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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

**Federal Trade Commission,**

Plaintiff,

vs.

**Forever Living Products International,**

**LLC, et al.,**

Defendants.

No. 2:26-cv-02526-CDB

STIPULATED ORDER FOR  
PERMANENT INJUNCTION  
AND OTHER RELIEF

Plaintiff, the Federal Trade Commission (“Commission” or “FTC”), filed its Complaint for Permanent Injunction and Other Relief (“Complaint”), for a permanent injunction and other relief in this matter, pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b). The Commission and Defendants stipulate to the entry of this Stipulated Order for Permanent Injunction and Other Relief (“Order”) to resolve all matters in dispute in this action between them.

THEREFORE, IT IS ORDERED as follows:

**FINDINGS**

1. This Court has jurisdiction over this matter.
2. The Complaint charges that Defendants participated in deceptive acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, in the promotion, marketing, and sale of opportunities to participate in Defendants’ multi-level marketing business by selling Defendants’ products and recruiting others to do the same.



1 D. **“Earnings”** means sales, income, profit, appreciation, or other financial  
2 gain, such as bonuses, commissions, or free travel.

3 E. **“Multi-Level Marketing Program” or “MLM”** means any plan or  
4 program in which a Participant has the right to (1) recruit others into the program or have  
5 others placed in the Participant’s downline and (2) receive payment or other  
6 compensation that is based, in whole or in part, upon purchases, sales, or any other  
7 activities of the Participant’s downline.

8 F. **“Participant”** means any person who participates in any Business Venture,  
9 including but not limited to, any person who is a Forever Business Owner (“FBO”).

10 **ORDER**

11 **I. Prohibited Misrepresentations**

12 IT IS ORDERED that Defendants, Defendants’ officers, agents, and employees,  
13 and all other persons in active concert or participation with any of them, who receive  
14 actual notice of this Order, whether acting directly or indirectly, in connection with the  
15 advertising, marketing, promoting, or offering of any Business Venture, are permanently  
16 restrained and enjoined from representing, including by providing others with the means  
17 and instrumentalities with which to represent, expressly or by implication, the below  
18 claims unless any such claim is non-misleading, and, at the time such claim is made,  
19 Defendants possess and rely upon competent and reliable evidence sufficient to  
20 substantiate that the claim is true:

21 A. That Participants will or are likely to make or receive Earnings, or will or  
22 are likely to make or receive any particular level or amount of Earnings;

23 B. The Earnings any Participant actually made or received, or could make or  
24 receive;

25 C. The reasons Participants do not make or receive Earnings or do not make or  
26 receive any particular level or amount of Earnings, including but not limited to  
27 representations that Participants fail to devote substantial or sufficient effort;

28 D. That Participants will or are likely to recruit others into their Downline; and

1 E. Any other fact material to consumers concerning the Business Venture,  
2 such as: the total expenses and costs, any material restrictions, limitations, or conditions;  
3 or any material aspect of its performance, efficacy, nature, or central characteristics.

4 **II. Prohibition on Failing to Maintain and Provide Substantiation for Earnings**  
5 **Claims**

6 IT IS FURTHER ORDERED that Defendants, Defendants’ officers, agents, and  
7 employees, and all other persons in active concert or participation with any of them, who  
8 receive actual notice of this Order, whether acting directly or indirectly, in connection  
9 with the advertising, marketing, promoting, or offering of any Business Venture, are  
10 permanently restrained and enjoined from representing, including by providing others  
11 with the means and instrumentalities with which to represent, expressly or by implication,  
12 any representation regarding Participant Earnings unless, at the time the representation is  
13 made:

14 A. Defendants have in their possession written materials that substantiate the  
15 representation at the time the representation is made; and

16 B. Defendants make the written substantiation available upon request to the  
17 FTC and any U.S. Participant or prospective U.S. Participant.

18 **III. Notice to Participants Concerning Order Prohibitions**

19 IT IS FURTHER ORDERED that Corporate Defendants must notify Participants  
20 of this Order’s prohibitions, as follows:

21 A. Within 30 days of entry of this Order, Corporate Defendants must email  
22 notice in the form shown in Attachment A to all U.S. Participants who, since January 1,  
23 2023, have made a purchase or sale, recruited a Participant or preferred customer, or  
24 otherwise engaged with the MLM business. The email notice must use the subject line  
25 “Important Notice Regarding Forever Living Settlement with Federal Trade  
26 Commission.” Corporate Defendants must send the notice from an email address that  
27 Forever Living regularly uses to communicate with U.S. Participants and must make  
28 commercially reasonable efforts to leverage technologies to ensure the deliverability of

1 emails (for example, but not limited to, SPF, DKIM, and use of sending IP addresses with  
2 known good reputations). No information other than that contained in Attachment A shall  
3 be included in or added to the notice required by this Section, nor shall any other  
4 materials be transmitted with the notice.

5 B. Within 15 days of entry of this Order, Corporate Defendants must post a  
6 prominent link to an exact copy of the form shown in Attachment A on the landing page  
7 of the portion of their website for U.S. Participants only (including  
8 <https://foreverliving.com/join/usa/en-us/fbo-enrollment>). Corporate Defendants shall  
9 keep the notice posted on the above-listed page continuously for a period of 180 days  
10 following the date of entry of this Order.

11 **IV. Monitoring Compliance with Order Prohibitions**

12 IT IS FURTHER ORDERED that Defendants, in connection with any Business  
13 Venture that is marketed, offered, offered for sale, or sold, directly or indirectly, to  
14 consumers in the United States, are hereby permanently restrained and enjoined from:

15 A. Failing to take reasonable steps to educate Participants on the requirements  
16 of Sections I and II of this Order;

17 B. Failing to take all reasonable steps necessary to monitor and ensure that  
18 Defendants' agents, representatives, employees, independent contractors, affiliates and  
19 Participants comply with all relevant requirements of this Order;

20 C. Failing to take corrective action to prevent continued noncompliance with  
21 this Order with respect to any person to whom this Order applies who is not complying  
22 with the Order; and

23 D. Failing to promptly and thoroughly investigate any complaint received by  
24 Defendants that relates to the subject matter of this Order and to notify the complainant  
25 of the resolution of the complaint and the reason therefor.

26 **V. Order Acknowledgments**

27 IT IS FURTHER ORDERED that Defendants obtain acknowledgments of receipt  
28 of this Order:

1           A.     Each Defendant, within 7 days of entry of this Order, must submit to the  
2 Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.

3           B.     For 10 years after entry of this Order, each Individual Defendant for any  
4 business that such Defendant, individually or collectively with any other Defendants, is  
5 the majority owner or controls directly or indirectly, and each Corporate Defendant, must  
6 deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers  
7 and members; (2) all employees having managerial responsibilities for conduct related to  
8 the subject matter of the Order and all agents and representatives who participate in  
9 conduct related to the subject matter of the Order; and (3) any business entity resulting  
10 from any change in structure as set forth in the Section titled Compliance Reporting.  
11 Delivery must occur within 7 days of entry of this Order for current personnel. For all  
12 others, delivery must occur before they assume their responsibilities.

13           C.     From each individual or entity to which a Defendant delivered a copy of  
14 this Order, that Defendant must obtain, within 30 days, a signed and dated  
15 acknowledgment of receipt of this Order.

16 **VI. Compliance Reporting**

17           IT IS FURTHER ORDERED that Defendants make timely submissions to the  
18 Commission:

19           A.     1 year after entry of this Order, each Defendant must submit a compliance  
20 report, sworn under penalty of perjury:

21                   1)     Each Defendant must: (a) identify the primary physical, postal, and  
22 email address and telephone number, as designated points of contact,  
23 which representatives of the Commission may use to communicate  
24 with Defendant; (b) identify all of that Defendant's businesses by all  
25 of their names, telephone numbers, and physical, postal, email, and  
26 Internet addresses; (c) describe the activities of each business,  
27 including the goods and services offered, the means of advertising,  
28 marketing, and sales, and the involvement of any other Defendant

1 (which Individual Defendants must describe if they know or should  
2 know due to their own involvement); (d) describe in detail whether  
3 and how that Defendant is in compliance with each Section of this  
4 Order; and (e) provide a copy of each Order Acknowledgment  
5 obtained pursuant to this Order, unless previously submitted to the  
6 Commission.

7 2) Additionally, each Individual Defendant must: (a) identify all  
8 telephone numbers and all physical, postal, email and Internet  
9 addresses, including all residences; (b) identify all business  
10 activities, including any business for which such Defendant performs  
11 services whether as an employee or otherwise and any entity in  
12 which such Defendant has any ownership interest; and (c) describe  
13 in detail such Defendant's involvement in each such business,  
14 including title, role, responsibilities, participation, authority, control,  
15 and any ownership.

16 B. For 10 years after entry of this Order, each Defendant must submit a  
17 compliance notice, sworn under penalty of perjury, within 14 days of any change in the  
18 following:

19 1) Each Defendant must report any change in: (a) any designated point  
20 of contact; or (b) the structure of any Corporate Defendant or any  
21 entity that Defendant has any ownership interest in or controls  
22 directly or indirectly that may affect compliance obligations arising  
23 under this Order, including: creation, merger, sale, or dissolution of  
24 the entity or any subsidiary, parent, or affiliate that engages in any  
25 acts or practices subject to this Order.

26 2) Additionally, each Individual Defendant must report any change in:  
27 (a) name, including aliases or fictitious name, or residence address;  
28 or (b) title or role in any business activity, including any business for

1 which such Defendant performs services whether as an employee or  
2 otherwise and any entity in which such Defendant has any  
3 ownership interest, and identify the name, physical address, and any  
4 Internet address of the business or entity.

5 C. Each Defendant must submit to the Commission notice of the filing of any  
6 bankruptcy petition, insolvency proceeding, or similar proceeding by or against such  
7 Defendant within 14 days of its filing.

8 D. Any submission to the Commission required by this Order to be sworn  
9 under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746,  
10 such as by concluding: “I declare under penalty of perjury under the laws of the United  
11 States of America that the foregoing is true and correct. Executed on: \_\_\_\_\_” and  
12 supplying the date, signatory’s full name, title (if applicable), and signature.

13 E. Unless otherwise directed by a Commission representative in writing, all  
14 submissions to the Commission pursuant to this Order must be emailed to  
15 DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate  
16 Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission,  
17 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin:  
18 FTC v. Forever Living Products International LLC, Matter No. X260013.

19 **VII. Recordkeeping**

20 IT IS FURTHER ORDERED that Defendants must create certain records for 10  
21 years after entry of the Order, and retain each such record for 5 years. Specifically,  
22 Corporate Defendants, in connection with any Business Venture, and each Individual  
23 Defendant for any business that such Defendant, individually or collectively with any  
24 other Defendants, is a majority owner or controls directly or indirectly, must create and  
25 retain the following records:

26 A. accounting records showing the revenues from all goods or services sold;  
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1 B. personnel records showing, for each person providing services, whether as  
2 an employee or otherwise, that person's: name; addresses; telephone numbers; job title or  
3 position; dates of service; and (if applicable) the reason for termination;

4 C. records of all consumer complaints and refund requests concerning the  
5 subject matter of this Order, whether received directly or indirectly, such as through a  
6 third party, and any response;

7 D. all records necessary to demonstrate full compliance with each provision of  
8 this Order, including all submissions to the Commission; and

9 E. a copy of each unique advertisement or other marketing material, except for  
10 advertisements or other marketing material related solely to physical goods.

11 **VIII. Compliance Monitoring**

12 IT IS FURTHER ORDERED that, for the purpose of monitoring Defendants'  
13 compliance with this Order:

14 A. Within 14 days of receipt of a written request from a representative of the  
15 Commission, each Defendant must: submit additional compliance reports or other  
16 requested information, which must be sworn under penalty of perjury; appear for  
17 depositions; and produce documents for inspection and copying. The Commission is also  
18 authorized to obtain discovery, without further leave of court, using any of the procedures  
19 prescribed by Federal Rules of Civil Procedure 29, 30 (including depositions by remote  
20 means), 31, 33, 34, 36, 45, and 69.

21 B. For matters concerning this Order, the Commission is authorized to  
22 communicate directly with each Defendant. Defendant must permit representatives of the  
23 Commission to interview any employee or other person affiliated with any Defendant  
24 who has agreed to such an interview. The person interviewed may have counsel present.

25 C. The Commission may use all other lawful means, including posing, through  
26 its representatives as consumers, suppliers, or other individuals or entities, to Defendants  
27 or any individual or entity affiliated with Defendants, without the necessity of  
28 identification or prior notice. Nothing in this Order limits the Commission's lawful use

1 of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49,  
2 57b-1.

3 **IX. Additional Provision**

4 IT IS FURTHER ORDERED that no provision of this Order shall apply to any  
5 foreign entity, to the extent that its conduct does not fall within the Commission’s  
6 jurisdiction, or impose on any Individual Defendant any obligation solely by virtue of  
7 their ownership or control of a foreign entity the conduct of which is not subject to the  
8 Commission’s jurisdiction.

9 **X. Retention Of Jurisdiction**

10 IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for  
11 purposes of construction, modification, and enforcement of this Order.

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1 **SO STIPULATED AND AGREED:**

2 **FOR PLAINTIFF:**

3 **FEDERAL TRADE COMMISSION**

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Date: 4/13/2026

8 Andrew Hudson  
9 ahudson@ftc.gov / (202) 326-2213  
10 Elsie Kappler  
11 ekappler@ftc.gov / (202) 326-2466  
12 Attorneys  
13 Federal Trade Commission  
14 600 Pennsylvania Ave NW  
15 Mailstop CC-5201  
16 Washington, DC 20580  
17 Fax: (202) 326-3395

16 **FOR DEFENDANTS:**

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19

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Date: 3/6/2026

20 John Villafranco  
21 jvillafranco@kelleydrye.com / (202) 342-8423  
22 Donnelly McDowell  
23 dmcdowell@kelleydrye.com / (202) 342-8645  
24 Ioana Gorecki  
25 igorecki@kelleydrye.com / (202) 342-8417  
26 Kelley Drye & Warren LLP  
27 670 Maine Avenue SW  
28 Washington, DC 20024  
Fax: (202) 342-8451

26 *COUNSEL for Forever Living Products International, LLC, ForeverLiving.com,*  
27 *LLC, Gregg Maughan, and Aidan O'Hare*

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**DEFENDANTS: Forever Living Products International, LLC, Forever Living.com, LLC, Gregg Maughan, and Aidan O'Hare**

Signed by:  Date: 3/6/2026  
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Gregg Maughan, individually  
and as an officer of Forever Living Products International, LLC and Forever Living.com, LLC

Signed by:  Date: 3/6/2026  
C5FE3C739480407...  
Aidan O'Hare, individually  
and as an officer of Forever Living Products International, LLC and Forever Living.com, LLC

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ATTACHMENT A

**Notice to Forever Living Participants**

We reached an agreement with the Federal Trade Commission (FTC), the nation’s consumer protection agency, to settle charges that we broke the law by making claims about how much money Forever Living participants could earn without the required proof, and by instructing Forever Living participants to do the same.

Forever Living did not admit or deny the FTC’s allegations, but we reached an agreement with the FTC to settle the lawsuit. We agreed not to make earnings claims without supporting evidence, which must be made available to actual and prospective U.S. Forever Living participants upon request. As a Forever Living participant, you must not make such claims either.

Learn more about the settlement on the FTC’s website.