



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

June 5, 2020
Via Electronic Mail

Plexus Worldwide, LLC
c/o Chris Reid, VP Compliance
& General Counsel
9145 E Pima Center Pkwy
Scottsdale, AZ 85258

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

Dear Mr. Reid:

Federal Trade Commission (“FTC”) staff has reviewed social media posts made by Plexus Worldwide, LLC (“Plexus Worldwide”) business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (“COVID-19”). This letter is to provide you with information about laws and regulations enforced by the FTC that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of COVID-19 prevention or treatment claims made by your business opportunity participants or representatives include:

- A post stating “#Plexus #coronavirüsü #prep #vitamins #health #covid_19 #covid19” and linking to another post stating “#Plexus #coronavirüsü #prep #vitamins #health #covid_19 #covid19” next to an image of Plexus Worldwide products and the text “Boost your immunity with our EVERYDAY WELLNESS COMBO....”
- “#VIRUS_CORONA Worried? I’ve been boosting my immune system for several years with high-quality Plexus supplements. You can too! #Plexus provides excellent all-natural supplements that truly work. Be sensible –not fearful. Scientifically formulated & doctor-approved! Ask me!”
- A post stating “We know that runaway inflammation is the culprit behind this virus. We’ve all seen what happens when the virus sneaks into the lungs. It gets worse – recently, researchers discovered it can damage your heart muscle... and even slip into your brain, causing loss of smell and taste. So, how do you stop runaway inflammation from damaging your lungs, heart and brain? And how do you protect against the virus in the first place? By giving your immune system an ‘energy upgrade’. Your immune system requires a TON of energy to fight the virus. Without enough energy, the virus wins and triggers runaway inflammation.

So, it's CRUCIAL to get your immune system the energy it needs. These can help!!" above an image of four Plexus Worldwide products.

- A post stating "Great information! Looks like the SAME probiotics strains and enzymes that are in my ProBio5 are being used to help treat COVID-19 symptoms. Almost all patients have shown an irregularity in their gut microbiota following treatment. Probiotics and pre-biotics are being used to avoid secondary reinfection.... #PlexusGetActive" next to an image stating "Some patients with COVID-19 showed intestinal microbialdysbiosis with decreasedprobtotics [sic] such as *Lactobacillus* and *Bifidobacterium*. Nutritional and gastrointestinal function should be assessed for all patients.Nutritional [sic] support and application of prebiotics or probiotics were suggested to regulate the balance of intestinal microbiota and reduce the risk of secondary infection due to bacterial translocation."

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

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

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

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

Sincerely,

Federal Trade Commission Staff