to protecting all consumers, especially the most vulnerable in our population. If you or your staff has additional questions or comments, please feel free to contact me or have your staff contact Jeanne Bumpus, the Director of our Office of Congressional Relations, at (202) 326-2946.

Sincerely,

Edith Ramirez

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, DC 20580

Lois C. Greisman
Associate Director

Division of Marketing Practices
Bureau of Consumer Protection

May 29, 2013

Mr. José Calderón
Hispanic Federation
55 Exchange Place, Suite 501
New York, NY 10005

Re: Hispanic Federation's Letter Urging the FTC to Investigate Herbalife Ltd.

Dear Mr. Calderón:

Thank you for your May 17, 2013 letter on behalf of your organization, Hispanic Federation, regarding recent allegations that Herbalife Ltd. is a pyramid scheme. Chairwoman Ramirez asked me to respond on her behalf.

As you know, the Federal Trade Commission has been directed by Congress to act in the interest of all consumers to prevent deceptive or unfair acts or practices, pursuant to the Federal Trade Commission Act, 15 U.S.C. §§ 41-58. In interpreting Section 5 of that statute, 15 U.S.C. § 45, the Commission has determined that a representation, omission, or practice is deceptive if (1) it is likely to mislead consumers acting reasonably under the circumstances; and (2) it is material; that is, likely to affect consumers' conduct or decisions with respect to the product at issue.

The FTC takes seriously the harm illegal pyramid schemes have on consumers and has used its authority under Section 5 of the FTC Act in appropriate cases. For example, since 1996, the FTC has brought 15 cases alleging that purportedly legitimate multi-level marketing ("MLM") companies were in fact pyramid schemes in masquerade. Most recently, the FTC brought a case against Fortune Hi-Tech Marketing, Inc. and related entities. *See FTC v. Fortune Hi-Tech Marketing, Inc. et al.*, 13 CV 578 (N.D. Ill. Jan. 24, 2013). In its complaint, the FTC alleged, among other things, that the defendants operated an illegal pyramid scheme and falsely claimed consumers would earn significant income for selling various products and services. In reality, the complaint charged that nearly all consumers who signed up with the scheme lost more money than they ever made. And, to the extent consumers could make any income, it was mainly for recruiting other consumers.

In determining whether to take enforcement or other action in any particular situation, the Commission may consider a number of factors, including the type of violation alleged; the nature and amount of consumer injury at issue and the number of consumers affected; and the likelihood of preventing future unlawful conduct and securing redress or other relief. Letters from organizations like yours provide valuable information that is frequently used to

develop or support Commission enforcement initiatives.

I appreciate you alerting the Commission to this potential problem. Please contact me if you have any additional information on this matter.

Sincerely,

Lois C. Greisman

OFFICE OF THE
CHAIRWOMAN

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

August 27, 2013

The Honorable Loretta Sanchez
United States House of Representatives
Washington, DC 20515

Dear Representative Sanchez:

Thank you for your recent letter regarding your concerns about Herbalife, Ltd.'s business practices. You noted that a number of outside groups, such as the Hispanic Federation, League of United Latin American Citizens, National Consumers League, Consumer Action, and Consumers Union, have raised concerns about the company's practices, including concerns that Herbalife is an illegal pyramid scheme. You requested that the Federal Trade Commission ("FTC" or "Commission") investigate the company.

As you know, the Commission has been directed by Congress to act in the interest of all consumers to prevent deceptive or unfair acts or practices, pursuant to the Federal Trade Commission Act, 15 U.S.C. §§ 41-58. In interpreting Section 5 of that statute, 15 U.S.C. § 45, the Commission has determined that a representation, omission, or practice is deceptive if (1) it is likely to mislead consumers acting reasonably under the circumstances; and (2) it is material that is likely to affect consumers' conduct or decisions with respect to the product at issue.

The Commission takes seriously the harm illegal pyramid schemes have on consumers and has used its authority under Section 5 of the FTC Act in appropriate cases. For example, since 1996, the FTC has brought 15 cases alleging that purportedly legitimate multi-level marketing companies were in fact pyramid schemes in masquerade. Most recently, the FTC filed a case against Fortune Hi-Tech Marketing, Inc. and related entities. *See FTC v. Fortune Hi-Tech Marketing, Inc. et al.*, 13-CV-578 (N.D. Ill. Jan. 24, 2013). The FTC alleged, among other things, that the defendants operated an illegal pyramid scheme and falsely claimed consumers would earn significant income for selling various products and services. In reality, the FTC charged that nearly all consumers who signed up with the scheme lost more money than they ever made. The FTC further alleged that to the extent consumers could make any income, it was mainly for recruiting other consumers.

In addition, just last year, the FTC won a victory in another case: *FTC v. BurnLounge, Inc. et al.*, No. 2:07-03654 (C.D. Cal. June 6, 2007). The FTC sued BurnLounge, Inc. and its top promoters for operating a deceptive pyramid scheme, making deceptive earnings claims, and failing to disclose that most consumers who participated in the pyramid scheme would not receive substantial income, but instead would lose money. More than 56,000 consumers fell

victim to the scheme. In March 2012, a judge for the Central District of California entered a final judgment and order against BurnLounge and several of its promoters. The final order requires the defendants to pay close to $17 million for consumer redress. The final order also prohibits the defendants from engaging in pyramid, Ponzi, or chain letter schemes or any schemes in which compensation for recruitment is unrelated to the sale of product to customers who are not participants. Among other things, the order also bars misrepresentations about multi-level marketing operations or business ventures. The case is currently on appeal to the United States Court of Appeals for the Ninth Circuit.

I have forwarded your letter to the appropriate staff in the FTC's Bureau of Consumer Protection. In determining whether to take enforcement or other action in any particular situation, the Commission may consider a number of factors, including the type of violation alleged; the likelihood of preventing future unlawful conduct and securing redress or other relief; and the nature and amount of consumer injury at issue and the number of consumers affected. However, a number of statutory provisions and the Commission Rules of Practice prevent me from discussing what action, if any, the Commission may take in any particular situation.

Complaints from consumers can provide valuable information that we frequently use to identify deceptive and unfair practices in the marketplace. Therefore, please encourage your constituents to file their complaints with the FTC, in English or in Spanish, by visiting the FTC's online Complaint Assistant, available at https://ftccomplaintassistant.gov/ or by calling 1-877-FTC-HELP (1-877-382-4357).

I appreciate your concerns about this matter and your commitment to protecting all consumers. If you or your staff has additional questions or comments, please feel free to contact me or have your staff contact Jeanne Bumpus, the Director of our Office of Congressional Relations, at (202) 326-2946.

Sincerely,

Edith Ramirez

OFFICE OF THE
CHAIRWOMAN

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

August 27, 2013

The Honorable Michelle Lujan Grisham
United States House of Representatives
Washington, DC 20515

Dear Representative Lujan Grisham:

Thank you for your recent letter regarding your concerns about Herbalife, Ltd.'s business practices. You noted that a number of outside groups, such as the Hispanic Federation, League of United Latin American Citizens, National Consumers League, Consumer Action, and Consumers Union, have raised concerns about the company's practices, including concerns that Herbalife is an illegal pyramid scheme. You requested that the Federal Trade Commission ("FTC" or "Commission") investigate the company.

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The Commission takes seriously the harm illegal pyramid schemes have on consumers and has used its authority under Section 5 of the FTC Act in appropriate cases. For example, since 1996, the FTC has brought 15 cases alleging that purportedly legitimate multi-level marketing companies were in fact pyramid schemes in masquerade. Most recently, the FTC filed a case against Fortune Hi-Tech Marketing, Inc. and related entities. *See FTC v. Fortune Hi-Tech Marketing, Inc. et al.*, 13-CV-578 (N.D. Ill. Jan. 24, 2013). The FTC alleged, among other things, that the defendants operated an illegal pyramid scheme and falsely claimed consumers would earn significant income for selling various products and services. In reality, the FTC charged that nearly all consumers who signed up with the scheme lost more money than they ever made. The FTC further alleged that to the extent consumers could make any income, it was mainly for recruiting other consumers.

In addition, just last year, the FTC won a victory in another case: *FTC v. BurnLounge, Inc. et al.*, No. 2:07-03654 (C.D. Cal. June 6, 2007). The FTC sued BurnLounge, Inc. and its top promoters for operating a deceptive pyramid scheme, making deceptive earnings claims, and failing to disclose that most consumers who participated in the pyramid scheme would not receive substantial income, but instead would lose money. More than 56,000 consumers fell

victim to the scheme. In March 2012, a judge for the Central District of California entered a final judgment and order against BurnLounge and several of its promoters. The final order requires the defendants to pay close to $17 million for consumer redress. The final order also prohibits the defendants from engaging in pyramid, Ponzi, or chain letter schemes or any schemes in which compensation for recruitment is unrelated to the sale of product to customers who are not participants. Among other things, the order also bars misrepresentations about multi-level marketing operations or business ventures. The case is currently on appeal to the United States Court of Appeals for the Ninth Circuit.

I have forwarded your letter to the appropriate staff in the FTC's Bureau of Consumer Protection. In determining whether to take enforcement or other action in any particular situation, the Commission may consider a number of factors, including the type of violation alleged; the likelihood of preventing future unlawful conduct and securing redress or other relief; and the nature and amount of consumer injury at issue and the number of consumers affected. However, a number of statutory provisions and the Commission Rules of Practice prevent me from discussing what action, if any, the Commission may take in any particular situation.

Complaints from consumers can provide valuable information that we frequently use to identify deceptive and unfair practices in the marketplace. Therefore, please encourage your constituents to file their complaints with the FTC, in English or in Spanish, by visiting the FTC's online Complaint Assistant, available at https://ftccomplaintassistant.gov/ or by calling 1-877-FTC-HELP (1-877-382-4357).

I appreciate your concerns about this matter and your commitment to protecting all consumers. If you or your staff has additional questions or comments, please feel free to contact me or have your staff contact Jeanne Bumpus, the Director of our Office of Congressional Relations, at (202) 326-2946.

Sincerely,

Edith Ramirez

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

FOIA-2012-00806

Database: Consumer Sentinel Network

Search Term: Herbalife

Search as of: April 18, 2012

Number of Complaints:

2012: 18

2011: 37

2010: 36

2009: 12

2008: 15

2007: 19

2006: 1

Note: Due to the Consumer Sentinel Network data retention policy, most complaints older than five years are purged from the system at six month intervals.

Federal Trade Commission
Matter Management System

MATTER INITIATION NOTICE

Use this form to open new matters *(Initial, Full Phase or "X" numbers)*. See the FTC Information Handbook for instructions and information on codes.
Please use the following forms if you need more space: FTC Form 84 for respondents, FTC Form 83 for anything else. Please print.

1. Name of Staff who completed the records check for initial or full phase investigation, date completed, and e-mail address.
Beverly Yates Date 1/22/09 Email byates@ftc.gov

2. Matter Number
C923073

3. Matter Name *(Use important descriptive words, up to 120 letters and spaces in length.)*
Loss Mitigation Service, Inc. / Direct Lender / Dean Shafer

4. Date opened M M D D Y Y

5. Original Matter Number *(If the new matter was split from another matter)*

IDENTIFICATION CODES/TITLES

6. Manager MIS Number	7. Organization Code	8. Program Code	9. Matter Source Code
142752	1148	K05	02

MATTER DESCRIPTION

10. Provide a brief description of the matter to be initiated. *(Use this space to describe the matter when it is opened. This description can be changed, as the matter progresses. If initial or full phase investigation, include legal theory or alleged violation.)*

Investigate Loss Mitigation Services, Inc. in relation to allegations that it deceptively marketed mortgage loan modification services.

MATTER INITIATION EVENT

11. Type of matter to be opened (Put an 'X' in the appropriate box. The code for the event follows the event description.)

- (•) Initial Phase Investigation (0010)
- ( ) Full Phase Investigation (0510)
- ( ) Rule/Guide (7001)
- ( ) Project (8010)
- ( ) Compliance Investigation (4910)
- ( ) Discovery Enforcement Action (5010)
- ( ) § 13 Preliminary Injunction Action (5020)
- ( ) Commission Court Action (5030)
- ( ) Petition to Review Commission Order (5040)
- ( ) Petition to Review Commission TRR (5050)
- ( ) FOIA Action Against Commission (5060)
- ( ) Court Action Against Commission (5070)
- ( ) Advocacy Matter (8950)

12. Organization code and name of organization that decided to open the matter
1148 Division of Financial Practices

13. Event Source Code

14. LANDOC Number

15. MIS number and name of person who decided to open the matter
258780 Mark L. Glassman

16. Event Comment *(Explain the reason for initiating the matter. If initial or full phase investigation, include the legal theory if different than item ID above.)*

Initial Phase Investigation.

PLANNED EVENT

17. Planned Completion Date
M M D D Y Y

18. Organization code and name of organization resonsible for the event

19. Event Source

20. Event Code

21. MIS number and of person resonsible for the event

22. Title for 9999 Event

23. Event Security Level *(B, O, R, F, X)*

24. Event comment *(Describe with more specifity the scope of this event.)*

MATTER STATUS

25. Briefly describe the current status of the entire matter

As of 01/21/2009
Date

DFP has started an initial-phase investigation into the potential respondents' business practices. We have interviewed a consumer, reviewed FTC and Better Business Bureau complaints, and have researched the corporation's relationships.

RESPONDENTS/DEFENDANTS/PARTICIPANTS (EXTERNAL)

(Records check must be completed for each respondent/defendant, d/b/a or a.k.a.)

NOTICE: The submitter of this form must enter this information into the External Participant portion of MMS2

26	Respondent Name (60 letters and spaces or less)	Phone Number	CHECK IF NON-RESPONDENT
A.	Loss Mitigation Services, Inc.	866-371-1046 / 1047	☒
	Company/Proposed Respondent/Defendant's Address (Street, City, State, Zip Code): 1700 Carnegie Avenue, Suite 250, Santa Ana, CA 92705-5533	Company's d/b/a or a.k.a.: DirectLender.com	
B.	Dean Shafer		☒
	Company/Proposed Respondent/Defendant's Address (Street, City, State, Zip Code): 54 Chandon, Newport Coast, CA 92657-1112	Company's d/b/a or a.k.a.	
C.			☐
	Company/Proposed Respondent/Defendant's Address (Street, City, State, Zip Code)	Company's d/b/a or a.k.a.	
D.			☐
	Company/Proposed Respondent/Defendant's Address (Street, City, State, Zip Code)	Company's d/b/a or a.k.a.	

(Continue on FTC Form 84 if necessary)

FTC STAFF

27. MIS Number	28. Participant Name, Telephone Number, and E-mail Address			29. Type
264920	Leah Frazier	(202) 326-2187	LFrazier@ftc.gov	
240751	Stephanie Rosenthal	(202) 326-3332	Srosenthal@ftc.gov	

30. Primary BCP Product Code: 3322

31. Other BCP Product Codes

32. Primary 6-Digit NAICS Code

33. Other NAICS Codes

34. Primary Statute Code: P

35. Other Statute Codes

36. Primary Violation Code: 66

37. Other Violation Codes

38. Companion Matter Number(s) *(Companion matters are similar to this matter in that they involve the same product, practice, violation, or are part of a sweep, etc.)*

APPROVALS - BC ONLY

39. Assistant Director *(Regional Office Matters)*	40. DOJ Clearance	41. Assistant Director for Evaluation

APPROVAL - ALL MATTERS		APPROVAL - ALL FULL PHASE INVESTIGATIONS	
42. Associate, Assistant or Regional Director	Date	43. Bureau Director	Date
Kazzy Tudey	1/22/09		

Send the completed and signed original form to your data entry staff. They will send the signers and the manager a copy and forward the original form and 2 copies to the Records Processing Section for filing.

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Bank of America, N.A. ATTN: Jack Sena, Associate General Counsel 50 Rockefeller Plaza NY1-50-12-05 New York, NY 10020	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
March 25, 2009	Leah Frazier Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc. Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Brian Figueroa, Paralegal Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580

DATE ISSUED	COMMISSIONER'S SIGNATURE
MAR 11 2009	William E. Kovacic

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Bank of America, N.A.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. "**You**" and "**Your**" shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the FTC before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Leah Frazier at (202) 326-2187 or lfrazier@ftc.gov.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with Leah Frazier at (202) 326-2187. All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to Brian Figueroa, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580. Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to Brian Figueroa at (202) 326-2022 at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted in lieu of original documents, provided that the originals are retained in their state at the time of

receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information ("ESI"):** The following guidelines refer to any ESI You submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   a. CD-R CD-ROMs formatted to ISO 9660 specifications.

   b. DVD-ROM for Windows-compatible personal computers.

   c. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

   Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   a. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.

   b. Scanned Documents: Image submissions will be accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      i. All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      ii. If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

c. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2002 version or earlier. Spreadsheets should be in MS Excel 2002 (*.xls) version or earlier. Database files should be in MS Access 2002 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2002 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

a. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

b. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION

M. **Right to Financial Privacy Act**: The documents demanded by this CID exclude any materials for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. §§ 3401, *et seq.*

1. The RFPA, § 3401(5), defines "customer" as any person or authorized

representative of that person who utilized or is utilizing any service of a financial institution, or for whom a financial institution is acting or has acted as a fiduciary, in relation to an account maintained in the person's name.

2. The RFPA, § 3401(4), defines "person" as an individual or a partnership of five or fewer individuals.

3. The records demanded herein relate to an account or accounts at the Company in the name of a corporation, which by definition is not an individual or partnership of five or fewer individuals.

N. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

O. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings.

III. SPECIFICATIONS

"Corporate Accounts" shall mean the accounts maintained by the Company:

1. In the name of the following entities: (a) Loss Mitigation Services, Inc.; (b) Synergy Financial Management Corporation; (c) Synergy Financial Corporation; (d) DirectLender.com; and (e) Direct Lender;

2. In the name of corporations, limited liability companies, partnerships of more than five individuals, or other entities that are not a "person" for purposes of the RFPA, to which any of the following individuals are signatories: (a) Andry Doran; (b) Dean Shafer; (c) Bernadette Carr-Perry; (d) Debi Britt; (e) Marion

Perry; (f) Ronald Cuha; (g) Aaron Cuha; and (h) Tony Perry.

A. Produce any and all documents relating to each Corporate Account, including but not limited to the following:

1. signature cards, corporate resolutions, and all other documents regarding signatories on the account;

2. copies of monthly or periodic bank statements;

3. copies of checks, drafts, wire transfers, ACH transfers, and other debit instruments, including any agreements and instructions regarding such debit instruments; and

4. copies of all deposit tickets, credits and wire transfers, ACH transfers, and other deposit instruments, including any agreements and instructions regarding such credit instruments.

NOTE: The documents demanded by this CID exclude any information for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. § 3401, *et seq*. Documents produced should not contain any additional information. If you have any questions about these requests, please contact FTC staff attorney Leah Frazier at (202) 326-2187 before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Bank of America, N.A. and attached hereto.

3. The documents produced and attached hereto by Bank of America, N.A. are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Bank of America, N.A.; and

   c) Were made in the regular practice of the business activity of Bank of America, N.A.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on _____, 2009.

_____
Signature

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Citicorp Payment Services, Inc. Litigation Support 1 Court Square 10th Floor Long Island, NY 11120	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
March 25, 2009	Leah Frazier Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc.Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Brian Figueroa, Paralegal Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580

DATE ISSUED	COMMISSIONER'S SIGNATURE
MAR 11 2009	William E. Kovacic

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Citicorp Payment Services, Inc.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. "**You**" and "**Your**" shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the FTC before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Leah Frazier at (202) 326-2187 or lfrazier@ftc.gov.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with Leah Frazier at (202) 326-2187. All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to Brian Figueroa, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580. Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to Brian Figueroa at (202) 326-2022 at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted in lieu of original documents, provided that the originals are retained in their state at the time of

receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information ("ESI"):** The following guidelines refer to any ESI You submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   a. CD-R CD-ROMs formatted to ISO 9660 specifications.

   b. DVD-ROM for Windows-compatible personal computers.

   c. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

   Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   a. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.

   b. Scanned Documents: Image submissions will be accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      i. All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      ii. If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

c. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2002 version or earlier. Spreadsheets should be in MS Excel 2002 (*.xls) version or earlier. Database files should be in MS Access 2002 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2002 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

a. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

b. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION

M. **Right to Financial Privacy Act**: The documents demanded by this CID exclude any materials for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. §§ 3401, *et seq.*

1. The RFPA, § 3401(5), defines "customer" as any person or authorized

representative of that person who utilized or is utilizing any service of a financial institution, or for whom a financial institution is acting or has acted as a fiduciary, in relation to an account maintained in the person's name.

2. The RFPA, § 3401(4), defines "person" as an individual or a partnership of five or fewer individuals.

3. The records demanded herein relate to an account or accounts at the Company in the name of a corporation, which by definition is not an individual or partnership of five or fewer individuals.

N. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

O. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings.

III. SPECIFICATIONS

"Corporate Accounts" shall mean the accounts maintained by the Company:

1. In the name of the following entities: (a) Loss Mitigation Services, Inc.; (b) Synergy Financial Management Corporation; (c) Synergy Financial Corporation; (d) DirectLender.com; and (e) Direct Lender;

2. In the name of corporations, limited liability companies, partnerships of more than five individuals, or other entities that are not a "person" for purposes of the RFPA, to which any of the following individuals are signatories: (a) Andry Doran; (b) Dean Shafer; (c) Bernadette Carr-Perry; (d) Debi Britt; (e) Marion

Perry; (f) Ronald Cuha; (g) Aaron Cuha; and (h) Tony Perry.

A. Produce any and all documents relating to each Corporate Account, including but not limited to the following:

1. signature cards, corporate resolutions, and all other documents regarding signatories on the account;

2. copies of monthly or periodic bank statements;

3. copies of checks, drafts, wire transfers, ACH transfers, and other debit instruments, including any agreements and instructions regarding such debit instruments; and

4. copies of all deposit tickets, credits and wire transfers, ACH transfers, and other deposit instruments, including any agreements and instructions regarding such credit instruments.

NOTE: The documents demanded by this CID exclude any information for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. § 3401, *et seq.* Documents produced should not contain any additional information. If you have any questions about these requests, please contact FTC staff attorney Leah Frazier at (202) 326-2187 before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Citicorp Payment Services, Inc. and attached hereto.

3. The documents produced and attached hereto by Citicorp Payment Services, Inc. are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Citicorp Payment Services, Inc.; and

   c) Were made in the regular practice of the business activity of Citicorp Payment Services, Inc.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on _____, 2009.

_____
Signature

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Columbus Bank & Trust Co. c/o Synovus Financial Corporation ATTN: Kim Carr 500 11th Street Columbus, GA 31902	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
March 25, 2009	Leah Frazier Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc. Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Brian Figueroa, Paralegal Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580

DATE ISSUED	COMMISSIONER'S SIGNATURE
MAR 11 2009	William E. Kovacic

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Columbus Bank & Trust Co.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. "**You**" and "**Your**" shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the FTC before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Leah Frazier at (202) 326-2187 or lfrazier@ftc.gov.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with Leah Frazier at (202) 326-2187. All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to Brian Figueroa, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580. Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to Brian Figueroa at (202) 326-2022 at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted in lieu of original documents, provided that the originals are retained in their state at the time of

receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information ("ESI"):** The following guidelines refer to any ESI You submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   a. CD-R CD-ROMs formatted to ISO 9660 specifications.

   b. DVD-ROM for Windows-compatible personal computers.

   c. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

   Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   a. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.

   b. Scanned Documents: Image submissions will be accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      i. All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      ii. If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

c. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2002 version or earlier. Spreadsheets should be in MS Excel 2002 (*.xls) version or earlier. Database files should be in MS Access 2002 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2002 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

a. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

b. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION

M. **Right to Financial Privacy Act**: The documents demanded by this CID exclude any materials for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. §§ 3401, *et seq.*

1. The RFPA, § 3401(5), defines "customer" as any person or authorized

representative of that person who utilized or is utilizing any service of a financial institution, or for whom a financial institution is acting or has acted as a fiduciary, in relation to an account maintained in the person's name.

2. The RFPA, § 3401(4), defines "person" as an individual or a partnership of five or fewer individuals.

3. The records demanded herein relate to an account or accounts at the Company in the name of a corporation, which by definition is not an individual or partnership of five or fewer individuals.

N. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

O. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings.

III. SPECIFICATIONS

"Corporate Accounts" shall mean the accounts maintained by the Company:

1. In the name of the following entities: (a) Loss Mitigation Services, Inc.; (b) Synergy Financial Management Corporation; (c) Synergy Financial Corporation; (d) DirectLender.com; and (e) Direct Lender;

2. In the name of corporations, limited liability companies, partnerships of more than five individuals, or other entities that are not a "person" for purposes of the RFPA, to which any of the following individuals are signatories: (a) Andry Doran; (b) Dean Shafer; (c) Bernadette Carr-Perry; (d) Debi Britt; (e) Marion

Perry; (f) Ronald Cuha; (g) Aaron Cuha; and (h) Tony Perry.

A. Produce any and all documents relating to each Corporate Account, including but not limited to the following:

1. signature cards, corporate resolutions, and all other documents regarding signatories on the account;

2. copies of monthly or periodic bank statements;

3. copies of checks, drafts, wire transfers, ACH transfers, and other debit instruments, including any agreements and instructions regarding such debit instruments; and

4. copies of all deposit tickets, credits and wire transfers, ACH transfers, and other deposit instruments, including any agreements and instructions regarding such credit instruments.

NOTE: The documents demanded by this CID exclude any information for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. § 3401, *et seq.* Documents produced should not contain any additional information. If you have any questions about these requests, please contact FTC staff attorney Leah Frazier at (202) 326-2187 before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Columbus Bank & Trust Co. and attached hereto.

3. The documents produced and attached hereto by Columbus Bank & Trust Co. are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Columbus Bank & Trust Co.; and

   c) Were made in the regular practice of the business activity of Columbus Bank & Trust Co.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on _____, 2009.

_____
Signature

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Wells Fargo Bank, N.A. ATTN: Subpoena Processing 2700 South Price Road Second Floor Chandler, AZ 85286	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
March 25, 2009	Leah Frazier Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc. Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Brian Figueroa, Paralegal Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580

DATE ISSUED	COMMISSIONER'S SIGNATURE
MAR 11 2009	William E. Kovacic

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Wells Fargo Bank, N.A.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. "**You**" and "**Your**" shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the FTC before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Leah Frazier at (202) 326-2187 or lfrazier@ftc.gov.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

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J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

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receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

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   a. CD-R CD-ROMs formatted to ISO 9660 specifications.

   b. DVD-ROM for Windows-compatible personal computers.

   c. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

   Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   a. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.

   b. Scanned Documents: Image submissions will be accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      i. All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      ii. If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

c. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2002 version or earlier. Spreadsheets should be in MS Excel 2002 (*.xls) version or earlier. Database files should be in MS Access 2002 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2002 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

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a. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

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representative of that person who utilized or is utilizing any service of a financial institution, or for whom a financial institution is acting or has acted as a fiduciary, in relation to an account maintained in the person's name.

2. The RFPA, § 3401(4), defines "person" as an individual or a partnership of five or fewer individuals.

3. The records demanded herein relate to an account or accounts at the Company in the name of a corporation, which by definition is not an individual or partnership of five or fewer individuals.

N. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

O. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings.

III. SPECIFICATIONS

"Corporate Accounts" shall mean the accounts maintained by the Company:

1. In the name of the following entities: (a) Loss Mitigation Services, Inc.; (b) Synergy Financial Management Corporation; (c) Synergy Financial Corporation; (d) DirectLender.com; and (e) Direct Lender;

2. In the name of corporations, limited liability companies, partnerships of more than five individuals, or other entities that are not a "person" for purposes of the RFPA, to which any of the following individuals are signatories: (a) Andry Doran; (b) Dean Shafer; (c) Bernadette Carr-Perry; (d) Debi Britt; (e) Marion

Perry; (f) Ronald Cuha; (g) Aaron Cuha; and (h) Tony Perry.

A. Produce any and all documents relating to each Corporate Account, including but not limited to the following:

1. signature cards, corporate resolutions, and all other documents regarding signatories on the account;

2. copies of monthly or periodic bank statements;

3. copies of checks, drafts, wire transfers, ACH transfers, and other debit instruments, including any agreements and instructions regarding such debit instruments; and

4. copies of all deposit tickets, credits and wire transfers, ACH transfers, and other deposit instruments, including any agreements and instructions regarding such credit instruments.

NOTE: The documents demanded by this CID exclude any information for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. § 3401, *et seq*. Documents produced should not contain any additional information. If you have any questions about these requests, please contact FTC staff attorney Leah Frazier at (202) 326-2187 before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Wells Fargo Bank, N.A. and attached hereto.

3. The documents produced and attached hereto by Wells Fargo Bank, N.A. are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Wells Fargo Bank, N.A.; and

   c) Were made in the regular practice of the business activity of Wells Fargo Bank, N.A.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on _____, 2009.

_____
Signature

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Level 3 Communications, LLC ATTN: Jason Krieger 1025 Eldorado Boulevard Broomfield, CO 80021	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
March 25, 2009	Leah Frazier Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc. Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Brian Figueroa, Paralegal Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580

DATE ISSUED	COMMISSIONER'S SIGNATURE
MAR 11 2009	William E. Kovacic

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Level 3 Communications, LLC**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. "**You**" and "**Your**" shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the FTC before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Leah Frazier at (202) 326-2187 or lfrazier@ftc.gov.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with Leah Frazier at (202) 326-2187. All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to Brian Figueroa, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580. Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to Brian Figueroa at (202) 326-2022 at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted in lieu of original documents, provided that the originals are retained in their state at the time of

receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information ("ESI"):** The following guidelines refer to any ESI You submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   a. CD-R CD-ROMs formatted to ISO 9660 specifications.

   b. DVD-ROM for Windows-compatible personal computers.

   c. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

      Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   a. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.

   b. Scanned Documents: Image submissions will be accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      i. All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      ii. If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

c. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2002 version or earlier. Spreadsheets should be in MS Excel 2002 (*.xls) version or earlier. Database files should be in MS Access 2002 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2002 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

a. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

b. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION

M. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

N. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings.

III. SPECIFICATIONS

Produce the following information relating to the customer(s) or subscriber(s) associated with the telephone numbers **866-371-1046, 866-371-1047, 866-371-5064,** and any other telephone number(s) or account(s) held by the same customer(s) or subscriber(s), during the applicable time period:

A. Name;

B. Address;

C. Local and long distance telephone connection records (inbound and outbound), or records of session times and durations;

D. Length of service (including start date) and types of service utilized;

E. Telephone or instrument number or other subscriber number or identity, including any temporarily assigned network address; and

F. Means and source of payment for such service (including any credit card or bank account number).

If readily available, please send the name and address of the customer(s) or subscriber(s) and a list of other telephone numbers of the customer(s) or subscriber(s) associated with the above telephone number(s) within two days of receipt of this CID. You may fax this preliminary information to Leah Frazier at (202) 326-3768 before completing your full response to the remaining items.

NOTE: This CID is issued in conformance with Sections 2702 and 2703 of Title 18 of the

United States Code (the Electronic Communications Privacy Act). To the extent you are a provider of electronic communication service or remote computing service, your response to this CID should not divulge a record or information pertaining to a subscriber or customer of your electronic communication service or remote computing service, other than that allowed pursuant to 18 U.S.C. § 2703(c)(2). If you have any questions, please contact FTC staff attorney Leah Frazier at (202) 326-2187 before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Level 3 Communications, LLC and attached hereto.

3. The documents produced and attached hereto by Level 3 Communications, LLC are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Level 3 Communications, LLC; and

   c) Were made in the regular practice of the business activity of Level 3 Communications, LLC.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on _____, 2009.

_____
Signature

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Total Call International, Inc. Legal Department 707 Wilshire Boulevard 12th Floor Los Angeles, CA 90017	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
March 25, 2009	Leah Frazier Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc. Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Brian Figueroa, Paralegal Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580

DATE ISSUED	COMMISSIONER'S SIGNATURE
MAR 11 2009	William E. Kovacic

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Total Call International, Inc.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. "**You**" and "**Your**" shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the FTC before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Leah Frazier at (202) 326-2187 or lfrazier@ftc.gov.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with Leah Frazier at (202) 326-2187. All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to Brian Figueroa, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580. Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to Brian Figueroa at (202) 326-2022 at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted in lieu of original documents, provided that the originals are retained in their state at the time of

receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information ("ESI"):** The following guidelines refer to any ESI You submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   a. CD-R CD-ROMs formatted to ISO 9660 specifications.

   b. DVD-ROM for Windows-compatible personal computers.

   c. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

      Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   a. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.

   b. Scanned Documents: Image submissions will be accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      i. All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      ii. If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

c. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2002 version or earlier. Spreadsheets should be in MS Excel 2002 (*.xls) version or earlier. Database files should be in MS Access 2002 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2002 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

a. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

b. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION

M. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

N. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings.

III. SPECIFICATIONS

Produce the following information relating to the customer(s) or subscriber(s) associated with the telephone number **888-433-9284,** and any other telephone number(s) or account(s) held by the same customer(s) or subscriber(s), during the applicable time period:

A. Name;

B. Address;

C. Local and long distance telephone connection records (inbound and outbound), or records of session times and durations;

D. Length of service (including start date) and types of service utilized;

E. Telephone or instrument number or other subscriber number or identity, including any temporarily assigned network address; and

F. Means and source of payment for such service (including any credit card or bank account number).

If readily available, please send the name and address of the customer(s) or subscriber(s) and a list of other telephone numbers of the customer(s) or subscriber(s) associated with the above telephone number(s) within two days of receipt of this CID. You may fax this preliminary information to Leah Frazier at (202) 326-3768 before completing your full response to the remaining items.

NOTE: This CID is issued in conformance with Sections 2702 and 2703 of Title 18 of the United States Code (the Electronic Communications Privacy Act). To the extent you are a

provider of electronic communication service or remote computing service, your response to this CID should not divulge a record or information pertaining to a subscriber or customer of your electronic communication service or remote computing service, other than that allowed pursuant to 18 U.S.C. § 2703(c)(2). If you have any questions, please contact FTC staff attorney Leah Frazier at (202) 326-2187 before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Total Call International, Inc. and attached hereto.

3. The documents produced and attached hereto by Total Call International, Inc. are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Total Call International, Inc.; and

   c) Were made by the regularly conducted activity as a regular practice of Total Call International, Inc.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on _____, 2009.

_____
Signature

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Citibank, N.A. Attn: Cathy Hoben 1 Court Square 10th Floor Long Island, NY 11120	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
April 20, 2009	Bevin Murphy Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc. Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Katherine Redding, Paralegal (202-326-3545) Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580

DATE ISSUED	COMMISSIONER'S SIGNATURE
4/7/09	

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Citibank, N.A.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. **"Referring to"** or **"relating to"** shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. **"You"** and **"Your"** shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the Commission before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Bevin Murphy at (202) 326-2191 or Robert Mahini at (202) 326-2642.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with **Bevin Murphy at (202) 326-2191 or Robert Mahini at (202) 326-2642.** All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to **Katherine Redding, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580.** Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to **Katherine Redding at (202) 326-3545** at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted

in lieu of original documents, provided that the originals are retained in their state at the time of receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information**: The following guidelines refer to any ESI you submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   (a) CD-R CD-ROMs formatted to ISO 9660 specifications.

   (b) DVD-ROM for Windows-compatible personal computers.

   (c) IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

   Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   (a) E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email accepted only with prior approval.

   (b) Scanned Documents: Image submissions accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      (i) All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      (ii) If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

(c) Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2003 version or earlier. Spreadsheets should be in MS Excel 2003 (*.xls) version or earlier. Database files should be in MS Access 2003 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2003 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

(a) All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

(b) Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION.

M. **Right to Financial Privacy Act**: The documents demanded by this CID exclude any materials for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. §§ 3401, *et seq.*

1. The RFPA, § 3401(5), defines "customer" as any person or authorized representative of that person who utilized or is utilizing any service of a financial

institution, or for whom a financial institution is acting or has acted as a fiduciary, in relation to an account maintained in the person's name.

2. The RFPA, § 3401(4), defines "person" as an individual or a partnership of five or fewer individuals.

3. The records demanded herein relate to an account or accounts at the Company in the name of a corporation, or other entity that is not an individual or partnership of five or fewer individuals.

N. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

O. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings. The Company can return this declaration along with its document production.

III. SPECIFICATIONS

"Corporate Accounts" shall mean the accounts maintained by the Company:

1. In the name of the following entities: (a) Loss Mitigation Services, Inc.; (b) Synergy Financial Management Corporation; (c) Synergy Financial Corporation; (d) DirectLender.com; and (e) Direct Lender;

2. In the name of corporations, limited liability companies, partnerships of more than five individuals, or other entities that are not a "person" for purposes of the RFPA, to which any of the following individuals are signatories: (a) Andry Doran; (b) Dean Shafer; (c) Bernadette Carr-Perry; (d) Debi Britt; (e) Marion Perry; (f) Ronald Cuha; (g) Aaron Cuha; and (h) Tony Perry.

A. Produce any and all documents relating to each Corporate Account, including but not limited to the following:

1. Signature cards, corporate resolutions, and all other documents regarding signatories on the account;

2. Copies of monthly or periodic bank statements;

3. Copies of checks, drafts, wire transfers, ACH transfers, and other debit instruments, including any agreements and instructions regarding such debit instruments; and

4. Copies of all deposit tickets, credits and wire transfers, ACH transfers, and other deposit instruments, including any agreements and instructions regarding such credit instruments.

NOTE: The documents demanded by this CID exclude any information for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. § 3401, *et seq.* Documents produced should not contain any additional information. If you have any questions about these requests, please contact FTC staff attorney Bevin Murphy at (202) 326-2191 or bmurphy1@ftc.gov, or Robert Mahini at (202) 326-2642 or rmahini@ftc.gov before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Citibank, N.A. and attached hereto.

3. The documents produced and attached hereto by Citibank, N.A. are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Citibank, N.A.; and

   c) Were made by the regularly conducted activity as a practice of Citibank, N.A.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on _____, 2009.

_____
Signature

*** ***PRIORITY*** ***

NOTICE TO PRESERVE PAPER RECORDS AND ELECTRONIC DATA
[Loss Mitigation Services, Inc., FTC Matter No. 092-3073, Program Code K09]

Re:
- Loss Mitigation Services, Inc.
- Synergy Financial Management Corporation d/b/a Direct Lender and DirectLender.com
- Dean Shafer
- Bernadette Perry (a.k.a. Bernadette Carr, Bernadette Carr-Perry)
- Marion Anthony ("Tony") Perry

Date: June 9, 2009

From: Mark L. Glassman, 202-326-2826

The above matter is subject to anticipated or pending litigation. Federal court rules may require the Commission to identify and/or produce all paper records and electronic data relevant to this matter at some point in the future. Therefore, you must ***immediately*** take the following steps to preserve all relevant materials in your possession:

- Review the Interim E-Discovery Guidelines for Agency Personnel ("Interim Guidelines") at http://intranet.ftc.gov/ogc/ediscovery/index.htm. The Interim Guidelines will help you determine which materials to preserve and how to preserve them. Attachment E to the Interim Guidelines provides a list of places where relevant information may be stored.

- Set aside in clearly marked, case specific files all paper records and documents related to this matter.

- Except as provided in the Interim Guidelines, do not delete, modify, alter, or make additions to any electronic data relevant to this matter, including data on your desktop computer, laptop, Blackberry, home or personal computer, or portable storage media. In particular, you must obtain approval from me and/or appropriate ITM personnel before compressing data, running defragmentation or optimization programs, or loading any new software onto your computer.

- Save relevant e-mail, attachments, and voicemail to a case-specific archive folder.

- Certify by June 23, 2009, that you have conducted a reasonably thorough search of your files and are preserving relevant materials consistent with the Interim Guidelines.

You must follow these instructions carefully and faithfully. Failure to do so could have adverse legal effects for you and for the Commission.

Thank you for your cooperation and assistance. If you have any questions regarding these instructions, please contact me at the above number.

Willard K. Tom
General Counsel

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Robert B. Mahini
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Attorneys for Plaintiff FTC

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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA
BY:

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc. and Synergy Financial Management Corporation, also d/b/a Direct Lender and DirectLender.com and Dean Shafer and Bernadette Perry (a.k.a. Bernadette Carr and Bernadette Carr-Perry) and	**SACV09-800 DOC(ANX)** Case No. COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF

Marion Anthony (a.k.a. "Tony") Perry,
Defendants.

Plaintiff, the Federal Trade Commission ("FTC"), for its Complaint alleges:

1. The FTC brings this action under Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), to obtain temporary, preliminary, and permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other equitable relief for Defendants' acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a) and 53(b).

3. Venue is proper in this District under 28 U.S.C. § 1391(b) and (c), and 15 U.S.C. § 53(b).

PLAINTIFF

4. Plaintiff FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and to secure such equitable relief as may be appropriate in each case, including restitution and disgorgement. 15 U.S.C. §§ 53(b), 56(a)(2)(A).

DEFENDANTS

5. Defendant Synergy Financial Management Corporation ("Synergy"), also doing business under the fictitious business names Direct Lender and DirectLender.Com, is a California corporation with its principal place of business at 8700 Warner Avenue, Suite 200, Fountain Valley, CA 92708. Synergy transacts

business in this district and throughout the United States. From at least late 2007 through at least May 2008, Synergy, acting alone or in concert with others, advertised, marketed, distributed, or sold purported mortgage loan modification and foreclosure relief services to consumers throughout the United States.

6. Defendant Loss Mitigation Services, Inc. ("LMS") is a California corporation with its current principal place of business at 1700 Carnegie Avenue, Suite 250, Santa Ana, CA 92705. Previously, LMS's principal place of business was at 8700 Warner Avenue, Suite 200, Fountain Valley, CA 92708. LMS transacts business in this district and throughout the United States. Beginning in at least February 2008, LMS, acting alone or in concert with others, has advertised, marketed, distributed or sold purported mortgage loan modification and foreclosure relief services to consumers throughout the United States.

7. Defendant Dean Shafer is CEO of LMS and is or has served as an officer of the company, including but not limited to, in the capacity of CFO, Secretary and a director. At all times material to this Complaint, acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control, or participated in the acts and practices of Defendants set forth in this Complaint. Defendant Shafer resides in this district and in connection with the matters alleged herein, transacts or has transacted business in this district.

8. Defendant Bernadette Perry, a.k.a. Bernadette Carr and Bernadette Carr-Perry, is or has served as an officer of Synergy, including, but not limited to, in the capacity of President, Vice President and Secretary, and is or has served as a member of the "Operational Executive Team" of LMS. At all times material to this Complaint, acting alone or in concert with others, she has formulated, directed, controlled, had authority to control, or participated in the acts and practices of Defendants set forth in this Complaint. Defendant Bernadette Perry resides in this district and in connection with the matters alleged herein, transacts or has transacted business in this district.

9. Defendant Marion Anthony (a.k.a. "Tony") Perry is or has served as President and Acting Chief Operations Officer of LMS. At all times material to this Complaint, acting alone or in concert with others, he has formulated, directed, controlled, or had authority to control, or participated in the acts and practices of Defendants set forth in this Complaint. Defendant Tony Perry resides in this district and in connection with the matters alleged herein, transacts or has transacted business in this district.

10. From at least February 2008 through at least May 2008, Synergy and LMS operated as a common enterprise while engaging in the deceptive acts and practices alleged below. During this time, Synergy and LMS shared office space and employees, were commonly controlled, and participated in a common scheme to deceive consumers. Because Synergy and LMS operated as a common enterprise, each of them is jointly and severally liable for the acts and practices alleged below beginning no later than February 2008 and ending no earlier than May 2008. Individual defendants Dean Shafer, Bernadette Perry, and Tony Perry formulated, directed, controlled, had the authority to control, or participated in the acts and practices of the common enterprise.

COMMERCE

11. At all times relevant to this complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

AVAILABILITY OF FREE LOAN MODIFICATION AND FORECLOSURE RELIEF SERVICES

12. Numerous mortgage lenders and servicers have instituted free programs to assist financially distressed homeowners by offering them the opportunity to modify loans that have become unaffordable. Many of these "loan modification" programs have expanded dramatically as lenders have increased participation in the President's "Making Home Affordable" plan. Moreover,

numerous major mortgage lenders and servicers, non-profit and community-based organizations, the federal government, and the news media have helped publicize the availability of these free mortgage loan modification programs. Lenders often notify consumers of the availability of these programs, or of consumers' eligibility, through their "loss mitigation" departments. Proposed defendants divert consumers from these free programs and induce them to spend thousands of dollars on their purported "Loss Mitigation Services."

DEFENDANTS' BUSINESS PRACTICES

13. Since at least late 2007, Defendants have engaged in a course of conduct to advertise, market, offer to sell, and sell to homeowners purported mortgage loan modification and foreclosure relief services.

14. Defendants typically have charged homeowners between $2,500 and $5,500 in up-front fees and have purported that they will modify homeowners' mortgages in all or virtually all cases. Defendants also have represented that they can prevent foreclosure.

15. Defendants have marketed their services to homeowners who are in financial distress, delinquent on their mortgage loans, or in danger of losing their homes to foreclosure.

16. Defendants' primary means of making initial contact with homeowners has been to send direct mail solicitations targeted to homeowners who may be in financial distress, including but not limited to those with mortgage loans scheduled to reset to higher payment levels, those who are late on their payments, and those who have received notices of default. Defendants also have marketed to such homeowners using telemarketers, email, and the internet.

17. Defendants Synergy and LMS have marketed mortgage loan modification and foreclosure relief services both individually and together. Beginning in or about late 2007, Defendant Synergy, operating through the fictitious business name Direct Lender, engaged in a course of conduct to

advertise, market, offer to sell, and sell such services using the name "Loss Mitigation Department." Beginning in or about April 2008, Direct Lender purported to transfer its loss mitigation operations to LMS. Following the purported transfer, LMS remained at the same location where Direct Lender had been, and maintained the same personnel and phone numbers, and used substantially the same marketing material. Additionally, through at least May 2008, LMS corresponded with customers using stationery with emblems for both LMS and Direct Lender.

Initial Contact: Direct Mail Marketing

18. In numerous instances, Defendants have initiated contact with homeowners by sending them direct mail solicitations that have represented, expressly or by implication, that Defendants would reduce consumers' mortgage interest rates and/or loan amounts, saving consumers thousands of dollars.

19. Defendants have mailed their solicitations to consumers whom they have had reason to believe are facing mortgage rate resets, delinquency, and/or foreclosure.

20. In numerous instances, the design and overall presentation of Defendants' direct mail solicitations have caused consumers to believe they were being contacted by their mortgage lenders or servicers, or an entity affiliated with, working with, or authorized by their mortgage lenders or servicers.

21. In numerous instances, the solicitations arrive in a window-type envelope, addressed so that showing through the window just above the homeowner's name and address, in bold print, is the name of the homeowner's mortgage lender or servicer followed by a hyphen and the phrase "Loan Modification Notice." Immediately above that notation is what appears to be a serial number or account number.

22. Upon opening the envelope, the homeowner finds a one-page notice which includes, at the top left, in bold lettering where a company name or logo

typically would appear, only the generic name "Loss Mitigation Services." Immediately below this line, proposed defendants print the phrase "Original Loan Amount," followed by the homeowner's loan amount. Immediately below that is a purported "Customer Code." Below the customer code is the address block, which shows through the envelope window.

23. At the top right of the letter, in all-capital, bold lettering, Defendants have printed the phrase "**FINAL NOTICE**" and have indicated that the notice was "**FILED ON**" a date that appears to reflect the mailing date of the solicitation.

24. In numerous instances, Defendants' initial solicitation letters have led homeowners to believe they had received a communication from their mortgage lender or servicer, or an entity affiliated with, working with, or authorized by, their mortgage lender or servicer.

25. In a typical and illustrative solicitation, the top portion of the initial solicitation letter has appeared as follows:

LOSS MITIGATION SERVICES
Original Loan Amount: $xxx,xxx
Customer Code: **[---------]**

FINAL NOTICE
FILED ON:

[DATE]

For Your Information
Call (866) 371-1046

[S E R I A L N U M B E R]
Re: [Lender/Servicer Name] - Loan Modification Notice
[Consumer's Name]
[Consumer's Address]

26. The body of the solicitation letter has begun by instructing consumers to "Please contact us today regarding your existing mortgage. Our records indicate that **you may be eligible for a loan modification** which could include a **rate reduction** and **loan amount reduction** on your existing loan." (Emphasis in original.)

27. The letter has instructed homeowners to call a toll-free number, and that "[t]his offer is good until" a date typically approximately three weeks after the date of the letter, and that "**[n]o other notices will be issued and no representatives will call you.**" (Emphasis in original.)

28. The letter has further represented that "[o]ur loan modification team has searched existing records to make you this comparison offer as it relates to your existing loan." The letter has advised consumers that "[t]his offer to negotiate your mortgage could **save you thousands of dollars**," and that "**[a] Senior Loan Modification Specialist is waiting to assist you**." (Emphasis original.)

29. At the bottom of the page, in a large but generic font, Defendants again have printed their name, "Loss Mitigation Services." Below that, in a font no larger than 8-point, and smaller than any other text in the letter, Defendants have included several disclaimers, stating, "Loss Mitigation Services, Inc. is a California Corporation. This information was obtained thru public record. We are not an affiliate of, nor endorsed by, nor associated with your lender."

30. This disclaimer has not been presented in a clear or prominent manner, is not connected to any representation in the text by a footnote or asterisk, and does not remedy the deceptive representations made in the letter.

31. Defendants have further reinforced their deceptive representations throughout the marketing process.

Defendants' Website

32. Defendants also have marketed their services via the website www.lmslossmit.com. The website urges consumers to "[g]et started" by calling Loss Mitigation Services at a toll-free number. Alternatively, the website requests that homeowners provide their name, email address and phone number to Defendants, presumably so that a telemarketer can call the homeowner.

33. Defendants' website has warned homeowners that "Representing Yourself Can Be Hazardous!" and has cautioned them that "you will be offered

less of a modification or short sale than you could really get." The website further has claimed that "[m]any times we can substantially improve your loan modification or short sale. We know how to communicate with your lender."

Inbound Telemarketing Sales

34. In numerous instances, when homeowners have called Defendants' toll-free number, Defendants' telemarketers have answered the phones, "modification department, can I help you?" Defendants' telemarketers immediately have requested the homeowner's phone number and address, and have told the homeowner he or she would be put on hold while the telemarketer pulled up the property record.

35. In numerous instances, Defendants' telemarketers have returned to the line and reported back to homeowners information about their mortgage loans, further leading homeowners to believe Defendants were their lenders or servicers or were affiliated with, working with or authorized by their lenders or servicers.

36. In numerous instances, without having communicated with the homeowner's lender or servicer, Defendants' telemarketers have advised homeowners that Defendants could obtain specific loan modification results, including conversion of variable-rate loans to fixed rate loans, interest rate reductions and principal reductions.

37. In numerous other instances, without having communicated with the homeowner's lender or servicer, Defendants' telemarketers have told homeowners they were prime candidates for a loan modification.

38. In numerous instances, to further gain homeowners' confidence, Defendants' telemarketers have made one or more of the following typical and illustrative representations:

- "We have a 93 percent success rate on loan modifications and a full money back guarantee."

- "[W]e have a team of lawyers here and we have over 300 employees that do this. I mean, it's a major, major operation here."
- "[E]ach modification is approximately 100 man-hours."
- "It is our experience that there is not a nonprofit organization that could ever get as much out of a lender as we can."
- "You can't lose using our team."
- "This is not something people should be trying on their own."

39. In numerous instances, Defendants have told homeowners that their success rate is above ninety percent. Defendants also have represented that they screen consumers to determine eligibility for a modification, that they only accept homeowners who are qualified and whose applications have passed a review, and that for such consumers, the loan modification process is guaranteed.

40. In numerous instances, Defendants have represented that they can quickly obtain loan modifications for homeowners, in some instances in as few as 30-45 days, in other instances in as few as one to three months.

41. In numerous instances, Defendants' telemarketers have represented that homeowners will be "disqualified" if they do not provide Defendants with detailed personal and financial information under a strict but artificial deadline. In other instances, Defendants' telemarketers have told consumers that if they do not act quickly, they risk losing the opportunity to modify their loans.

42. In numerous instances, at the conclusion of the telemarketing sales call, Defendants have sent consumers worksheets that request detailed personal and financial information by email or overnight delivery.

43. In numerous instances, after receiving detailed personal and financial information from homeowners, but without having contacted the homeowners' lender or servicer, Defendants have sent letters or emails advising homeowners:

> Your loan modification was approved. **I have attached the payment form to process the fee for your loan modification.** The fee for your loan modification is $5,500. (Emphasis original.)
>
> * * *
>
> Your application has passed our underwriting department. The fee required to handle your modification is $3700.
>
> * * *
>
> Congratulations! Your application has been accepted for a loan modification. I have attached the payment forms to process the fee for your loan modification. The processing fee for your loan modification is $3500.
>
> * * *
>
> Your loan modification application was reviewed and accepted. I have attached the payment form to process the fee for your loan modification. The fee for your loan modification is $3,500.

44. In at least one such letter, Defendants represented to the homeowner:

> "We have a proven track record with a 97% success rate in modifying our customer's loans."

45. In numerous instances, Defendants have instructed consumers that they must pay all, or a substantial portion of, Defendants' fee up-front, before Defendants will begin working on their modifications.

46. In other instances, Defendants have told consumers that they would not charge them a fee until their loan modification was complete. However, after receiving consumers' payment information, Defendants nevertheless have processed payment before performing the promised services.

47. In numerous instances, Defendants have told homeowners that if they are not satisfied with Defendants' service they are entitled to a full refund of the fees paid.

48. In numerous instances, Defendants have encouraged consumers to stop paying their mortgages while their loan modification was being processed.

49. In numerous instances, Defendants have told homeowners not to speak to their mortgage lenders or servicers while their loan modification was being processed, and have told homeowners that Defendants would provide them with regular updates.

Tactics to Gain Consumers' Confidence

50. In furtherance of their deceptive marketing scheme, Defendants directly, and indirectly through related entities, have made representations to instill consumers with a false sense of confidence about Defendants' purported services.

51. Defendant LMS's telemarketers have told consumers that Defendants are part of a watchdog committee supported by the state of California to protect homeowners. LMS has further identified this organization by sending homeowners a link by email to the URL of an organization called The National Loss Mitigation Association, www.tnlma.com.

52. Defendants' website also tells homeowners that LMS is a "Proud Premier Member of The National Loss Mitigation Association ("TNLMA"™)," and that LMS is "Certified" by TNLMA as a "Loan Modification Specialist." Two seals, one blue and one gold, apparently signify this purported premier membership and certification. The seals also appear on correspondence LMS sends consumers.

53. In fact, TNLMA is not an independent organization, but is substantially under the control and direction of Defendants LMS and Synergy. The organization is incorporated at the same address as LMS; its bank account was opened by the president of LMS; its president is Aaron Cuha, founder of Direct Lender; and its URL is registered to Synergy Capital Management Corporation, an apparent affiliate of Defendant Synergy, listing Mr. Cuha as the administrative contact.

54. Among other things, TNLMA has published a "consumer alert" advising that "FREE Loan Modifications May Be Hazardous To Your Mortgage," and has advised consumers in its "Education Center" to disregard Better Business Bureau ratings of mortgage loan modification companies.

55. Also as a tactic to gain consumers' confidence, Defendants have provided homeowners with a "Credibility & Legitimacy Report" for LMS. The report includes three sections: "The Facts About the Better Business Bureau (BBB)"; a "Corporate Bio"; and "Real Life Testimonials." The report includes a number of misrepresentations about LMS's rating with the BBB and its corporate good standing, as well as purported consumer endorsements from consumers whose full identities are not provided.

56. In addition, in numerous instances, LMS has described its services as "attorney assisted." However, LMS has refused to provide consumers with the identity, contact information or work product of the attorney who purportedly is working on their account.

Consumer Harm

57. In numerous instances, after homeowners have paid Defendants' fee, Defendants have failed to answer or return homeowners' telephone calls or provide updates about the status of Defendants' purported communications with the homeowners' lenders or servicers. Homeowners who have called Defendants often are transferred from one "mitigator" to another. In many instances, Defendants

have misrepresented that negotiations were underway, although Defendants had not yet contacted the lender or had only left messages or had non-substantive contacts. In other instances, Defendants have misrepresented that the lender was the cause for delay when, in reality, Defendants have made little, if any, effort to contact the lender. In other instances, Defendants have misrepresented that the process has been delayed because of incomplete information from the homeowner, although LMS had made no attempt to obtain the purportedly missing information before being reached by the homeowner. In other instances, homeowners who have contacted their lenders have been told that the lenders had never heard of Defendants or refused to work with third-party negotiators. In other instances, homeowners who have contacted their lenders have learned that Defendants sent the lenders incomplete information.

58. In numerous instances, Defendants have failed to obtain mortgage loan modifications. Some homeowners who have paid for Defendants' services have been able to obtain mortgage loan modifications and avoid foreclosure only through their own efforts and not because of any service provided by Defendants.

59. In numerous instances, Defendants have denied refunds to homeowners for whom they failed to obtain modifications. In other instances, Defendants have made it difficult for homeowners to obtain promised refunds, or have given refunds only after homeowners made repeated requests or complained to entities such as the BBB or a state attorney general. In numerous instances, Defendants have purported to require homeowners to remove complaints posted to the BBB, or sign a document purporting to hold Defendants free from all liability and responsibility as a condition of receiving a refund, but then still have not provided the refund.

VIOLATIONS OF SECTION 5 OF THE FTC ACT

60. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits "unfair or deceptive acts and practices in or affecting commerce."

61. Misrepresentations or deceptive omissions of material fact constitute deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

Count I

62. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of mortgage loan modification or foreclosure relief services, Defendants have represented directly or indirectly, expressly or by implication, that Defendants will obtain a mortgage loan modification or stop foreclosure in all or virtually all instances.

63. In truth and in fact, Defendants do not obtain a mortgage loan modification or stop foreclosure in all or virtually all instances.

64. Therefore, Defendants' representation as set forth in Paragraph 62 of this Complaint is false and misleading and constitutes a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

Count II

65. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of mortgage loan modification or foreclosure relief services, Defendants have represented directly or indirectly, expressly or by implication, that Defendants will give refunds to consumers if Defendants fail to obtain a mortgage loan modification or stop foreclosure.

66. In truth and in fact, in numerous instances in which Defendants have made the representations set forth in Paragraph 65 of this Complaint, Defendants do not give refunds to consumers when Defendants fail to obtain a mortgage loan modification or stop foreclosure.

67. Therefore, Defendants' representations as set forth in Paragraph 65 of this Complaint are false and misleading and constitute deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

Count III

68. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of mortgage loan modification or foreclosure relief services, Defendants have represented directly or indirectly, expressly or by implication, that Defendants are consumers' mortgage lenders or servicers, or are affiliated with, working with, or authorized by consumers' mortgage lenders or servicers.

69. In numerous instances in which Defendants have made the representations set forth in Paragraph 68 of this Complaint, Defendants have failed to disclose or disclose adequately that they are not consumers' mortgage lenders or servicers, and are not affiliated with, working with, or authorized by consumers' mortgage lenders or servicers.

70. Defendants' failure to disclose or disclose adequately the material information described in Paragraph 69, above, in light of the representations described in Paragraph 68, above, constitutes a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

CONSUMER INJURY

71. Consumers have suffered and will continue to suffer substantial injury as a result of Defendants' violations of the FTC Act. In addition, Defendants have been unjustly enriched as a result of their unlawful acts or practices. Absent injunctive relief by this Court, Defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

THIS COURT'S POWER TO GRANT RELIEF

72. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt

and redress violations of the FTC Act. The Court, in the exercise of its equitable jurisdiction, may award ancillary relief, including rescission or reformation of contracts and restitution, the refund of monies paid, and the disgorgement of ill-gotten monies, to prevent and remedy any violation of any provision of law enforced by the FTC.

PRAYER FOR RELIEF

Wherefore, Plaintiff Federal Trade Commission, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and the Court's own equitable powers, requests that the Court:

A. Award Plaintiff such preliminary injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action and to preserve the possibility of effective final relief, including but not limited to temporary and preliminary injunctions;

B. Enter a permanent injunction to prevent future violations of the FTC Act by Defendants;

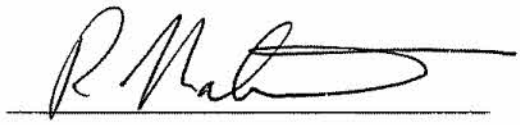
C. Award such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the FTC Act, including but not limited to, rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies; and

D. Award Plaintiff the costs of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper.

Dated: June 10, 2009

Respectfully submitted,

Willard K. Tom
General Counsel



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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc., et al. Defendants.	Case No. **PLAINTIFF'S MOTION FOR *EX PARTE* TEMPORARY RESTRAINING ORDER WITH ASSET FREEZE AND OTHER EQUITABLE RELIEF, AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE**

Plaintiff, Federal Trade Commission ("FTC") moves this Court, pursuant to Section 13(b) of the Federal Trade Commission Act, 15 U.S.C. § 53(b) and Federal Rule of Civil Procedure 65(b) for an *ex parte* Temporary Restraining Order:

A. temporarily restraining Defendants, in connection with the offering for sale or sale of any mortgage loan modification or foreclosure relief services, from making material misrepresentations or omissions of facts;

B. temporarily restraining Defendants from representing that they will provide any mortgage loan modification or foreclosure relief service unless they clearly and prominently disclose that they are not affiliated with the consumer's lender or servicer;

C. restricting Defendants from collecting advance fees for any mortgage loan modification or foreclosure relief services;

D. freezing all assets of Defendants, wherever located;

E. ordering Defendants to notify each of their consumers of the existence of this action and Order, the status of any mortgage loan modification or foreclosure relief service, and the consumer's option to seek other assistance;

F. requiring Defendants to identify all assets, make an accounting of their present financial condition and make an accounting of certain business information;

G. requiring Defendants to repatriate assets located outside the United States;

H. permitting limited expedited discovery as to the identity and location of Defendants, the nature and location of assets, the location and identification of relevant documents, and other matters related to monitoring Defendants' compliance with the requested Order;

G. requiring Defendants to serve a copy of the requested Order on all employees, agents, and independent contractors;

H. requiring Defendants to preserve records relating to their business and assets;

I. providing other equitable relief; and

J. requiring Defendants to show cause why a preliminary injunction should not issue extending the foregoing temporary relief until the merits of the FTC's allegations are finally adjudicated.

As grounds for this motion, the FTC states that Defendants have engaged, and continue to engage, in deceptive acts and practices in or affecting commerce, in violation of Section 5 of the FTC Act, 15 U.S.C. § 45. Such *ex parte* temporary relief is necessary to halt Defendants' unlawful conduct and to preserve this Court's ability to issue final equitable relief, including but not limited to rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies.

Pursuant to L.R. 7-19.1, on July 13, 2009, the FTC contacted two attorneys whom the FTC had reason to believe may have represented certain of the Defendants. The first attorney, G. Bradley Hargrave, of Medlin & Hargrave PC, Oakland, California, confirmed that he had represented Defendant Loss Mitigation Services, Inc. ("LMS") in certain matters. Counsel for the FTC informed Mr. Hargrave of the FTC's intention to file a civil Complaint and motion for a temporary restraining order, as well as the substance of relief sought in the temporary restraining order. Mr. Hargrave was not able to confirm that he would represent LMS in this matter. However, he agreed to attempt to reach his contact at LMS to inform the company of the filing of the Complaint and this motion, and if possible, to advise counsel for the FTC whether Defendant LMS opposed the motion and wished to be present when the application is presented to the Court. As of the time of filing, counsel for the FTC had not received a response.

Counsel for the FTC contacted the second attorney, Brian A. Walker, and asked him if he represented any of Defendants LMS, Dean Shafer, Bernadette Perry or Tony Perry. Mr. Walker informed counsel for the FTC that he did not represent LMS and did not state that he represented Mr. Shafer, Ms. Perry or Mr. Perry.

Counsel for the FTC also telephoned Defendant Dean Shafer and asked if he was represented by counsel in consumer protection matters. Mr. Shafer said he was not, at which point counsel for the FTC informed him of the FTC's intention to file a civil Complaint and motion for a temporary restraining order, as well as the substance of relief sought in the temporary restraining order. Mr. Shafer stated his intention to retain counsel.

Counsel for the FTC also called the toll-free number for Defendant LMS and asked for the legal department. Counsel was given different phone numbers to call, and eventually reached Bruce Leyden, who identified himself as the Director of Strategic Services. Counsel for the FTC asked Mr. Leyden if LMS was represented by counsel, and Mr. Leyden told FTC counsel that LMS was not. At that point, counsel for the FTC informed Mr. Leyden of the FTC's intention to file a civil Complaint and motion for a temporary restraining order, as well as the substance of relief sought in the temporary restraining order. Mr. Leyden said that LMS opposed the FTC's motion and that he believed if LMS retained an attorney, the attorney would want LMS be present when the application was presented to the Court.

Counsel for the FTC also telephoned Defendants Bernadette Perry and Tony Perry. Counsel left a voice message informing them of the FTC's intention to file a civil Complaint and motion for a temporary restraining order, as well as the substance of relief sought in the temporary restraining order.

The FTC respectfully refers this Court to the memorandum of law and exhibits thereto, filed herewith in support of this motion. A proposed order also has been filed herewith.

Dated: July 13, 2009

Respectfully submitted,

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc., et al., Defendants.	Case No. SACV09-800 DOC(ANx) **REPLY MEMORANDUM IN SUPPORT OF ENTRY OF PRELIMINARY INJUNCTION WITH ASSET FREEZE AND APPOINTMENT OF RECEIVER** Judge: Hon. David O. Carter DATE: August 17, 2009 TIME: 8:30 a.m. COURTROOM: 9 D

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INTRODUCTION

Nearly a month after the Court entered an *Ex Parte* Temporary Restraining Order with Asset Freeze and Other Equitable Relief and Order to Show Cause Why a Preliminary Injunction Should Not Issue on July 20, 2009 [Docket Itm. # 14] ("TRO"), Defendants Dean Shafer and Loss Mitigation Services, Inc. ("LMS") still have not complied with central provisions of the Order. Numerous consumers have been harmed, and continue to be harmed, both as a result of Defendants' original violations of the FTC Act and of this ongoing non-compliance. In briefs filed with the Court, the FTC has set forth extensive evidence and information demonstrating that Defendants have violated the FTC Act, and that without interim relief, irreparable harm will result to consumers and to the Court's ability to enter final effective relief. The FTC therefore has requested entry of a Preliminary Injunction order prohibiting further FTC Act violations, extending and clarifying the asset freeze ordered in the TRO, and providing for expedited discovery, fencing in relief and the appointment of a receiver.

The FTC files this Reply Memorandum in Support of Entry of a Preliminary Injunction with Asset Freeze and Appointment of Receiver ("Reply Memorandum") as a response to Defendant Dean Shafer's submission opposing entry of a preliminary injunction ("Shafer Mem.") [Docket Itm. # 32].[1] As set forth herein, Mr. Shafer fails to refute the evidence and information set forth in the FTC's prior submissions, fails to refute that it is likely the FTC ultimately will prevail on the merits, and fails to refute that Defendants' conduct both before and after entry of the TRO warrants the extension and expansion of interim relief.

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[1] The cover page filed with the Shafer Memorandum indicates that counsel representing Mr. Shafer now also represents LMS. *See* Shafer Mem. [Docket Itm. # 32] (cover page). However, the Shafer Memorandum appears to have been filed only "On Behalf of Defendant Dean Shafer." *Id.*

I. DEFENDANT DEAN SHAFER DOES NOT DISPUTE THE FACTS ESTABLISHING DEFENDANTS' DECEPTIVE PRACTICES

A. Defendant Dean Shafer Does Not Dispute That LMS Failed to Obtain Loan Modifications In Most Cases

Mr. Shafer does not refute the evidence presented in the FTC's initial filing, which established that Defendants made numerous misrepresentations to convince consumers that Defendants would secure a loan modification or stop foreclosure in all or virtually all cases. *See* Mem. In Support of FTC's Motion for Temporary Restraining Order With Asset Freeze and Other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue ("Opening Mem.") [Docket Itm. # 7]. On the contrary, Mr. Shafer admits that it is highly unlikely that a consumer paying an advance fee for LMS's loan modification program would actually be offered a modification. According to Mr. Shafer, it is even less likely that such a consumer would find the modification acceptable. Mr. Shafer purports to set forth in his declaration statistics by month showing the number of: (1) loan modifications originated; (2) clients who were "approved" for a loan modification; and (3) clients who "accepted" a lender approved loan modification. *See* Shafer Decl. ¶¶ 35-53, at 8-11. When aggregated, these statistics show that only 27% of LMS's clients were "approved" for a loan modification, and only 16% found the modification acceptable. *See* PX 01 (Redding) ¶¶ 9-11 & Att. A, at 6. Thus, even by Mr. Shafer's admission, 84% of consumers either did not receive modifications or found the modifications they were offered unacceptable.

The FTC provided numerous declarations of consumers who testified that they were led to believe by LMS that a loan modification was assured or virtually assured if they hired Defendants. *See* Opening Mem. [Docket Itm. # 7] § IV.A & PX 04 (Dondi) ¶¶ 5, 12 & Att. F, at 45, 46, 76; PX 14 (Studt) ¶ 3, at 280; PX 05 (Hall) ¶ 3, at 94; PX 16 (Turley) ¶¶ 4, 7, 15 & Att. D, at 287-88, 290, 328; PX 10 (Ruiz) ¶ 4, at 193; PX 13 (Stewart) ¶¶ 3-4, at 249-50; PX 18 (Wells) ¶ 4, at 439; PX 02 (Bavadi)

¶ 4, at 20; PX 06 (Luke) ¶ 5, at 115. Further, the FTC provided samples of express *written* misrepresentations by Defendants that they had a "proven track record with a 97% success rate in modifying our customer's [sic] loans." *See* Op. Mem. Ex. 16, Att. D at 328; Op. Mem. Ex. 4, Att. F, at 76. The FTC provided samples of other *written* misrepresentations in which Defendants falsely told consumers that their modifications had been "approved," although Defendants had not yet contacted the consumers' lenders. *See* Op. Mem. at 12:3-13:18; PX 16 (Turley), Att. D, at 328; PX 13 (Stewart), Att. C, at 270; PX 18 (Wells), Att. E, at 475; PX 19 (White), Att. B, at 523.

In addition, the FTC provided transcripts of undercover telephone calls in which LMS representatives claimed that LMS had a high probability of success, offered attractive lender concessions, and made a variety of other misrepresentations. *See. e.g.,* Op. Mem. at 9:24-28 & PX 23 (Budich), Att. A, at 636; 11:13-19 & PX 22 (Figueroa), Att. A, at 591-92. In fact, in each of the four undercover calls the FTC made between March and July 2009, Defendants' phone representatives made material misrepresentations. *See* Opening Mem. [Docket Itm. #7] at 11:13-12:2, 21:14-22 (describing undercover calls by Budich, Figueroa and Redding). In the most recent calls, on July 21, 2009 and July 24, 2009, a phone representative told an FTC investigator that LMS had helped over 1,500 consumers obtain loan modifications, had a 66% success rate, and offered a full money-back guarantee. *See* TRO [Docket Itm. # 27], at 3:17-4:6 & PX 2 (Stahl), Att. A at 20, Att. D at 43-44. In contrast to these misrepresentations, Mr. Shafer now purports that a total of only 591 out of 2,200 consumers, or 27%, were "approved" for loan modifications. *See*

Shafer Decl. ¶¶ 35-53.[2] Mr. Shafer has stated that in June 2009, the month prior to the July misrepresentation, LMS had a success rate of 0%. Shafer Decl. ¶ 53.

Despite this evidence, Mr. Shafer argues that the FTC has failed to establish a "pattern of misrepresentations rather than isolated incidents," and that the FTC has not established that the misrepresentations were "widely disseminated." Shafer Mem. [Docket Itm. # 32] at 8:10-13. Mr. Shafer offers nothing in support of this contention except the assertion that "LMS has a strict policy not to guarantee specific outcomes to any potential customers" and that employees who violate the policy are "subject to discipline, including being written up or terminated." *Id.* at 8:3-9. Although Mr. Shafer included an unsigned boilerplate employment agreement with some language to this effect, he cited not one single example of any employee who was ever disciplined in any way for violating this purported policy.

Mr. Shafer's argument stretches the facts to the breaking point and misapprehends the applicable law. Defendants' misrepresentations were widely disseminated by any reasonable estimation. At its height, Defendants' mass-marketing effort yielded 500 inbound calls per day. Opening Mem. [Docket Itm. # 7] at 7:11-12 & PX 24 (Redding), Att. W, at 1055-61. Defendants would have had to mail at least 5,000 deceptive direct mail solicitations to consumers each month to receive 500 calls, based on Mr. Shafer's assertion that his customer targeting has achieved "up to 10% average response rates in the loan modification industry." *See* Shafer Decl. ¶ 14 at 4. Mr. Shafer also has asserted that LMS signed up

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[2] It is anything but clear what Mr. Shafer means when he says that LMS clients were "approved" for modifications, and based on evidence set forth in the FTC's Opening Memorandum, this claim is to be viewed with skepticism. The FTC provided evidence that in one case, LMS claimed to have obtained a loan modification for a consumer after the consumer's home was sold in foreclosure. *See* Opening Mem. [Docket Itm. # 7] at 20:15-21:5. In that case, LMS claimed that the consumer had been "offered" a loan modification one day before the foreclosure sale that "consisted of: Contribution of $8,110 to stop sale." *Id.*

approximately 2,100 customers, Shafer Mem. [Docket Itm. # 32] at 7:25-27, and that it collected nearly $7 million from consumers, *See* PX 02 (Financial Statement of LMS) at 10. Based on these facts, the court "may safely assume defendants widely disseminated [their] misrepresentations." *FTC v. Freecom Comms., Inc.*, 401 F.3d 1192, 1206 (10th Cir. 2005); *see also FTC v. Nat'l Urological Group*, No. 1:04-CV-3294-CAP, --- F. Supp. 2d --- , 2008 WL 2414317, at *33 & n.28 (N.D. Ga., June 4, 2008).

Mr. Shafer offers no evidence that his boilerplate employment agreement was read and signed by all employees and enforced by managers. It is well-established that boilerplate compliance plans and telemarketing scripts that are not followed or enforced do not shield a Defendant from liability under Section 5. *See FTC v. Amy Travel Serv. Inc.*, 875 F.2d 564, 574 (7th Cir. 1989) (finding liability based on "the embellishing misrepresentations employed by the telemarketers in deviation from the scripts."); *U.S. v. Central Adjustment Bureau, Inc.*, 667 F. Supp. 370, 383 (N.D. Tex. 1986) (finding "widespread pattern of violations" of Fair Debt Collection Practices Act where "not a single employee of the defendant has ever been disciplined in any way for violating the Act").

Contrary to Mr. Shafer's assertions, LMS's misrepresentations about its success rate have been pervasive, egregious and recent. For example, as noted above, in July 2009, a phone representative told an FTC investigator that LMS had a 66% success rate, when Mr. Shafer's statistics show that the prior month, LMS had a success rate of 0%. *Compare* Mem. In Support of Amended TRO [Docket # 27], PX 2 (Stahl), Att. D at 44 *with* Shafer Decl. ¶ 53. In March 2009, a telephone representative told an FTC investigator that LMS had a 93% success rate, when Mr. Shafer's statistics show that the prior month, LMS had a success rate between 3% and 6%. *Compare* Opening Mem. [Docket Itm. # 7], PX 23 (Budich), Att. A, at 636, *with* Shafer Decl. ¶ 49.

B. Defendant Dean Shafer Does Not Dispute that LMS Refused to Provide Refunds When It Failed to Obtain Loan Modifications

Mr. Shafer also does not refute the evidence presented in the FTC's Opening Memorandum demonstrating that Defendants misrepresented that they offered a money-back guarantee. Instead, he responds with the conclusory assertion that from April 2008 to late November 2008, LMS "did not even offer a refund policy." Shafer Mem. [Docket Itm. # 32] at 8:16-22. This categorical statement does not convincingly rebut the detailed and specific evidence presented by the FTC in its Opening Memorandum demonstrating that Defendants did, in fact, promise numerous consumers that they would be given refunds in the event that Defendants failed to obtain loan modifications.

The FTC presented numerous declarations of consumers who were told by Defendants' telemarketers that Defendants offered a full money-back guarantee if they failed to obtain a loan modification. *See, e.g.*, Opening Mem. [Docket Itm. # 7], PX 14 (Studt) ¶ 4 (Direct Lender money-back guarantee in January 2008), at 280; PX 10 (Ruiz) ¶ 5 (LMS money-back guarantee in June 2008), at 193; PX 19 (White) ¶ 4, at 492-93 (LMS money-back guarantee in October 2008); PX 03 (Browne) ¶ 4 & Att. B, at 27, 34 (LMS money-back guarantee in December 2008); PX 08 (Osorio) ¶ 4, at 170 (LMS money-back guarantee in December 2008). Defendants also made these misrepresentations *in writing*. *See* Opening Mem. [Docket Itm. # 7] PX 03 (Browne), Att. B, at 34 (email transmitting a loan modification application and stating, "[w]e do offer a money back guarantee."); PX 12 (Sciutti), Att. A, at 220 (same); PX 23 (Budich), Att. F, at 667 (email transmitting a loan modification application and stating, "[w]e also have a money back guarantee. If we don't get your loan modified we will give you your money back. That guarantee is in writing."). Moreover, the call logs attached to Mr. Shafer's Brief as Exhibit D further support the statements of these declarants that LMS denied their refund

requests. *See, e.g.,* Shafer Mem. [Docket Itm. # 32], Ex. D (refunds denied to homeowners Studt, Bavadi, Ruiz, Luke, Osorio, Sciutti, Turley, Wells and White).[3]

Defendants' phone representatives also orally repeated these misrepresentations in undercover calls in June and July 2009. *See* Opening Mem. [Docket Itm. # 7] at 21:14-22 & PX 24 (Redding), Att. AA, at 1100, 1102, 1103, 1105 (June 4, 2009) (numerous representations, including "we do have a money-back guarantee," "everything is guaranteed, you know?," "the process is guaranteed," and after the application is approved, "we can guarantee you the modification"); Mem. In Support of Amended TRO [Docket Itm. # 27], PX 2 (Stahl), Att. D at 43 (July 24, 2009) ("you know, your refund is always there," "there's no reason, you know, why we need to keep your money"). Plainly, Defendants told numerous consumers that Defendants would provide a refund in the event that they could not obtain a loan modification.

Moreover, Mr. Shafer's own declaration further supports the conclusion that, after making a money-back guarantee, Defendants denied refunds to the vast majority of consumers for whom Defendants failed to obtain loan modifications. Mr. Shafer states that LMS refunded approximately 7% of its gross revenues. *See* Shafer Resp. at 4:10-21. Yet, Mr. Shafer acknowledges in his declaration that Defendants obtained loan modifications for only 27% of consumers, and that only 16% of consumers found these modifications acceptable. Shafer Decl. ¶¶ 35-53;

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[3] The call logs also establish the falsity of Defendants' other representations. For example, although LMS phone representatives claimed that LMS could "pull strings" and "knew all the right people" to obtain loan modifications, Opening Mem. [Docket Itm. # 7] at 14:7-15:2, the call logs reflect that LMS had no special expertise. One entry shows that two months after accepting an advance fee from homeowner Deborah Bavadi, an LMS representative "gave her the little bit of information I knew about [her lender] indymac and whats going on with her file." *See* Shafer Mem. [Docket Itm. # 32, Ex. D].

PX 01 (Redding) ¶¶ 9-11 & Att. A, at 6. Thus, 84% of consumers either did not receive modifications or found the modifications they were offered unacceptable. Despite this large-scale failure, Defendants provided refunds to only 7% of customers overall.

To the extent Mr. Shafer contends that Defendants' misrepresentations that consumers would receive a money-back guarantee were somehow cleansed if Defendants subsequently provided consumers with a "standard client agreement" that omitted the guarantee, *see* Shafer Decl. ¶ 57, he is mistaken. It is well-established as a matter of law that subsequent disclosures do not remedy deceptive representations. *See, e.g.*, *FTC v. Cyberspace.com LLC*, 453 F.3d 1196, 1200 (9th Cir. 2006) (defendants "contend that the fine print notices they placed on the reverse side of the check, invoice, and marketing insert preclude liability under FTC[Act] § 5. We disagree."); *FTC v. Minuteman Press*, 53 F. Supp. 2d 248, 262 (E.D.N.Y. 1998) ("a conflict between a specific disclaimer and a contrary oral representation . . . is, as discussed previously, ipso facto, actionable by the FTC"). Indeed, here, Mr. Shafer does not even allege that there was a subsequent disclosure disavowing the money-back guarantee; merely that there was a subsequent failure to mention a money-back guarantee. "[A]dvertisements that promote guarantees that ultimately vary from the guarantee certificate or that fail to state significant limitations" are "fraudulent or deceptive." *FTC v. Think Achievement Corp.*, 144 F. Supp. 2d 993, 1010 (N.D. Ind. 2000).

II. DEFENDANT DEAN SHAFER FAILS TO REFUTE THAT THE FTC IS LIKELY TO PREVAIL ON THE MERITS

A. Defendant Dean Shafer's Claim That He Did Not Intend to Deceive Consumers Into Thinking LMS Was Affiliated With Their Lender Is Unpersuasive and Not Relevant

Mr. Shafer asserts that the LMS direct mail solicitations were not designed with the intention of creating the impression that LMS was the consumer's lender or servicer, or was affiliated with the consumer's lender or servicer. *See* Shafer Mem. [Docket Itm. # 32] at 9; Shafer Decl. ¶ 62. Instead, he claims that the purpose as "simply to inform potential customers of LMS's services, create interest and encourage response." Shafer Mem. [Docket Itm. # 32] at 9. Mr. Shafer's argument that he lacked intent is both unpersuasive and irrelevant. In its Opening Memorandum, the FTC set forth ample evidence that Defendants led numerous consumers to believe that Defendants were the consumers' lender or servicer, or that they were affiliated with, working with, or authorized by, the consumers' lender or servicer. *See, e.g.*, Opening Mem. [Docket Itm. # 7], PX 16 (Turley) ¶¶ 3-4 & Att. A, at 287, 298; PX 10 (Ruiz) ¶ 2 & Att. A, at 193, 200; PX 02 (Bavadi) ¶ 3, at 20; PX 08 (Osorio) ¶ 2 & Att. A, at 170, 178; PX 01 (Anderson) ¶ 3 & Att. A, at 1, 6. Mr. Shafer does not refute this evidence.

Instead, he argues that the FTC "has failed to establish that a reasonably prudent person would rely on the deceptive advertisements," Shafer Mem. [Docket Itm. # 32] at 7:1-10, apparently because LMS included a small-text disclaimer at the bottom of the solicitation, *id*. at 9:1-8. Mr. Shafer misstates the standard for deception articulated in the case on which he relies. In *Southwest Sunsites, Inc. v. FTC*, 785 F.2d 1431, 1435 (9th Cir. 1986), the Court merely restated the now long-established standard for deception: "[T]he Commission will find deception if there is a representation, omission or practice that is *likely* to mislead the consumer acting

reasonably in the circumstances." *Id*. (emphasis original). Interpreting this standard, courts have held that:

> Deception may be by innuendo rather than outright false statements, and a statement may be deceptive even if the constituent words may be literally or technically construed so as not to constitute a misrepresentation. . . . The determination is not restricted to a consideration of what impression an expert or careful reader would draw from the advertisements, but rather involves viewing the advertisement as it would be seen by the public generally which includes the ignorant, the unthinking and incredulous, who, in making purchases, do not stop to analyze but too often are governed by appearances and general impressions.

FTC v. Think Achievement Corp., 144 F.Supp.2d 993, 1009-10 (N.D. Ind. 2000) (citations omitted).

Mr. Shafer's claim that the small-print disclaimer at the bottom of the solicitation stating, "[w]e are not an affiliate of, nor endorsed by, nor associated with your lender," cured the deceptive overall net impression conveyed by the solicitation, is unavailing. Shafer Mem. [Docket Itm. # 32] at 9:1-8. "Disclaimers or qualifications in any particular ad are not adequate to avoid liability unless they are sufficiently prominent and unambiguous to change the apparent meaning of the claims and to leave an accurate impression. Anything less is only likely to cause confusion by creating contradictory double meanings." *Removatron Int'l Corp. v. FTC*, 884 F.2d 1489, 1497 (1st Cir. 1989). Not only was the disclaimer ineffective for its purported purpose, it is evidence that LMS was aware of, and intended to convey the claim that the solicitation was sent by the consumer's lender, or a party

affiliated with, working with, or authorized by, the consumer's lender. Although not necessary, a showing of intent to make a claim is powerful evidence that the alleged claim in fact was conveyed to consumers. *See, e.g.*, *In re Telebrands Corp.*, 140 F.T.C. 278, 304 (2005) (citing *In re Novartis Corp.*, 127 F.T.C. 580, 683 (1999)). For this reason, Mr. Shafer's statement that "there was no intent to imply LMS is affiliated with the lender or servicer," Shafer Decl. ¶ 62, is not a valid defense. The FTC does not need to show that defendants acted in bad faith or with an intent to deceive in order to establish liability under Section 5 of the FTC Act. *See, e.g., Cyberspace.com, LLC*, 453 F.3d at 1202; *FTC v. World Travel Vacation Brokers, Inc.*, 861 F.2d 1020, 1029 (7th Cir. 1988); *Removatron Int'l Corp.*, 884 F.2d at 1495.

Mr. Shafer's argument that the disclaimer was effective because it was "clear and concise," Shafer Mem. [Docket Itm. # 32] at 9:7, also applies the wrong standard. The disclaimer was indeed "concise" – to a fault. To be effective, however, it had to be "sufficiently prominent and unambiguous to change the apparent meaning of the claims and to leave an accurate impression." *Removatron Int'l Corp.*, 884 F.2d at 1497.

B. Defendant Dean Shafer's Ownership, Close Control, and Knowledge of the Representations Makes him Personally Liable for the Acts of LMS[4]

Mr. Shafer's testimony and financial disclosures further establish his personal liability for the acts of Defendants. Mr. Shafer stated in his Declaration that he

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[4] Defendants Bernadette Perry and Marion Anthony Perry have not submitted memoranda in response to the FTC's papers requesting preliminary relief. Nevertheless, the call logs submitted as Exhibit D to the Shafer Memorandum [Docket Itm. # 32] further support the conclusion that both Mr. Perry and Ms. Perry participated directly in the acts or practices of the corporation or had authority to control them. For example, homeowner Studt's refund request was denied by Mr. Perry, and homeowner Bavadi's refund request was denied by Ms. Perry.

founded LMS and "designed all the back-end processes that were the blueprint for how LMS operated." Shafer Decl. ¶¶ 28-29. In his financial statement, Mr. Shafer claimed to be 100% owner of LMS. Moreover, he is listed as CEO of the company in corporate filings. *See* Opening Mem. [Docket Itm. # 7] at 3:22-25. Mr. Shafer acknowledges that he was aware of the claims made in the direct mail solicitation, though he disputes that they were deceptive. *See* Shafer Decl. ¶ 62.

"When the defendant is the chief executive and sole shareholder of a closely held corporation, the burden of exculpating himself from the deceptive acts carried out under the name of the corporation is heavy." *Think Achievement Corp.,* 144 F. Supp. 2d at 1101, (citing *Standard Educators, Inc. v. FTC*, 475 F.2d 401, 403 (D.C. Cir. 1973)). Courts in this Circuit have found that an individual can be held personally liable for the deceptive acts of a corporation if he "participated directly in the acts or practices or had authority to control them." *FTC v. Cyberspace.com LLC*, 453 F.3d 1196, 1202 (9th Cir. 2006) (quoting *FTC v. Publishing Clearing House, Inc.*, 104 F.3d 1168, 1170-71 (9th Cir.1997); *FTC v. Am. Standard Credit Sys.*, 874 F.Supp. 1080, 1089 (C.D.Cal.1994)). In *Cyberspace*, the Court found that the owner of a company, who had reviewed the solicitations, and was aware of some consumer complaints, "knew the facts constituting the § 5 violation or at the very least was recklessly indifferent to the truth." *Cyberspace.com, LLC*, 453 F.3d at 1202. On that basis, the court affirmed a finding that he was personally liable for the corporation's FTC Act violations. *Id*. Similarly, in *FTC v. Medlab, Inc.*, 615 F. Supp. 2d 1068 (N.D. Cal. 2009), the court found that the president of the defendant companies, who was responsible for their operations, was subject to both injunctive relief and redress on behalf of the corporate defendants. *Id*. at 1073, 1081-82.

In determining the amount of redress, the FTC must present a calculation that "reasonably approximate[s] the amount of customer's net losses[.]" *FTC v. J.K. Pubs., Inc.*, No. 99-0044 ABC (AJWx), 2000 WL 35594143, at *17 (C.D. Cal. Aug.

9, 2000) (quoting *FTC v. Febre*, 128 F.3d 530, 534 (7th Cir.1997)). Then, "the burden shifts to the defendants to show that those figures were inaccurate." *J.K. Pubs., Inc.*, at *17. Any risk of uncertainty in determining the amount of damages "fall[s] on the wrongdoer whose illegal conduct created the uncertainty." *Id.* (internal quotation omitted). Mr. Shafer's ownership of LMS, his authority to direct its activities, and his knowledge of or reckless indifference to its deceptive claims, demonstrate that he should be held personally liable for the acts of the corporation and for redress.

III. THE CONDUCT OF DEFENDANTS SUPPORTS ENTRY OF THE REQUESTED PRELIMINARY INJUNCTION ORDER

A. The Failure of Defendants Dean Shafer and LMS to Comply With The Order Has Resulted In The Dispersion of Assets and Evidence

The TRO ordered Defendants to provide financial and other disclosures to the FTC within 48 hours of service. *See* TRO [Docket Itm. # 14] § VI. Mr. Shafer was served on July 15, 2009, PX 03 at 17, and was required to provide these disclosures on July 17. Notwithstanding, Mr. Shafer delayed until August 10, 2009 before providing *any* disclosures, and then provided incomplete disclosures.[5] The result has been that the FTC has not been able to account for assets that may be necessary for final effective relief. Indeed, it is difficult to understand where all the money Mr. Shafer purportedly generated has gone. In his Declaration, Mr. Shafer asserted that he:

- "built multiple . . . multimillion dollar revenue-based business operations," Shafer Decl. ¶ 2.

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[5] LMS was served on July 14, 2009, PX 04 at 18, and was required to provide these disclosures on July 16. It too delayed until August 10 to provide disclosures. The FTC is still reviewing these disclosures to determine whether they are complete.

- "generated over 500 million dollars in Alt-A mortgage sales during 2006/2007 fiscal year" Shafer Decl. ¶ 8.
- "increased Direct Lender's mortgage retail sales from 3 million to 40 million dollars per month . . . (January 2006 to August 2007)" Shafer Decl. ¶ 8.
- increased "company sales from 100 million to 150 million dollars per month (January 2007 to August 2007)" Shafer Decl. ¶ 9.
- "developed sales and tracking systems . . . that . . . generated over a half a billion dollars in sales (January 2006 to August 2007). Shafer Decl. ¶ 10.
- "currently generates over 30,000 per month home-based business opportunities leads for one of the largest Herbalife organizations." Shafer Decl. ¶ 11.
- "developed DRTV and Radio campaigns . . . purchasing over $6 million dollars in . . . buys generating over 35,000 home-based business opportunity leads per month." Shafer Decl. ¶ 15.

Yet, despite these lucrative accomplishments, Mr. Shafer has reported that his income from all sources was $26,637 in 2009 and $108,887 in 2008. Mr. Shafer reports no income in 2007, 2006, 2005 or 2004. *See* PX 05, (Financial Statement of Dean Shafer), at 21-23. Mr. Shafer also reports that he now has liabilities of $2,718,590 and assets of $1,961,901. *See id.* (Shafer Summary Financial Schedule) at 24. In other words, his reported net worth is *negative* $756,689. The long delay in providing disclosures and the absence of any net assets is even more suspicious in light of Mr. Shafer's statements in an email in late May 2009, after the California Department of Real Estate issued a Desist and Refrain Order against LMS and Mr. Shafer, that:

> with the advent of this action, the countdown has been triggered and LMS will at some point cease to exist at least in its current state. We of course expected this and planned for this . . . . The next level of response ultimately could end up with me going to jail. I will of course be trying to mitigate this.

Opening Mem. [Docket Itm. # 7], PX 21 (Sibner), Att. A, at 571.

Mr. Shafer's sole explanation for the delay – that "the financial disclosure . . . required substantial time and effort to complete" – is unconvincing, in light of the fact that the handwritten disclosure remains incomplete.[6]

B. The Failure of Defendants Dean Shafer and LMS to Comply With The Order Has Resulted In Further Consumer Injury

Mr. Shafer and LMS have disregarded numerous requirements of the *Ex Parte* Temporary Restraining Order with Asset Freeze and Other Equitable Relief and Order to Show Cause Why a Preliminary Injunction Should Not Issue entered on July 20, 2009 [Docket Itm. # 14] ("TRO"). To the detriment of numerous consumers, LMS has not sent the notification required by Section V of the TRO to

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[6] Almost all of LMS's remaining funds are in a merchant reserve account held by Monterey County Bank ("Monterey"), which had been established for consumer credit card charge backs. The FTC served the TRO with asset freeze on Monterey. However, Monterey has informed FTC counsel of the bank's position that, while the Defendants are enjoined from removing funds from this account, Monterey is not prohibited from using fund for consumer charge backs. The account balance as of entry of the TRO was $211,731.67. Subsequently, however, Monterey has released funds from this reserve account for consumer charge backs, and the account balance as of August 3, 2009 was $197,331.67. The FTC has requested that Monterey not release funds from the account, which is subject to the asset freeze. *See* PX 06 (Murphy) & Att. A-C, at 28-34. As part of the requested Preliminary Injunction order, the FTC also seeks a provision clarifying that the asset freeze applies to banks as well as to Defendants.

consumers informing them of the Order, and that they have the right to contact their lenders directly or to seek help from other organizations, such as the Hope Now Alliance and the Homeowners' Hope Hotline. These notifications were required to be sent out by July 25, 2009. *See* TRO [Docket Itm. # 14] at 8. Since requesting the TRO on July 13, 2009, the FTC has received inquiries from more than fifty consumers, most of whom had paid advance fees to LMS and have been unable to reach LMS. PX 01 (Redding) ¶¶ 5-8 at 2. Many of these consumers have reported that they face foreclosure or that their circumstances have further deteriorated. *Id.* Such consumers already may have experienced irreparable harm as a result of not being contacted by LMS. As set forth in the FTC's briefs requesting appointment of a receiver, given the lack of cooperation by Defendants, a receiver appears to be the only practical way to identify and contact these consumers. *See* Mem. of Points and Authorities In Support of (1) Plaintiff's Notice of *Ex Parte* Application and *Ex Parte* Application for Order to Show Cause Why Receiver Should Not be Appointed and Other Injunctive Relief Be Entered and (2) Opposition to Defendant Dean Shafer's Request for Continuance ("Mem. In Support of PI") [Docket Itm. # 18]; Mem. In Support of Amended TRO [Docket Itm.# 27].

Although Mr. Shafer asserts in his brief that "Defendants have . . . notified . . . customers," Shafer Mem. at 3:1-2, this statement is contrary to FTC counsel's understanding, inconsistent with inquiries from numerous consumers, and unsupported by Mr. Shafer's declaration. Neither Mr. Shafer nor LMS has informed FTC counsel if it has sent notification letters to consumers, nor has any defendant provided copies of the letters to counsel as required by the TRO.[7] The FTC has not

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[7] Although LMS purported to provide a proposed letter to the FTC on July 24, the letter was essentially a screed against excessive government interference with LMS's right to make a profit. FTC counsel provided proposed revisions on July 27, Mem. In Support of PI [Docket Itm. # 18], PX 9 (Glassman), Att. B at 182, but has never received any response.

heard from any consumers who have received letters from Defendants. PX 01 (Redding) ¶ 8. And, Mr. Shafer's Declaration does not state that Defendants have contacted consumers. *See* Shafer Decl. ¶¶ 66-67 ("Compliance with the Court's Temporary Restraining Order").

Finally, among other things, Defendants have failed to provide the FTC with an affidavit (or any document) identifying all employees, agents, directors, officers, subsidiaries, affiliates, attorneys, independent contractors, representatives, franchisees, all persons in active concert or participation with Defendants, and any person who has solicited customers for Defendants' mortgage loan modification or foreclosure relief service or provides any aspect of that service, to whom Defendants have provided a copy of the Order. Defendants were required to do this by July 25, 2009. *See* TRO [Docket Itm. # 14] at 15.

C. Defendant Dean Shafer Misleads the Court by Claiming a History of Good Corporate Citizenship and "Zero Tolerance" for Fraud

Mr. Shafer's Memorandum and Declaration put forth a misleading impression that Mr. Shafer has a history as a good corporate citizen and that LMS, under his leadership, has been a "legitimate company" providing honest services to the public. *See* Shafer Mem. [Docket Itm. # 32] at 11:18-20, 12:17-20, 13:14-21. The first five pages and 28 paragraphs – fully a third – of Mr. Shafer's declaration are devoted to describing his purported 27-years of business experience and qualifications to operate LMS, experience Mr. Shafer stated was obtained between his graduation from college in 1982 and the present. Shafer Decl. ¶¶ 1, 27. Mr. Shafer also portrayed himself as a good corporate citizen for having "created jobs and employee tax generation for the state of California and the United States of America." *Id.* ¶ 8.

Mr. Shafer also stated, as evidence that LMS did not make the misrepresentations alleged in the Complaint, that he implemented a "zero tolerance policy for any employee fraud or misrepresentation." Shafer Decl. ¶¶ 56-57. He

stated that "LMS policies specifically and explicitly required all LMRs strictly to follow scripts provided by LMS, which prohibited guarantees of specific outcomes." *Id.* ¶ 56. He also stated that there was "no intent to imply LMS is affiliated with a lender or servicer." *Id.* ¶ 62. In his brief, Mr. Shafer argues that "LMS is not a sham operation," and that it "has implemented strict business practices to prevent the type of behavior the FTC alleges." Shafer Mem. [Docket Itm. # 32] at 2:15-17, 3:19-21. He argues that LMS has "helped hundreds of clients modify their loans and is currently helping another 1,600 clients." *Id.* at 13:15-17. Mr. Shafer urges the Court to consider that "[i]n evaluating the public equities, this Court should consider that LMS is helping thousands of people . . . and that these people will lose these services" if the Preliminary Injunction issues. *Id.* at 13:18-21.

A significant component of Mr. Shafer's legal defense also appears to be that "the FTC has failed to establish that any alleged representations . . . establish a pattern of misrepresentations rather than isolated incidents." Shafer Mem. [Docket Itm. # 32] at 8:10-12. He distinguished cases cited by the FTC in support of the asset freeze on the ground that in those cases, "there is also evidence of pervasive fraud or attempts by the Defendants to conceal or dissipate assets," and that "the defendant had already pled guilty to criminal charges associated with give-away promotions that were a complete sham." *Id.* at 10:28-11:17. Mr. Shafer argues that "[i]n sharp contrast, the record in the case at bar shows that LMS provides legitimate services to thousands of customers." *Id.* at 11:18-20.

In offering this testimony, Mr. Shafer omitted to mention that he has twice been convicted of financial fraud-related felonies. In late 1993, Mr. Shafer was convicted of stolen treasury check, theft of government property, interstate transportation of stolen property, and aiding and abetting. He was sentenced to 32 months confinement followed by three years supervised release. *See* PX 07 (Judgment) at 36-37. In late 1998, Mr. Shafer was convicted of two counts of false

statement to a federally insured lending institution. He was sentenced to six months home confinement followed by five years probation. *See* PX 08 (Docket Report & Order Amending Def.'s Judgment and Commitment Order), at 40, 45-46.

This evidence is relevant to demonstrate that Mr. Shafer – the sole declarant upon whose testimony the defense of Mr. Shafer and LMS is based – is not credible. Mr. Shafer has been twice convicted of multiple crimes involving dishonesty and false statement. Although the FTC acknowledges that these convictions are beyond the ten-year time limit for mandatory admission under Fed. R. Evid. 609(a)(2) & (b), based on the specific facts and circumstances outlined above, the probative value of these convictions substantially outweighs any potential prejudice.[8] *See, e.g., U.S. v. Reesor*, 10 Fed. Appx. 297, 306 (6th Cir. 2001) (upholding district court's admission of prior convictions, reasoning that "[i]t is plausible that the admissions of these convictions hurt [the defendant's] image as an honest businessman, but the district court could reasonably have thought it unfair for the jury to not be privy to the crucial impeachment that might be able to pierce [the defendant's] alternative version of the facts."); *U.S. v. Bidegary*, 39 Fed, Appx. 506, 510 (9th Cir. 2002) (holding that district court did not abuse its discretion in admitting prior convictions that were indicative of dishonesty and deception).

IV. THE BALANCE OF EQUITIES FAVORS ENTRY OF A PRELIMINARY INJUNCTION AND APPOINTMENT OF A RECEIVER

The FTC has presented ample evidence, in its Opening Memorandum [Docket Itm. # 7], Memorandum In Support of PI [Docket Itm. # 18], Memorandum In Support of Amended TRO [Docket Itm. # 27], and this Memorandum, to establish

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[8] In accordance with Fed. R. Evid. 609(b), FTC counsel provided counsel for Mr. Shafer with notice of the FTC's intent to introduce these convictions based on statements made in Mr. Shafer's declaration and brief. *See* PX 09 (Glassman Letter to Lear) at 47-48.

that Defendants violated the FTC Act. To obtain an advance fee, typically $2,500 to $5,500, Defendants deceptively have told consumers that in all or virtually all cases, Defendants can lower consumers' mortgage payments and save their homes from foreclosure. Defendants deceptively have claimed that, if consumers pay the fee but do not receive a loan modification, the fee will be refunded. Defendants deceptively have led many consumers to believe that Defendants were actually a department of the consumers' lender or servicer, or were affiliated with, working with, or authorized by the consumers' lender or servicer.

To the detriment of numerous consumers, Defendants Dean Shafer and LMS have not complied with key provisions of the TRO. They have failed to inform consumers of the existence of the TRO and of consumers' right to contact their lenders directly or to seek help through organizations such as the Hope Now Alliance and the Homeowners Hope Hotline. They have failed to make timely disclosures regarding assets that might be preserved for use in consumer redress. They have failed to preserve evidence and assets, instead permitting the dispersion of documents, computer hardware and office equipment.

For there to be any reasonable likelihood of recovering lost assets and information, as well as communicating with consumers in a timely manner that will permit consumers to exercise options to help themselves, a Preliminary Injunction order extending the asset freeze, appointing a permanent receiver, permitting expedited discovery, and providing for other relief, is crucial.

CONCLUSION

For the reasons set forth above, the Commission respectfully requests that the Court enter the proposed Preliminary Injunction Order [Docket Itm. # 27-2], including provisions for expedited discovery, fencing in relief, extension of the asset freeze, preservation of evidence, and the appointment of a receiver, to halt

Defendants' violations of the FTC Act and to protect the Court's ability to issue effective, final relief in this matter as it may deem appropriate.

Dated: August 13, 2009

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Mark Glassman, certify as follows:

I am over the age of 18 and am employed by the Federal Trade Commission. My business address is 600 Pennsylvania Avenue, NW, Mail Stop NJ-3158, Washington, DC 20580

On August 13, 2009, I caused the attached document entitled "Reply Memorandum in Support of Entry of Preliminary Injunction With Asset Freeze and Appointment of Receiver " to be served, by the following means to the following individuals:

By Overnight Delivery and Email

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Counsel for Defendants Dean Shafer and Loss Mitigation Services, Inc.

By Agreement For Email Service

Marion Anthony ("Tony") Perry
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Defendant Pro Se

Bernadette Perry
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Defendant Pro Se

Registered Agent for Synergy Financial Management Corporation

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 13, 2009

/s/ Mark L. Glassman
Mark L. Glassman

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc. and Synergy Financial Management Corporation, also d/b/a Direct Lender and Direct Lender.com and Dean Shafer and Bernadette Perry (a.k.a. Bernadette Carr and Bernadette Carr-Perry) and Marion Anthony (a.k.a. "Tony") Perry Defendants.	Case No. SACV09-800 DOC(ANx) **[PROPOSED]** **STIPULATION BY DEFENDANT DEAN SHAFER TO ENTRY OF PRELIMINARY INJUNCTION ORDER WITH ASSET FREEZE AND OTHER EQUITABLE RELIEF AS TO DEFENDANT DEAN SHAFER**

Plaintiff Federal Trade Commission ("FTC") commenced this civil action on July 13, 2009, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), to obtain preliminary and permanent injunctive and other equitable relief for Defendants'

violations of Section 5 of the FTC Act, 15 U.S.C. § 45, in connection with the marketing and sale of mortgage loan modification and foreclosure relief services. On July 20, 2009, the Court entered an *Ex Parte* Temporary Restraining Order With Asset Freeze and Other Equitable Relief and Order to Show Cause Why a Preliminary Injunction Should Not Issue [Docket Itm. # 14]. The Order set a hearing for August 3, 2009. On July 30, 2009, based on evidence and information received by the FTC after filing, the FTC filed an *Ex Parte* Application for Order to Show Cause Why Receiver Should not be Appointed and Other Injunctive Relief Be Entered [Docket Itm. # 17]. By Order on July 31, 2009, the Court continued the August 3, 2009 hearing to August 17, 2009 [Docket Itm. # 25]. On August 3, 2009, the FTC filed an *Ex Parte* Application and *Ex Parte* Application for Amended Temporary Restraining Order Appointing Temporary Receiver and Entering Additional Injunctive Relief and Order to Show Cause Why Permanent Receiver Should Not be Appointed and Other Injunctive Relief Be Entered [Docket Itm. #27]. On August 10, 2009, Defendant Dean Shafer filed a Response to Order to Show Cause Why a Preliminary Injunction Should Not Issue, on Behalf of Defendant Dean Shafer [Docket Itm. #32]. On August 13, 2009, the FTC filed a Reply Memorandum in Support of Entry of Preliminary Injunction With Asset Freeze and Appointment of Receiver [Docket Itm. # 33].

Plaintiff and Defendant Dean Shafer, through their respective undersigned counsel, have now stipulated to entry of a Preliminary Injunction Order With Asset Freeze and Other Equitable Relief as to Defendant Dean Shafer with the following terms:

FINDINGS OF FACT

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a) and 1345, and 15 U.S.C. §§ 45(a) and 53(b), and there is good cause to believe that it will have jurisdiction over all the parties hereto.

2. Venue in the Central District of California is proper under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b) and (c).

3. There is good cause to believe that Defendants Loss Mitigation Services, Inc., Synergy Financial Management Corporation (also d/b/a Direct Lender and DirectLender.com), Dean Shafer, Bernadette Perry (a.k.a. Bernadette Carr and Bernadette Carr-Perry) and Marion Anthony (a.k.a. "Tony") Perry have engaged, and are likely to continue to engage, in acts or practices that violate Section 5 of the FTC Act, 15 U.S.C. § 45, and that the FTC therefore is likely to prevail on the merits in this action.

4. There is a reasonable likelihood that Defendants will violate Section 5 of the FTC Act, 15 U.S.C. § 45, in the future unless Defendants are restrained and enjoined by order of this Court.

5. There is good cause to believe that immediate and irreparable damage to the Court's ability to grant effective final relief in the form of permanent injunctive relief, rescission of contracts, restitution, disgorgement and other equitable remedies will occur from the destruction, transfer, dissipation or concealment by Defendants of their assets and business documents or records unless Defendants are immediately restrained and enjoined by order of this Court.

6. No security is required of any agency of the United States for issuance of a restraining order. Fed. R. Civ. P. 65(c).

7. Considering Plaintiff's likelihood of ultimate success on the merits and weighing the equities, a preliminary injunction order with asset freeze and other equitable relief is in the public interest.

ORDER

DEFINITIONS

For the purposes of this Order, the following definitions shall apply:

1. "Plaintiff" or "FTC" means the Federal Trade Commission.

2. "Defendants" means, together and separately: (A) Loss Mitigation Services, Inc.; (B) Synergy Financial Management Corporation, also d/b/a Direct Lender and Direct Lender.com; (C) Dean Shafer; (D) Bernadette Perry (a.k.a. Bernadette Carr and Bernadette Carr-Perry) and (E) Marion Anthony (a.k.a. "Tony") Perry.

3. "Corporate Defendants" means: (A) Loss Mitigation Services, Inc. and (B) Synergy Financial Management Corporation, also d/b/a Direct Lender and Direct Lender.com.

4. "Mortgage loan modification or foreclosure relief service" means any service, product, or program that is represented, expressly or by implication, to assist a homeowner in any manner to (A) obtain or arrange a modification of any term of a home loan, deed of trust, or mortgage; (B) obtain or arrange a refinancing, recapitalization, or reinstatement of a home loan, deed of trust, or mortgage; (C) obtain or arrange a pre-foreclosure sale, short sale, or deed-in-lieu of foreclosure; (D) stop, prevent, or postpone any home mortgage or deed of trust foreclosure sale; (E) obtain any forbearance from any beneficiary or mortgagee; (F) obtain a loan or advance of funds that is connected to the consumer's home ownership; (G) avoid or ameliorate the impairment of the homeowner's credit standing, credit rating or credit profile; (H) examine, audit or evaluate any term of a home loan, deed of trust or mortgage; or (I) save the consumer's residence from foreclosure.

5. "Assisting others" means knowingly providing any of the following goods or services to another person or entity: (A) performing customer service functions, including, but not limited to, receiving or responding to consumer inquiries or complaints; (B) formulating or providing, or arranging for the formulation or provision of, any telephone sales script or any other marketing material; (C) providing names of, or assisting in the generation of, potential customers; (D) performing marketing services of any kind; or (E) providing mortgage loan modification or foreclosure relief services.

6. "Material fact" means any fact that is likely to affect a person's choice of, or conduct regarding, goods or services.

7. "Assets" means any legal or equitable interest in, right to, or claim to, any real or personal property, including, without limitation, chattels, goods, instruments, equipment, fixtures, general intangibles, leaseholds, mail or other deliveries, inventory, checks, notes, accounts, credits, contracts, receivables, shares of stock, and all cash, wherever located.

8. "Person" means a natural person, organization, or other legal entity, including a corporation, partnership, proprietorship, association, cooperative, or any other group or combination acting as an entity.

9. The term "document" is equal in scope and synonymous in meaning to the usage of the term in Federal Rule of Civil Procedure 34(a), and includes writings, drawings, graphs, charts, photographs, audio and video recordings, computer records, and any other data compilations from which information can be obtained. A draft or non-identical copy is a separate document within the meaning of the term.

PROHIBITED REPRESENTATIONS

I. IT IS THEREFORE ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, marketing, promotion, offering for sale or sale of any mortgage loan modification or foreclosure relief service, are hereby preliminarily enjoined from falsely representing, or from assisting others who are falsely representing, expressly or by implication, any of the following:

A. that any Defendant or any other person will

1. obtain, arrange or negotiate a modification of any term of a consumer's home loan, deed of trust, or mortgage, including any recapitalization or reinstatement agreement;
2. obtain or arrange a pre-foreclosure sale, short sale, or deed-in-lieu of foreclosure;
3. stop, prevent, or postpone any home mortgage foreclosure sale;
4. save any consumer's residence from foreclosure;
5. obtain or arrange lower or affordable monthly mortgage payments for any consumer;
6. obtain or arrange lower interest rates on any home loan, deed of trust, or mortgage for any consumer;
7. otherwise provide any mortgage loan modification or foreclosure relief service;
8. give a full or partial refund of any fees paid if the Defendant or any other person fails to provide a mortgage loan modification or foreclosure relief service;

B. the terms that any beneficiary, mortgagor, or other home-loan holder will or is likely to offer or accept, with respect to any item listed in subparagraphs I.A.1-8 above, or to cure any delinquency or default on, or to reinstate, any mortgage, deed of trust, or other home loan;

C. the amount of time it will take or is likely to take to obtain any item listed in subparagraphs I.A.1-8 above;

D. the refund policy of any Defendant or any other person, including but not limited to the likelihood of a consumer obtaining a full or partial refund, or the circumstances in which a full or partial refund will be granted to the consumer;

E. that any Defendant or any other person is the consumer's lender, or is affiliated with, working with, or authorized by, the consumer's lender, or

F. any other fact material to a consumer's decision whether to purchase mortgage loan modification or foreclosure relief services.

II. IT IS FURTHER ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, marketing, promotion, offering, or obtaining of any extension of credit, whether the credit is provided by a Defendant or by a third party, are hereby preliminarily enjoined from falsely representing, or from assisting others who are falsely representing, expressly or by implication, any fact material to a consumer's decision whether to purchase the services of the Defendants or otherwise to provide money to the Defendants related to any extension of credit.

III. IT IS FURTHER ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, marketing, promotion, offering for sale or sale of any mortgage loan modification or foreclosure relief service, are hereby preliminarily enjoined from representing in any manner, expressly or by implication, or from assisting others who are representing in any manner, expressly or by implication, that they will provide any mortgage loan modification or foreclosure relief service, unless they disclose clearly and prominently, and in close proximity to such representation, that they are not the consumer's lender or servicer, a department of the consumer's lender, or affiliated with, working with, or authorized by, the consumers' lender or servicer.

RESTRICTION ON COLLECTION OF ADVANCE FEES

IV. IT IS FURTHER ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, marketing, promotion, offering for sale or sale of any mortgage loan modification or foreclosure relief service, are hereby preliminarily enjoined from requesting or accepting payment of any fee or consideration in advance of performing each and every mortgage loan modification or foreclosure relief service and each and every service related to an extension of credit that Defendants and their successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with any of them contracted to perform or represented would be performed.

PROHIBITION ON COLLECTION OF PAYMENTS

V. IT IS FURTHER ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, are hereby preliminarily enjoined from attempting to collect payment from any consumer for any mortgage loan modification or foreclosure relief service and any services related to an extension of credit marketed or sold by or for any Defendant prior to the date of this Order.

ASSET FREEZE

VI. IT IS FURTHER ORDERED that:

A. Defendant Dean Shafer is hereby preliminarily enjoined, except as otherwise provided in subsections B, C and D of this Section VI, from:

1. transferring, encumbering, selling, concealing, pledging, hypothecating, assigning, spending, withdrawing, disbursing, conveying, gifting, dissipating, or otherwise disposing of any funds, property, coins, lists of consumer names, shares of stock, or other assets, wherever located, that are (a) owned or controlled by any of the Defendants, in whole or in part; (b) in the actual or constructive possession of any of the Defendants; (c) held by an agent of any of the Defendants, as a retainer for the agent's provision of services to a Defendant; or (d) owned, controlled by, or in the actual or constructive possession of, or otherwise held for the benefit of, any corporation, partnership, or other entity directly or indirectly owned or controlled by any of the Defendants;

2. opening or causing to be opened any safe deposit boxes titled in the name of any of the Defendants, or subject to access by any of the Defendants;

3. incurring charges or cash advances on any credit or debit card issued in the name, singly or jointly, of any of the Defendants, or any corporation, partnership, or other entity directly or indirectly owned or controlled by any of the Defendants; and

4. failing to disclose to the FTC, immediately upon service of this Order, information that fully identifies each asset of the Defendants, and each entity holding such asset, including, without limitation, the entity's name, address, and telephone number, the number of the account, and the name under which the account is held.

B. Defendant Dean Shafer shall transfer all funds existing as of the date of this Order into Bank of America account number XXXXXX2387 (in the name of Dean Shafer).

C. The funds, property and assets affected by this Section VII shall include those assets existing as of the effective date of this Order, including without limitation, those acquired by loan or gift. Defendant Dean Shafer may retain and spend income received from employment performed after the date of entry of this Order; *provided, however*, that such income shall first be deposited into Bank of America account number XXXXXX2387 (in the name of Dean Shafer); *provided further* that such income shall be limited to reasonable and necessary living expenses. Further, Defendant Dean Shafer may retain and spend assets acquired by loan or gift after the date of entry of this Order only after identifying such assets to FTC counsel. This section does not apply to loans or gifts valued at less than $500 except to the extent that the aggregate amount of such loans from any single source exceeds $2,000.

D. Defendant Dean Shafer may open one (1) business account, which shall be used to deposit all funds received from any future business activities and from which reasonable business expenses may be withdrawn. Defendant Dean Shafer shall identify this account to counsel for the FTC within 24 hours of opening the account.

E. Defendant Dean Shafer shall report the balance of each account in SubParagraphs B, C and D to counsel for the FTC every 30 days. Upon request Defendant Dean Shafer shall provide additional reasonable information regarding the accounts.

F. Except as otherwise provided in subsections B, C and D, the freeze imposed in this Section VI also shall be construed to apply to assets that Defendant Dean Shafer acquires following service of this Order; *provided that* the freeze imposed in this Section VI shall not apply to up to $40,000, which Defendant Dean Shafer shall be permitted to obtain through a personal loan, provided that the proceeds are deposited into one of the accounts identified subsections B, C and D.

G. Nothing herein shall preclude Defendant Dean Shafer from filing future motions with the Court for release of funds for the payment of reasonable and necessary living expenses or attorney's fees. Nothing herein shall preclude the FTC from filing objections to any such future motion for release of funds.

FINANCIAL AND BUSINESS ACCOUNTING

VII. IT IS FURTHER ORDERED that within forty-eight (48) hours after service of this Order:

A. Defendant Dean Shafer shall complete and deliver to the FTC the Financial Statement captioned "Financial Statement of Individual Defendant," a copy of which is attached hereto as Attachment A;

B. Defendant Dean Shafer shall provide the FTC access to records and documents pertaining to assets of any of the Defendants that are held by financial institutions outside the territory of the United States by signing a Consent to Release of Financial Records, a copy of which is attached hereto as Attachment C.

C. Defendant Dean Shafer shall provide the name of:

1. each of Defendants' former employees or independent contractors, whose employment with Defendants ceased during the period October 1, 2007 to the date of service of this order, and the specific dates during which such person was employed. Defendants also shall state all known addresses, phone numbers and email addresses for each individual;
2. each person who holds, or within the last two years held, a real estate license, whom Defendants have employed, retained, or contracted with to provide mortgage loan modification or foreclosure relief services. Defendants also shall state all known addresses, phone numbers and email addresses for such person, and the specific dates during which such person provided such services;

3. each attorney whom Defendants have employed, retained, or contracted with to provide mortgage loan modification or foreclosure relief services. Defendants also shall state all known addresses, phone numbers and email addresses for each attorney, paralegal or other legal professional and the specific dates during which such person provided such services; and

4. each employee or independent contractor of Defendants who provides mortgage loan modification or foreclosure relief services and the title of each such person.

D. Defendant Dean Shafer shall provide the FTC with a list of all business or corporate entities acquired by any Defendant since October 1, 2007, and all business or corporate entities that may be acquired or under negotiation to be acquired by Defendants, that provide or have provided mortgage loan modification or foreclosure relief services and produce a copy of any contracts or agreements memorializing the terms of such acquisition or pending acquisition. For each such business or corporate entity, state all known addresses, phone numbers, and email addresses.

E. Defendants shall provide the address and telephone number for each business premise used by Defendants in connection with the provision of mortgage loan modification or foreclosure relief services, including but not limited to any call center operations.

F. Defendant Dean Shafer shall provide a list of all officers and directors of the Corporate Defendants and all other individuals or entities with authority to direct the operations of any Corporate Defendant or withdraw money from the account of any Corporate Defendant.

Provided that Defendant Dean Shafer does not have to provide any such information identified by this Section VII if (1) Defendant Dean Shafer has complied with the

similar provision set forth in Section VI of the TRO; and (2) the information provided has not changed.

IDENTIFYING INFORMATION RELATING TO ACCOUNTANTS AND FINANCIAL PLANNERS

VIII. IT IS FURTHER ORDERED that Defendant Dean Shafer shall provide counsel for the Plaintiff: the name, address and telephone number for each accountant, financial planner, investment advisor, stock broker, or other individual, corporation or partnership who has provided financial, business or tax advice or services to Defendants since January 1, 2008.

FINANCIAL INSTITUTIONS

IX. IT IS FURTHER ORDERED that:

A. any financial or brokerage institution, any business entity, or any other person having possession, custody, or control of any records of Defendant Dean Shafer, or of any account, safe deposit box, or other asset titled in the name of Defendant Dean Shafer, either individually or jointly or held for the benefit of any of the Defendants, or which has maintained any such account, safe deposit box, or other asset at any time since October 1, 2007 (collectively "Asset Holders"), shall:

1. hold and retain within such Asset Holder's control, and prohibit the withdrawal, removal, assignment, transfer, pledge, hypothecation, encumbrance, disbursement, dissipation, conversion, sale, liquidation, or other disposal of any funds, documents, property, or other assets, except as otherwise provided in Subsections VI.B, VI.C, and VI.D above, held by or under such entity's or person's control (1) on behalf of, or for the benefit of, Defendant Dean Shafer; (2) in any account maintained in the name of, or subject to withdrawal by, Defendant Dean Shafer; or (3) that are subject to access or use by, or under the signatory power of, Defendant Dean Shafer;

2. deny access to any safe deposit boxes that are either (1) titled in the name, individually or jointly, of Defendant Dean Shafer; or (2) subject to access by any Defendant Dean Shafer.

3. provide to the FTC, within three (3) business days of notice of this Order, a sworn statement setting forth:

a. the identification of each account or asset;

b. the balance of each account or a description of the nature and value of each asset as of the close of business on the day notification of this Order is received, and, if the account or asset has been closed or moved, the balance or value removed, the date on which it was removed, and the person or entity to whom it was transferred; and

c. the identification of any safe deposit box titled in the name of or subject to access by Defendant Dean Shafer;

4. upon request by counsel for the FTC, promptly provide the FTC with copies of all records or other documentation pertaining to such account or asset, including but not limited to originals or copies of account applications, account statements, signature cards, checks, drafts, deposit tickets, transfers to and from the accounts, all other debit and credit instruments or slips, currency transaction reports, 1099 forms, and safe deposit box logs.

Provided that Asset Holders do not have to provide the information set forth in Subsections IX.A.3 and IX.A.4 if (1) they have complied with the similar provisions set forth in Section VII.A and VII.B of the TRO; and (2) the information provided has not changed.

B. the accounts subject to this provision include existing assets and assets deposited after the effective date of this Order, except as otherwise provided in Subsections VI.B and VI.C above. This Section shall not prohibit transfers in accordance with any provision of this Order, or any further order of the Court.

C. The FTC is granted leave, pursuant to Fed. R. Civ. P. 45, to subpoena documents immediately from any such Asset Holder, including account custodians or other entities, concerning the nature, location, status, and extent of Defendant Dean Shafer's assets, and compliance with this Order, and such Asset Holder, including account custodian or other entity, shall respond to such subpoena within five (5) business days after service. For purposes of this subsection, the FTC may serve any such subpoena by facsimile or overnight courier.

REPATRIATION OF ASSETS

X. IT IS FURTHER ORDERED that within five (5) business days following service of this Order, Defendant Dean Shafer shall:

A. repatriate to the United States all funds, documents, or assets in foreign countries held either: (1) by them; (2) for their benefit; or (3) under their direct or indirect control, jointly or singly;

B. the same business day as any repatriation under sub-section A above,

1. notify the FTC of the name and location of the financial institution or other entity that is the recipient of such funds, documents, or assets; and

2. serve this Order on any such financial institution or other entity;

C. provide the FTC with a full accounting of all funds, documents, and assets outside of the territory of the United States held either: (1) by them; (2) for their benefit; or (3) under their direct or indirect control, jointly or singly; and

D. hold and retain all repatriated funds, documents, and assets and prevent any transfer, disposition, or dissipation whatsoever of any such assets or funds. *Provided* that Defendants Dean Shafer does not have to perform the acts required by this Section X if (1) Defendant Dean Shafer has complied with the similar provision set forth in Section VIII of the TRO; and (2) the assets and information provided have not changed.

NONINTERFERENCE WITH REPATRIATION

XI. IT IS FURTHER ORDERED that Defendant Dean Shafer is hereby preliminarily enjoined from taking any action, directly or indirectly, which may result in the encumbrance or dissipation of foreign assets, or in the hindrance of the repatriation required by Section X of this Order, including, but not limited to:

A. sending any statement, letter, fax, email or wire transmission, or telephoning or engaging in any other act, directly or indirectly, that results in a determination by a foreign trustee or other entity that a "duress" event has occurred under the terms of a foreign trust agreement until such time that all assets have been fully repatriated pursuant to Section X of this Order;

B. notifying any trustee, protector or other agent of any foreign trust or other related entities of either the existence of this Order, or of the fact that repatriation is required pursuant to a court order, until such time that all assets have been fully repatriated pursuant to Section X of this Order.

PRESERVATION OF RECORDS AND TANGIBLE THINGS

XII. IT IS FURTHER ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, are hereby enjoined from:

A. destroying, erasing, mutilating, concealing, altering, transferring, or otherwise disposing of, in any manner, directly or indirectly, any documents or records that relate to the business practices, or business or personal finances, of Defendants, or other entity directly or indirectly under the control of Defendants;

B. failing to create and maintain books, records, and accounts which, in reasonable detail, accurately, fairly, and completely reflect the incomes, assets, disbursements, transactions and use of monies by any Defendant or other entity directly or indirectly under the control of any Defendants.

CONSUMER REPORTS

XIII. IT IS FURTHER ORDERED that pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. § 1681b(1), any consumer reporting agency may furnish a consumer report concerning Defendant Dean Shafer to the FTC.

MONITORING

XIV. IT IS FURTHER ORDERED that employees, agents or representatives of the FTC may contact Defendant Dean Shafer's employees, agents or representatives directly and anonymously for the purpose of monitoring compliance with Section I of this Order, and may tape record any oral communications that occur in the course of such contacts.

PROHIBITION ON RELEASE OF CUSTOMER INFORMATION OR CUSTOMER LISTS

XV. IT IS FURTHER ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, are hereby preliminarily enjoined from selling, renting, leasing, transferring, or otherwise disclosing the name, address, telephone number, credit card number, bank account number, e-mail address, or other identifying information of any person who paid money to any of the Defendants for a mortgage loan modification or foreclosure relief service or who were contacted or are on a list to be contacted by any of the Defendants; *provided* that Defendant Dean Shafer may disclose such identifying information to a law enforcement agency or as required by any law, regulation, or court order.

NOTIFICATION OF BUSINESS ACTIVITIES

XVI. IT IS FURTHER ORDERED that:

A. Defendant Dean Shafer is hereby preliminarily enjoined from directly or indirectly creating, operating, or exercising any control over any business entity,

including any partnership, limited partnership, joint venture, sole proprietorship or corporation, without first serving on counsel for the FTC a written statement disclosing the following: (1) the name of the business entity; (2) the address and telephone number of the business entity; (3) the names of the business entity's officers, directors, principals, managers and employees; and (4) a detailed description of the business entity's intended or actual activities.

B. Defendant Dean Shafer shall notify counsel for the FTC at least seven (7) days prior to affiliating with, becoming employed by, or performing any work for any business that is not a named Defendant in this action. Each notice shall include Defendant Dean Shafer's new business address and a statement of the nature of the business or employment and the nature of his duties and responsibilities in connection with that business or employment.

NOTICE TO EMPLOYEES, AGENTS AND REPRESENTATIVES

XVII. IT IS FURTHER ORDERED that within three (3) calendar days following this Order, Defendant Dean Shafer shall provide a copy of this Order to each of Defendants' employees, agents, directors, officers, subsidiaries, affiliates, attorneys, independent contractors, representatives, franchisees, all persons in active concert or participation with Defendants, and any person who has solicited customers for Defendants' mortgage loan modification or foreclosure relief service or provides any aspect of that service. Within five (5) calendar days following this Order, Defendant Dean Shafer shall provide counsel for the Commission with an affidavit identifying the names, titles, addresses, and telephone numbers of the persons and entities that Defendants have served with a copy of this Order in compliance with this provision.

LIMITED EXPEDITED DISCOVERY

XVIII. IT IS FURTHER ORDERED that, notwithstanding the provisions of Federal Rules of Civil Procedure 26(d) and (f), 30(a)(2), 33(a) and (b)(2), and Local

Rule 26-1, and pursuant to Federal Rules of Civil Procedure 30(a), 33, 34 and 45, the FTC is granted leave, at any time after service of this Order, to:

A. take the deposition, on three (3) days' notice, of any person, whether or not a party, for the purpose of discovering the nature, location, status, and extent of assets of the Defendant Dean Shafer; the nature and location of documents reflecting the business transactions of the Defendant Dean Shafer; the applicability of any evidentiary privileges to this action; and monitoring compliance with this Order. The limitations and conditions set forth in Fed. R. Civ. P. 30(a)(2)(B) and 31(a)(2)(B) regarding subsequent depositions of an individual shall not apply to depositions taken pursuant to this Section. Any such depositions taken pursuant to this Section shall not be counted toward the ten-deposition limit set forth in Fed. R. Civ. P. 30(a)(2)(A) and 31(a)(2)(A). Service of discovery upon a party, taken pursuant to this Section shall be sufficient if made by facsimile or by overnight delivery;

B. demand the production of documents, on ten (10) days' notice, from any person, whether or not a party, relating to the nature, status, or extent of the Defendant Dean Shafer's assets; the location of documents reflecting the business transactions of Defendant Dean Shafer; the applicability of any evidentiary privileges to this action; and monitoring compliance with this Order, provided that twenty four (24) hours' notice shall be deemed sufficient for the production of any such documents that are maintained or stored only as electronic data; and

C. serve on Defendant Dean Shafer up to five (5) interrogatories relating to the location, storage or retention of documents reflecting the business transactions of the Defendant Dean Shafer; and monitoring compliance with this Order. The limitations and conditions set forth in Fed. R. Civ. P. 33(a)(1) regarding the number of interrogatories shall not apply to interrogatories taken pursuant to this Section. Any such interrogatory taken pursuant to this Section shall not be counted toward the twenty-five interrogatory limit set forth in Fed. R. Civ. P. 33(a)(1). Service of

discovery upon a party, taken pursuant to this Section shall be sufficient if made by facsimile or by overnight delivery.

CORRESPONDENCE

XIX. IT IS FURTHER ORDERED that for the purposes of this Order, all service on and correspondence to the FTC shall be sent via Federal Express or email and be addressed to: Mark Glassman, Federal Trade Commission, 600 Pennsylvania Avenue, NW, Room NJ-3158, Washington, DC 20580; Telephone: (202) 326-2826; Facsimile: (202) 326-3768; email: mglassman@ftc.gov.

SERVICE OF THIS ORDER

XX. IT IS FURTHER ORDERED that copies of this Order may be served by facsimile transmission, email (upon written consent), personal or overnight delivery, or U.S. Express Mail, by agents and employees of the FTC or any state or federal law enforcement agency or by private process server, on Defendants or any other person or entity that may be subject to any provision of this Order.

RIGHT TO INVESTIGATE AND ADD ADDITIONAL PARTIES AND CLAIMS

XXI. IT IS FURTHER ORDERED that nothing in this Order shall be construed as limiting or restricting the FTC's right or ability to investigate, take discovery from, add to this action or bring further actions against any persons or entities not specifically named herein as a defendant or who may be in active concert or participation with any of the defendants.

RETENTION OF JURISDICTION

XXII. IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for all purposes.

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SO STIPULATED:

Dated: August 19, 2009

FEDERAL TRADE COMMISSION

By: _____
Mark L. Glassman
Robert B. Mahini
Bevin T. Murphy

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

Dated: 18, 2009

CENTURY LAW GROUP LLP

By: _____
Edward O. Lear

Attorney for Defendant
DEAN SHAFER

CERTIFICATE OF SERVICE

I, Mark Glassman, certify as follows:

I am over the age of 18 and am employed by the Federal Trade Commission. My business address is 600 Pennsylvania Avenue, NW, Mail Stop NJ-3158, Washington, DC 20580

On August 19, 2009, I caused the document entitled "Stipulation by Defendant Dean Shafer to Entry of Preliminary Injunction Order With Asset Freeze and Other Equitable Relief as to Defendant Dean Shafer" to be served, by the following means to the following individuals:

By Overnight Delivery and Email

Edward O. Lear, Esq.
Century Law Group LLP
5200 West Century Boulevard
345
Los Angeles, CA 90045
lear@centurylawgroup.com

Counsel for Defendants Dean Shafer and Loss Mitigation Services, Inc.

By Agreement For Email Service

Marion Anthony ("Tony") Perry
[Street address omitted per L.R. 79-5.4]
Irvine, California

Defendant Pro Se

Bernadette Perry
[Street address omitted per L.R. 79-5.4]
Irvine, California

Defendant Pro Se

Registered Agent for Synergy Financial Management Corporation

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 19, 2009

/s/ Mark L. Glassman
Mark L. Glassman

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc., et al., Defendants	Case No. SACV09-800 DOC(ANx) **JOINT REPORT AND DISCOVERY PLAN PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(f)**

Pursuant to Federal Rule of Procedure 26(f) and Local Rule 26-1, Plaintiff Federal Trade Commission ("FTC" or "the Commission") conducted telephone conferences with the following parties on the following dates: Defendant *pro se* Bernadette Perry (a.k.a. Bernadette Carr and Bernadette Carr-Perry) ("Bernadette Perry") on September 29, 2009; Defendant *pro se* Marion Anthony (a.k.a. "Tony") Perry ("Tony Perry") on October 1, 2009; and counsel for Loss Mitigation Services, Inc. ("LMS") and Dean Shafer on October 5, 2009. At present, Defendant Synergy Financial Management Corporation, also d/b/a Direct Lender and Direct Lender.com ("Direct Lender") does not have counsel in the litigation, and thus did not participate in a conference.[1]

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[1] Defendant Bernadette Perry is listed in corporate filings as the registered agent for Direct Lender and has been served with papers on its behalf.

I. STATEMENT OF THE CASE

Plaintiff FTC alleges that since at least late 2007, Defendants have engaged in a course of conduct to advertise, market, offer to sell, and sell to homeowners purported mortgage loan modification and foreclosure relief services. The FTC alleges that Defendants typically have charged homeowners between $2,500 and $5,500 in up-front fees and have purported that they will modify homeowners' mortgages in all or virtually all cases and can prevent foreclosure. The FTC alleges that from at least February 2008 through at least May 2008, Synergy and LMS operated as a common enterprise while engaging in the deceptive acts and practices alleged, making them jointly and severally liable during that period. The FTC further alleges that defendants Dean Shafer, Bernadette Perry, and Tony Perry formulated, directed, controlled, had the authority to control, or participated in the acts and practices of the common enterprise, making them personally liable for the acts and practices of the corporate defendants. The FTC estimates that Defendants collected approximately $7 million from approximately 2,200 consumers.

The FTC alleges that Defendants make three primary deceptive representations to induce consumers to pay up-front fees and enroll in their program. First, Defendants represent that they will obtain mortgage loan modifications for consumers or stop foreclosure on their homes in all or virtually all instances. In actuality, the FTC alleges that once consumers pay the up-front fee, Defendants do little, if anything, to negotiate with the consumers' lenders and often fail to obtain the promised modifications. Second, Defendants represent that they will refund consumers' money if Defendants do not succeed in obtaining a loan modification or stopping foreclosure. In actuality, the FTC alleges that when Defendants ultimately fail to obtain promised loan modifications and consumers request their money back, Defendants routinely refuse to provide a refund. Third, Defendants lead numerous consumers to believe that Defendants are the consumers' lender or servicer, or that they are affiliated with, working with, or authorized by, the consumers' lender or

servicer. In actuality, the FTC alleges that Defendants are not affiliated with, working with, or authorized by, the consumers' lender or servicer.

II. PRINCIPAL LEGAL AND FACTUAL ISSUES

A. Principal Legal Issues

1. Whether Defendants have engaged in deceptive acts and practices in violation of Section 5 of the FTC Act in connection with marketing loan modification and foreclosure relief services.

2. Whether corporate Defendants LMS and Synergy operated as a common enterprise and are jointly and severally liable for the alleged violations of the FTC Act occurring during such enterprise's operation.

3. Whether Defendants Dean Shafer, Bernadette Perry, and Tony Perry are individually liable for the alleged violations of the FTC Act and are jointly and severally liable for redress.

B. Principal Factual Issues

1. Whether through their acts and practices Defendants have represented that they would obtain a loan modification or stop foreclosure in all or virtually all instances and whether such representations are deceptive.

2. Whether through their acts and practices Defendants have represented that they will refund consumers' money if Defendants do not succeed in obtaining a loan modification or stopping foreclosure and whether such representations are deceptive.

3. Whether through their advertisements and other materials and statements Defendants have represented that they are the consumers' lender or servicer, or that they are affiliated with, working with, or authorized by, the consumers' lender or servicer and whether such representations are deceptive.

III. Addition of Parties and/or Claims

Plaintiff FTC anticipates that it may be necessary to join one or more parties as defendants or as relief defendants, and to add claims. Should such addition of

parties and/or claims be warranted based on information obtained in discovery and subsequent to filing the Complaint, it shall be accomplished by amendment of the Complaint.

IV. Issues to be Resolved by Motion

Plaintiff FTC believes this case can be resolved on summary judgment. Plaintiff FTC proposes below that motions for summary judgment be filed no later than June 21, 2010.

V. Report Regarding Settlement Discussions

Plaintiff FTC has discussed the possibility of settlement, including the nature and possible substance of settlement, with all Defendants except Direct Lender, which has not made an appearance in this case. Defendants LMS and Dean Shafer have indicated an interest in principle in settlement. However, no terms of settlement have been agreed upon and the FTC believes that further discovery is necessary before such terms can be reached. Defendants Marion Anthony "Tony" Perry and Bernadette Perry have indicated that they do not wish to pursue settlement at this time.

Pursuant to Local Rule 16-15.4, Plaintiff FTC and Defendants LMS and Dean Shafer designate Settlement Procedure No. 1 (appearance before the district judge or magistrate judge assigned to the case) as its settlement vehicle.

VI. Proposed Schedule and Discovery Plan

A. Proposed Schedule

Plaintiff FTC and Defendants LMS and Dean Shafer propose the following schedule for discovery and certain other matters in this litigation:

Event	Parties' Proposed Date
Defendants to file and serve answers or other responsive papers	October 12, 2009
Parties to exchange initial disclosures required by Rule 26(a)(1).	October 27, 2009

Fact discovery begins	November 2, 2009
Last day to move to amend pleadings	December 23, 2009
Last day to amend pleadings	January 22, 2010
Expert disclosures	March 1, 2010
Fact and expert discovery cutoff	May 3, 2010
Last day to file motions for summary judgment.	June 21, 2010
Pre-trial conference	September 14, 2010
First day of trial	September 15, 2010

A. Proposed Discovery Plan

1. Discovery Needed

The FTC anticipates issuing requests for documents, deposing fact witnesses and possibly expert witnesses, and issuing interrogatories and requests for admission, to discover information relating to the conduct alleged in the Complaint including but not limited to the acts and practices used to promote and sell Defendants' loan modification services; Defendants' acts and practices with respect to refunds; the nature and extent of the services that Defendants provided to consumers; the identity and extent of involvement of other parties who may have participated in or benefitted from Defendants' practices; and the extent of consumer injury.

2. Depositions

Plaintiff FTC anticipates the need to seek leave under Rule 26(b)(2) to take depositions in excess of the 10 deposition limit imposed by the Federal Rules of Procedure given the number of Defendants in this case and likely need to depose several third parties. Therefore, the FTC requests that it be permitted to take a maximum of 25 depositions.

VII. Trial

The FTC anticipates that this case will be tried to the Court. The FTC estimates that eight (8) days are needed for trial in the event that issues are not narrowed through a motion for summary judgment, with the understanding that those days are to be divided as appropriate between the FTC and the defendants.

VIII. Redress

As final relief in this action, Plaintiff FTC intends to seek an order: (1) permanently banning Defendants from marketing, advertising, or selling any loan modification and foreclosure relief service; (2) barring Defendants from violating the FTC Act in connection with the marketing, advertising, or sale of any mortgage loan, debt relief or credit product, service, or program; (3) requiring Defendants to post bonds prior to marketing, advertising, or selling any pre-paid service; (4) barring Defendants from misrepresenting the likelihood of success, the results that can be achieved, and the amount of time for performance in connection with the marketing, advertising, and sale of any pre-paid service; (5) entering other equitable relief, including rescission, restitution, and disgorgement, as the Court finds necessary, to redress injury to consumers; and (6) awarding the costs of this litigation. Plaintiff FTC believes that redress in this case should be calculated as the full amount of money that consumers paid to Defendants for loan modification services minus any refunds provided. Although, without discovery, the Commission does not yet know the full amount of monetary injury, the FTC estimates monetary injury to be approximately $7 million.

IX. Electronically Stored Information

The FTC has obtained electronic documents and information pertaining to Defendant LMS from the receiver appointed pursuant to the Preliminary Injunction Order with Receiver, Asset Freeze and Other Equitable Relief as to Defendants Loss Mitigation Services, Inc. and Synergy Financial Management Corporation d/b/a/ Direct Lender.com [Docket Itm. # 41] ("Receiver"). A substantial quantity of these

documents and information is in the form of email saved in backup volumes. The volumes are not readily accessible using software in the possession of the FTC, and the FTC is working with outside contractors to access the information. The FTC anticipates the need to request additional documents and information in the possession of the defendants. The FTC maintains electronic documents and information pertinent to this case collected in the course of its investigation.

Defendant Tony Perry has in his possession a computer containing emails and possibly other electronic files that may be discoverable.

Defendant Bernadette Perry asserts that she is not currently aware of electronic documents or information in her possession that may be discoverable.

Defendant LMS states that all documents and computers are in the possession of the Receiver.

Defendant Dean Shafer states that all documents of Defendant LMS are in the possession of the Receiver. Defendant Shafer states that certain documents and information relating to his personal financial information may be in the possession of a tax preparation firm. Counsel for Mr. Shafer states that, to the extent other documents and information relating to Mr. Shafer personally remain in his possession, counsel will identify and take steps to preserve such documents and information.

The parties agree to cooperate in the handling and production of electronic documents and information, including future discussions as to the format of production of electronic information.

Respectfully submitted,

Dated: October 6, 2009

FEDERAL TRADE COMMISSION

By: _____
Mark L. Glassman
Robert B. Mahini
Bevin T. Murphy

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

Dated: October 6, 2009

LOSS MITIGATION SERVICES, INC.

By: _____
Edward O. Lear

Attorney for Defendant
LOSS MITIGATION SERVICES, INC.

Dated: October 6, 2009

DEAN SHAFER

By: _____
Edward O. Lear

Attorney for Defendant
DEAN SHAFER

Dated: October 6, 2009

BERNADETTE PERRY (a.k.a. BERNADETTE CARR and BERNADETTE CARR-PERRY)

By: /s/ Bernadette Perry
(by permission granted 10/6/2009)
Bernadette Perry
Defendant *Pro Se*

Dated: October 6, 2009

MARION ANTHONY (a.k.a. "TONY") PERRY

By: _____
Marion Anthony Perry
Defendant *Pro Se*

Dated: October 6, 2009

SYNERGY FINANCIAL MANAGEMENT CORPORATION, ALSO D/B/A DIRECT LENDER AND DIRECT LENDER.COM

By: [This Party Has Not Appeared]

For Defendant
SYNERGY FINANCIAL MANAGEMENT CORPORATION, ALSO D/B/A DIRECT LENDER AND DIRECT LENDER.COM

Dated: October 6, 2009

BERNADETTE PERRY (a.k.a. BERNADETTE CARR and BERNADETTE CARR-PERRY)

By: _____
Bernadette Perry
Defendant *Pro Se*

Dated: October 6, 2009

MARION ANTHONY (a.k.a. "TONY") PERRY

By: Marion Anthony Perry
Marion Anthony Perry
Defendant *Pro Se*

Dated: October 6, 2009

SYNERGY FINANCIAL MANAGEMENT CORPORATION, ALSO D/B/A DIRECT LENDER AND DIRECT LENDER.COM

By: [This Party Has Not Appeared]

For Defendant
SYNERGY FINANCIAL MANAGEMENT CORPORATION, ALSO D/B/A DIRECT LENDER AND DIRECT LENDER.COM

CERTIFICATE OF SERVICE

I, Mark Glassman, certify as follows:

I am over the age of 18 and am employed by the Federal Trade Commission. My business address is 600 Pennsylvania Avenue, NW, Mail Stop NJ-3158, Washington, DC 20580

On October 6, 2009, I caused the attached document entitled "Joint Report and Discovery Plan Pursuant to Federal Rule of Civil Procedure 26(f)" to be served, by the following means on the following individuals:

By Overnight Delivery and Email

Edward O. Lear, Esq.
Century Law Group LLP
5200 West Century Boulevard
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Los Angeles, CA 90045
lear@centurylawgroup.com

Counsel for Defendants Dean Shafer and Loss Mitigation Services, Inc.

Brick Kane
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11450 Sheldon Street
Sun Valley, CA 91352
brick_kane@robbevans.com

Receiver for Loss Mitigation Services, Inc.

By Agreement For Email Service

Marion Anthony ("Tony") Perry
[Street address omitted per L.R. 79-5.4]
Fountain Valley, California

Defendant Pro Se

Bernadette Perry
[Street address omitted per L.R. 79-5.4]
Irvine, California

Defendant Pro Se

Registered Agent for Synergy Financial Management Corporation

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 6, 2009

/s/ Mark L. Glassman
Mark L. Glassman

Willard K. Tom
General Counsel

Mark L. Glassman
Robert B. Mahini
Bevin T. Murphy
mglassman@ftc.gov; rmahini@ftc.gov; bmurphy1@ftc.gov
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Attorneys for Plaintiff FTC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc., et al., Defendants.	Case No. SACV09-800 DOC(ANx) **AMENDED NOTICE OF TAKING OF DEPOSITION OF DEAN SHAFER** Date: January 5, 2010 Time: 9:00 a.m. Place: 10877 Wilshire Boulevard Suite 700 Los Angeles, CA 90024

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to the Preliminary Injunction Orders issued by this Court, the Plaintiff Federal Trade Commission ("FTC") may take the deposition, on three days' notice, of any person, whether or not a party, for the purpose of discovering the nature, location, status, and extent of assets of the named Defendants, or of

their affiliates or subsidiaries; the nature and location of documents reflecting the business transactions of the named Defendants, or their affiliates or subsidiaries; the applicability of any evidentiary privileges to this action; and monitoring compliance with this Order. (*See* Preliminary Injunction Order with Asset Freeze and Other Equitable Relief as to Bernadette Perry and Marion Anthony Perry § XVIII.A [Docket Itm. # 43]; Preliminary Injunction Order with Asset Freeze and Other Equitable Relief as to Defendant Dean Shafer § XVIII.A [Docket Itm. # 44]; Preliminary Injunction Order with Receiver, Asset Freeze and Other Equitable Relief as to Defendants Loss Mitigation Services, Inc. and Synergy Financial Management Corp. d/b/a/ Direct Lender and Direct Lender.com § XVII.A [Docket Itm. # 41].) Such deposition is permitted notwithstanding the provisions, among others, of Federal Rule of Civil Procedure 30(a)(2), and therefore shall not limit the FTC's right to take a subsequent deposition of Defendant Dean Shafer. (*See* Preliminary Injunction Order with Asset Freeze and Other Equitable Relief as to Defendant Dean Shafer § XVIII.A [Docket Itm. # 44].)

On November 3, 2009, the FTC served the Notice of Taking of Deposition of Dean Shafer, setting the deposition for December 8, 2009 at 9:30 am. On December 3, 2009, counsel of record Century Law Group filed a Request for Approval of Substitution of Attorney (Docket Itm. # 64), requesting that Mr. Shafer and Loss Mitigation Services, Inc. be permitted to represent themselves. As of the time for commencement of the deposition on December 8, 2009, the clerk had not entered on the Docket any indication that the Court had acted upon the request. Although Mr. Shafer appeared for his deposition, his counsel of record, Century Law Group, did not appear, and did not respond to requests by counsel for the FTC to permit the deposition to be conducted in their absence. The deposition therefore had to be rescheduled until such time as the record reflected that the Court had acted upon the Request for Approval of Substitution

of Attorney.

THEREFORE, NOTICE IS HEREBY GIVEN that, pursuant to the above mentioned orders, the FTC will take the deposition of Defendant Dean Shafer **on January 5, 2010, commencing at 9:00 a.m.** The deposition will be conducted at the Federal Trade Commission, Western Region, 10877 Wilshire Boulevard, Suite 700, Los Angeles, CA 90024.

The deposition will be recorded by video and/or stenographic means and conducted before a person authorized to administer oaths.

DATED: December 16, 2009

Mark L. Glassman

Attorney for Plaintiff
Federal Trade Commission

CERTIFICATE OF SERVICE

I, Mark Glassman, certify as follows:

I am over the age of 18 and am employed by the Federal Trade Commission. My business address is 600 Pennsylvania Avenue, NW, Mail Stop NJ-3158, Washington, DC 20580.

On December 16, 2009, I caused the attached document entitled "AMENDED NOTICE OF TAKING OF DEPOSITION OF DEAN SHAFER" to be served, by the following means, on the following individuals:

By Agreement for Email Service

Dean Shafer
& Loss Mitigation Services, Inc.
[Street address omitted
per L.R. 79-5.4]
Newport Coast, CA 92657
deanshafer2004@yahoo.com

Defendants Pro Se

Marion Anthony ("Tony") Perry
[Street address omitted
per L.R. 79-5.4]
Fountain Valley, CA

Defendant Pro Se

Bernadette Perry
[Street address omitted
per L.R. 79-5.4]
Laguna Woods, CA

Defendant Pro Se; Registered Agent for Synergy Financial Management Corporation

By Overnight Delivery and Email

Brick Kane
Robb Evans & Associates, LLC
11450 Sheldon Street
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brick_kane@robbevans.com

Receiver for Defendant Loss Mitigation Services, Inc.

Gary O. Caris
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Counsel for Receiver Robb Evans & Associates, LLC

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Counsel for Intervenor TK Global Partners, LP

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 16, 2009

Mark L. Glassman

Willard K. Tom
General Counsel

Mark L. Glassman
Robert B. Mahini
Bevin T. Murphy
mglassman@ftc.gov; rmahini@ftc.gov;
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-2642 (Mahini); -2191 (Murphy)
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John D. Jacobs (Local Counsel)
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Los Angeles, CA 90024
Tel: (310) 824-4343
Fax: (310) 824-4380
jjacobs@ftc.gov

Attorneys for Plaintiff FTC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc., et al., Defendants.	Case No. SACV09-800 DOC (ANx) **PLAINTIFF'S NOTICE OF MOTION AND MOTION TO STRIKE DEAN SHAFER'S AFFIRMATIVE DEFENSES AND DENY HIS REQUEST FOR JURY TRIAL** Judge: Hon. David O. Carter

Plaintiff Federal Trade Commission ("FTC"), pursuant to Federal Rules of Civil Procedure 12(f) and 39(a)(2), respectfully moves this Court for an order striking Defendant Dean Shafer's affirmative defenses and denying his request for a jury trial. Each of the affirmative defenses in Defendant Dean Shafer's Answer

to Complaint for Permanent Injunction and Other Equitable Relief is legally insufficient, redundant and/or immaterial. Furthermore, Defendant Dean Shafer has no right to a jury trial, and this request should be denied. A memorandum of points and authorities in support of the FTC's motion is filed herewith.

This motion is made following the conference of Plaintiff's counsel and Defendant Dean Shafer, representing himself *pro se*, pursuant to L.R. 7-3, which took place on January 11, 2010.

Dated: January 12, 2010

Respectfully submitted,

Willard K. Tom
General Counsel

/s/ Robert B. Mahini

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Tel: (310) 824-4343
Fax: (310) 824-4380
jjacobs@ftc.gov

Attorneys for Plaintiff FTC

CERTIFICATE OF SERVICE

I, Katherine Redding, certify as follows:

I am over the age of 18 and am employed by the Federal Trade Commission. My business address is 600 Pennsylvania Avenue, NW, Mail Stop NJ-3158, Washington, DC 20580.

On January 12, 2010, I caused the attached document entitled "PLAINTIFF'S NOTICE OF MOTION AND MOTION TO STRIKE DEAN SHAFER'S AFFIRMATIVE DEFENSES AND DENY HIS REQUEST FOR JURY TRIAL" to be served, by the following means, on the following individuals:

By Agreement for Email Service

Dean Shafer
& Loss Mitigation Services, Inc.
[Street address omitted
per L.R. 79-5.4]
Newport Coast, CA 92657
deanshafer2004@yahoo.com

Defendants Pro Se

Marion Anthony ("Tony") Perry
[Street address omitted
per L.R. 79-5.4]
Fountain Valley, CA

Defendant Pro Se

Bernadette Perry
[Street address omitted
per L.R. 79-5.4]
Laguna Woods, CA

Defendant Pro Se; *Registered Agent for Synergy Financial Management Corporation*

By Overnight Delivery and Email

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Los Angeles, CA 90071
mbrewer@hgblaw.com

Counsel for Intervenor TK Global Partners, LP

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 12, 2010

/s/ Katherine Redding
Katherine Redding