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13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA

15 FEDERAL TRADE COMMISSION, )

16 Plaintiff, )

Case No. 2:26-cv-05900

17 v. )

18 ) COMPLAINT FOR  
19 ) PERMANENT INJUNCTION  
20 ) AND OTHER RELIEF

21 AMARE GLOBAL HOLDINGS, INC. a )  
22 corporation, d/b/a Amare and Amare )  
23 Global; f/k/a M3 Ventures, Inc., a )  
24 corporation. )

25 SHAWN TALBOTT, individually, )

26 DAVID CHUNG, individually, and )

27 PATRICK HINTZE, individually. )

28 Defendants. )

1 Plaintiff, the Federal Trade Commission (“FTC” or “Commission”) for its  
2 Complaint alleges:

3 1. The FTC brings this action for Defendants’ violations of Sections 5(a)  
4 and 12 of the FTC Act, 15 U.S.C. §§ 45(a), 52. For these violations, the FTC  
5 seeks relief, including a permanent injunction and other relief, pursuant to Section  
6 13(b) of the FTC Act, 15 U.S.C. § 53(b).

7 **SUMMARY OF THE CASE**

8 2. Defendants operate a nationwide multi-level marketing program  
9 (“MLM”) under the name “Amare.” A self-described “Mental Wellness  
10 Company,” Amare produces, markets, and sells dietary supplements that  
11 purportedly treat diseases and medical conditions such as depression, anxiety, and  
12 ADHD in children and adults. Defendants also represent that consumers who  
13 become “brand partners”—participants in their MLM and agents of the company—  
14 will or are likely to make a profit through their work as an MLM marketer and  
15 recruiter.

16 3. Amare represents that its products will provide various health  
17 benefits, including treatment of certain diseases and conditions, both in children  
18 and adults. Amare, both directly and through its brand partners, promote the  
19 products on social media such as Instagram, TikTok, Facebook, or YouTube, claim  
20 three of Amare’s most popular products—the Happy Juice Pack (a combination of  
21 supplements), Kids Mood+, and Kids Happy Juice—work across the “gut-brain  
22 axis” to increase or normalize neurotransmitters like serotonin, dopamine, and  
23 Gamma-aminobutyric acid (“GABA”), while decreasing or regulating hormones  
24 like cortisol. They also claim these functions cause the products to improve the  
25 symptoms of a range of mental conditions including depression, anxiety, and  
26 ADHD. All of these claims are false, misleading, or not substantiated.

27 4. Defendants have long used a variety of deceptive earnings claims to  
28 entice consumers to become brand partners, including through brand partners in

1 “Founding Brand Partner” Defendant Hintze’s downline. Amare’s brand partners  
2 claim they operate “seven-figure” businesses. They post on social media that  
3 anyone can join Amare by following simple steps to make, at a minimum, \$500 a  
4 month, to supplement or replace their current income, even if they do not have a  
5 large social media following or prior MLM experience. However, from January  
6 2021 through December 2024, only [REDACTED] of brand partners made \$500 per month  
7 or more; an income disclosure statement available on Amare’s website at least  
8 through April 2026 indicates a typical brand partner brings in just \$25 per month  
9 before expenses.

10 5. Amare’s misconduct is particularly egregious given that since its  
11 formation in 2017, Amare’s leadership has included two key players who are  
12 already subject to prior court-ordered permanent injunctions prohibiting them from  
13 making false, misleading, or unsubstantiated claims (“FTC Orders”). The first,  
14 Shawn Talbott, a defendant in *FTC v. Window Rock Enterprises, Inc.*, No. 2:04-cv-  
15 08190-DSF-JTL (C.D. Cal. filed Sept. 30, 2004), was Amare’s Chief Science  
16 Officer from the company’s inception until he resigned in October 2024. He has  
17 been subject to an FTC Order since 2005. The second, Patrick Hintze, a defendant  
18 in *FTC v. Green Foot Global, L.L.C.*, No. 2:13-cv-02064-JCM-GWF (D. Nev.  
19 filed Nov. 8, 2013), is the company’s Founding Brand Partner and heads Amare’s  
20 multi-level sales structure. He has been subject to an FTC Order since 2013.  
21 Amare placed each in control positions despite knowing that Talbott and Hintze  
22 were each subject to FTC Orders. In these roles, Talbott and Hintze continued  
23 making and disseminating unsubstantiated claims, both directly and through  
24 thousands of brand partners.

25 6. On the *Window Rock* docket, shortly after filing this Complaint, the  
26 FTC intends to file a motion to hold Talbott, Amare, Hintze, and Amare’s  
27 founding CEO Hiep Tran in contempt for violating Talbott’s final order by making  
28

1 false, misleading, or unsubstantiated health claims. The FTC seeks additional  
2 relief against Defendants through the filing of this Complaint.

3 **JURISDICTION AND VENUE**

4 7. This Court has subject matter jurisdiction pursuant to 28 U.S.C.  
5 §§ 1331, 1337(a), and 1345.

6 8. Venue is proper in this District under 28 U.S.C. §§1391 (b)(2), (b)(3),  
7 (c)(2) and (d), and 15 U.S.C. § 53(b).

8 **PLAINTIFF**

9 9. The FTC is an agency of the United States Government created by the  
10 FTC Act. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15  
11 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting  
12 commerce. The FTC also enforces Section 12 of the FTC Act, 15 U.S.C. § 52,  
13 which prohibits false advertisements for food, drugs, devices, services, or  
14 cosmetics in or affecting commerce.

15 **DEFENDANTS**

16 10. Defendant Amare Global Holdings, Inc. (“Amare”), also doing  
17 business as Amare and Amare Global, is a Utah corporation with its principal place  
18 of business at 3401 N. Thanksgiving Way in Lehi, Utah. Amare transacts or has  
19 transacted business in this District and throughout the United States. At all times  
20 relevant to this Complaint, acting alone, in concert with others, and through its  
21 brand partners, Amare has advertised, marketed, distributed, or sold dietary  
22 supplements and the opportunity to sell and market the supplements to consumers  
23 throughout the United States. The company has also, on numerous occasions,  
24 provided instructional and marketing materials to brand partners regarding its  
25 dietary supplements and brand partners’ potential earnings. Amare formed on or  
26 about March 18, 2022.

27 11. From May 2016 through March 2022, M3 Ventures West, Inc. (“M3  
28 Ventures”), a California corporation with a principal place of business in Irvine,

1 California, did business as Amare and Amare Global. [REDACTED]

2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 12. Defendant Shawn Talbott (“Talbott”), also known as Dr. Shawn, is a  
6 founder of Amare and was its Chief Science Officer from January 2017 through  
7 October 2024. As of March 2025, he owns [REDACTED] of Amare. At times relevant to  
8 this Complaint, acting alone or in concert with others, including Amare brand  
9 partners, he has formulated, directed, controlled, had the authority to control, or  
10 participated in the acts and practices of Amare, including the acts and practices  
11 described in this Complaint. Defendant Talbott resides in Massachusetts and, in  
12 connection with the matters alleged herein, transacts or has transacted business in  
13 this District and throughout the United States.

14 13. Defendant Talbott was responsible for Amare’s research,  
15 development, and product formulation. He led all aspects of the development of  
16 Amare’s product formulations and specifications, as well as clinical and  
17 experimental research, product claims substantiation and technical support. As  
18 detailed below, notwithstanding the fact that he is subject to an FTC Order  
19 prohibiting false or unsubstantiated health claims, Defendant Talbott personally  
20 made many of the company’s deceptive health claims. [REDACTED]

21 [REDACTED]  
22 [REDACTED]  
23 14. Defendant David Chung (“Chung”) acquired Amare in December  
24 2023, taking an [REDACTED] share through his holding company, Bioamity Global LLC.  
25 At times relevant to this Complaint, acting alone or in concert with others,  
26 including Amare brand partners, he has formulated, directed, controlled, had the  
27 authority to control, or participated in the acts and practices of Amare, including  
28 the acts and practices described in this Complaint. Defendant Chung resides in

1 Florida and, in connection with the matters alleged herein, transacts or has  
2 transacted business in this District and throughout the United States.

3 15. [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]

11 16. Chung knew Amare lacked appropriate substantiation for the  
12 company’s marketing claims. At the July 2024 company-sponsored convention,  
13 Chung explicitly acknowledged the lack of substantiation for not just the  
14 ingredients but the finished products. Despite this knowledge, Chung did not  
15 direct the company to cease sales of its products. Indeed, with Chung at the helm  
16 in 2024, revenues from Amare products exceeded [REDACTED], with over [REDACTED]  
17 [REDACTED] coming from the sale of Happy Juice and its component parts; [REDACTED]  
18 from Kids Mood+; and [REDACTED] from Kids Happy Juice, which launched in  
19 October 2024.

20 17. Chung continues to lead the company and formally took over as CEO  
21 in July 2025. He emphasized Happy Juice as a critical Amare product in a May  
22 2025 interview with Forbes and appeared on stage at Amare’s July 2025  
23 convention to launch new products for brand partners to sell and double-down on  
24 the company’s business model. That summer, Chung also stated, “Amare is more  
25 than a company to me, it’s my legacy.”

26 18. Amare posted a video in October 2025 further claiming that Chung “is  
27 **fully invested** financially, operationally, and emotionally in building a company  
28 with **lasting impact.**” (emphasis in original).

1 19. Defendant Patrick Hintze, also known as Pat Hintze (“Hintze”), is  
2 Amare’s founding brand partner. At times relevant to this Complaint, acting alone  
3 or in concert with others, including Amare brand partners, he has formulated,  
4 directed, controlled, had the authority to control, or participated in the acts and  
5 practices of Amare, including the acts and practices described in this Complaint.  
6 Defendant Hintze resides in Wisconsin and, in connection with the matters alleged  
7 herein, transacts or has transacted business in this District and throughout the  
8 United States.

9 20. [REDACTED]  
10 [REDACTED] Through Hintze’s downline,  
11 Defendants disseminated false, misleading, or unsubstantiated claims. Hintze  
12 remains in control of his downline and received over [REDACTED] per year in 2022,  
13 2023, and 2024 for his and their efforts. [REDACTED]

14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

26 Despite this knowledge, and despite, for example, sitting next to Talbott as Talbott  
27 made deceptive health claims, Hintze regularly referred brand partners to Talbott  
28 to answer their questions about Amare’s products.

1 **AMARE’S BRAND PARTNERS**

2 21. Amare’s brand partners acted as Amare’s actual or apparent agents  
3 when making the false, misleading, or unsubstantiated claims alleged below.  
4 Among other facts alleged herein, Amare held its brand partners out as its  
5 representatives, including at company events and in marketing materials; sold its  
6 products almost entirely through brand partners; trained brand partners on how to  
7 sell the products, including by distributing instructional and marketing materials to  
8 them; and provided brand partners with personalized pages on Amare’s website  
9 through which brand partners sold Amare’s products to consumers. Because  
10 Amare’s brand partners are its actual or apparent agents and make the  
11 representations alleged below within the scope of their authority, Amare is liable  
12 for the acts and practices alleged below.

13 **COMMERCE**

14 22. At all times relevant to this Complaint, Defendants have maintained a  
15 substantial course of trade in or affecting commerce, as “commerce” is defined in  
16 Section 4 of the FTC Act, 15 U.S.C. § 44.

17 **DEFENDANTS’ BUSINESS ACTIVITIES**

18 **Amare’s Structure and Responsibility for Their Brand Partners**

19 23. Defendants market and distribute dietary supplements through a  
20 network of salespeople who participate in Amare’s multi-level marketing scheme  
21 as “brand partners.”

22 24. Amare has defined a brand partner as “[a] person who enrolls with a  
23 membership and wants to share the products with other people,” and presently  
24 notes “[o]nly [b]rand [p]artners have the authority to enroll other [b]rand [p]artners  
25 and participate in the Amare Global Compensation Plan.” Brand partners are paid  
26 as independent contractors.

27 25. [REDACTED]

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]

6 26. Amare provides new brand partners with a personalized link to  
7 execute sales. Potential customers who see brand partners' claims online click on  
8 these links, which lead to the official Amare website where they may purchase  
9 Amare's products. The relevant Amare brand partner's name and contact  
10 information appears at the top of the page under the Amare logo.

11 27. Amare brand partners typically make sales through their personalized  
12 page on Amare's website, suggesting to purchasers that they are representatives of  
13 the company.

14 28. Amare also provides brand partners voluminous materials to promote  
15 and sell Amare products and recruit new brand partners, including training  
16 materials, graphics, and logos to use in promoting the company's products and  
17 income opportunity.

18 29. Brand partners themselves appear in Amare's promotional materials  
19 and are featured as speakers at Amare events.

20 30. Amare refers to its brand partners as the company's "lifeblood" and  
21 has stated "Amare's business is inherently tied to and built upon the success of its  
22 Brand Partners' network."

23 31. Indeed, since 2017, Amare has sold almost all of its products through  
24 its brand partners. Between September 2017, when the company began selling  
25 products, through December 2024, Amare made [REDACTED] of its monthly sales  
26 through brand partners.

27 32. Amare defines a "customer" as "[a] person who purchases Amare  
28 products and who is not enrolled as a Brand Partner." Customers do not sponsor

1 new brand partners (*e.g.*, build a downline, as described below) and do not receive  
2 commissions.

3 33. Amare and its brand partners promote the company’s products on  
4 social media such as Instagram, TikTok, Facebook, or YouTube. There, they make  
5 false, misleading, or unsubstantiated health claims about the benefits of their  
6 products and testing done on them.

7 34. Amare and its brand partners likewise make false, misleading, or  
8 unsubstantiated claims when recruiting new brand partners, claiming recruits can  
9 earn large sums of money—often specifying \$500 per month—by selling Amare’s  
10 products.

11 35. The claims about Amare’s products and brand partners’ earnings  
12 originate with Amare, Talbott, and Hintze and are repeated by brand partners. In  
13 doing so, the brand partners not only repeat these claims, but they also often  
14 amplify or elaborate on the claims about the products’ ability to produce certain  
15 results or treat or cure medical conditions and brand partners’ ability to earn  
16 income.

17 36. Amare is aware of this repeated and widespread conduct and has  
18 allowed it to continue, even rewarding and highlighting many of the brand partners  
19 making the most extreme and deceptive statements.

20 37. Indeed, despite its awareness, Amare’s compliance department does  
21 not take meaningful action to prevent or remove deceptive posts like those  
22 described throughout this complaint, which direct consumers to Amare’s website  
23 to purchase products or become a brand partner. Amare regularly fails to take any  
24 other disciplinary action against brand partners for making false or unsubstantiated  
25 health claims about its products, such as freezing their commissions, disabling their  
26 credentials, or suspending or terminating them from the network.

27 38. [REDACTED]  
28 [REDACTED]

1 [REDACTED] Brand  
2 partners’ deceptive claims often remained online for days, weeks, months, and  
3 even years, and the brand partners who made them—including those described in  
4 this Complaint—continued to market Amare’s products.

5 39. [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]

14 40. Indeed, rather than taking reasonable steps to stop deceptive claims,  
15 Amare promoted brand partners who made them—including brand partners whose  
16 claims Amare recognized violated the company’s policies. For example, Amare  
17 featured high-ranking brand partners whose claims are quoted in this Complaint at  
18 its conventions and featured them in marketing materials, and in doing so endorsed  
19 and encouraged their deceptive claims. They did so after the brand partners had  
20 made such claims for days, months, or even years.

21 **Amare’s Claims About its Dietary Supplements**

22 *Amare’s Products*

23 41. Amare markets many dietary supplements, including ones not  
24 described below. They market these products for both children and adults.

25 42. Amare’s flagship offering is a product “pack” called Happy Juice.  
26 Happy Juice is a combination of either two or three Amare products. It contains a  
27 supplement called MentaBiotics, as well as a form of a supplement referred to as  
28 “Edge”—either the original “Edge” or a newer formulation called “Edge+.” It

1 sometimes also contains a product called “Energy+,” which comes in both a  
2 caffeinated and caffeine free version. The Happy Juice components are all  
3 powders that are mixed together with liquids and thereafter consumed. Happy  
4 Juice and its components described in Paragraphs 43-47 below are typically  
5 marketed for adults.

6 43. Amare began offering Happy Juice for sale in September 2021, and  
7 currently markets it for sale. Between September 2021 and December 2024,  
8 revenues for the Happy Juice Pack exceed [REDACTED].

9 44. Amare began offering MentaBiotics for sale in September 2017, and  
10 currently markets it for sale independently of Happy Juice as well as in  
11 combination with other supplements in the Happy Juice pack. Between September  
12 2017 and December 2024, revenues for MentaBiotics purchased independently  
13 (not as a part of the Happy Juice pack) exceed [REDACTED] (including over [REDACTED]  
14 [REDACTED] during the time since Happy Juice launched).

15 45. Amare began offering Edge for sale in March 2021, and currently  
16 markets it for sale independently of Happy Juice as well as in combination with  
17 other supplements in the Happy Juice pack. Between March 2021 and December  
18 2024, revenues for Edge purchased independently (not as a part of the Happy Juice  
19 pack) exceed [REDACTED] (including over [REDACTED] since Happy Juice  
20 launched).

21 46. Amare began offering Edge+ for sale in February 2024, and currently  
22 markets it for sale independently of Happy Juice as well as in combination with  
23 other supplements in the Happy Juice pack. Between February 2024 and  
24 December 2024, revenues for Edge+ purchased independently (not as a part of the  
25 Happy Juice pack) exceed [REDACTED] (all after Happy Juice launched).

26 47. Amare began offering Energy+ for sale in September 2017, and  
27 currently markets it for sale independently of Happy Juice as well as in  
28 combination with other supplements in the Happy Juice pack. Between September

1 2017 and December 2024, revenues for Energy+ purchased independently (not as a  
2 part of the Happy Juice pack) exceed [REDACTED] (including over [REDACTED]  
3 since Happy Juice launched).

4 48. Kids Mood+ is another Amare dietary supplement, which Amare  
5 markets to parents for use by children. It is a powder that can be consumed  
6 directly or mixed into other liquids or food. Amare began offering Kids Mood+  
7 for sale in September 2019, and currently markets it for sale. Between September  
8 2019 and December 2024, revenues for Kids Mood+ exceed [REDACTED].

9 49. Kids Happy Juice is also an Amare dietary supplement, which Amare  
10 also markets to parents for use by children. Unlike the adult Happy Juice, Kids  
11 Happy Juice is a standalone product (it is not a product “pack”). It is a powder that  
12 can be mixed into other liquids or food. Amare began offering Kids Happy Juice  
13 for sale to certain brand partners in August 2024, to the public in October 2024,  
14 and currently markets it for sale. Between August 2024 and December 2024,  
15 revenues for Kids Happy Juice exceed [REDACTED].

16 Amare’s Deceptive Neurotransmitter and Hormone Claims (Happy Juice, Kids  
17 Mood+, Kids Happy Juice)

18 50. Defendants claim their products “work across the entire gut-brain  
19 axis” to increase or normalize neurotransmitters such as dopamine, serotonin, and  
20 GABA, and lower or regulate cortisol, a hormone. As described throughout this  
21 complaint, Defendants claim various health benefits result from their products’  
22 purported effect on neurotransmitters and hormones.

23 51. Defendants’ claims about their products’ effects on neurotransmitters  
24 and hormones originated with Talbott, who formulated Amare’s products and  
25 personally made claims relating to their purported ability to regulate  
26 neurotransmitters and hormones. For example, he made the following claims in  
27 marketing videos with Amare products in the background, wearing Amare apparel,  
28 or using Amare branding:

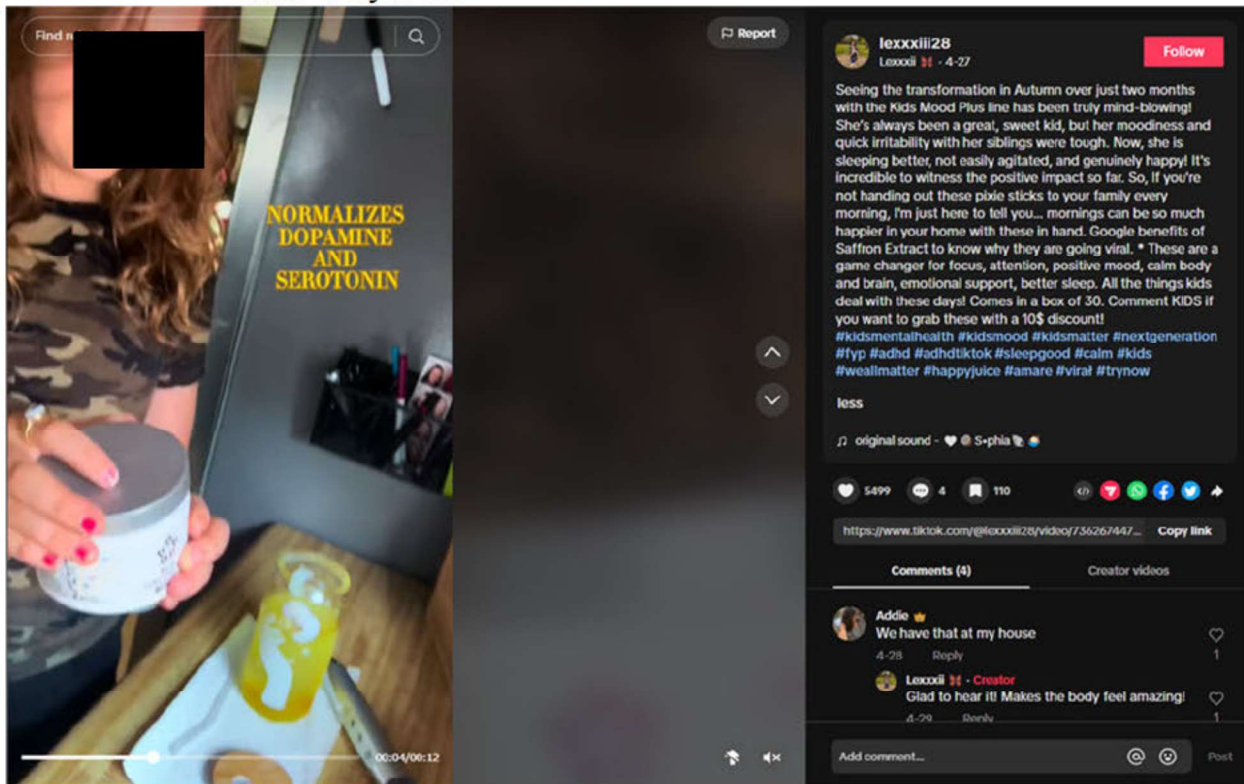
- 1 a. When pitching Happy Juice, Talbott claimed the product works in  
2 “so many different ways to improve overall mental wellness,”  
3 stating it “lowers cortisol” and “raises different neurotransmitters  
4 like serotonin, that helps with happiness, and dopamine, that helps  
5 with motivation,” and GABA “for stress reduction and relaxation.”  
6 b. When pitching Kids Mood+, Talbott claimed the product has been  
7 shown to modulate neurotransmitters. For example, he claims it  
8 “helps normalize serotonin and dopamine activity—the ‘feel good’  
9 neurotransmitters” and “[b]alances stress hormones (cortisol).”

10 52. Amare has made similar claims on its website about Happy Juice and  
11 Kids Mood+, for example representing that Happy Juice “[i]ncreases natural  
12 serotonin, dopamine, and GABA production,” and that Kids Mood+ normalizes  
13 neurotransmitter activity, including serotonin and dopamine in the brain,  
14 “support[s] healthy cortisol levels,” and “reduce[s] stress hormones.”

15 53. Likewise, on or about May 21, 2024, Amare.com contained a video  
16 advertising Mango Happy Juice, stating it “won’t solve all of your problems, but it  
17 will optimize neurotransmitters for happiness.” The video also notes that Happy  
18 Juice provides “Probiotics for emotional wellness. So you can experience  
19 optimized ‘happy’ neurotransmitters [] [l]ike [s]erotonin, [d]opamine, [and]  
20 GABA.”

21 54. Defendants, both directly and through Amare brand partners, routinely  
22 disseminate claims about Amare’s products’ effects on neurotransmitters and  
23 hormones online and through other means in promoting Happy Juice, Kids Mood+,  
24 and Kids Happy Juice. Below are typical examples of claims regarding  
25 neurotransmitters and hormones. The date the claim was posted on social media is  
26 noted below; the claims may have been viewable for months or years after they  
27 were posted. All of the examples below post-date Talbott and Hintze’s FTC  
28 Orders.

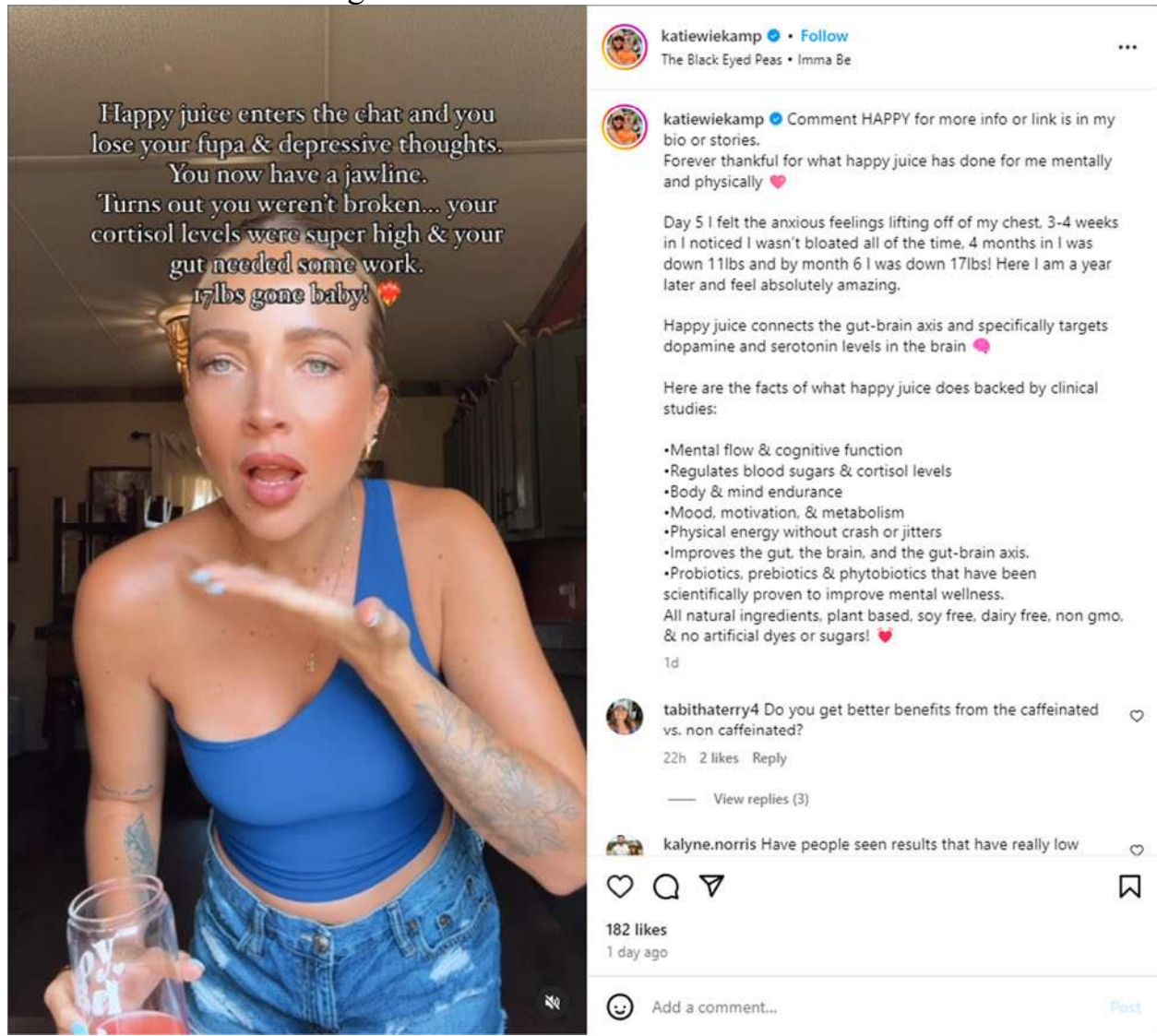
1 a. On or about April 27, 2024, an Amare brand partner stated Kids  
 2 Mood+ “NORMALIZES DOPAMINE AND SEROTONIN,”  
 3 which she claims is “a game changer for focus, attention, positive  
 4 mood, calm body and brain, emotional support, better sleep. All  
 5 the things kids deal with these days!” She then included the  
 6 hashtags “#kidsmentalhealth,” “#adhd,” “#adhdtiktok,” “#amare,”  
 7 and “#trynow.”



8 **Figure 1**

9  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21 b. On or about August 12, 2024, an Amare brand partner posted a  
 22 picture with overlaid text reading, “Happy juice enters the chat and  
 23 you lose your fupa & depressive thoughts. You now have a  
 24 jawline. Turns out you weren’t broken. . . your cortisol levels were  
 25 super high & your gut needed some work. 17lbs gone baby!” In the  
 26 caption, she elaborates that “Happy Juice connects the gut-brain  
 27 axis and specifically targets dopamine and serotonin levels in the  
 28

1 brain,” and that clinical studies prove Happy Juice “[r]egulates  
2 blood sugars & cortisol levels.”



21 **Figure 2**

22 c. On or about November 30, 2022, an Amare brand partner claimed  
23 there are “[o]ver 100 Clinical Study Results” for Happy Juice, and  
24 it “lower[s] cortisol exposure and improves GABA  
25 neurotransmission” and “increase[es] serotonin.” She elaborated  
26 that Happy Juice caused a “55% **DECREASE** in **ANXIETY**  
27 scores,” a “50% **DECREASE** in **DEPRESSION** scores,” a  
28

1                   **“105% DECREASE in NEGATIVE MOOD”** and a **“211%**  
2                   **INCREASE in POSITIVE MOOD.”** (emphasis in original)

- 3                   d. On or about December 29, 2025, an Amare brand partner claimed  
4                   her “body had unlevel serotonin + dopamine communication &  
5                   high cortisol” and was “craving dopamine, serotonin and GABA.”  
6                   She claimed these issues resolved after she found “an all natural  
7                   probiotic drink that actually helps the body naturally create ALL of  
8                   the neurotransmitters & hormones I needed—via the GUT,”  
9                   elaborating “after 2 weeks I was weaning myself off of my anti  
10                  anxiety meds. I’m no[w] three years med free!”
- 11                  e. On or about July 4, 2024, an Amare brand partner claimed “one  
12                  drink can: lower cortisol . . . increase serotonin, dopamine &  
13                  GABA production” to “[i]mprove mental health.” In the caption,  
14                  she stated, “About 90% of our serotonin, the primary  
15                  neurotransmitter responsible for happiness and mood, is actually  
16                  produced and located in our gut. Gut health IS mental health. This  
17                  supplement drink supports the growth and vitality of specific  
18                  strains of gut bacteria to increase the production of those ‘feel  
19                  good’ neurotransmitters so you literally feel happier as you  
20                  continue to drink it and heal your gut.” She included the hashtags  
21                  “#HappyJuice,” “#MentalHealth,” “#MentalWellness,”  
22                  “#Cortisol,” “#Anxiousness,” and “#AnxiousFeelings” on the post.
- 23                  f. On or about January 7, 2025, an Amare brand partner claimed  
24                  when she started her children on the same supplements she was  
25                  using for her and her husband (Happy Juice), “but formulated for  
26                  kids,” (Kids Happy Juice), her “house transformed” because “these  
27                  supps work the gut-brain axis[,] [g]etting the serotonin and  
28                  dopamine in the gut communicating with the brain.” She

concluded, “This product doesn’t just mask symptoms: it addresses the root by regulating those key brain chemicals.”

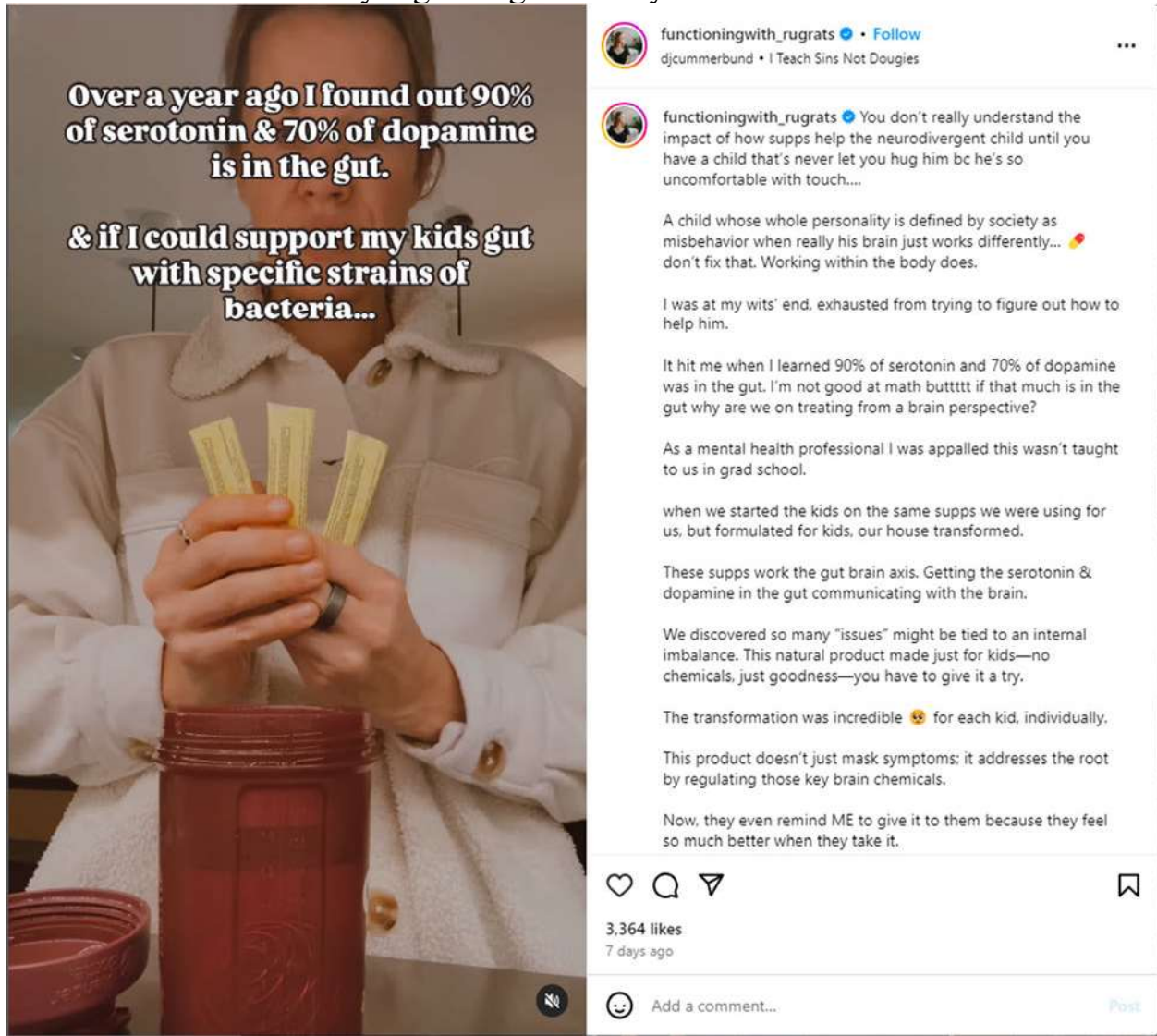


Figure 3

g. On or about August 7, 2024, an Amare brand partner posted a video with the words, “[Y]ou’ve had 4 kids it’s just genetics your [sic] big boned[.] [L]owering the cortisol enters the chat[.] [L]ost 50 lbs[,] all my inflammation[,] and have never felt better.” In her caption, this brand partner wrote, “[M]ake sure you are following me and comment 555 for my gut health protocol to lower

1 cortisol[.]” She continued, it “helped my mental wellness, curbed  
2 my sugar cravings, better sleep and transformed me.”

3 55. Defendants’ representations as described in Paragraphs 50-54 are  
4 false, misleading, or not substantiated.

5 Amare’s Deceptive Depression Claims (Happy Juice, MentaBiotics, Kids Mood+,  
6 Kids Happy Juice)

7 56. Defendants, both directly and through Amare brand partners, have  
8 routinely disseminated deceptive claims online and through other means that  
9 Happy Juice and one of its components, MentaBiotics, as well as Kids Mood+,  
10 treat, prevent, or cure depression. Below are typical examples of such claims. The  
11 date the claim was posted on social media or otherwise made is noted below; the  
12 claims may have been viewable for months or years after they were first posted.  
13 All of the examples below post-date Talbott and Hintze’s FTC Orders.

- 14 a. On or about April 19, 2018, Hintze hosted a launch tour event,  
15 which was reposted on Vimeo, where Talbott presented. In the  
16 video Talbott displayed an Amare-branded slide with a graphic  
17 titled “where are you on the mental wellness continuum” showing  
18 a scale from 1-10, with a “disease status” on the left, which listed  
19 depression, anxiety, ADD/ADHD, and Alzheimer’s. The middle  
20 of the chart reads, “Normal,” and the right-hand side of the chart  
21 reads “optimized,” which includes feeling “happy” and “resilient.”  
22 Talbott states that no matter where you are on the continuum,  
23 Amare will help you towards the optimized side of the continuum.

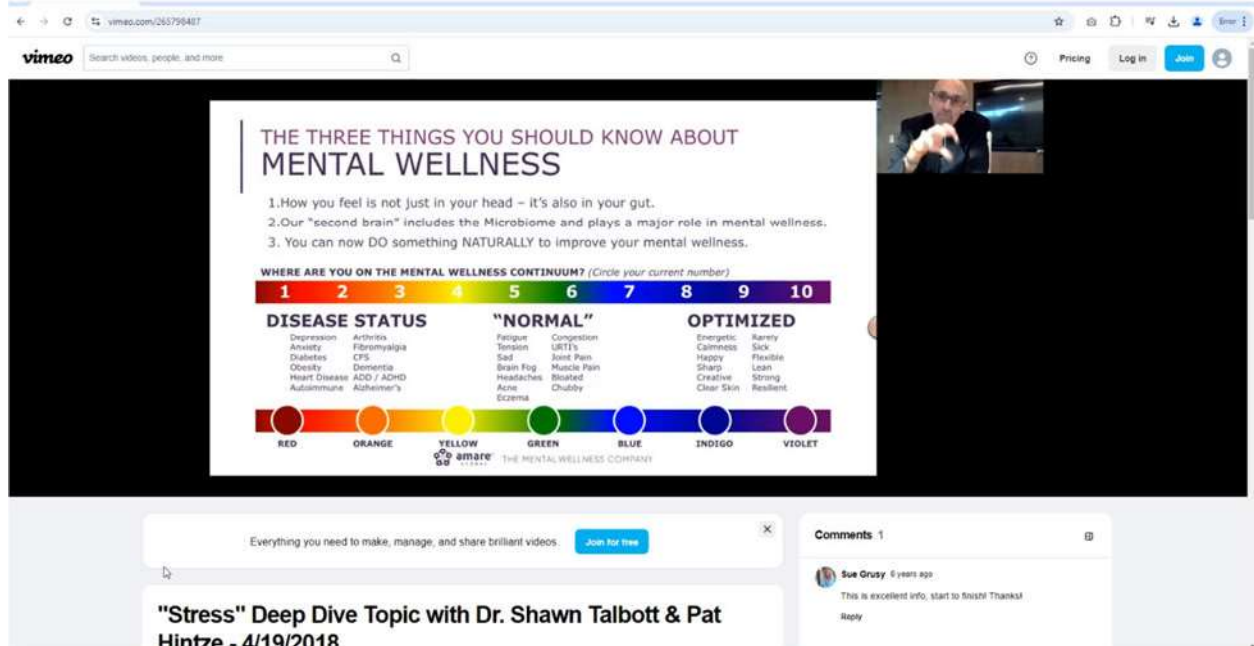


Figure 4

b. Shortly thereafter, Talbott presented a slide depicting the antidepressants Prozac, Lexapro, and Celexa, along with energy drink and coffee brands, noting these substances are what people typically “reach for” when “struggling” with mental health issues. Talbott says that instead people need “something that really gets in and addresses all the things that might be out of balance, and that’s what we’re going to talk about tonight.” Talbott proceeded to discuss Amare products such as the FundaMentals Pack, which contains MentaBiotics (a component in Amare’s Happy Juice pack, which was introduced in 2021).

c. [REDACTED]

d. On or about February 11, 2020, Talbott posted a video to his YouTube page showing his appearance on an ABC News Los

1 Angeles affiliate program from December 2019. In the segment,  
2 Talbott appears in a shirt with an Amare logo and explains that the  
3 saffron extract used in Kids Mood+ “can help with depression in  
4 teenagers, equivalent to Prozac.” Amare also made this video  
5 available to brand partners for sharing on its portal for brand  
6 partners.

7 e. In another 2024 ad, Talbott appears in a video posted on  
8 Amare.com, noting a purported scientific paradigm shift, where  
9 scientists believe you should treat the gut to get results in the brain;  
10 while he speaks, different traditional drugs/treatments, including  
11 “antidepressants,” appear on the screen. The video implies that  
12 Amare’s products can replace these traditional treatments.

13 f. In 2024, Happy Juice’s packaging stated, “THE KEY  
14 INGREDIENTS IN HAPPY JUICE ARE SHOWN TO: increase  
15 positive mood +105%.”

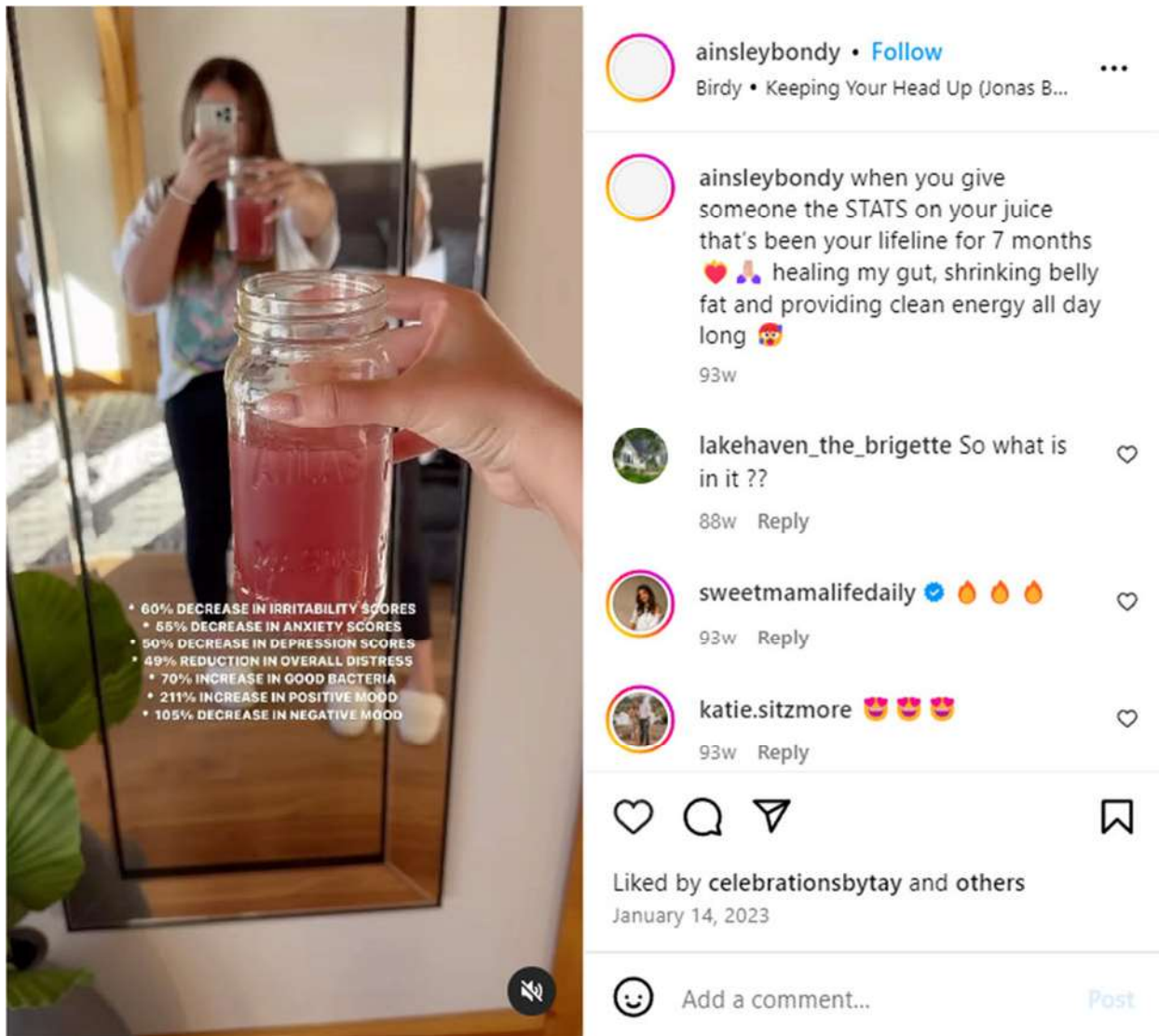
16 57. Brand partners frequently repeat and elaborate on these claims,  
17 sometimes by quantifying the amount by which Amare’s products will lower  
18 depression (by 50 or 55%), increase positive mood (by 211%), or decrease  
19 negative mood (confoundingly, by 105%). *See supra* Paragraph 54.c. Below are  
20 other typical examples of such claims.

21 a. On or about December 4, 2022, an Amare brand partner repeated  
22 claims made by Talbott on the ABC News segment, claiming that  
23 Kids Mood+, the “saffron extract pixie stick,” was “tested in  
24 clinical trials, went head-to-head with Prozac for mood and anxiety  
25 and Ritalin for focus.”

26 b. On or about June 13, 2022, an Amare brand partner wrote, “This is  
27 the famous Happy Juice I’ve been raving about!!” In the picture,  
28

1 she says that it is “[s]cientifically proven to: [l]ower depression by  
2 55%.”

3 c. On or about January 14, 2023, an Amare brand partner posted,  
4 “when you give someone the STATS on your juice that’s been  
5 your lifeline for 7 months[.] [H]ealing my gut, shrinking belly fat  
6 and providing clean energy all day long.” In the picture, she  
7 writes, “55% DECREASE IN ANXIETY SCORES,” “50%  
8 DECREASE IN DEPRESSION SCORES,” “211% INCREASE IN  
9 POSITIVE MOOD” and “105% DECREASE IN NEGATIVE  
10 MOOD.”



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**Figure 5**

- 1 d. On or about February 26, 2023, an Amare brand partner posted,  
2 while holding a glass of Happy Juice, “Key Ingredients in  
3 MentaBiotics have been clinically shown to” lead to a “55%  
4 Decrease in anxiety scores,” a “50% Decrease in depression  
5 scores,” and a “49% Reduction in overall distress.”
- 6 e. On or about May 16, 2024, an Amare brand partner claimed  
7 Amare’s products have “CLINICALLY PROVEN RESULTS like  
8 . . . 55% less depression . . . [and] 55% lower anxiety scores,” with  
9 the hashtags “#reducecortisol” and “#hysterectomy.”
- 10 f. On or about August 21, 2024, an Amare brand partner called  
11 Happy Juice a “cortisol detox drink,” that is patented, clinically  
12 proven, and “created by a doctor.” On her Linktree page, this  
13 brand partner claimed Happy Juice is “**a drink mix that is**  
14 **CLINICALLY PROVEN TO: 55% Decrease in anxiety**  
15 **scores . . . Lowers depression by 55% . . . increases positive mood**  
16 **by 211%, Decreases negative mood by 105%.”** (Emphasis in  
17 original.)

18 58. Other brand partners amplify these deceptive claims by citing their  
19 own purported experiences and experiences they attribute to their customers who  
20 allegedly found relief from depression after using Amare products. Below are  
21 typical examples of such claims posted on social media.

- 22 a. On or about January 7, 2025, an Amare brand partner claimed in a  
23 video she no longer needed medications for suicidal ideations  
24 because of Happy Juice.
- 25 b. On or about October 24, 2024, an Amare brand partner posted a  
26 picture of three children with the following text on top of it: “The  
27 2nd leading cause of death for children is suicide. That is not ok.  
28 Here[’]s [sic] 5 tips to help your kids achieve mental wellness and

1 bring happiness back! There [sic] life could depend on it!” In the  
2 caption, one of five tips she offers is to “Focus on GUT & BRAIN  
3 health” and then states the “Mental Wellness Company just  
4 launched . . . the world[’]s FIRST pre & probiotic drink with  
5 specific strains [of] bacteria to replenish the gut bacteria that is  
6 being stripped from a child’s gut due to poor diet.” After saying  
7 “[t]he results parents are seeing is awesome,” she offers “coupons  
8 [for] \$10-30 off our KIDS HAPPY JUICE!” She concludes with  
9 the keywords, “kids mental wellness cortisol ADD ADHD focus.”

- 10 c. On or about August 20, 2024, an Amare brand partner claimed on  
11 her social media page that drinking Happy Juice allowed her to  
12 stop taking medications: “See ya 250 Zoloft & adhd meds! Hello  
13 sex drive back, & life without debilitating anxiety!” She  
14 elaborated, “I’m no longer bound by whether or not I’ve taken my  
15 prescription that day or if I’m waiting on a refill[,]” and stated  
16 “I’m not dealing with prescriptions that wrecked the gut I’ve  
17 worked so hard to heal.” She also referenced that “with the help of  
18 the nootropics,” her anxiety and ADHD are now “manageable”  
19 despite having “struggled with anxiety [her] whole adult life.” She  
20 claims to have “noticed a huge shift” “around day 27 on this  
21 protocol.”  
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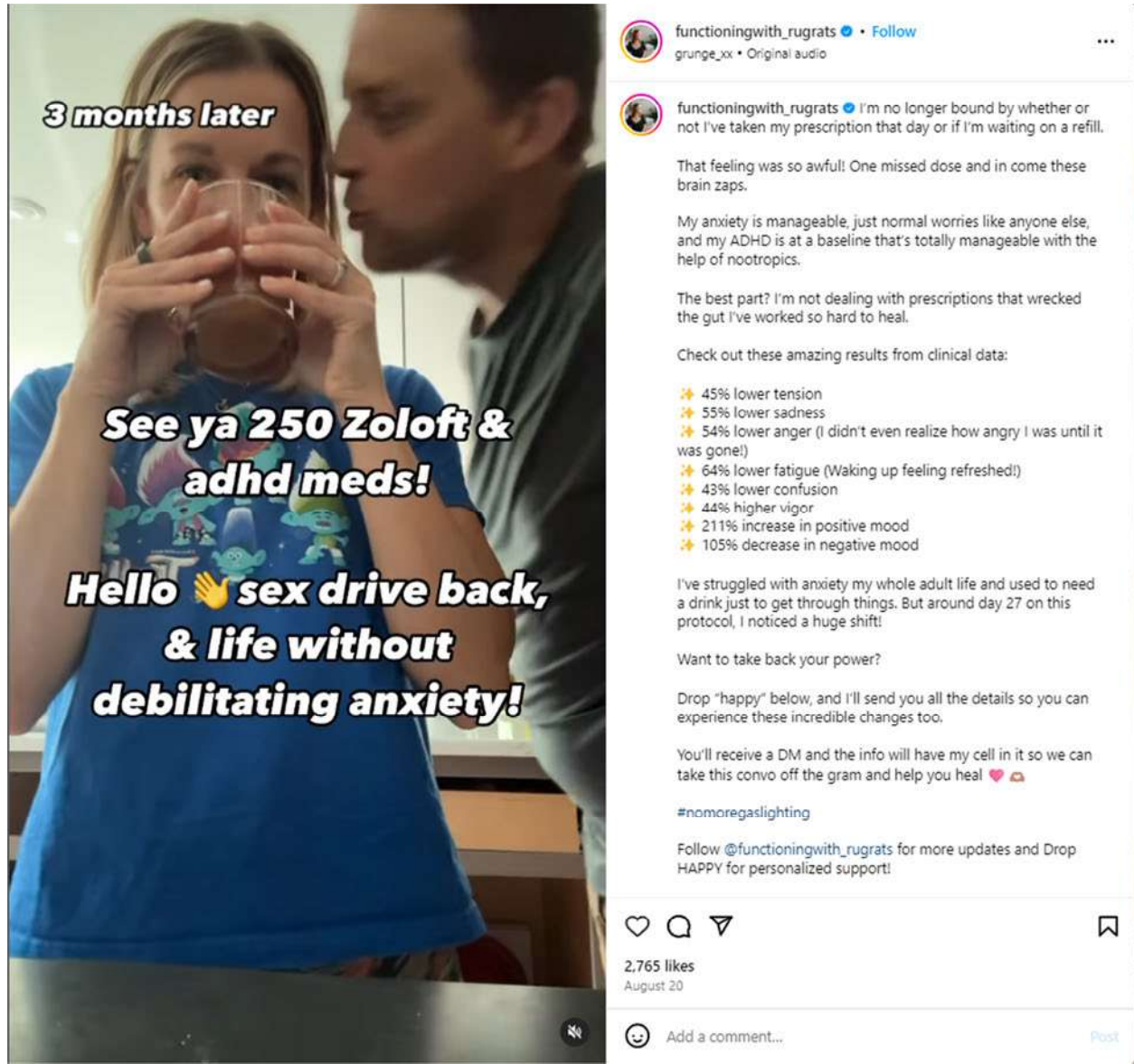


Figure 6

d. On or about July 10, 2025, an Amare brand partner posted a series of pictures where she claims, “The pharmaceuticals weren’t working & I was extremely anxious, sad, depressed, severe brain fog, & inflamed. The Dr said my hormones were ‘fine.’” Then, over a “before” picture depicting herself in a bikini, she writes: “When I stopped recognizing myself I knew it was the wake up call. . . .” She continues, over an “after” picture also depicting her in a bikini having lost weight, “I starting taking natural

1 supplements to support GLP-1 and lower cortisol (stress hormone)  
2 naturally and everything changed. . . .” On the next slides, she  
3 continues, “I went from this. . . always painfully bloated and  
4 inflamed,” and then, over an “after” weight loss picture, “To losing  
5 17lbs, never painfully bloated, face inflammation gone, cystic acne  
6 gone, & so much happier.” She continues, over another “after”  
7 weight loss picture, “I’m in the best physical & mental shape I’ve  
8 ever been.” She elaborates, over a picture of herself kissing a  
9 child, “I’m less over stimulated & a much better mama to my  
10 kids.” She writes in the caption: “The best investment I ever made  
11 was to get healthy again for my kids. . . . By incorporating natural  
12 supplements that have transformed my health & confidence.”

13 e. On or about July 4, 2024, the same day she linked Happy Juice to  
14 increasing serotonin, dopamine, and GABA (*see* Paragraph 54.e),  
15 an Amare brand partner claimed “most doctors won’t tell you  
16 about these natural options because Big ph@rm@ is a sell out and  
17 doesn’t want us finding healing solutions to poor gut health,  
18 antidepressants and more—so here’s a holistic option that  
19 everyone is obsessed with + finding massive success with (and for  
20 the record—is clinically validated MANY times YEARS!)” She  
21 states, “Comment HAPPY and I’ll send you the discounts all  
22 stacked up!”

23 f. On or about January 5, 2024, an Amare brand partner, regarding  
24 Happy Juice, declared, alongside a picture of her crying,  
25 “Depression is not my story, healing is.” She elaborated in the  
26 caption that she “found a place offering a wholistic [sic] option to  
27 help support the gut-brain connection, and scientifically proven to  
28 decrease feelings of sadness, anxiousness & more. I KNEW I

1           NEEDED THIS. I started taking [Amare’s] main product because  
2           the title alone had me intrigued. All I wanted was my happy  
3           back.” She continued, “Comment HEAL and I’ll send you the  
4           discount link to try the mental wellness + gut nourishing drink I  
5           use.” On or about August 27, 2024, this brand partner had a story  
6           called “Happy Juice,” showing videos from January 2024 wherein  
7           she (a) made and drank Happy Juice and (b) made similar claims  
8           (for example, “decreases feelings of sadness + anxiousness by over  
9           50%”).

10          g. On or about December 7, 2023, an Amare brand partner reposted a  
11          text message from a purported consumer where this consumer  
12          claimed she was, because of Happy Juice, “off my Zoloft and  
13          feeling so much better!”

14          h. On or about October 12, 2024, an Amare brand partner posted a  
15          video on social media about Kids Happy Juice with the following  
16          text overlaid: “1 in 6 U.S. children aged 6-17 has a mental health  
17          disorder.[.] Suicide is the 2nd leading cause of death among  
18          children aged 10-14 in the U.S. 51% of children who experience  
19          mental health challenges do not receive the care they need[.]”  
20          Then, over an image of the Kids Happy Juice Box, she writes,  
21          “THIS IS HOW WE FIGHT BACK AGAINST THE  
22          STAGGERING STATISTICS[.]” In the caption, she writes,  
23          “After test driving the new [K]ids Happy [J]uice for the last two  
24          months[,] I am so excited it is now available to everyone!” She  
25          includes the hashtags “#mentalhealth,” “#kidsmentalhealth,” and  
26          “#amareglobal” in the description of her post.

27          i. [REDACTED]  
28          [REDACTED]

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[REDACTED]

59. [REDACTED]

[REDACTED]

[REDACTED] One brand partner [REDACTED] during a call to an FTC undercover investigator posing as a prospective brand partner, explaining sellers are “obviously” “not allowed to say those medical terms online because it’s illegal per, like, the government,” “but, you know, you just have to find different words around it.” Talbott describes such tactics as “engaging in word play” in a YouTube video he published about making dietary supplement claims.

60. Amare’s product information sheets, which were made available to Amare brand partners on the Amare website, reflect this advice. For example, the May 2024 product information sheet for Happy Juice states the product “[s]upports mood and motivation.” Likewise, Amare’s May 2024 product information sheet for Kids Mood+ states the product “[s]upports better mood and stress resilience.”

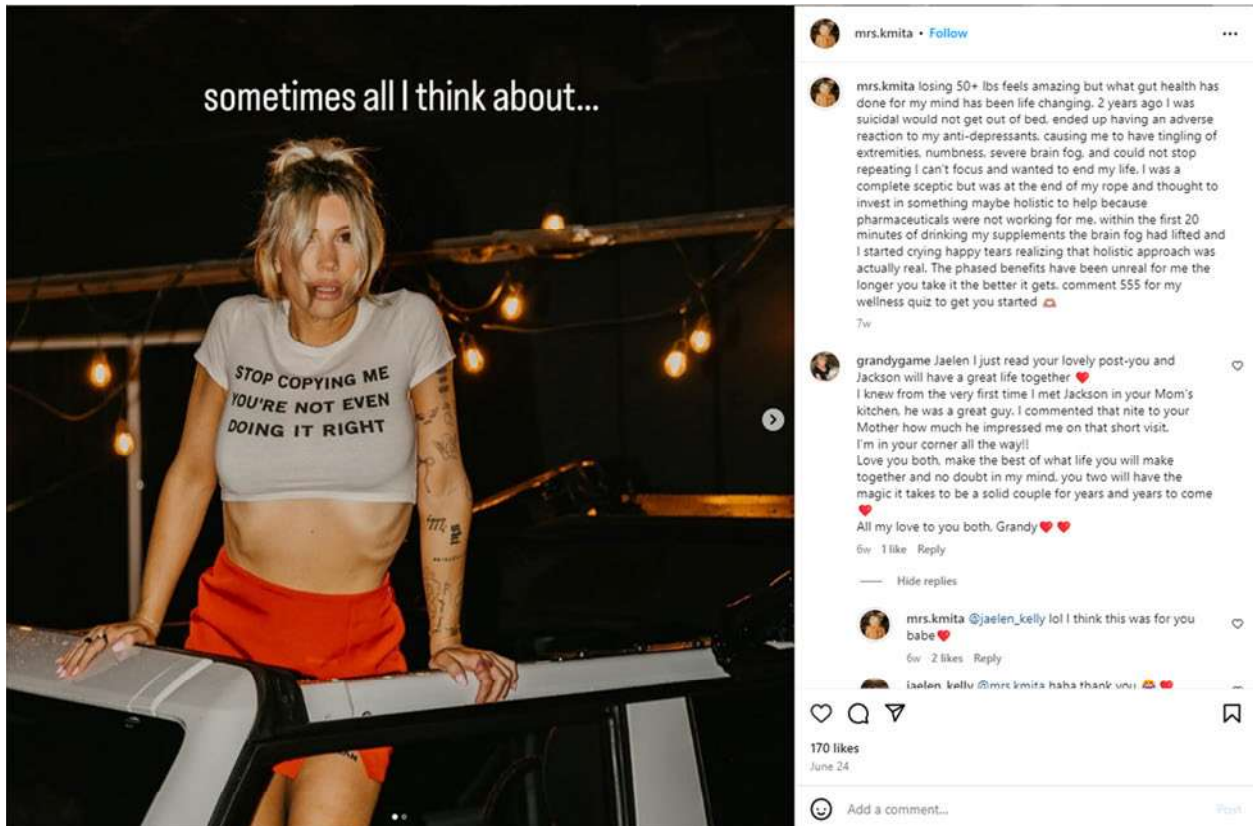
1           61. The net impression of such code words is that Amare’s products treat  
2 depression.

3           62. Similarly, in addition to making explicit both “depression” and  
4 “mood” claims referenced above, brand partners sometimes describe Amare  
5 products relieving symptoms of depression rather than using the terms  
6 “depression” or “depressed.” Below are examples of typical claims posted on  
7 social media.

8           a. On or about November 21, 2025, an Amare brand partner claimed  
9 before trying Happy Juice, she was “waking up at 3 AM every  
10 single. day[,]” “[h]aving terrible panic attacks,” and “[s]itting on  
11 the floor of the shower, bawling my eyes out, hoping that the hot  
12 water would wash the feelings away.” After “drinking [] happy  
13 juice[,]” she claims “I truly mean it when I say that this stuff is  
14 changing my life. I’m eating again. I am freaking sleeping again  
15 (amen)[.] I’m smiling again[.] Laughing again. . . I’m feeling joy  
16 again.” She added, “Happy Juice is proven to lower cortisol  
17 levels[,] [b]oost motivation[,] [b]oost energy, [m]ental clarity . . .  
18 it’s just everything.” She then invites people to try the product,  
19 writing: “If you’re looking for any mental relief like this—try it.  
20 Try happy juice and just SEE how it completely transforms your  
21 life like it has mine.” She concludes, “Drop HEAL & I’ll send the  
22 link[.]”

23           b. On or about June 24, 2024, an Amare brand partner claimed  
24 “losing 50+ pounds feels amazing but what gut health has done for  
25 my mind has been life changing. 2 years ago I was suicidal would  
26 not get out of bed, ended up having an adverse reaction to my anti-  
27 depressants, causing me to have tingling of extremities, numbness,  
28 severe brain fog and could not stop repeating I can’t focus and

1 wanted to end my life. I was a complete sceptic [sic] but was at  
 2 the end of my rope and thought to invest in something maybe  
 3 holistic to help because pharmaceuticals were not working for me,  
 4 within the first 20 minutes of drinking my supplements the brain  
 5 fog lifted and I started crying happy tears realizing that holistic  
 6 approach was actually real. The phased benefits have been unreal  
 7 for me the longer you take it the better it gets. comment 555 for my  
 8 wellness quiz to get you started.”



23 **Figure 7**

24 c. On or about February 16, 2024, an Amare brand partner stated,  
 25 “My body was stuck in flight or fight. Panic attacks, brain fog,  
 26 insomnia, sensitivity to noise and light, headaches, easily irritated  
 27 and snappy, light headed, and literally being glued to my couch  
 28 because I was SO tired. I started to chronically cough and hated

1 wakening up. My symptoms were just controlling my life.” She  
2 continued, “I started researching herbs, plants, spices, and specific  
3 probiotics that helped support stress resilience, lowered my cortisol  
4 levels, calmed me down, elevated my mood, and eliminated my  
5 anxiety.”

6 d. On or about November 11, 2024, an Amare brand partner claimed,  
7 “Wild how last year I was in the lowest point of my life mentally  
8 and I came across happy juice. Not only did it improve my mental  
9 health, it allowed me to lose inflammation I was clinging onto by  
10 promoting healthy cortisol and blood sugar levels.” In the caption,  
11 she wrote, “I was beyond miserable and I’m so thankful I found  
12 happy juice.”

13 63. Defendants’ representations as described in Paragraphs 56-62 are  
14 false, misleading, or not substantiated.

15 *Amare’s Deceptive Anxiety Claims (Happy Juice, Kids Mood+, Kids Happy Juice)*

16 64. Defendants, both directly and through Amare brand partners, have  
17 routinely disseminated deceptive claims online and through other means that  
18 Happy Juice, Kids Mood+, and Kids Happy Juice treat, prevent, or cure anxiety.  
19 For example, in May 2024, Amare provided its brand partners with product  
20 information (“performance”) sheets claiming MentaBiotics (a component of Happy  
21 Juice) is “PROVEN TO” cause a “55% Decrease in anxiousness scores.”

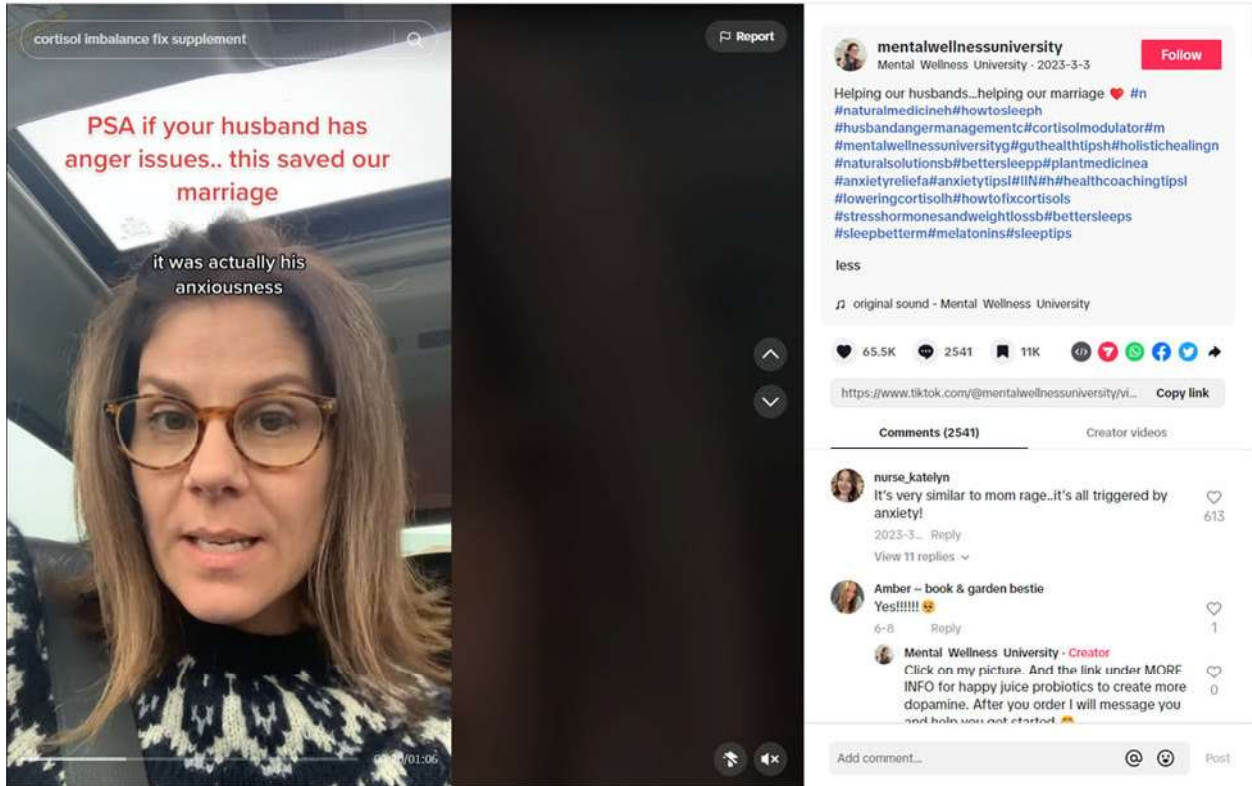
22 65. Amare brand partners likewise represent Happy Juice or MentaBiotics  
23 will cause a 55% reduction in anxiety or anxiousness or allow consumers to cease  
24 use of medication taken to treat anxiety. Exemplar claims are referenced above  
25 and below in Paragraphs 54.c, 57.a, 57.c, 57.d, 57.e, 57.f, 58.c, 58.d, 58.g, and 66.i.

26 66. Defendants, both directly and through Amare brand partners, have  
27 routinely disseminated deceptive claims online and through other means in  
28 promoting Happy Juice and one of its components, MentaBiotics, as well as Kids

1 Mood+ and Kids Happy Juice, that these products treat, prevent, or cure anxiety,  
2 often specifically claiming it can treat anxiety in children. Below are typical  
3 examples of these claims posted on social media. The date the claim was posted  
4 on social media is noted below; the claims may have been viewable for months or  
5 years after they were first posted. All of the examples below post-date Talbott and  
6 Hintze’s FTC Orders.

- 7 a. On or about June 29, 2024, an Amare brand partner said her  
8 children went from “anxious, ungrateful, demanding, MOODY,  
9 wetting the bed, ANGER OUTBURSTS & not sleeping . . . to this  
10 within a WEEK.” She posted a video of them dancing happily. In  
11 the description, the brand partner writes that the product  
12 “drastically improved our kids[’] mood, anxiousness, they’re not as  
13 emotional & we have way less outbursts & crying.” She uses the  
14 hashtags “#kidsadhd,” “#kidsanxiety,” and  
15 “#sensoryprocessingdisorder.” When the FTC reviewed this post  
16 on or about September 4, 2024, her social media page included  
17 links to purchase Kids Mood+.
- 18 b. On or about March 3, 2023, an Amare brand partner linked her  
19 husband’s anger issues to anxiety, saying, “PSA for all you wives  
20 out there that have husbands that have anger issues, they have  
21 anxiety. Men that have anger issues have anxiety.” She claimed  
22 this was “their reaction to having too much cortisol pumping  
23 through their body,” explaining “cortisol is your stress hormone,  
24 and what it also does is that it disrupts sleep and it creates belly  
25 fat.” After asking consumers if their husband is angry, has  
26 disrupted sleep, or has additional belly fat, “if the answer[] to that  
27 is yes, it’s a cortisol issue.” She told consumers if they “comment  
28 yes below,” she would tell them “how to hook him up, because

hooking him up is hooking you up, am I right?” In the post’s comments, below a “yess” [sic] comment, the brand partner told a consumer to look for “happy juice probiotics to create more dopamine.” The post also included the hashtags “anxietyrelief,” “#anxietytips[,],” “#loweringcortisol[,]” and “#howtofixcortisol[,],” and “#stresshormonesandweightloss.”



**Figure 8**

- c. On or about January 10, 2023, an Amare brand partner claimed, while displaying a pack of Kids Mood+, “Kids & adults with ADHD and/or anxiety . . . This little saffron pixie stick helps us get out of fight or flight & improves focus[,] Calms our bodies & helps improve sleep. It’s blowing up tiktok & it was actually out of stock for a hot minute.”
- d. On or about July 6, 2023, an Amare brand partner stated, “[t]here are 3 products in Happy Juice: Mentabiotics, Energy+, and Edge that lower cortisol, raise dopamine, raise serotonin, and improve

1 GABA signaling. You mix all three of these together to make  
2 Happy Juice. Why do you care? Because in a hyper stressed out  
3 world, Happy Juice has been show to . . . [r]educe anxiousness.”

- 4 e. On or about October 10, 2024, an Amare brand partner claimed,  
5 after describing testimonials of children who are no longer anxious  
6 or melting down, that Kids Happy Juice “contains specific strains  
7 of bacteria that help address anxiousness, stress, and tension.”
- 8 f. On or about November 5, 2024, an Amare brand partner, while  
9 referencing Kids Happy Juice, stated “POV: the drink that got you  
10 off adhd meds + anxiety meds + helped you feel happier bc it helps  
11 your serotonin and dopamine . . . COMES OUT FOR KIDS!”
- 12 g. On or about October 24, 2024, an Amare brand partner posted,  
13 “Signs your kiddo is struggling with anxious ADHD.” She  
14 provided a list of symptoms, and stated, “The natural supplements  
15 [I] use for my own kids are recommended to balance the nervous  
16 system, help calm the mind and body, help them focus, regu[la]te  
17 cortisol, and sleep. No side effects and everything is natural.” She  
18 included the hashtags “#cortisol,” “#kidswithanxiety,” “#adhd,”  
19 and “#adhdawareness.”
- 20 h. On or about April 1, 2025, an Amare brand partner posted a video  
21 of herself making Happy Juice, and writes, “She doesn’t know it  
22 yet. . . But this drink is about to save her life & improve her mental  
23 health & get rid of all sad thoughts & anxious feelings. It’s also  
24 going to help her lost [sic] 17lbs in 6 months caused by high  
25 cortisol.”
- 26 i. On or about December 30, 2025, an Amare brand partner claimed,  
27 “I’m a mom of 4 that was stuck in the viscous [sic] cycle of my  
28 anxiety, adhd and depression [pill emoji] constantly being



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Figure 9



Figure 10



**Figure 11**

72. On numerous occasions, Amare brand partners have reposted clips of this Talbott television appearance on social media or reiterated his claim, asserting the Kids Mood+ product itself was tested and shown to work equivalent to Ritalin. *See, e.g.,* Paragraph 57.a.

73. Defendants, both directly and through Amare brand partners, have routinely disseminated deceptive claims online and through other means in promoting Happy Juice and one of its components, MentaBiotics, as well as Kids Mood+, that these products treat, prevent, or cure ADHD, including ADHD in children. Below are typical examples of these claims. The date the claim was posted on social media is noted below; the claims may have been viewable for months or years after they were first posted. All of the examples below post-date Talbott and Hintze’s FTC Orders.

- a. On or about November 17, 2022, an Amare brand partner posted a testimonial on her Instagram story: “My name is Danielle and I have always been a disorganized, distracted, and unmotivated mess with adult ADD. No more!!! Happy Juice works!”

- 1           b. On or about July 26, 2024, an Amare brand partner posted about  
2 Kids Mood+, writing, “Thinking about how moms are still  
3 struggling with kids who are anxious and overstimulated but I  
4 found pixie sticks that reduce their nerves, have less meltdowns +  
5 help them focus during school.” In the caption, she writes, “If  
6 you’re tired of watching your kids struggle with school, or big  
7 emotions, constant calls from teachers, can’t focus, melt downs  
8 and anxiousness . . . These pixie sticks are a supplement filled with  
9 incredible brain + mood supporting herbs + spices, proven to help  
10 kids feel calm and focused.” She included the hashtags  
11 “#neurodivergent,” “#anxiouskids,” “#adhdkids,” and  
12 “#adhdfamily.”
- 13           c. On or about October 13, 2023, an Amare brand partner pitched the  
14 “[a]ll natural holistic gut supplements that help kiddos be the best  
15 they can be. They help with mental health, anxiousness, focus,  
16 behavior, moodiness, attention and more.”
- 17           d. On or about December 11, 2024, an Amare brand partner posted  
18 about her “oldest ask[ing] for the holy basil pixie stick so, ‘my  
19 body doesn’t start to feel out of control—like I can’t listen.” In the  
20 description, she writes, “Holy Basil + saffron helps your kids feel  
21 in control of their emotions to articulate what they’re feeling  
22 without the breakdowns, keeps anxious feelings abay [sic], and  
23 those adhd SQUIRREL behavior[s] steady.” She then uses the  
24 hashtags “#kidsadhd” and “#sensoryprocessingdisorder.”
- 25           e. On or about October 28, 2025, an Amare brand partner posted,  
26 “My daughter & I started taking saffron, holy basil & rosemary  
27 daily & not only did it improve our focus, attention & big emotions  
28 ... Our relationship got better.” In the caption, she stated, “It’s

1 hard to get along when you both struggle with adhd & irritability  
2 [crying emoji] I wanted help for us but without the harmful side  
3 effects of medication. This delicious plant based pixie stick with  
4 natural ingredients such as rosemary, holy basil & saffron  
5 completely shifted our mood, focus, attention & irritability.” On  
6 or about November 24, 2025, a link from this brand partner’s  
7 Instagram page had links to two Amare products: Happy Juice and  
8 Kids Mood+.

9 74. Other exemplar claims are referenced in Paragraphs 58.c, 62.a, and  
10 66.i (Happy Juice); 57.a, 66.a, and 66.c (Kids Mood+); and 66.f (Kids Happy  
11 Juice).

12 75. [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]

17 76. [REDACTED]  
18 [REDACTED]  
19 [REDACTED]

20 For example, on or about July 20, 2024, one Amare  
21 brand partner posted, “Getting interviewed by the Mental Wellness Company.”  
22 Appearing in a lab, she continues, “I went from being filled with anxiousness,  
23 trouble sleeping, extra weight gain, feeling lightheaded, overstimulated, brain fog,  
24 and fatigue to healing my wrecked nervous system. My mess became my message  
25 and now I teach others what supplements I recommend to help support the nervous  
26 system. If you can resonate this account is for you.”

27 77. The net impression of such code words is that Amare’s products treat  
28 ADHD.

1 78. Moreover, Amare is aware Talbott and Amare’s brand partners make  
2 express claims that its products treat ADHD. [REDACTED]

3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]

11 79. [REDACTED], the company does not prevent its  
12 employees or brand partners from making such claims. For example, Talbott  
13 remained the company’s Chief Science Officer for five subsequent years after the  
14 ABC News video, [REDACTED]

15 [REDACTED]  
16 [REDACTED] Likewise, many of the brand partners described above  
17 remain with the company, or remained with Amare for years, despite the company  
18 being repeatedly warned about their claims. Astoundingly, Amare has held out  
19 many of the brand partners described above as examples during company  
20 conventions.

21 80. Defendants’ representations as described in Paragraphs 70-79 are  
22 false, misleading, or not substantiated.

23 Amare’s Claims About the Kids Mood+ Study and about Studies Backing Happy  
24 Juice

25 81. Defendants, both directly and through Amare brand partners, routinely  
26 represent that their products’ health benefits, including those of Kids Mood+ and  
27 Happy Juice, are clinically proven by studies. In fact, the “study” Amare and  
28

1 Talbott conducted on Kids Mood+ is facially deficient, and no studies on Happy  
2 Juice exist.

3 The Kids Mood+ Study

4 82. In 2020, Talbott authored a study of Kids Mood+ (hereinafter “Kids  
5 Mood+ Study”) with members of Amare’s “Mental Wellness Advisory Board,”  
6 Andrea Armstrong, Michella Masa, and Markham McHenry, and former Amare  
7 brand partner, Jessica Royston.

8 83. This study was an open-label design, meaning both the researchers  
9 and participants are aware of the treatment being given, involving ten children who  
10 received the Kids Mood+ supplement for one month. There was no placebo  
11 administered.

12 84. The parents of the subject children administered the National Institute  
13 for Children’s Health Quality (“NICHQ”) Vanderbilt Assessment Scales, which  
14 measures symptoms in five areas (inattention, hyperactivity, defiance, conduct, and  
15 anxiety/depression) and performance, including school and social relationship  
16 performance. The authors claim that following the month of supplementation, the  
17 children experienced “dramatic improvements” in all measures.

18 85. [REDACTED]  
19 [REDACTED]

20 86. [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]

27 87. The Kids Mood+ Study is unreliable due to, *inter alia*, the conflicts of  
28 interest [REDACTED]

1 [REDACTED]  
2 [REDACTED]; a sample size far too small for statistical  
3 validity; and the lack of blinding and placebo.

4 88. In spite of the study’s unreliability, Defendants, both directly and  
5 through Amare brand partners, routinely use this study to promote Kids Mood+ in  
6 the manners described above.

7 89. For example, in a video posted on Amare’s website, Talbott shared  
8 the results of this “clinical trial,” stating that 10/10 families saw improvements in  
9 their children’s “focus, and mood, and, importantly, improvements in overall  
10 performance when the kids were under the most stress.”

11 90. In another example, Talbott claimed, “In a recent clinical study, Kids  
12 Mood+ was shown to dramatically enhance a wide range of attributes and  
13 performance metrics associated with mental performance in kids.”

14 91. Additionally, Talbott claims that the symptom and performance  
15 improvements occurred “when the kids were under the most stress,” but the study  
16 abstract says nothing about the conditions under which the parents completed the  
17 health assessment.

18 92. [REDACTED]

19 The Lack of Studies on Happy Juice

20 93. Defendants, both directly and through Amare brand partners, have  
21 disseminated deceptive claims online and through other means in promoting  
22 Happy Juice, representing there are clinical studies of the product. Exemplar  
23 claims are referenced above in Paragraphs 54.b, 54.c, 57.d, and 57.f.

24 94. [REDACTED]

25 95. [REDACTED]  
26 [REDACTED]  
27  
28

1 **Amare’s Claims About its Income Opportunity**

2 *Background*

3 96. Amare also markets the ability to become a brand partner, thereby  
4 becoming eligible to sell Amare’s products and receive rewards or compensation  
5 for doing so.

6 97. A prospective brand partner typically joins Amare’s MLM structure  
7 by using a link from an existing brand partner and thereby joining the existing  
8 brand partner’s business “organization,” referred to as a “downline.” The Amare  
9 Global Policy Manual requires new brand partners to pay an annual fee to Amare,  
10 which is typically \$69, unless the brand partner joins during a promotional period  
11 when that fee is waived, generally with a minimum product purchase.

12 98. The December 2025 Global Policy Manual requires brand partners to  
13 be an “active” brand partner to be eligible for commissions and bonuses.  
14 According to the March 2026 Amare compensation plan, which was available on  
15 the Amare website through at least April 7, 2026, to be considered an “active”  
16 brand partner, a consumer must (1) complete a first order or have a personal  
17 customer order and (2) maintain a current brand partner membership.

18 99. Furthermore, the March 2026 Amare compensation plan specifies  
19 that, to be eligible for commissions or bonuses, a brand partner must attain at least  
20 100 in so-called personal volume (“PV”) during a qualifying month, which is  
21 comprised of sales made from orders placed by that brand partner personally and  
22 by their personally enrolled customers.

23 100. Generally, to obtain 100 PV, the brand partner and their personally  
24 enrolled customers must cumulatively spend more than \$100. 100 PV does not  
25 have a uniform dollar value, and it often has different dollar values depending on  
26 the product purchased and how it was purchased (for example, whether the  
27 purchase was recurring or not).

28

1           101. Between January 2021 and December 2024, on average, [REDACTED] of  
2 brand partners were commission-eligible in any given month (meaning [REDACTED]  
3 were not commission-eligible).

4           102. Once enrolled, a Brand Partner can then solicit additional Brand  
5 Partners or customers to join their own downline networks and organization. As  
6 part of Amare’s Compensation Plan, a portion of all downline sale proceeds flows  
7 back “upline” to the sponsoring Brand Partner as a limited commission.  
8 To encourage new brand partners to join, Amare and its brand partners make  
9 various claims about the ability to make money with Amare. In an Amare video  
10 posted on YouTube in October 2025, Hintze described the “business model” as  
11 “simple, supportive, and built for today’s world.” As detailed above, Hintze is the  
12 company’s founding brand partner; as he and the company sell more products and  
13 recruit more brand partners through his downline, his compensation increases.

14           103. In its March 2026 compensation plan, which details how people can  
15 make money as an Amare brand partner, Amare highlighted “7 Ways to Earn.”  
16 The first way is “Fast Start Bonuses,” which consist of the “First Order Bonus, Me  
17 & Three Bonus, and Focus on 5 Bonus.” When describing the Fast Start Bonuses,  
18 Amare states, “Brand Partners can earn up to \$500+ by introducing Amare  
19 products and retaining new Customers and Brand Partners. *That’s close to 100%*  
20 *payout in commissions on your first 5 monthly enrollments!*” (emphasis in  
21 original) (captured April 7, 2026).

22           104. Amare has also described six other ways to earn, all in the same size  
23 font as “Fast Start Bonuses.” The second is the “social selling bonus,” which  
24 enables consumers to “Earn and rank advance without building a team!” The third  
25 is a “minimum monthly reward,” which are between \$1,000 and \$2,500 per month  
26 depending on rank. The fourth are “rank advancement bonuses,” which are cash  
27 prizes depending on rank. The fifth are “vacations of a lifetime.” The sixth is  
28 “create a legacy,” which states, “As you grow with Amare, get paid 10 levels

1 deep” and describes how such payments work. The seventh way are “bonus  
2 pools,” which depends on your rank at the company.

3 105. This compensation plan also contains small-print text. For example, a  
4 portion of this text reads, “Generating meaningful income and rewards takes  
5 dedication and work. The typical Brand Partner earns \$300.48/yearly. See the  
6 Income Disclosure Statement found at amare.com/ids. The representation of  
7 income does not include expenses.”

8 106. The income disclosure statement available on Amare’s website from  
9 at least May 21, 2024, through April 7, 2026, contained statistics for members  
10 active from May 2021 through April 2022.

11 107. When making the claims described in Paragraphs 110 and 122 below,  
12 Amare’s brand partners typically did not provide any disclaimer that their earnings  
13 claims were atypical.

14 *\$500 Per Month Claims*

15 108. As described above, Amare’s compensation plan sets forth methods  
16 by which brand partners purportedly can earn \$500 per month.

17 109. [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]

23 110. Defendants, both directly and through Amare brand partners, have  
24 routinely disseminated deceptive claims that consumers will or are likely to earn  
25 \$500 per month at Amare. Below are typical examples of these claims. The date  
26 the claim was posted on social media is noted below; the claims may have been  
27 viewable for months or years after they were first posted:  
28

1 a. On or about June 21, 2023, an Amare brand partner posted: “A  
2 company hits HYPER GROWTH ONCE. It’s [sic] doesn’t take a  
3 genius to know that if you are at THE BEGINNING of a company  
4 in an INDUSTRY SO NEEDED RIGHT NOW (hello mental  
5 wellness and coming out of a pandemic, where mental health is  
6 about every other person). There is a social need. There is an elite  
7 product that is SOOO good, the company offered a money back  
8 guarantee, AND WE ARE ABOUT TO GO GLOBAL. **If You**  
9 **start today and put in the work-there’s no way you’re not**  
10 **making at least \$500 month.**” (emphasis added)



Figure 12

- 1 b. On or about April 12, 2024, an Amare brand partner posted,  
2 “Being here at Amare, I get to share my passion for it while  
3 helping others change their life mentally, and financially. I’ve  
4 been in this industry for 10 years, I’ve led a team of thousands  
5 twice now and I’m 100% confident I can help you make an extra  
6 \$500-\$2000 if you’re coachable and willing to learn.”
- 7 c. On or about July 27, 2024, an Amare brand partner posted, “[O]ur  
8 mental wellness company is on hypergrowth if you like wellness—  
9 THIS is it, patent viral supplements, in major hypergrowth it’s my  
10 super power to help women. I have girls making \$500 [to] 90+k a  
11 month literally social media + this job is the most amazing, the  
12 comp plan is like no other.”
- 13 d. On or about August 21, 2024, after asking, “How will \$500 help  
14 you right now,” an Amare brand partner posted, “I will show you  
15 how to make your first \$500 with a plan to grow and scale from  
16 here.”
- 17 e. On or about November 8, 2024, an Amare brand partner posted  
18 that she has a “VERY, VERY, VERY simple system, that when  
19 you follow this every single month, you will make \$500. this is  
20 \*every\* month.”
- 21 f. On or about July 12, 2025, an Amare brand partner posted on  
22 Instagram, “If you’re sick of not having enough money to do the  
23 things you want to do. . . DO NETWORK MARKETING.” She  
24 continued in the caption, “I needed to find a way to replace my  
25 corporate income and reclaim time with my family. Network  
26 marketing has changed my life. Starting with the share with 5,  
27 make \$500 monthly bonus. Then the 1, 2, and 2.5k base pay \$\$\$  
28 obviously I chose not to stop there. Today, I enjoy unparalleled

1 time freedom and am living my best life. The best part? I get to  
2 help others achieve the same. Want this freedom in your life too?  
3 Comment ‘TELLME’ below if you’re ready to make a change. In  
4 the past 6-years I’ve helped HUNDREDS create passive and  
5 residual income.”

6 g. On or about October 26, 2025, an Amare brand partner posted,  
7 “What it looks like to partner with Amare . . . Get paid 5x’s a  
8 month or opt in for DAILY PAY! Earn a min. \$500 a month with  
9 just 5 sales.” In the video accompanying the post, she stated “I  
10 share Happy Juice, which completely transformed my mental and  
11 physical health, if you know, my mental health was absolute shit  
12 and this completely changed my life. And by me sharing this with  
13 thousands of other women, I get paid multiple times from this  
14 because [] I’m not just selling one product, one time, boom bam,  
15 my sale is done. I am selling it, and it is a consumable product that  
16 people drink over and over and over again. Therefore, that’s  
17 residual income that you get paid on monthly. . . . So by doing that,  
18 I get paid over and over and over again. So, that’s just smart  
19 business right there. . . .” After pitching becoming a brand partner  
20 with her, she again claimed, “Your first five customers every  
21 single month is a \$500 bonus. . . . You can kick ass with this and  
22 make [] life changing money or you can aim to just get five  
23 customers a month and make \$500. Like, whatever your income  
24 goal is, you can absolutely, absolutely achieve.”

25 111. These representations that Brand Partners will or are likely to earn  
26 \$500 per month in revenue are false, misleading, or not substantiated. Between  
27 January 2021 and December 2024, just [REDACTED] of brand partners made \$500 in a  
28 month in revenue.

1 112. In those four years, the month with the highest number of brand  
2 partners making at least \$500 was April 2023, when [REDACTED] ([REDACTED] brand  
3 partners) made that amount.

4 113. [REDACTED]  
5 [REDACTED]

6 [REDACTED] Amare regularly recruited new brand partners with large social media  
7 followings by offering them contracts with guaranteed monthly minimums. A new  
8 brand partner without a large following who was not offered a guaranteed  
9 minimum contract would be less likely than specially recruited sellers to earn at  
10 least \$500 per month.

11 *Meaningful Income Claims*

12 114. As described above, Amare’s compensation plan sets forth methods  
13 by which brand partners can earn meaningful income, including (or in addition to)  
14 “vacations of a lifetime,” “financial freedom” and the ability to “create a legacy.”

15 115. Furthermore, the company and its brand partners make lifestyle and  
16 general earnings claims (about obtaining life-changing income).

17 116. From at least May 2022 through July 2024, on its webpage “Join as an  
18 Amare Partner,” Amare asked potential enrollees, “Why Amare?” and stated the  
19 “Generous Compensation Plan” was one of four reasons to enroll.

20 117. Furthermore, from at least May 2022 through February 2024, Amare  
21 claimed, without qualification, that under its compensation plan, brand partners  
22 “[g]enerate dozens of passive income streams and opportunity through the  
23 compensation plan. Earn from product sales, revenue sharing pools, monthly  
24 contests, and much more.”

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**Why Amare?**




**Personal Virtual Assistant**

Amare provides you with access to Penny, a virtual personal assistant that will organize tasks, spark conversations, and help build and strengthen authentic relationships.




**Generous Compensation Plan**

Generate dozens of passive income streams and opportunity through the compensation plan. Earn from product sales, revenue sharing pools, monthly contests, and much more.



**Onboarding System**

If you're completely brand new to social selling or a seasoned veteran, Amare will provide concierge level onboarding to ensure proper set up, training, and ongoing support the moment you become an Amare Partner.



**Monthly Specials & Promotions**

Gain access to promotions, generous discount codes, free product credits, and loyalty reward programs. These special offers are designed to help grow your business and sales every month.

So... what are you waiting for?

**Enroll Today!**

Become a Partner

**Figure 13**

118. From March 2024 through July 2024, this webpage contained two hyperlinks to the “Income Disclosure Statement” and an earlier version of the “Amare Compensation Plan” referenced above in Paragraphs 99-106. There is also a qualifier at the bottom of the page reading, “Generating meaningful income and rewards takes dedication and work. The typical Brand Partner earns \$300.48 yearly. See the income disclosure statement found at amare.com/ids. The representation of income does not include expenses.”

119. Amare buttressed the claims referenced in Paragraphs 116-117 by emphasizing the support it provides Amare brand partners in growing their business and generating income. First, Amare noted the support it provides immediately to the left of the claims described above, including, alternatively, a “Personal Virtual Assistant” or “Business Builder App,” both of which purportedly “help build and strengthen authentic relationships.” Second, below and to the left, the company describes an “Onboarding System,” for which Amare notes, “If you’re completely brand new to social selling or a seasoned veteran, Amare will provide concierge level onboarding to ensure proper set up, training, and ongoing support the moment you become an Amare Partner.” Third, immediately below the claim, Amare describes “Monthly Specials & Promotions” where brand partners “[g]ain access to promotions, generous discount codes, free product

1 credits, and loyalty reward programs. These special offers are designed to help  
2 grow your business and sales every month.”

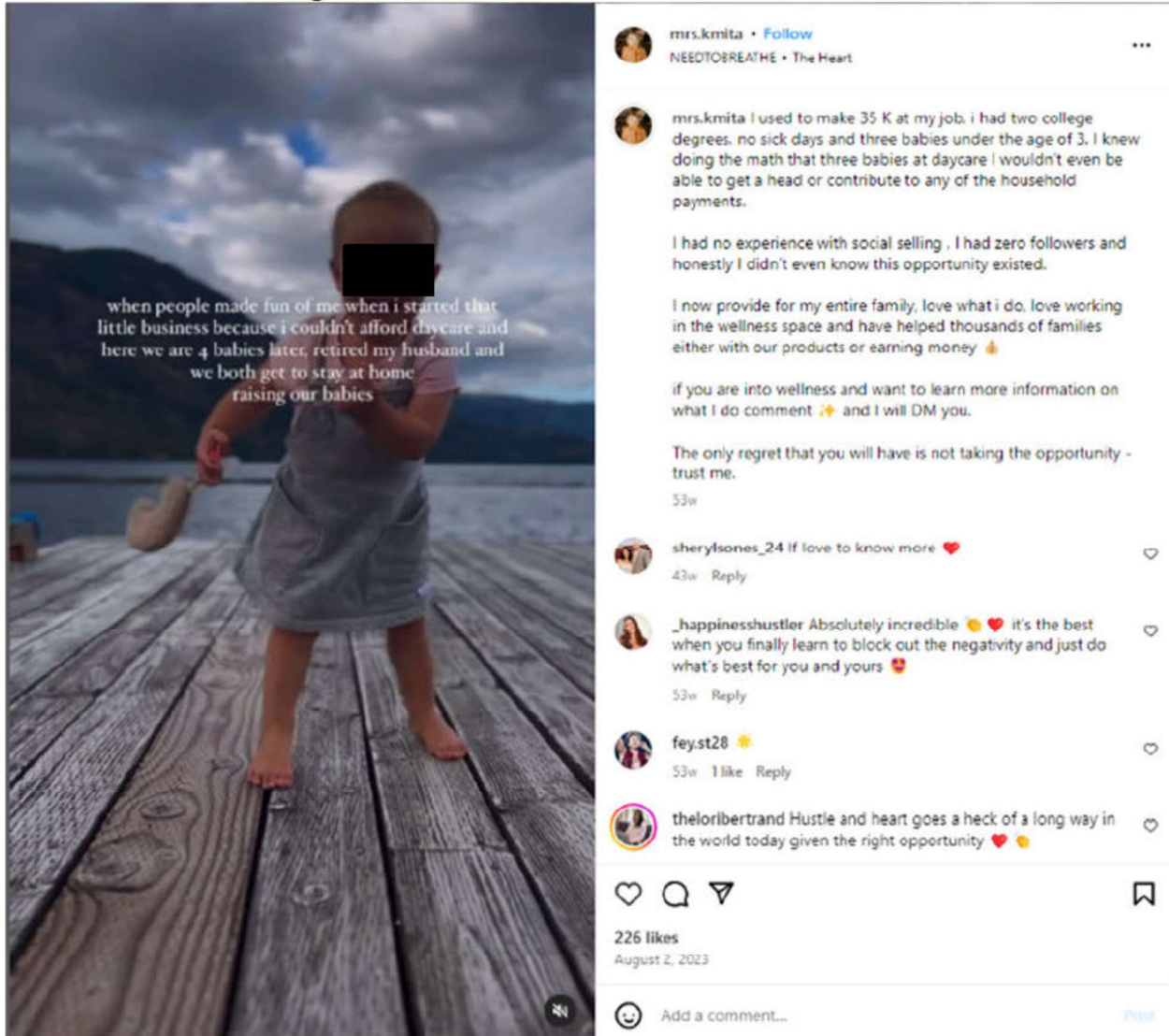
3 120. On this webpage, there were four buttons to join as an Amare brand  
4 partner, including immediately below the claims described in Paragraphs 116-119.

5 121. [REDACTED]  
6 [REDACTED]  
7 [REDACTED]

8 122. Defendants, both directly and through Amare brand partners, have  
9 routinely disseminated claims that brand partners will or are likely to earn  
10 significant amounts of money. Below are typical examples of these claims. The  
11 date the claim was posted on social media is noted below; the claims may have  
12 been viewable for months or years after they were first posted:

- 13 a. On or about June 6, 2023, an Amare brand partner posted on  
14 Instagram, “POV: when you get to help mamas with no  
15 experience earn 6 figures from their phones in the affiliate  
16 marketing space.” She continued, “I get to help mamas make  
17 money from home, around being present with their babes.”
- 18 b. On or about June 13, 2023, an Amare brand partner posted on  
19 Facebook, “I’d love to show you the way to earn a little extra  
20 grocery money or an executive income.”
- 21 c. On or about July 19, 2023, an Amare brand partner posted on  
22 Instagram, “POV you both are a year into your wellness business  
23 and make more than a general doctor does” while clinking glasses  
24 at a pool. She stated, “[W]hen you know you are destined for  
25 greatness, you know you want to help others earn an income online  
26 and create generational wealth, you do whatever it takes.”
- 27 d. On or about August 2, 2023, an Amare brand partner posted on  
28 Instagram, “when people made fun of me when [I] started that little

1 business because [I] couldn't afford daycare and here we are 4  
2 babies later, retired my husband and we both get to stay at home  
3 raising our babies.”



22 **Figure 14**

23 e. On or about January 15, 2026, an Amare brand partner posted on  
24 Instagram, “I want to thank the woman who ‘scammed’ me into  
25 network marketing 15 years ago. Because of her [ ] my husband’s  
26 home[,] I work in a hoodie[, and] I built a 7-figure business.” In  
27 the caption, she elaborates, “I built a 7-figure business using  
28 systems without chasing or convincing anyone to join me[.] And

1 now I help other women do the same. Drop ‘PLAYBOOK’ below.  
2 I’ll show you the exact systems I used to build a team of 190k.  
3 [R]eceipts included.” Five days later, her profile contained a reel  
4 titled “Why Amare” and also links to a webpage claiming,  
5 “UNLOCK YOUR 4 FIGURE A MONTH INCOME with the  
6 Mental Wellness Company” and asks, “Are you ready to build a 4-  
7 **figure monthly income** from your phone in just **90 days?**”  
8 (emphasis in original).

- 9 f. On or about February 6, 2024, an Amare brand partner posted, “I  
10 made 1/3 of a million dollars in just 12 months sharing my  
11 supplement routine online (and I’m not the only one). That’s it,  
12 that’s the reel. If you’d rather spend your time clawing your way  
13 to the top instead of being part of a thriving community that is  
14 filling a big need in society and getting paid well, be my guest.  
15 But if you want a free affiliate link to start this stream of income  
16 for your family, drop a 2 in comments.” The caption continues, “If  
17 you want to open up this MASSIVE stream for your family, it just  
18 takes your YES, and your willingness to get uncomfortable. You  
19 can do it too. . . . We linked arms and stepped on a rocket ship that  
20 changed our lives, and your seat is waiting.”
- 21 g. On or about April 13, 2024, an Amare brand partner posted a story  
22 on Instagram wherein she stated she is a “high school drop out  
23 making a physician’s salary.”
- 24 h. On or about May 23, 2024, an Amare brand partner posted on  
25 Instagram, “[T]he biggest flex isn’t my income, car, vacations, or  
26 designer bags. [I]t’s getting to be a full time family & my husband  
27 never missing a moment. [I]t’s my children’s savings and  
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investments accounts for their future. [I]t’s the freedom to choose how we spend our days.”

- i. On or about June 22, 2024, an Amare brand partner posted on Instagram, “[W]hen I started my business [I] was just[,] ‘hey, that’s sick if [I] could make \$500 a month helping people with their mental wellness and getting 5 friends the product per month.’ [L]ittle did [I] know it would turn into a 7 figure and beyond business per year and the lives we would help to change every single day.”
- j. On or about August 12, 2024, an Amare brand partner posted on Instagram, “Two years ago we were on food stamps. With 4 under 5, financial stress directly impacted my mental health. Then, a friend from the internet presented me with an opportunity to transform both. Today, we make 6 figures, [I’m] off meds after 18 years and [I’m] changing the lives of those seeking support like I was.”

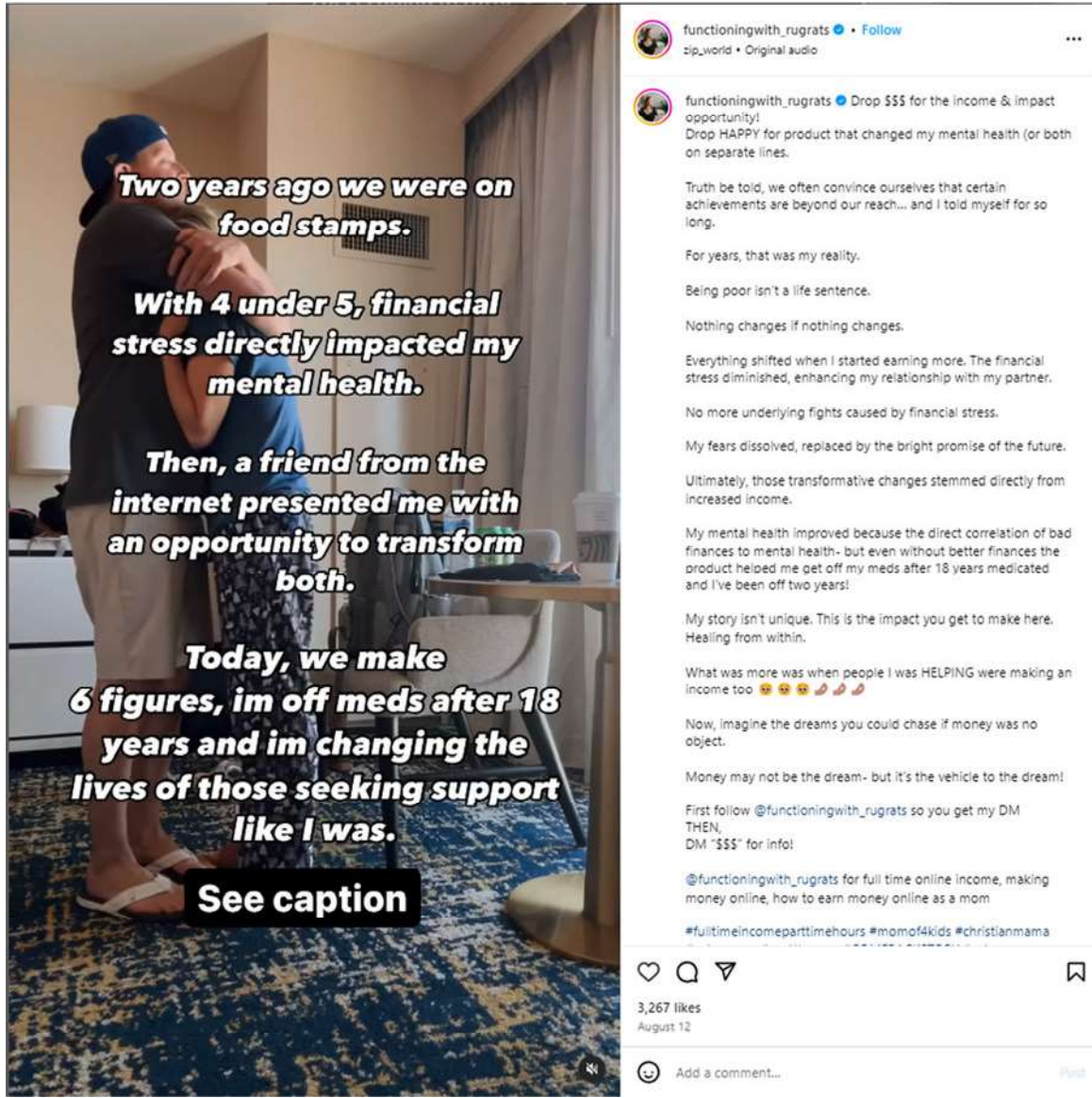


Figure 15

- k. On or about December 16, 2024, an Amare brand partner posted a picture of herself at Disney World on Instagram, writing, “pay off debt, stay home with your babies, go on vacation, etc. whatever it is, I’ll show you how to do it[.]”
- l. On or about March 12, 2025, an Amare brand partner posted on Instagram, “DOES SHE THINK SHE[’]S AN INFLUENCER? No. [S]he[’]s just a 42 year old mom who found a way to post 5 second videos and support her entire family from her phone by sharing a probiotic drink that boosts mood and focus and lowers

1 stress.” In the caption, she writes, “Be cringe with me and build a  
2 brand that allows you to earn an income from your phone. I’ve got  
3 the roadmap for you and you get immediate access when you  
4 partner with me in the mental wellness company. . . . Comment  
5 ‘happy’ for the roadmap.” She concludes, “#happyjuice.”

- 6 m. On or about May 22, 2025, an Amare brand partner claimed she  
7 “[b]ought the home. Paid for our cars in cash. Own my time with  
8 my babies all because of this page.” She uses the caption  
9 “financial freedom for moms” in the post’s description.
- 10 n. On or about July 14, 2025, an Amare brand partner posted on  
11 Instagram, “THE MIDDLE CLASS IS DROWING. . . [sic].” In  
12 the caption, she claimed, “Groceries used to be a line item. Now  
13 they’re a budget breaker. We don’t need more Starbucks hacks.  
14 We need more income. I’m not selling a fantasy. I’m sharing a  
15 real solution that helped us go from scraping by to breathing easier.  
16 If you’re this far, you know you need this. \$2.5k/month isn’t  
17 chump change. It’s groceries, sports, field trips, and the vacation  
18 you haven’t said yes to in years. We’re helping families win again.  
19 Want in? Follow me and drop ZOOM in the comments.”
- 20 o. On or about December 2, 2025, an Amare brand partner claimed,  
21 “I stared at our end-of-month report and had to read it twice. []  
22 41.6% growth. In one month. . . . When you help people heal  
23 from the inside out . . . everything grows. Health grows. Hope  
24 grows. Income grows.”
- 25 p. On or about December 15, 2023, an Amare brand partner posted  
26 on Instagram, “Officially headed out on a boat again. So excited to  
27 have earned a 7 day cruise through Greece, Croatia, Montenegro,  
28 and Italy. And here’s the best part: you have the same opportunity

1 to come along with me. DM me and let’s talk how. Who is  
2 coming with me?”

3 q. On or about October 13, 2024, an Amare brand partner posted on  
4 Instagram, “Take us back to when we were sailing through Europe  
5 ... all because we said yes to this drink.” In the comments, she  
6 states, “Comment below how happy juice has helped you.”

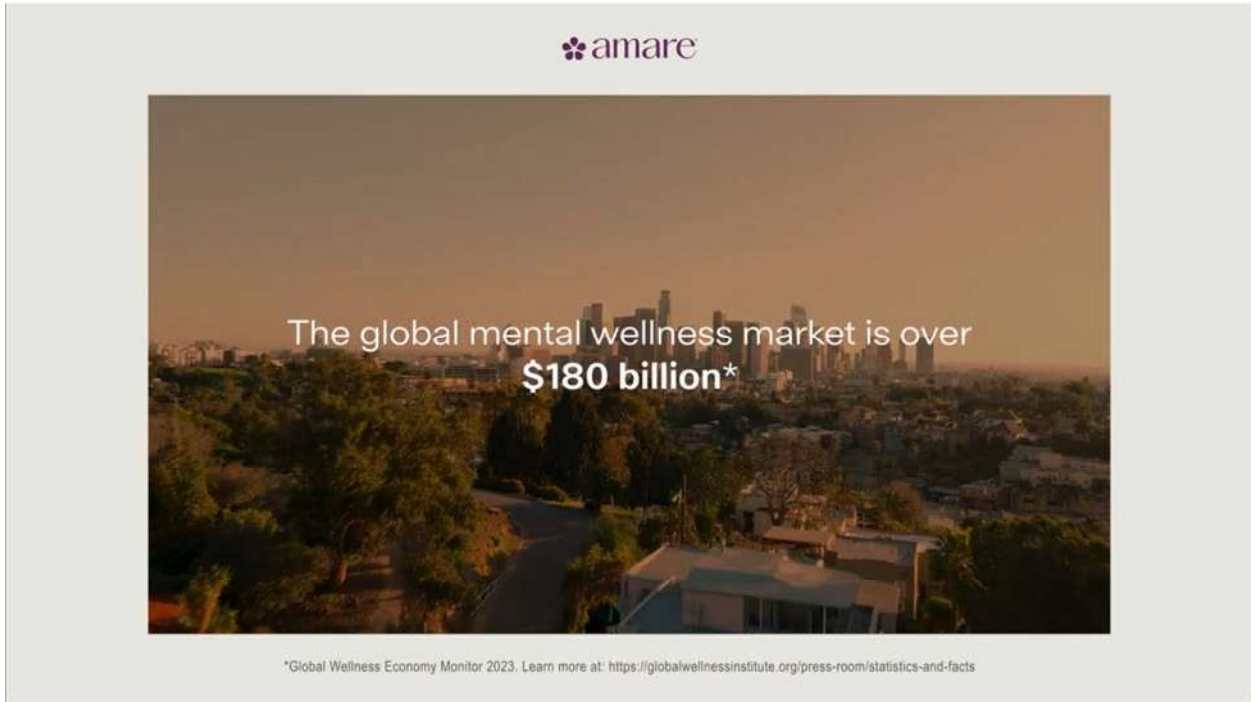
7 r. On or about November 15, 2024, brand partner posted on  
8 Facebook, “Panama [check mark] Mexico [check mark] & I just  
9 earned a trip for 2 to CABO for next October!” Therein, she  
10 reposted a November 15, 2022, post where she wrote, “Panama  
11 Day 1[.] First time out of the country[.] Free trip for 2[,] All  
12 inclusive[.] Thank you Amare Global.”

13 s. On or about July 25, 2025, an Amare brand partner claimed to be  
14 on a “4 days expenses paid” trip to Disney World. She continued,  
15 “I’ve met some of my best friends, made a ridiculous amount of  
16 money, & been on so many free vacations.”

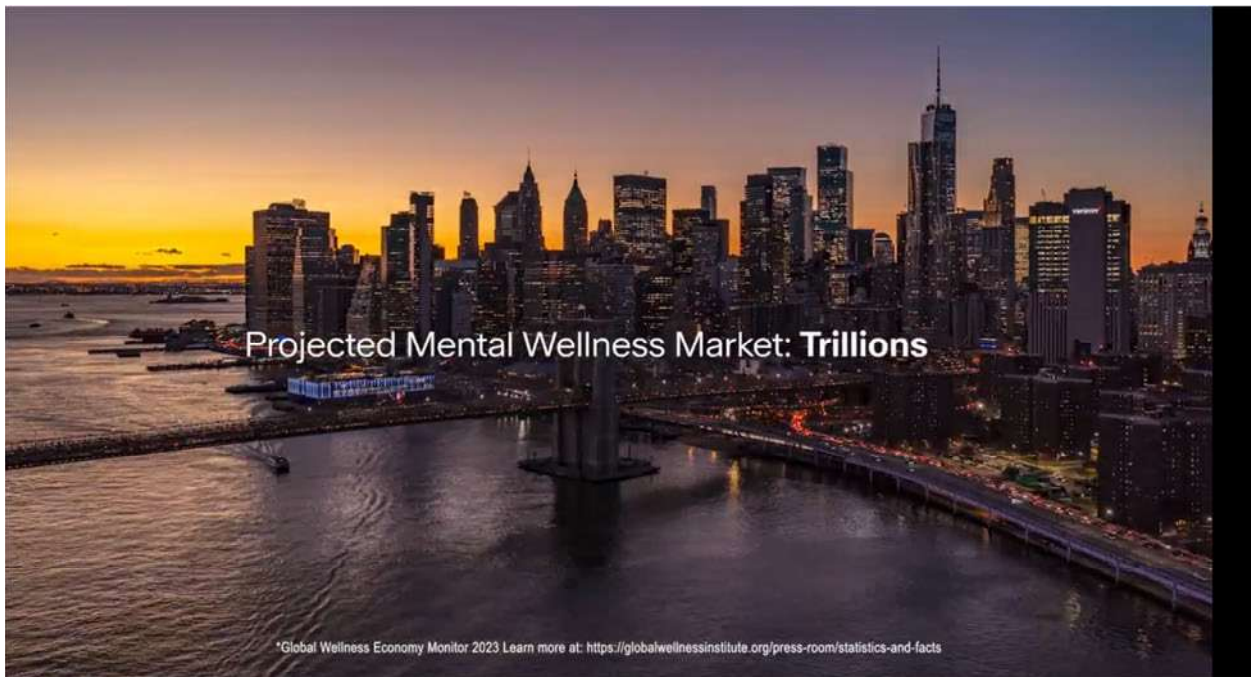
17 123. Amare and its brand partners also post about the size and growth of  
18 the mental wellness space, reinforcing claims about the likelihood that its brand  
19 partners will make money. For example, in July 2024, Amare claimed this  
20 subsector of the global wellness industry is over \$180 billion and is projected to  
21 grow into the trillions.

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**Figure 16**



**Figure 17**

124. At the 2025 annual company convention in July 2025, Amare also shared slides in a presentation about the growth of the “GLOBAL WELLNESS ECONOMY,” this time predicting it to grow to \$7.5 trillion by 2030, with “MENTAL WELLNESS” capturing hundreds of billions of that amount.

1 125. Talbott made similar claims in 2018, stating the mental health space is  
2 valued at over \$100 billion.

3 126. Defendant Chung has affirmed such statements, saying, “In 2025,  
4 Amare is on track for \$200 million in net sales. Our vision is to grow that to \$1  
5 billion within the next five years.”

6 127. As noted above, only a tiny percentage of brand partners make at least  
7 \$500 in revenues per month (\$6,000 per year).

8 128. Moreover, from January 2021 through April 2024, the average  
9 monthly earnings for an Amare Brand Partner were [REDACTED].

10 129. According to Amare’s income disclosure statement, which was  
11 available on Amare’s website at least through April 2026, 86% of people made just  
12 \$25 per month (\$300 per year), before any expenses.

13 130. As described above, expenses often include the purchase of a product  
14 in a month to remain eligible for commissions. For example, in May 2024, Amare  
15 listed Happy Juice at \$149.95 on a Subscribe & Save plan (which auto-renews) and  
16 Kids Mood+ at \$45.95 on a Subscribe and Save plan. In July 2025, Kids Happy  
17 Juice cost \$87.95 on Subscribe & Save.

18 131. Based on the facts and violations of law alleged in this Complaint, the  
19 FTC has reason to believe that Defendants are violating or are about to violate laws  
20 enforced by the Commission because, among other things:

- 21 a. Amare and its brand partners continue to disseminate the claims  
22 described above, even though the company is aware of an FTC  
23 investigation into the company’s health and income claims;
- 24 b. Defendants have engaged in their unlawful acts and practices  
25 willfully and knowingly, and with knowledge of Talbott’s order,  
26 which prohibits (1) making health claims without competent and  
27 reliable scientific evidence to back them, and (2) misrepresenting  
28 the results of studies;

- 1 c. Amare’s revenues exceed [REDACTED] from participating in these  
2 unlawful acts and practices, and Defendants Amare, Talbott,  
3 Chung, and Hintze continue to profit from the claims’ continued  
4 occurrence and their direct or indirect ownership of Amare  
5 (Chung, Talbott) and status as founding brand partner (Hintze);  
6 d. Defendants have continued their unlawful acts or practices for  
7 years despite knowledge of unsubstantiated claims being made;  
8 e. Defendants’ unlawful acts and practices were the subject of prior  
9 law enforcement actions against other companies of which  
10 Defendants Amare, Talbott, and Hintze were aware, yet  
11 Defendants have continued to engage in such practices; and  
12 f. Defendants remain in the multi-level marketing and direct selling  
13 business and maintain the means, ability, and incentive to resume  
14 their unlawful conduct.

15 **VIOLATIONS OF THE FTC ACT**

16 132. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits “unfair or  
17 deceptive acts or practices in or affecting commerce.”

18 133. Misrepresentations or deceptive omissions of material fact constitute  
19 deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

20 134. Section 12 of the FTC Act, 15 U.S.C. § 52, prohibits the  
21 dissemination of any false advertisement in or affecting commerce for the purpose  
22 of inducing, or which is likely to induce, the purchase of food, drugs, devices,  
23 services, or cosmetics. For the purposes of Section 12 of the FTC Act, 15 U.S.C.  
24 § 52, Happy Juice and its component parts, Kids Mood+, Kids Happy Juice, and  
25 the FundaMentals pack and its component parts, are a “food” or “drug” as defined  
26 in Section 15(b) and (c) of the FTC Act, 15 U.S.C. § 55(b), (c).

1 **Count I- Deceptive Health Claims**

2 135. In numerous instances, in connection with the advertising, marketing,  
3 promotion, offering for sale, or sale of Happy Juice, MentaBiotics, the  
4 FundaMentals Pack, Kids Mood+, and Kids Happy Juice, Defendants represent or  
5 have represented, directly or indirectly, expressly or by implication, that:

- 6 a. Amare's products will lower, reduce, or regulate cortisol;  
7 b. Amare's products will raise, increase, or normalize serotonin;  
8 c. Amare's products will raise, increase, or normalize dopamine;  
9 d. Amare's products will raise, increase, or normalize GABA;  
10 e. Amare's products will cure, treat, or mitigate depression, including  
11 by reducing the risk of suicide in children;  
12 f. Amare's products will cure, treat, or mitigate anxiety; and  
13 g. Amare's products will cure, treat or mitigate ADHD.

14 136. Defendants' representations as described in Paragraph 135 are false or  
15 misleading or were not substantiated at the time the representations were made.

16 137. Therefore, Defendants' representations as described in Paragraph 135  
17 constitute a deceptive act or practice and the making of false advertisements in  
18 violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a), 52.

19 **Count II- Deceptive Income Claims**

20 138. In numerous instances in connection with the advertising, marketing,  
21 promotion, offering for sale, or sale of the right to participate, or further  
22 participate, as a brand partner, Defendants represent or have represented, directly  
23 or indirectly, expressly or by implication, that:

- 24 a. Amare brand partners will or are likely to earn specific stated  
25 dollar amounts of income, earnings, or profit, such as \$500 per  
26 month; and  
27 b. Amare brand partners will or are likely to earn extra, part-time,  
28 supplemental, significant, or substantial income.

1 139. In fact, in numerous instances in which Defendants have made the  
2 representations described in Paragraph 138, Amare brand partners are:

- 3 a. Not likely to earn specific stated dollar amounts of income,  
4 earnings, or profit, including that Amare brand partners are not  
5 likely to earn \$500 per month, and  
6 b. Not likely to earn extra, part-time, supplemental, significant, or  
7 substantial income.

8 140. Therefore, Defendants' representations as described in Paragraph 138  
9 constitute a deceptive act or practice in violation of Section 5(a) of the FTC Act,  
10 15 U.S.C. § 45(a).

11 **Count III- Means and Instrumentalities**

12 141. By furnishing Amare brand partners with instructional and marketing  
13 materials regarding Amare's dietary supplements and its brand partners' earnings  
14 potentials, including as described in Paragraphs 10, 34, 50-53, 56, 59-60, 64, 67,  
15 70-72, 75, 81-91, 93, 96-109, 114-121, and 123-126, Defendants have provided the  
16 means and instrumentalities for the commission of deceptive acts and practices.

17 142. Therefore, Defendants' practices, as set forth in Paragraph 141,  
18 constitute a deceptive act or practice in violation of Section 5(a) of the FTC Act,  
19 15 U.S.C. § 45(a).

20 **CONSUMER INJURY**

21 143. Consumers are suffering, have suffered, and will continue to suffer  
22 substantial injury as a result of Defendants' violations of the FTC Act. Absent  
23 injunctive relief by this Court, Defendants are likely to continue to injure  
24 consumers and harm the public interest.

25 **PRAYER FOR RELIEF**

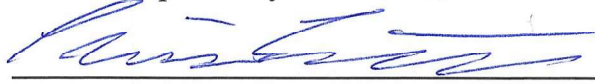
26 Wherefore, the FTC requests that the Court:

27 A. Enter a permanent injunction to prevent future violations of the FTC  
28 Act; and

1 B. Award additional relief as the Court determines to be just and proper.

2  
3 Respectfully submitted,

4 Dated: June 2, 2026



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