



December 18, 2017

VIA EMAIL

Jigna Patel, General Counsel
Smart Circle International
4490 Von Karman Avenue
Newport Beach, CA 92660

Re: Deceptive Marketing for Smart Circle Business Opportunity

Dear Ms. Patel:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. We recently investigated every member company of the Direct Selling Association as of November 29, 2017 and found that over 97% of companies (and/or their divisions) are making (or have made) false and unsubstantiated income claims; misrepresentations that cause real and substantial harm to consumers. See <https://www.truthinadvertising.org/mlm-income-claims-investigation/>. Claims range from reaching financial freedom to being able to quit your job, stay home with your children and make unlimited income, and can be found across the internet, including on social media.

We found that Smart Circle International is one of the companies at issue. A database containing a sampling of inappropriate income claims being made can be found here: <https://www.truthinadvertising.org/smart-circle-income-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated income claims being made, as well as ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator