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

Federal Trade Commission) **CASE NO. CV-20-00047-PHX-DWL**
Plaintiff,)
vs.)
James D. Noland, Jr., et al.,) **RESPONSE AND OBJECTION TO**
Defendants.) **FTC'S EX PARTE MOTION FOR**
) **TEMPORARY RESTRAINING ORDER**
) **WITH ASSET FREEZE,**
) **APPOINTMENT OF TEMPORARY**
) **RECEIVER, LIMITED EXPEDITED**
) **DISCOVERY, AND OTHER**
) **EQUITABLE RELIEF**

Defendants respond and object to the Federal Trade Commission's ("FTC's") *Ex Parte* Motion for Temporary Restraining Order with Asset Freeze, Appointment of Temporary Receiver, Limited Expedited Discovery, and other Equitable Relief and the Memorandum in support thereof.¹ [Dkts #7-8.]

¹ The FTC has not moved or otherwise applied to the Court for a preliminary injunction. The FTC requests preliminary injunctive relief in its Amended Complaint [Dkt. # 35 at p. 40] and has already sought and obtained a Temporary Restraining Order. [Dkt. #8, #38]. While the TRO requires Defendants to appear and show cause why a preliminary injunction should not issue [Dkt. #38, Section XXIX], the FTC has not specifically requested such relief, nor provided the

1 **I. INTRODUCTION**

2 The case law is abundantly clear—when analyzing a multi-level marketing
 3 company, courts must look at how the company actually operates in practice. *See F.T.C.*
 4 *v. Burn Lounge*, 753 F. 3d 878, 883 (9th Cir. 2014); *Webster v. Omnitrition Int'l, Inc.*, 79
 5 F.3d 776, 781 (9th Cir. 1996); *In re Amway Corp.*, 93 F.T.C. 618, 716 (1979). But the
 6 FTC virtually ignores how Success By Media actually operates. For example, no mention
 7 is made in any of the FTC's filings of Success By Media's other revenue-generating
 8 business verticals, none of which have an affiliate-marketing component. The FTC also
 9 aggregates data to the point of absurdity to allow it to draw false conclusions about the
 10 Defendant companies that are not borne out by the evidence.

11 Worst of all, when given the opportunity to learn how the company actually
 12 operates from the company itself, the FTC dismissed the company's offer as "not
 13 credible." [Dkt. #8, p. 46 n.11]. Apparently, the FTC had already decided what its
 14 investigation would show, and constructed the investigation to fit that conclusion. For the
 15 FTC to paint Mr. Noland and his companies as evasive and dishonest without first even
 16 attempting to determine whether this offer of cooperation could prove genuine or, better
 17 yet, fruitful to the ongoing investigation was both irresponsible and disingenuous. It is,
 18 however, completely indicative of the strategy that the FTC has employed throughout this
 19 case—proceed quickly and in secrecy with cherry-picked evidence that may or may not
 20 have any basis in fact or the actual business operations or outcomes for affiliates.

21 This strategy may have been effective while the FTC proceeded *ex parte* and under
 22 seal, but, now that Defendants have an opportunity to defend themselves, the Court will
 23 see that the facts are not as the FTC claims, or as they might wish them to be. This type
 24 of superficial, rubber-stamp investigation falls well short of meeting the Government's
 25 burden when seeking to deny Defendants' constitutional rights to operate their business,
 26 as would any preliminary injunction entered based on such an investigation. And more

27
 28 court with a separate factual showing of why a preliminary injunction (not a TRO) should issue.
 Nonetheless, Defendants provide their Response.

1 importantly, the FTC's secretive and deceptive campaign to harm the Defendants without
2 legitimate basis, has also caused enormous harm to the thousands of individual consumers
3 the FTC is supposed to protect: ie., the affiliates who rely on their ability to sell the
4 Defendants' products to pay their bills and meet their families' needs.

5 This Court has already acknowledged that obtaining the sweeping temporary relief
6 granted here without any notice to the affected party is unusual. [Transcript of *Ex Parte*
7 Hearing on January 9, 2020 ("Hearing Tr.") at 6:20-25, 9:18-24]. The FTC is unlikely to
8 succeed on the merits of its case, and therefore entry of preliminary injunction against
9 Defendants is improper.

10 The Court should deny the FTC's request for a preliminary injunction against
11 Defendants, remove the Temporary Receiver, and return the company and all of its assets
12 over to the Defendants in order to preserve any hope of keeping this business from being
13 permanently destroyed.

14 II. FACTS

15 A. Success By Media's Operations

16 1. Success by Media LLC is a Nevada limited liability company formed in
17 2015. Success by Media Holdings, Inc. is a Nevada corporation formed in 2018 and
18 Success by Media LLC's parent company (collectively, "Success by Media"). [Dkt. #8,
19 Ex. 1, Att. 1-3].

20 2. Success By Media operates three distinct revenue-generating business
21 verticals: (1) Success By Coaching, (2) Success By Networking, and (3) Success by
22 Health. See Declaration of James D. Noland, Jr. ("Noland Decl.") attached hereto as
23 Exhibit A at ¶ 4.

24 3. Success By Coaching provides generic, non-branded personal growth and
25 training systems. Success By Coaching has generated \$592,087.67 in revenue since its
26 inception in 2016. Noland Decl. at ¶ 5-6.

27

28

1 4. Success By Networking provides consulting and training services to
 2 individuals in the direct sales industry. Success By Networking has generated \$872,687.92
 3 in revenue since its inception is 2017. Noland Decl. at ¶¶ 7-8.

4 5. Success By Health (SBH) is an affiliate-marketing program that sells coffee
 5 products and other nutraceuticals through its online platform and network of affiliates.
 6 SBH has generated \$7,040,205.05 in revenue since its inception in mid-2017. Noland
 7 Decl. at ¶¶ 9-10.

8 6. Prior to the imposition of the temporary restraining order, Success By Media
 9 was also in the process of launching additional business verticals including: Success By
 10 VT (Virtual Training), Success By Travel, and Success By Music. Noland Decl. at ¶ 11.

11 7. Revenue generated by the various business verticals is reflected in Success
 12 By Media's audited year-end financial statements [Noland Decl. at ¶ 12], which the FTC
 13 reviewed. [Doc. 8, Exh. 4 at ¶10].

14 8. All business verticals are operated through Success By Media and utilize the
 15 same bank accounts and payment platforms. [Noland Decl. at ¶ 13]. Thus, any payments
 16 to or from Success By Media would be represented in the FTC's data obtained via
 17 subpoena.

18 **B. SBH Structure and Commission Plan**

19 9. As of January 13, 2020, SBH had 6,754 affiliates. 5,003 of those Affiliates
 20 earned commissions and 1,751 did not. Affiliates earned an average of \$387.42, which
 21 includes affiliates who earned no commissions. Those affiliates who earned commissions
 22 averaged \$523.01 in earnings. Noland Decl. at ¶¶ 15-17.

23 10. To become an affiliate, an interested individual must register with SBH and
 24 pay a \$49 annual fee. Noland Decl. at ¶ 18.

25 11. Upon payment of the fee and completion of a valid registration form, the
 26 affiliate is immediately qualified to begin earning commissions and bonuses. Noland
 27 Decl. at ¶ 19.

1 12. SBH affiliates are compensated in three ways: (1) retaining all revenue from
 2 direct retail sales to consumers, (2) commissions earned on online product sales, and (3)
 3 bonuses. Noland Decl. at ¶ 20.

4 13. Affiliates are compensated through direct retail sales of the product
 5 purchased by the Affiliate. 100% of any profit realized on those direct retail sales goes to
 6 the Affiliate. Noland Decl. at ¶ 21.

7 14. Affiliates earn Tier Commissions. The affiliate earns 10% on any of her own
 8 purchases, as well as on purchases made through that affiliates unique e-commerce site,
 9 which is a mirror of the SBH e-commerce portal. Noland Decl. at ¶ 22. Affiliates can
 10 also earn percentage commissions on their downline affiliates' product sales as follows:

- 11 • Tier 1: 10%
- 12 • Tier 2: 6%
- 13 • Tier 3: 4%
- 14 • Tier 4: 3%
- 15 • Tier 5: 2%

16 There are no minimum monthly volume requirements nor a minimum number of affiliates
 17 required to earn Tier Commissions. Noland Decl. at ¶¶ 22-24.

18 15. SBH also has a number of bonus programs:

- 19 • Auto-Order Bonuses. Auto-Order Bonuses are a loyalty rewards
 20 program, which allows affiliates to earn a 5% product credit on personal
 21 auto-orders plus additional \$65 or \$130 product credit for enrolling 5 or
 22 10 customers/affiliates in a \$60 monthly auto-order. Auto-Order is not
 23 required to earn commissions. Noland Decl. at ¶¶ 26-27.
- 24 • Accelerator Bonuses: Accelerator Bonuses are one-time bonuses
 25 available to affiliates whose downline affiliates purchase a promotional
 26 product business pack, paid as follows:
 - 27 ○ SBH Affiliates earn a minimum of \$75 and up to \$125 for the sale
 28 of the \$500 Accelerator Pack. A \$500 Accelerator Pack contains

\$605.00 worth of product (as calculated by the listed wholesale price of each product if purchased individually).

- Affiliates earn \$500 for the sale of the Super Accelerator Pack. A \$1995 Super Accelerator Pack contains \$2198.00 worth of product. Noland Decl. at ¶¶ 28-32.
 - Generation Infinity Bonus: An affiliate whose team reaches \$15,000 in purchases becomes a Super Business Affiliate and earns a 1% “Generation Infinity Bonus” on all purchases (customer or affiliate) in his network. Super Business Affiliates can earn up to an additional 3% “Generation Infinity Bonus” based on the sales purchases performance of their affiliate team. Noland Decl. at ¶¶ 33-34.
 - BAM Bonuses: One-time bonuses for hitting certain team and sales milestones. These bonuses range from \$1,000 to \$5 million and depend on the number of downline affiliates in the earning affiliates’ network. This is the only bonus that requires a certain number of downline affiliates to qualify. Noland Decl. at ¶¶ 36-37.

C. SBH Marketing, Training and Compliance

16. SBH marketing and training emphasize that retail sale of the products is always the first step toward getting paid as an affiliate. Noland Decl. at ¶ 38.

¹⁷ Mr. Noland refers to retail sales as “number one.” Noland Decl. at ¶ 39.

18. SBH hosts “Daily Heat Calls” during which affiliates share their retail success stories. Noland Decl. at ¶40.

19. From July 2017 through January 13, 2020, SBH hosted the following affiliate trainings/check-in events:

- 609 Daily Heat Calls
 - 358 Facebook Live Videos. Noland Decl. at ¶ 41

20. Scott Harris and Thomas Sacca are Senior Field Advisors for SBH. Noland Decl. at ¶42.

1 21. SBH Senior Field Advisors are responsible for verifying affiliates'
2 compliance with training, and sales and recruitment scripts. Noland Decl. at ¶ 43.

3 22. Senior Field Advisors are responsible for responding to and resolving
4 support tickets submitted through the Success By Media support center. Noland Decl. at
5 ¶ 44.

6 23. Senior Field Advisors also assist affiliates with offloading unwanted
7 product to other affiliates or customers through direct sales. Noland Decl. at ¶ 45.

8 **D. SBH Shipping and Fulfillment**

9 24. SBH Terms of Use are located on the bottom bar of the SBH website,
10 (www.successbyhealth.com). Noland Decl. at ¶ 46.

11 25. SBH Shipping Terms can be found on the bottom bar of the SBH website.
12 Noland Decl. at ¶ 47.

13 26. From July 2017 to January 2020, SBH logged 33,473 product transactions.
14 Of those, 33,123, or 99% were successfully process and delivered. Noland Decl. at ¶ 48-
15 49.

16 27. From the May 30, 2018 through January 10, 2020, SBH shipped 21,920
17 orders. The average time to fulfill those orders (from invoice to shipment from
18 warehouse) was 3.933 days. Noland Decl. at ¶¶ 49-51.

19 28. Any backordered items would be designated as such on the "Product
20 Catalog," the e-commerce platform within SBH's website.
21 (<https://successbyhealth.com/product-catalog>). Noland Decl. at ¶¶ 52.

22 29. From July 2017 to January 2020, SBH issued 172 refunds. SBH received
23 134 chargeback requests from purchasers' credit card companies, 44 of which were later
24 reversed when SBH established that the complaining purchaser actually received the
25 product ordered. This is a low chargeback rate for the industry. Noland Decl. at ¶¶ 53-55

26 30. SBH Senior Field Advisors would also work with Affiliates or customers
27 considering a refund to offload product through sale to other customers or Affiliates. This

1 would not be logged in SBH records as a refund, but resulted in purchasers being
 2 compensated for unwanted product. Noland Decl. at ¶¶ 56-57.

3 **E. The Noland Defendants' Travel**

4 31. Lina Noland was born and raised in Colombia. Mrs. Noland moved to the
 5 United States after marrying Mr. Noland. Noland Decl. at ¶ 58.

6 32. The Nolands have always wanted to their son, who is bilingual, to experience
 7 life in a Latin American country along with living in the United States. Noland Decl. at
 8 ¶ 59-60.

9 33. Success By Media always intended to expand to Latin American as part of
 10 its international growth model.

11 34. The Nolands considered spending part of the year in Colombia, but decided
 12 against it due to security concerns. Noland Decl. at ¶ 61.

13 35. After researching which Latin American countries were safest for foreign
 14 nationals to live and work in, the Nolands determined that they would visit Uruguay to
 15 assess whether it would be a place where Success By Media could establish a Latin
 16 American operation and where their family could live part-time. Noland Decl. at ¶ 62.

17 36. The Nolands traveled to Uruguay for the first time in August, 2019 and spent
 18 9 days there, traveled to Colombia, and returned to the United States on September 3,
 19 2019. Noland Decl. at ¶ 63-64

20 37. After returning to the United States, the Nolands visited Uruguay in October
 21 2019 and returned on January 13, 2020. Noland Decl. at ¶ 64.

22 38. The Nolands do not own real estate in Uruguay, but rather leased an
 23 apartment and a warehouse/office facility for Success By Media's operations. The
 24 Nolands set up a Uruguayan bank account and purchased vehicles for their, and the
 25 company's use. Noland Decl. at ¶ 65, 68.

26 39. Success By Media listed two job openings for positions with Success By
 27 Media in Uruguay: an Executive Assistant, an Office Manager, and model talent. As of
 28

1 February 6, 2020, Success By Media has received over 100 applications in response to
 2 those postings. Noland Decl. at ¶¶ 69-70.

3 40. Mr. Noland makes payments to the Nestmann Group as a subscription for
 4 access to reports other materials for individuals and business owners looking to live or
 5 expand their businesses abroad. Noland Decl. at ¶ 71.

6 **F. The FTC's Investigation**

7 41. Prior to the sealed filing of the instant Action, the FTC never raised any
 8 concerns with Defendants regarding Success By Media's business practices. Noland Decl.
 9 at ¶ 72.

10 42. The FTC never made any inquiry of Defendants regarding Success By
 11 Media's or SBH's practices, and never asked Defendants to describe or provide any
 12 information regarding their business practices. Noland Decl. at ¶ 72.

13 43. The FTC never made any requests of Mr. Noland pursuant to the 2002
 14 Permanent Injunction issued in *F.T.C. v. Netforce Seminars*, 00-cv-2260-PHX-FJM,
 15 authorizing the same. Noland Decl. at ¶ 73.

16 44. In May 2019, Defendants learned of the FTC's investigation. Noland Decl.
 17 at ¶ 74.

18 45. On May 20, 2019, Defendants, through counsel, sent a letter to the FTC
 19 offering to cooperate with the ongoing investigation. Noland Decl. at ¶ 75.

20 46. The FTC did not make any requests of Mr. Noland or Success by Media
 21 Noland Decl. at ¶ 76, and instead concluded that the offer was "not credible." [Dkt. #8 at
 22 46, n. 11].

23 **G. Success By Media and SBH can operate legally on an Interim Basis**
 24 **Pending Determination On the Merits.**

25 47. Since receiving notice of the TRO, Defendants and their counsel and
 26 Defendants' staff have cooperated with the FTC and the Temporary Receiver. [See Dkt.
 27 #61 at pp. 3-5]. The time commitment required by Defendants' cooperation has made it
 28 difficult to devote the necessary time to prepare a defense, especially in light of the tight

1 deadlines, various discovery and other information requests, and limited access to funds,
 2 but Defendants understand the importance of cooperation and transparency.²

3 48. Defendants believe that the FTC's allegations lack merit, the Temporary
 4 Receiver should be removed and the asset freeze should be lifted without condition.

5 49. Nonetheless, Defendants are willing to operate Success By Media in a
 6 limited, modified fashion during the pendency of this action. The modified business
 7 operations would include each of the following elements:

- 8 • All Success by Media business lines, other than Success by Health are
 9 removed from the receivership estate and control is returned to the
 Defendants.
- 10 • Success by Media will maintain a segregated bank account for non-Success
 11 By Health businesses.
- 12 • Success By Media will suspend enrollment of new SBH affiliates.
- 13 • Success By Media will suspend SBH commission and bonus payments to
 14 existing affiliates, but will continue to track such payments as they accrue
 continue pending final resolution of this case.
- 15 • Success By Media will not host any trainings or events.
- 16 • Success By Media will not publish or disseminate new marketing or sales
 17 materials without prior delivery to the FTC for review. If the FTC objects to
 any such materials, Defendants will not use such materials without first
 obtaining Court approval.
- 18 • Success By Media will operate with a smaller management and employee
 19 team necessary for the limited interim operations.
- 20 • Mr. Noland will work with Success By Media and the FTC to develop a
 21 proposal limiting Mr. Noland's involvement with Success By Media during
 the interim period.
- 22 • Success By Media will not transfer or dispose of any material assets of the
 23 entities (other than sales made in the ordinary course and related transactions)
 without prior notice to the Court and the FTC.

27 ² The Court will recall that the parties originally stipulated to continue the hearing until the
 28 week of February 18, 2020, but neither the Court's calendar, nor the Temporary Receiver's
 schedule would accommodate a hearing later than February 12, 2020.

- 1 • Mr. Noland and Lina Noland will not leave the country without prior notice
2 to the Court and the FTC.
- 3 • Success By Media will file regular reports with the Court and the FTC
4 describing business operations, including sales and all cash inflows and
outflows.
- 5 • The Temporary Receiver is removed from control over Success By Media's
6 assets and operations, and the freeze of Defendants' assets is lifted. However,
7 if Success by Media fails to satisfy each of the forgoing elements, it will be
subject to re-imposition of a Receiver and asset freeze. If appropriate,
8 Success By Media would agree to the appointment of an independent third-
party to monitor Success By Media operations and ensure compliance with
9 Court orders during the pendency of this case.

10 This modified business operations plan would preserve the true *status quo*, and prevent
11 the summary liquidation of a growing business.

12 III. **LEGAL ARGUMENT**

13 A. **The FTC Has Failed to Meet its Burden of Proving that Injunctive Relief** **Is Warranted Against Defendants.**

14 “A preliminary injunction is an extraordinary and drastic remedy, one that should
not be granted unless the movant, by a clear showing, carries the burden of persuasion.”
Lopez v. Brewer, 680 F.3d 1068, 1072 (9th Cir. 2012) (*citing Masurek v. Armstrong*, 520
15 U.S. 968, 972 (1997)). Thus, section 13(b) of the Federal Trade Commission Act permits
entry of a preliminary injunction only if the FTC can establish that it is likely to succeed
20 on the merits of its case and that, after weighing the equities, a preliminary injunction is
in the public interest. 15 U.S.C. § 53(b). While the public interest generally receives
25 greater weight than private interests, a court may not “drop private equities from the
calculus” altogether when determining whether to modify a temporary restraining order.
F.T.C. v. World Travel Vacation Brokers, Inc., 861 F.2d 1020, 1030 (7th Cir. 1988). The
FTC may only seek a preliminary injunction when it believes a person “is violating, or is
about to violate” any law enforced by the FTC. *FTC v. Evans Prods. Co.*, 775 F.2d 1084,

1087 (9th Cir.1985). The FTC, therefore, cannot base its request for injunctive relief on evidence of past violations without a showing that those violations are likely to recur. *Id.*

1. **FTC Has Presented No Evidence to Support Entry of A Preliminary Injunction Prohibiting Operations of Success By Media’s Non-Affiliate Marketing Business Verticals**

An injunction should be “no more burdensome to the defendant than necessary to provide complete relief to the plaintiffs.” *Califano v. Yamasaki*, 442 U.S. 682, 702 (1979). Here, the FTC’s allegations relate only to the structure of SBH and the representations made regarding the business opportunity presented by SBH, and the alleged harm caused to consumers by SBH. [Doc. 8 at p. 1 (“The [FTC] requests the Court put an immediate halt to a nationwide pyramid scheme.”)].

Only one of Success by Media’s three revenue-generating business verticals operates as an affiliate-marketing company. [Statement of Facts (“SOF”) at ¶¶ 2-5] The remaining business verticals, which account for nearly \$1.5 million of Success By Media’s total lifetime revenues, are not affiliate-marketing enterprises. [SOF ¶¶ 3-4]. Yet nowhere in any of the FTC’s filings or argument before this Court does the FTC attempt to distinguish among the various enterprises. Instead, the FTC sought and obtained a temporary restraining order freezing *all* of Success By Media’s assets (and all of Defendants personal assets for that matter), making it impossible for Success By Media to continue operating these other enterprises. Leaving aside for the moment the obvious shortcomings of the evidence presented against SBH, with regard to Success By Networking and Success By Coaching the FTC has presented *zero* evidence to support the asset freeze and other limitations currently in place. Without such evidence, the Court should not impose a preliminary injunction preventing the operation of Success By Media’s non-affiliate marketing businesses.

2. The FTC has Not Demonstrated a Likelihood of Success on the Merits of its Claim that Success By Media is a Pyramid Scheme

1 A multi-level marketing business model is not *per se* illegitimate. *BurnLouge*,
 2 753 F.3d at 883 (“Not all MLM businesses are illegal pyramid schemes.”). To determine
 3 whether a multi-level marketing company is legitimate, the Ninth Circuit employs the
 4 FTC’s test as set forth in *In re Koscot Interplanetary, Inc.*, 86 F.T.C. 1106 (1975). To
 5 establish that a company operates a pyramid scheme in violation of § 5, the FTC must
 6 prove that participants pay money to the company “in return for which they receive (1)
 7 the right to sell a product and (2) the right to receive in return for recruiting other
 8 participants into program rewards which are unrelated to the sale of the product to ultimate
 9 users.” *BurnLouge*, 753 F. 3d at 889 (quoting *Omnitrition*, 79 F.3d at 781).

10 A required purchase to become a distributor satisfies the first prong of the *Koscot*
 11 test. *BurnLouge*, 753 F.3d at 833. The second prong is more nuanced, and requires the
 12 trier of fact to evaluate how the structure of the company does or does not incentivize
 13 recruitment over retail sales to ultimate users. The FTC has provided guidance on this
 14 point:

15 The critical question for the FTC is whether the revenues that
 16 primarily support the commissions paid to all participants are
 17 generated from purchases of goods and services that are not
 18 simply incidental to the purchase of the right to participate in a
 19 money-making venture.

20 *BurnLouge*, 753 F.3d at 887-88 (quoting FTC Staff Advisory Opinion – Pyramid Scheme
 21 Analysis dated January 14, 2004). Whether the rewards are related to the sale of products
 22 depends on how the company’s commission structure operates in practice. *BurnLouge*,
 23 753 F.3d at 887 (citing *Omnitrition*, 79 F.3d at 781).

24 Ultimate users are those that purchase and consume the product. Affiliates can be
 25 ultimate users when they consume their own product, so long as they would have
 26 purchased the product even if not for the income opportunity. *See FTC v. Vemma*
 27 *Nutrition Company*, 2:15-cv-01578-JJT Dkt. #118 at *6 (D. Ariz. Sept. 18, 2015) (citing
 28 *BurnLouge*, 753 F.3d at 886-87). It remains the FTC’s burden to show that—in practice

1 —the company is actually rewarding affiliates primarily for recruiting and not for the sale
 2 of product to ultimate users.

3 Defendants do not dispute that a \$49 annual fee is required to become an affiliate
 4 of SBH. [SOF ¶ 10]. However, that is the *only* thing that is required to become an SBH
 5 affiliate, remain an SBH affiliate, and earn commissions or bonuses. [SOF ¶¶ 11, 14]
 6 Upon payment of that fee, affiliates are immediately eligible to begin earning
 7 commissions on every dollar of product purchased by the affiliate herself, or any other
 8 customer or affiliate with access to her unique link. [SOF ¶ 14]. This is the fundamental
 9 component of the SBH model, and all other benefits and bonuses are incidental to this
 10 right to earn commissions based on sales of the product and the related right to sell product
 11 at retail. Thus, the FTC cannot meet its burden to show a likelihood of success on its claim
 12 that Success By Media operates a pyramid scheme in violation of section 5(a) of the FTC
 13 Act, and a preliminary injunction cannot be imposed.

14 a. The FTC Has Not Shown that SBH Satisfies the Second Prong
 15 of the Koscot Test.

16 i. *The FTC’s Expert improperly usurps the role of the*
 17 *trier of fact.*

18 How a multi-level marketing is presented to prospective affiliates (though not the
 19 only relevant factor) is relevant to the second prong of the *Koscot* test because it bears on
 20 the question of *why* affiliates are paying money to enroll, *i.e.*, are they being incentivized
 21 by the prospect of earning money based on recruitment or product sales. It is up to the
 22 trier of fact to assess the intent of the prospective affiliates based on the facts presented.
 23 The proper role of an expert in such a case is to perform the analyses that may be helpful
 24 to the trier of fact in its evaluation of the relevant factual and legal elements, including
 25 fraud and intent. [See Report of Michael A. Fahlman, CPA, CFF, CIRA (“Fahlman
 26 Report”) at ¶ 26, attached hereto as Exhibit B]. Dr. Bosley improperly usurps the Court’s
 27 role by rendering opinions as to this ultimate issue, including by evaluating and opining
 28 on what is motivating affiliates to engage with SBH. [Fahlman Report, ¶ 19].

ii. The SBH commission and bonus structure does not promote inventory loading.

Under the SBH commission plan, Affiliates who have paid the \$49 sign-up fee can begin earning commissions on every dollar's worth of product they sell. Affiliates, therefore, have no structural incentive to "inventory load" under the SBH plan because they do not have to meet any minimum volume requirements to be eligible for commissions. This distinguishes SBH from the companies at issue in recent cases like *Vemma* and *BurnLouge*. In those cases, affiliates were required to personally meet monthly or other volume requirements to even be eligible to earn any commission whatsoever. See *BurnLouge*, 753 F.3d at 883 ("[B]ecause purchasing a package was required for participation as a Retailer or Mogul, and because Moguls earned cash for selling packages, '[Moguls] by default earned compensation for recruiting others into the program.'"); *Vemma*, 2:15-cv-01578-JJT at *6-7 ("[U]nder the current bonus system there is no way to unbundle the Affiliates' intent to consume Vemma products as ultimate users from their desire to remain qualified for bonuses.").

SBH's program is distinguishable because, while affiliates do earn percentage commissions on their personal purchases and purchases within their network, the commission and bonus plan does not create a financial mandate for the affiliate to purchase. [SOF ¶¶ 11, 14]. Affiliates essentially sign up to earn 10% off on product, and can earn additional commissions if they refer customers to their unique e-commerce platform, or if they refer additional affiliates who also make purchases. [SOF ¶ 14]. SBH affiliates do not need to make any personal purchases to be eligible for commissions or bonuses. [SOF ¶¶ 11, 14]. Thus, affiliates have no incentive to spend money to inventory load under the SBH plan, which is designed to move product and relies on retail sales as a primary component of affiliate compensation (not commission). In other words, affiliates are only incentivized to buy product they believe they can sell directly to a consumer or will consume themselves. Affiliate commissions are inextricably linked to consumer demand for the product because the only way to realize value in excess of the

1 affiliate's investment in product is to sell it retail for profit, or consume the discounted
2 product themselves.

iii. The FTC's chosen metric of "loss position" is a red herring and irrelevant under the Koscot test.

The FTC’s expert spends just three pages of her 80-page report analyzing the actual purchase data obtained by the FTC through its investigation of Success By Media’s bank records. [Dkt. #8, Exh 3 at 67-68]. She concludes that Defendants must operate a pyramid scheme because the purchase data shows that 98.4% of affiliates show a net loss based on transaction data showing payments to and from Success By Media by affiliates. However, proving that some or most affiliates appear to be in a loss position is (1) not required under the *Koscot* test and (2) ignores the value obtained by Affiliates in exchange for their purchases.

13 Dr. Bosley did not value actual retail sales or internal consumption in performing
14 her loss position analysis. These valuations are highly relevant to the question of whether
15 the SBH program rewards recruitment over sales to ultimate users. For example, an SBH
16 affiliate who enrolls by paying the \$49 fee and later purchases \$100 worth of product and
17 consumes it over the course of a year earns \$10 of commission. Under the FTC's analysis,
18 this affiliate would show a \$139 loss (excluding any shipping & handling costs).
19 Similarly, a SBH affiliate who enrolls by paying \$49 fee and later purchases \$100 worth
20 of coffee (at \$20/box) and sells each box directly to customers for \$35/box would show a
21 \$149 loss, despite have netted \$36 in profit (\$10 in commission plus 26 dollars profit,
22 excluding any shipping & handling costs). Both of these scenarios result in the sale of
23 product to an ultimate user and are therefore precisely relevant to the analysis required
24 under the second prong of the *Koscot* test.³ An analysis like Dr. Bosley's that omits both

³ These scenarios are also not mere hypotheticals. SBH affiliates independently established a Facebook group where they could share their experiences and how the temporary restraining order has impacted their personal finances and ability to run their businesses. Many of the participating affiliates substantially rely on profits from direct retail sales of SBH products as meaningful income for their families. The affiliates also share how the products have become a part of their and their retail customers' daily nutritional regimens, and how the temporary

1 personal consumption and retail sales is fatally flawed and misleading. [Fahlman Report
 2 at ¶¶ 29-30]. Dr. Bosley also wrongfully omitted from her analysis the total value of the
 3 product received by purchases of SBH's various discount multi-product packs, such as
 4 the Accelerator Pack or Super Accelerator Packs.⁴ [Fahlman Report ¶ 31].

5 Dr. Bosley failed to include in her analysis any assessment of the economic value
 6 obtained by an affiliate (or customer) who purchases SBH training. This was an error
 7 because "professional business training is a generally accepted method of developing
 8 people, growing revenue, and expanding businesses in corporate America." [Fahlman
 9 Report at ¶ 32]. Finally, by failing to eliminate from the pool the amount of any purchases
 10 by an SBH affiliate from one of the other Success By Media business verticals, who offer
 11 training packages and other products direct to consumer on their respective websites, the
 12 purchase-side data underlying Dr. Bosley's analysis is artificially inflated (possibly to the
 13 tune of almost \$1.5 million, see SOF ¶¶3-4). In that context, Affiliates are just regular
 14 customers, and those purchases should not be counted toward a calculation of whether
 15 affiliates are "getting more" out of SBH than they are putting in. Dr. Bosley clearly
 16 understands that there is a meaningful difference here, as she did not present any analysis
 17 as to whether *customers* of the SBH affiliate were in a loss position.

18 Absent consideration of (1) retail sales and internal consumption, (2) resale of
 19 product, (3) product pack value, or (4) professional training, Dr. Bosley's loss position
 20 analysis is "misleading and unreliable," [Fahlman Report, ¶ 34], to the extent that analysis
 21 is relevant at all to the second prong of the *Koscot* test.

22 *iv. Burnlounge requires the Court to consider actual
 23 commissions.*

24 restraining order has made high-demand products increasingly scarce. Contrary to the FTC's
 25 assumptions, a substantial number of SBH affiliates have been positively impacted through their
 26 relationship with SBH, and are in fact being harmed by the temporary restraining order sought
 27 and obtained by the FTC. [See Screenshots from the Facebook page, attached as Exhibit C
 28 hereto.]

⁴ The \$500 Accelerator Pack contains \$605.00 worth of product (as calculated by the listed wholesale price of each product if purchased individually) and the \$1995 Super Accelerator Pack contains \$2198.00 worth of product.

The FTC’s analysis is devoid of any reference to commissions actually paid to Affiliates. This renders the FTC’s factual showing fatally deficient because *BurnLounge* requires such an analysis. 753 F.3d at 883 (“To determine whether a MLM business is a pyramid, a court must look at how the MLM business operates in practice.”).

Dr. Bosley did not consider actual commissions paid to Affiliates in rendering her opinions, yet still concluded: “Affiliate compensation is overwhelmingly triggered by recruitment and recruitment-associated purchases, not to sales of ultimate users.” [Dkt. #8, Exh. 3, at p. 79 ¶ 142]. Dr. Bosley further states that the “anticipated result of the SBH’s program, as designed, is an endless recruitment chain, with a strong emphasis on recruitment over sales to ultimate users.” [Dkt #8, Exh. 3, at p. 80, ¶ 145]. However, *BurnLounge* and its predecessors clearly state that the Court must consider not the anticipated results, but how the business operates in practice. An analysis of actual commissions is essential to this consideration, and the FTC does not provide it, though it is their burden to do so.

b. SBH Affiliate Training and Policies Reinforce Permissible Practices

In formal trainings and on Daily Heat Calls, Defendants reinforce to affiliates that retail sales of SBH product are the first step toward earning income in the program. [SOF ¶¶ 16-19]. For example, SBH training and recruitment materials consistently refer to retail sales as “Step 1.” [See Dkt #8, Exh. 1, Att. 52 at 462]. With just ten customers spending \$105 per month, the materials accurately state that the affiliate can earn \$450 each month (not including the additional 10% tier commission the affiliate would have earned on his purchase of the product for sale to the consumer). Likewise, Mr. Noland’s first-ever training on the SBH program referred to retail sales as “Number 1.” [SOF ¶ 17]. This emphasizes for affiliates the importance of retail sales to the overall compensation structure of the SBH program and trains them to prioritize retail sales.

Success By Media uses Senior Field Advisors to reinforce this training and provide on the ground, personal support to affiliates. [SOF ¶ 21-23]. The SBH Senior Field

1 Advisors' purpose is, thus, twofold: (1) to reinforce training regarding making income
 2 claims and (2) encourage or assist affiliates in making retail product sales.

3 Senior Field Advisors also respond to inquiries made online through the SBM
 4 Support Center. [SOF ¶ 22]. Among other things, the Senior Field Advisors help
 5 customers and affiliates with unwanted product offload that product through retail sales.
 6 [SOF ¶ 23]

7 **3. The FTC Has Not Demonstrated a Likelihood of Success of
 8 the Merits of its Misrepresentation Claims.**

9 An act or practice violates 15 U.S.C. § 45(a)(1) if ““there is a representation,
 10 omission, or practice that, second, is likely to mislead consumers acting reasonably under
 11 the circumstances, and third, the representation, omission, or practice is material.”” *F.T.C.*
 12 *v. Stefanchik*, 559 F.3d 924, 928 (9th Cir. 2009) (quoting *F.T.C. v. Gill*, 265 F.3d 944, 950
 13 (9th Cir. 2001)). Express representations are presumed to be material. *F.T.C. v. Pantron*
 14 *I Corp.*, 33 F.3d 1088, 1096 (9th Cir. 1994). However, a court must consider “the overall
 15 ‘net impression’ that Defendants’ representations make upon consumers.” *Id.*

16 The FTC has failed to provide the Court with sufficient context by which to
 17 determine whether the net impression of Defendants statements, trainings, and materials
 18 is likely to mislead consumers. Rather, as Defendants show, the net impression of SBH’s
 19 messaging is that hard work drives results.

20 a. The FTC has deprived the Court of important context by
 21 cherry-picking its evidence.

22 The trier of fact must review the context in which alleged misrepresentations are
 23 made to assess whether the overall net impression of the statements upon consumers is
 24 misleading. *Pantron I Corp.*, 33 F.3d at 1096. The FTC has deprived the Court, as the
 25 trier of fact for this preliminary phase, of the relevant context to which it is entitled. The
 26 FTC has cherry-picked its evidence of Defendants’ alleged misrepresentations in two
 27 ways.

28

1 First, the FTC has culled from the many events, trainings, YouTube videos, over
 2 600 Daily Heat Calls and more than 300 Facebook video presentations, just a small
 3 percentage of examples to include with its filings to the court. For example, the FTC
 4 investigator listened to 15 Daily Heat Calls, and his paralegal recorded (and perhaps
 5 listened to) 170 Daily Heat Calls [See Dkt #8, Exh. 1 at ¶ 42, ¶44], out of the over 600
 6 total calls hosted by SBH. [See SOF ¶ 19]. Thus, the FTC's investigation eliminates the
 7 important context of the content that was either not reviewed or captured at all, or not
 8 included in its Declaration—presumably because the FTC investigators did not find the
 9 statements misleading or otherwise objectionable.

10 Second, of those limited examples that the FTC elected to present to the Court, the
 11 FTC has cherry-picked phrases and passages, again eliminating the context that is
 12 essential to the trier of fact's determination of the net impression on consumers.

13 b. Defendants' claims are neither false nor lacking a
 14 reasonable basis.

15 A representation is "likely to mislead consumers" when (1) the representation is
 16 false; or (2) the advertiser lacked a reasonable basis for its claims. F.T.C. v. John Beck
 17 Amazing Profits, LLC, 865 F. Supp. 2d 1052, 1067 (C.D. Cal. 2012) (citing F.T.C. v. U.S.
 18 Sales Corp., 785 F. Supp. 737, 748 (N.D.Ill.1992); *In the Matter of Thompson Med. Co.*,
 19 Inc., 104 F.T.C. 648, 64 (1984)). Puffery is defined as "empty superlatives on which no
 20 reasonable person would rely." *F.T.C. v. Trudeau*, 579 F.3d 754, 765 (7th Cir. 2009); *All-*
Tech Telecom, Inc. v. Amway Corp., 174 F.3d 862, 868 (7th Cir. 1999). "When
 22 determining whether statements amount[] only to puffery, the court must analyze the
 23 context in which the statements were made." *In re Bridgepoint Educ. Inc. Sec Litig.*, No.
 24 3:12-CV-1737 JM (WMC), 2013 U.S. Dist. LEXIS 131423 at *17 (SD Cal. Sept. 13, 2013
 25 (citing *Trudeau*, 579 F. 3d at 766 ("In determining whether a statement is puffery, the
 26 context matters.")).

27 Defendants are also entitled to engage in puffery to promote their product and
 28 program. Puffery is "empty superlatives on which no reasonable person would rely."

1 *F.T.C. v. Trudeau*, 579 F.3d 754, 765 (7th Cir. 2009); *All-Tech Telecom, Inc. v. Amway*
2 *Corp.*, 174 F.3d 862, 868 (7th Cir. 1999). “When determining whether statements
3 amount[] only to puffery, the court must analyze the context in which the statements were
4 made.” *In re Bridgepoint Educ. Inc. Sec Litig.*, No. 3:12-CV-1737 JM (WMC), 2013 U.S.
5 Dist. LEXIS 131423 at *17 (SD Cal. Sept. 13, 2013 (citing *Trudeau*, 579 F. 3d at 766 (“In
6 determining whether a statement is puffery, the context matters.”)). When viewed in
7 context, Defendants’ assertions about the income potential available to affiliates, while
8 designed to be motivational and inspiring, do not amount to impermissible
9 misrepresentations.

i. *Context of Statements Reveals the Net Impression on Consumers.*

12 Where Defendants do reference income potential, their claims are mathematically
13 correct and, therefore, not false. In other words, it is possible for some affiliates to earn
14 thousands of dollars a month in commissions and bonuses as an SBH affiliate, and, in fact,
15 some have.⁵ The FTC’s expert’s calculations acknowledge that such income is possible
16 under the SBH commission and bonus plan, even without complete “tiers” of downline
17 affiliates. [Dkt. #8, Exh. 3 at p. 35, Tables 2 and 3.]

18 Furthermore, these statements are accompanied by (1) disclaimers (either written,
19 spoken, or both) that reinforce for prospective affiliates that financial success of any kind
20 can only come from effort and (2) an acknowledgement from Defendants that not all
21 prospective affiliates are seeking compensation to achieve job replacement or financial
22 freedom. In short, Defendants do not “promise” affiliates substantial income or even
23 suggest that all affiliates should be pursuing financial freedom, as the FTC has alleged.
24 [Dkt. #8 at p. 5]. Understood in their proper context, Defendants’ statements are unlikely
25 to mislead a reasonable consumer about the income potential of the SBH program.

26 | For example:

⁵ Affiliates on the independent Facebook page described in n.3 *supra*, describe such earnings, and dozens of these people have offered to provide testimony in support of the Defendants in this proceeding.

- The FTC alleges that Defendants frequently tell consumers that they likely will replace their job income within six months and obtain “financial freedom” within 18 months if they work hard and follow Defendants’ instructions. [Dkt. #35 at ¶ 39(a), Dkt. #8 at p. 5]. The full context of those statements provides:

14 So I want the Heat. I've got to develop
15 right now, I need 100 warriors. I'm going to build it
16 out starting with the core. So I want people with the
17 warrior mindset. Or if you're not there, you're very
18 respectful, you're not getting your feelings hurt when
19 we're pushing our ass off out here busting through and
20 bringing people to financial freedom.

20 bringing people to financial freedom.
21 I'm going to have people by the end of this
22 year, they never have to work again. Did you hear
23 what I just said? There will be people working and by
24 the end of this year they never, ever have to work
25 again. Period. That's what's going to happen right

1 before your eyes. In order for me to do that, I got
2 to bring the heat. I got to have a place where me, my
3 leaders and the affiliates that are in there, they
4 understand and they're wanting the heat. Y'all got
5 that?

6 All right. So that's the key to the SBH
7 Heat page. I wonder if my landscapers are here? You
8 got to bear with that background. I'm only -- this is
9 going to be a short one. My landscapers are going to
10 be coming here.

11 All right. Now, listen to me. Here's what
12 everybody else needs to understand. There's two other
13 subjects I want to cover in housekeeping. Okay.
14 There's people that bought extra red tickets and
15 there's people that bought extra boot camp tickets. I
16 want y'all to listen very carefully what I'm going to
17 tell you here.

[Dkt #8, Exh. 1, Att. 113 at 5:21-6:5].

- The FTC alleges: “With just under four hours left in one 30-day qualification period, Noland told Affiliates with \$500 in volume to buy \$14,500 in additional products so they could reach a higher rank.” Dkt #35 at ¶ 73(c).

The full context of those statements provides:

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1 of direct sales say the same thing. They go, man, I
 2 don't feel any of that.
 3 So you got to make your mind up as we go
 4 into it. What do we got? How much time we got left?
 5 We got three hours and 45 minutes to burn it up. I
 6 would love for somebody to go SBA1 that's sitting at
 7 about 500 in volume right now. That's 15,000 in
 8 volume. You can do it. It's just in your mind. It's
 9 all in your mind. You got the products. You got the
 10 new GHCBD products. That's ridiculous, by the way.
 11 When you see what we're going to do with
 12 this -- this -- this incredible, hip CBD cannabis
 13 line, we're going to dominate that so crucially,
 14 incredibly awesome. I had to give it all kind of
 15 adjectives. You notice that? We're going to blow
 16 them up.
 17 Listen to me. You can go in, order you
 18 a case. I remember when I built my last multi-
 19 million-dollar ridiculous run of students. I had
 20 a plethora of them that came from nowhere that
 21 became multimillionaires -- millionaires and
 22 multimillionaires. We used to talk about, hey, I'm
 23 on your case. People would always be saying, I'm on
 24 your case. And we all knew what that meant.
 25 If they said I'm on your case, that means

14 [Dkt #8, Exh. 1, Att. 106 at p. 976 10:5-24]. It is clear from this additional context
 15 that Mr. Noland was not, as the FTC would have it, pressuring any specific affiliates into
 16 spending money they don't have. Rather, his comments are motivational, saying he would
 17 love to see someone make a big jump in sales.

18 • The FTC alleges that Mr. Noland tells affiliates that they can have a
 19 “reasonable expectation” of replacing their job income within six months
 20 simply by being “result-oriented and focused.” [Dkt #8, p. 5]. The full
 21 context of that statement provides:

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15 They're going to ask at least two people a
 16 day to actually join the business for money. See,
 17 some people will be prospecting with a followup.
 18 That's why I say five. But if you're consistently
 19 doing that sampling, right, prospecting, setting
 20 appointments, following up, you're going to get your
 21 pipeline built up of all these people you've sampled
 22 to, all these people you've prospected, and maybe you
 23 didn't have enough time at that setting, you set a
 24 second appointment, so you're going to have at least
 25 two per day, five days per week for six months. So

10

6 you're asking two people a day for money.
 7 You're going to do that five days a week,
 8 and you're going to do that for six months. By doing
 9 so, you can have a reasonable expectation that you
 10 would have replaced your income if you were result-
 11 oriented and focused. So it wasn't just, hey, you
 12 want to get in the business? That's not what I'm
 13 talking about. I'm talking about showing the plan,
 14 going through those bullet points.

10

11 See Dkt #8, Exh. 1, Att. 88 at p. 867, 10:3-6. Mr. Noland goes on to explain:

12

16 products. So you need to be thinking about that.
 17 So, now, if I want my financial freedom
 18 people, if I want them to understand what to do, I'm
 19 going to set the expectation for them. I'm going to
 20 say would you like to be financially free. People say
 21 yes. Now, here's the issue that we all got to deal
 22 with today. Here's the issue. Only 10 percent of the
 23 people are going to work the work ethic to replace
 24 their income. And only 10 percent of the people that
 25 are building the business are going to actually have

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14
 1 the work ethic to get financial freedom. Only 10
 2 percent. Okay? And that's a high number.
 3 Here's the problem. Eighty percent of the
 4 people that see this business when the plan is shown
 5 correctly, are going to say, I want financial freedom.
 6 Eighty percent. So how most people get stuck in this
 7 industry is they get frustrated by all the people
 8 telling them that they want financial freedom, but
 9 when it comes to the action part, putting it into
 10 play, only 10 percent -- that means if you personally
 11 refer 10 people into the business, only one of them
 12 will show you the work ethic in order to go out and
 13 get financial freedom, only one.
 14 Another one will show you the work ethic to

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Id. at 13:17-25, 14:1:13.

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As these few examples reveal, the context within which the FTC's cherry-picked phrases are situated bear directly on how a listening consumer might understand and interpret

them. Thus, the Court cannot rely on how the statements or parts of statements are presented by the FTC, but must understand them in context before determining what the “net impression” of the presentation is and whether the presentation, heard in full, is likely to mislead a reasonable consumer.

- ii. Disclaimers add additional context and expectation management.*

The FTC does not dispute that Defendants' written promotional materials contain income disclaimers. [Dkt. #8, p. 9-10]. Whether the income disclaimers are sufficient to advise the consumer of her realistic expectations regarding their true income potential as an SBH affiliate is up to the trier of fact, not the FTC (unless the FTC can point to a regulation dictating the permissible font size and color.)

More importantly, the pervasiveness and the conspicuousness of the disclaimers is not as the FTC have presented them. Materials explaining the SBH commission plan contain visible disclaimers on every slide that reference income potential. [See, e.g. Dkt. #8, Exh. 1, Att. 8 at pp. 116, 120, 121, Att. 52 at pp. 462-472]. It is disingenuous and misleading for the FTC describe the font size on these slides as “2 millimeters” when it is clear that the slides are designed as presentation and therefore the “size” of the disclaimer depends upon the screen used to deliver the presentation. [Dkt. #8 at 9-10.] In any event, the disclaimer is conspicuous even as displayed in the PDF version included by the FTC. [Dkt. #8, Exh.1, Att. 8, 52].

SBH's terms and conditions also contain explicit income disclaimers. [See Dkt. #8, Exh. 1 at Att. 6, p. 92]. Again, whether this disclaimer, along with the totality of the statements made by Defendants, is sufficient to advise the consumer of his income potential in the SBH program under section 5 of the FTC Act is a question for the trier of fact.⁶ But the FTC does not dispute that the disclaimers are there.

⁶ In this way, Dr. Bosley again usurps the role of the Court. For example, she opines that “SBH and Mr. Noland are promoting a fraudulent marketing program, using deceptive and prohibited income representations.” [Dkt. #8, Exh. 3, p. 80, ¶ 145]. Such fraud opinions by an expert are improper. [Fahlman Report, ¶ 20]. Rather, it is the Court’s job to evaluate whether the totality

1 **4. The FTC has not Demonstrated a Likelihood of Success on**
 2 **the Merits of its Cooling-Off Rule or Merchandise Rule**
 3 **claims.**

4 The FTC makes sweeping generalizations with regard to SBH's refund policy,
 5 propensity to issue refunds, and ability to timely fulfill product orders. [Dkt. 8, p. 24-27].
 6 The FTC alleges that Success by Media failed to "conspicuously" disclose a shipping date
 7 in violation of 16 C.F.R. 435.2(b)(1) (the "Merchandise Rule"). [Dkt. #8, p. 38-39]
 8 However, the FTC's allegation is directly contradicted by its own evidence, which shows
 9 that Success By Media's terms and conditions (a logical place to find such information)
 10 candidly disclose to purchasers that most product shipped with 48 hours, but some orders
 11 may take up to 60 days or more to fulfill. [Dkt. #8 at p. 24-25]. The FTC also ignores the
 12 fact that SBH's website contains separate direct bottom banner links to the Shipping
 13 Policy, Terms of Use and other legal disclosures. [See SOF at ¶¶ 24-25; See also Dkt. #8,
 14 Ex. 1 at Att. 5, p. 3, Att. 6, p. 7, Att. 7, p. 3 (showing Shipping Policy link on bottom
 15 banner of SBH webpages)]. These policies are not "buried" as the FTC alleges. [Dkt. #8,
 16 p. 24].

17 The FTC also alleges that Success By Media "refuses" to issue any refunds, in
 18 violation of 16 C.F.R. § 435.2(c)(1). Again, the data paints a decidedly different picture.

19 Despite claiming that "multiple consumers" report never receiving products or
 20 waiting months for delivery, the FTC cites to just 9 examples of consumers (out of over
 21 33,000 transactions, see SOF at ¶ 26) alleging issues with delivery [Dkt. 8, p. 24-27].
 22 Success By Media fulfilled 99% of the 33,473 product transactions logged between July
 23 2017 and January 2020. [SOF ¶ 26]. Between May 30, 2018 and January 2020, SBH
 24 fulfilled incoming product orders in an average 3.933 days. [SOF ¶ 27].

25 Despite its transparent no refund policy, Success By Media issued 172 refunds to
 26 SBH customers during that period. [SOF ¶ 29]. Senior Field Advisors also worked with
 27 customers considering requesting a refund to help sell their product to someone else,

28 of the evidence shows that a reasonable consumer is likely to be misled by Defendants'
 statements.

1 which would not be logged as a traditional refund but resulted in the customer being
 2 compensated for the product they no longer wanted. [SOF ¶ 23]. Occasionally, customers
 3 would request a chargeback through their bank. Of the 134 chargebacks requested, 44
 4 were reversed in favor of Success by Media, indicating that the customer had in fact
 5 received the product at issue. [SOF ¶ 29]. (Had the FTC taken Success By Media's offer
 6 of cooperation seriously, they too would have had this data.)

7 Finally, the FTC alleges that Success By Media failed to inform consumers
 8 purchasing above the \$130/order threshold of their right to cancel in violation of 16 C.F.R.
 9 § 429.1 (the “Cooling-Off Rule”). [Dkt. #8, p. 39]. However, § 429.1 only applies to door-
 10 to-door sales (i.e., if Affiliates elect to sell product at a retail markup in person). 16 C.F.R.
 11 § 429.0 (Defining door-to-door sale as any “sale, lease, or rental of consumer goods or
 12 services in which the seller or his representative personally solicits the sale[.”]), of which
 13 the FTC has not produced any evidence.⁷ Most importantly, the FTC does not point to
 14 any specific instances of an in-person \$25 or \$130 purchases where the required
 15 disclosures were not provided.⁸

16 The FTC therefore has failed to establish likelihood of success on the merits of
 17 their alleged violations of the Merchandise Rule and the Cooling-Off Rule, and a
 18 preliminary injunction cannot issue on that basis.

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 22
 23 ⁷ As discussed previously, the FTC and its expert repeatedly downplay the impact of in-person
 24 retail sales on the profitability of Affiliates and the structure of the SBH compensation plan as a
 25 whole. Retail sales cannot simultaneously be irrelevant and “exacerbating” the harm caused by
 26 SBH’s compensation plan. [See Dkt. #8, p. 24].

27 ⁸ As support for this argument [Dkt. # 8, p. 39], the FTC cites broadly to its SOF Section II.E,
 28 which does not allege *any* purchases of \$130 or more where the required cancellation policy was
 not provided. FTC investigator Rottner used his undercover identity to purchase, via the SBH
 website, \$46.00 worth of product, \$118.00 worth of product, \$59 worth of product, and \$25.00
 training session [Dkt. 8, Exh. 1 at ¶ 66, ¶ 69, ¶ 73, ¶ 83]. None of these purchases would trigger
 the disclosure requirements alleged to have been violated.

5. The Balance of the Equities Favors Denying Injunctive Relief Because the TRO and Preliminary Injunction Are Overly Broad and Unduly Burdensome.

The FTC has not presented any argument to the Court regarding the scope of preliminary injunction they seek. Presumably, the FTC seeks entry of a preliminary injunction order substantially similar to the TRO they have already obtained, including a continued asset freeze and appointment of a permanent receiver. Because Defendants operate a legitimate affiliate-marketing business, the TRO is overly broad and unduly burdensome, as would be any substantially similar preliminary injunction. *See FTC v. Loewen*, No. C12-1207MJP, 2012 U.S. Dist. LEXIS 130924, *12-13 (W.D. Wash. Sept. 13, 2012) (denying injunctive relief where FTC's proposed TRO and preliminary injunction, including an asset freeze, imposed hardships on defendants because balance of equities tipped in favor of defendants); *FTC v. Merch. Servs. Direct, LLC*, No. 13-CV-0279-TOR, 2013 U.S. Dist. LEXIS 114960, *12-13 ("Given that the FTC has not established a high likelihood of success on the merits, the risk of putting Defendants out of business is unacceptable.").

The balance of equities favors Defendants. FTC has not met its burden to show that it is likely to succeed on the merits of its claims against Defendants. SBH's sales, and the commissions earned thereon, are driven by consumption and retail sales by affiliates. Nor has the FTC shown that Defendants' statements, when taken in their full context, are likely to mislead or deceive consumers. Most importantly, the FTC has not demonstrated that any of the alleged violations are likely to recur, which is a prerequisite to granting preliminary injunctive relief. *Evans Products Co.*, 775 F.2d at 1087. Yet a preliminary injunction that includes a continued asset freeze and appointment of a receiver, will likely put Success By Media out of business. Thus, the balance of equities tips in Defendants' favor and the TRO should be dissolved and not replaced with a similar preliminary injunction.

1 In the alternative, any preliminary injunction ordered should be narrowly tailored to
 2 address only alleged violations of the FTC Act for which the FTC has met its burden. *See*
 3 *Califano*, 442 U.S. at 702 (an injunction should be “no more burdensome to the defendant
 4 than necessary to provide complete relief to the plaintiffs”). The Court already recognized
 5 at the *Ex Parte* Hearing that interim relief should be tailored to fit the objectives of the
 6 relief sought and that the Court should order only what is “totally necessary.” [Hearing
 7 Tr. at 23:1-7]. Defendants agree.

8 While Defendants do not concede that any part of Success By Media’s operations
 9 are pyramidal in nature, if the Court determines that the FTC has met its burden with
 10 regard to certain aspects of Defendants’ operations or representations, it should tailor the
 11 injunctive relief to address just those concerns while allowing the unproblematic portions
 12 of the company to operate.

13 **B. The Temporary Receiver Should be Dismissed in Favor of a Monitor**

14 **1. Receiverships are Extraordinary Remedies of Last Resort.**

15 Appointment of a receiver is an extraordinary and drastic remedy. *Solis v. Matheson*,
 16 563 F.3d 425, 437 (9th Cir. 2009) (“The appointment of a receiver is considered to be an
 17 extraordinary remedy that should be employed with the utmost caution and granted only
 18 in cases of clear necessity to protect plaintiff’s interests in the property.”) (citing 12
 19 Charles Alan Wright & Arthur R. Miller, *Federal Practice and Procedure* § 2983 (2d ed.
 20 1997). The appointment of a receiver interferes with defendants’ property rights by
 21 ousting them from control of their own company. *Solis*, 563 F.3d at 437. This
 22 extraordinary remedy is warranted in only “the most compelling circumstances.” *Bracco*
 23 *v. Lackner*, 462 F. Supp. 436, 456 (N.D. Cal 1978).

24 The appointment of a receiver is not a matter of right or entitlement, and the Court
 25 has broad discretion in deciding whether to appoint a receiver. *Canada Life Assurance*
 26 *Co. v. LaPeter*, 563 F.3d 837, 845 (9th Cir. 2009). A request for appointment should not
 27 be granted without careful consideration of and factual findings on the federal receivership
 28

1 factors. *Canada Life*, 563 F.3d at 844, *Sterling Sav. Bank v. Citadel Dev. Co.*, 656 F. Supp.
 2d 1248, 1258 (D. Or. 2009).

3 The Ninth Circuit has recognized a variety of factors that federal courts should
 4 consider when determining whether a receiver should be appointed, including whether:
 5 (1) the party requesting a receiver has a valid claim; (2) there is fraudulent conduct or the
 6 probability of fraudulent conduct by the defendant; (3) the property is in imminent danger
 7 of loss, concealment, injury, diminution in value, or squander; (4) the legal remedies are
 8 inadequate; (5) the harm to plaintiff by denial of a receiver would outweigh injury to
 9 defendant opposing a receiver; (6) the plaintiff's probable success in the action and the
 10 possibility of irreparable injury to Plaintiff's interest in the property; and (7) whether
 11 plaintiff's interests will be well-served by the receivership. *Canada Life*, 563 F.3d at 844
 12 (citing 13 James Wm Moore et al., *Moore's Federal Practice* 66.04[2][b] (3d ed. 2008));
 13 *Solis*, 563 F.2d at 438; *Sterling Sav. Bank*, 656 F. Supp. 2d at 1258. No single factor is
 14 dispositive. *Canada Life*, 563 F.3d at 845. "The most important factor for a court to
 15 consider when deciding whether to appoint a receiver is if an alternative remedy appears
 16 likely to be successful." *Cobell v. Norton*, 226 F. Supp. 2d 1, 146 (D. D.C. 2002).

17 The FTC has failed to make a sufficient factual showing that appointment of a
 18 receiver is warranted in this case. The FTC does not cite or discuss the required *Canada*
 19 *Life* factors in their briefing. In fact, just two paragraphs of the FTC's 50-page
 20 Memorandum is devoted to explaining why a temporary receiver should be appointed.
 21 [Dkt. #8 at 49-50]. Instead of walking the Court through the *Canada Life* factors, the FTC
 22 alleges that appointment of a receiver is "particularly appropriate" because of Defendants'
 23 "deceptive and unlawful business practices and history of violating court orders" make it
 24 likely that Defendants will destroy evidence and dissipate assets. [Dkt. #8 at p. 49]. This
 25 singular accusation is insufficient to meet the FTC's high burden to show that a receiver
 26 should be appointed.

27 **First**, the FTC has produced no evidence to support their assertions that there is
 28 imminent risk that assets will be concealed or improperly dissipated. So far, Mr. Noland

1 has no history of violating a court order, though the FTC will attempt to make that claim
 2 at some point (but has not yet). With knowledge of the FTC's investigations, Mr. Noland
 3 took no steps to dissipate his personal assets or the assets of the Defendant companies.
 4 Instead, Mr. Noland, through his attorney, sent a letter to the FTC offering full
 5 cooperation. [SOF ¶¶ 41-46]. The FTC ought not be able to manufacture a need for
 6 appointment of a receiver by ignoring Defendants' offer of cooperation.

7 The FTC attempts to show Mr. Noland's propensity to hide assets by identifying a
 8 payment to the Nestmann Group, but that payment is a subscription to a company that
 9 provides reports and other materials for individuals and business owners looking to live
 10 and expand abroad. [SOF ¶ 40] No such allegations are even made regarding the
 11 remaining Defendants, each of whom have had their assets frozen and subject to the
 12 Temporary Receiver's broad investigatory powers since January 13. Defendants,
 13 particularly Mr. Noland, are entitled to a factual showing more robust than just inference
 14 and conjecture before a receiver is appointed to manage their assets.

15 **Second**, for the reasons discussed above, the FTC is unlikely to prevail on its claims
 16 of violations of section 5(a) of the FTC Act. Even if the FTC was to establish a likelihood
 17 of prevailing on some aspect of their claims, any injunctive relief should limited to a
 18 prohibit only the specific business operations implicated in such claims, and the remainder
 19 of Defendants business can continue without receivership.

20 **Third**, the FTC's evidence fails to show that Defendants operate in a fraudulent
 21 manner. Defendants' evidence shows that the Success By Media can operate under their
 22 proposed modified business operations plan.

23 **Fourth**, FTC's allegations that Defendants present an imminent risk of loss,
 24 concealment, injury or diminution in value to the now-frozen business and personal assets
 25 are not compelling. There is no evidence to support the idea that Defendants would violate
 26 any reporting requirements imposed under the proposed modified business operations
 27 plan. In fact, Defendants previous offers of cooperation prove just the opposite. Nor do
 28 the Noland Defendants present a legitimate flight risk. While the Noland Defendants do

1 spend time in both Colombia and Uruguay, they do so as a lifestyle choice for their family,
 2 and in an attempt to expand the business, not as way to avoid responsibility for their U.S.
 3 obligations. [SOF ¶¶ 31-35]. On behalf of Success By Media, the Nolands took several
 4 steps towards establishing the business in Uruguay, including leasing warehouse/office
 5 space and soliciting applicants for various positions on Uruguay. [SOF ¶¶ 38-39]. The
 6 Noland Defendants do not own property in South America and do not intend to relocate
 7 there fulltime. [SOF ¶ 38].

8 **Fifth**, legal remedies are adequate. Defendants proposed modified business
 9 operations plan allows Success By Media to operate on an interim basis with the
 10 transparency that the FTC seeks, and under this Court's (not a receiver's) supervision.

11 **Sixth**, the likelihood of irreparable injury to Defendants and their business
 12 outweighs the harm to the FTC by denial of a permanent receiver. Since January 13, 2020,
 13 Defendants have been unable to accept or fulfill any orders by customers and affiliates.
 14 While the Temporary Receiver is empowered to operate the company, she has not done
 15 so. Moreover, Defendants are aware of affiliates (among the group purported to be in
 16 need of the FTC's protection) whose inability to access product to fulfill orders for their
 17 customers is harming their independent retail businesses. [*See supra*, n.3]. The likelihood
 18 that Defendants will be unable to overcome the disruption caused by the abrupt end to
 19 operations increases with each day. However, if operations are allowed on the modified
 20 interim basis proposed, there will be no harm to the FTC, affiliates, consumers, and
 21 minimal harm to Defendants' business.

22 **Seventh**, there is no risk of irreparable injury to the FTC because removing the
 23 receiver and allowing Defendants to operate on their proposed modified basis will actually
 24 preserve and increase asset value. Conversely, asset values are being diminished while
 25 Success By Media is inoperable.

26 **Eighth**, any legitimate FTC interests, which are to prevent violations of the FTC
 27 Act, are not well served by a receivership. The interim operations proposed by Defendants
 28 ensure compliant, Court-supervised operation pending the final determinations in this

1 case. The key to preserving all parties' interests lies in the operation—albeit limited
 2 operation—of the going concern.

3 Under these circumstances and with the proposed limitations, there is no basis for
 4 continuing the receivership and it should be terminated under the terms proposed by
 5 Defendants.

6 **2. Defendants are entitled to a Receiver's Bond.**

7 At the absolute minimum, any receiver appointed should be required to post a bond.
 8 In a typical civil proceeding, the party seeking a temporary restraining order or
 9 preliminary injunction is required to post a bond to protect the enjoined party's assets
 10 during the pendency of the injunction and the action. Fed. R. Civ. P. 65(c); *see also Conn.*
 11 *Gen. Life Ins. Co. v. New Images of Beverly Hills*, 321 F.3d 878, 882 (9th Cir. 2003) (We
 12 do not, however, believe that the language of Rule 65(c) absolves the party affected by
 13 the injunction from its obligation of presenting evidence that a bond is needed[.]"). In
 14 many similar cases involving alleged violations of section 5 of the FTC Act, courts have
 15 required a Temporary Receiver to post a bond. *See e.g. FTC v. Vemma*, 2:25-cv-01578-
 16 JJT at Dkt. #25, p. 16 (ordering Temporary Receiver to post a \$50,000 bond).

17 Although the Temporary Restraining Order does not require the Temporary
 18 Receiver to post a bond, the FTC made no argument to the Court in its briefing or
 19 otherwise as to why a receiver's bond should not be required in this case. Should the
 20 Court appoint a Permanent Receiver, Defendants request that the Court order the Receiver
 21 to post a bond in an amount appropriate to protect Defendants' assets and the value of the
 22 Success By Media business.

23 **C. The Court Should Not Freeze Defendants' Assets.**

24 A prejudgment freeze of a defendant's assets is an extraordinary remedy, imposed
 25 only where there is compelling evidence that the defendant would otherwise dissipate or
 26 hide assets. *See Johnson v. Couturier*, 572 F.3d 1067, 1085 (9th Cir. 2009) (noting that
 27 “[a] party seeking an asset freeze must show a likelihood of dissipation of the claimed
 28 assets, or other inability to recover monetary damages, if relief is not granted”); *In re*

1 *Estate of Ferdinand Marcos, Human Rights Litig.*, 25 F.3d 1467, 1480 (9th Cir. 1994)
2 (noting that a district court can enjoin a defendant where the “defendant has engaged in a
3 pattern of secreting or dissipating assets to avoid judgments”). The FTC has neither
4 alleged nor presented evidence that any of the Defendants here have engaged in the kind
5 of conduct that warrants a prejudgment freeze of their assets. This Court, therefore, should
6 deny that aspect of preliminary relief requested by the FTC.

D. The Court Should Not Impose Monetary Sanctions as Part of Preliminary Relief.

The FTC seeks relief pursuant to Sections 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 53(b), 57b. (Dkt. #35 at 40.) Section 13(b) of the Act authorizes the district court to impose preliminary injunctive relief to prevent violation of law enforced by the FTC, applying the usual weighing of factors such as likelihood of success on the ultimate merits. 15 U.S.C. § 53(b)(2). Section 19 of the Act provides that as part of final judgment, the district court can impose injunctive relief and monetary relief for violations of the FTC Act. 15 U.S.C. § 57b(b). Because Section 13(b) addresses preliminary relief, it controls what remedy this Court can impose now.

17 Although § 53(b) does not specifically authorize the imposition of monetary
18 damages as part of preliminary relief, controlling Ninth Circuit precedent holds that a
19 district court has discretion to impose monetary relief such as restitution pursuant to 15
20 U.S.C. § 53(b). *See FTC v. AMG Capital Mgt., Inc.*, 910 F.3d 417, 422 (9th Cir. 2018).

21 There is ample reason to question whether the Ninth Circuit has correctly construed
22 the extent of relief that a district court has discretion to impose under the injunctive powers
23 [provided by § 53(b). *See AMG Capital*, 910 F.3d at 430 (“if ‘injunction’ included court
24 orders to pay monetary judgments, then “a statutory limitation to injunctive relief would
25 be meaningless, since any claim for legal relief can, with lawyerly inventiveness, be
26 phrased in terms of an injunction.””]) (O’Scannlain, CJ, specially concurring, joined by
27 Bea, CJ, quoting *Great-West Life & Annuity Ins. Co. v. Knudson*, 534 U.S. 204, 211 n.1
28 (2002)). As Judge O’Scannlain wrote:

Read together, §§ 13(b) and 19 give the Commission two complementary tools—one forward-looking and preventive, the other backward-looking and remedial—to satisfy its statutory mandate. Injunctive relief in § 13(b) therefore functions as a simple stop-gap measure that allows the Commission to act quickly to prevent harm. * * * Buttressing § 13(b)'s preventive relief, § 19 allows the Commission later to seek retrospective relief to punish or to remediate past violations.

* * *

[A]warding monetary relief under § 13(b) circumvents § 19's procedural protections.

Id. at 431.

Until and unless the Ninth Circuit interpretation of § 13(b) of the FTC Act is overturned by an *en banc* panel or the Supreme Court, it is controlling law. *Miller v. Gammie*, 335 F.3d 889, 893 (9th Cir. 2003) (*en banc*). But that precedent only stands for the principal that § 13(b) gives the district court discretion to order monetary relief as part of its preliminary injunctive powers. It does not mandate that the court order such relief. It is discretionary. For all the reasons identified by Judge O’Scannlain in *AMG Capital*, (for which a petition for *writ of certiorari* is currently pending), this court should exercise its discretion and refrain from ordering any monetary relief at this early point in this litigation.

IV. CONCLUSION

The FTC has not met its burden to show that a preliminary injunction, continued asset freeze, and continued appointment of a receiver should issue. Defendants have the right to operate their businesses unless and until this Court adjudicates—on the merits and after a full and fair trial—that Defendants have violated section 5 of the FTC Act. For these reasons, Defendants request that the Court deny the FTC’s request for a preliminary injunction.

1 RESPECTFULLY SUBMITTED this 6th day of February, 2020.

2 GORDON REES SCULLY
3 MANSUKHANI, LLP

4 By: /s/ Leon B. Silver
5 Leon B. Silver
6 Rebecca N. Cain
7 Andrew S. Jacob
8 Mary M. Curtin
9 Rachel L. Werner

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on February 6th, 2020, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the CM/ECF registrants represented in this matter.

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By: Angelina Chavez

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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

I, James D. Noland, Jr., declare under penalty of perjury:

1. I am the chief executive officer of Success By Media, LLC.
 2. I am also the owner, director, chief executive officer, president, and treasurer of Success By Media Holdings, Inc., which is Success By Media LLC's parent company (collectively, "Success By Media").

1 3. I declare that following is either personally known to me or has been obtained from (1) people who I believe to be reliable and capable of ascertaining the facts described herein or (2) records maintained by Success By Media.

4 4. Success By Media operates three distinct revenue-generating business verticals:

- 6 • Success By Coaching
- 7 • Success By Networking
- 8 • Success By Health

9 5. Success By Coaching provides generic, non-branded personal growth and training systems.

11 6. Success By Coaching has generated \$592,087.67 in revenue since its inception in 2016.

13 7. Success By Networking provides consulting and training services to individuals in the direct sales industry.

15 8. Success By Networking has generated \$872,687.92 in revenue since its inception is 2016.

17 9. Success By Health (SBH) is an affiliate-marketing program that sells coffee products and other nutraceuticals through its online platform and network of affiliates.

19 10. SBH has generated \$7,040,205.05 in revenue since its inception in mid-2017.

20 11. Prior to the imposition of the temporary restraining order in FTC v. Noland et al, 20-cv-00047-PHX-DWL, Success By Media was also in the process of launching additional business verticals including: Success By VT (Virtual Training), Success By Travel, and Success By Music.

24 12. Revenue generated by the various business verticals is reflected in Success By Media's audited year-end financial statements.

26 13. All business verticals are operated through Success By Media and utilize the same bank accounts and payment platforms.

28 14. As of January 13, 2020, SBH had 6,754 affiliates.

1 15. As of January 12, 2020, 5,003 of SBH Affiliates earned commissions and
2 1,751 did not.

3 16. SBH Affiliates earned an average of \$387.42 in commissions, which includes
4 affiliates who earned no commissions.

5 17. SBH Affiliates who earned commissions averaged \$523.01 in earnings.

6 18. To become an SBH Affiliate, an interested individual must register with SBH
7 and pay a \$49 annual fee.

8 19. Upon payment of the fee and completion of a valid registration form, the
9 Affiliate is immediately qualified to begin earning commissions and bonuses.

10 20. SBH Affiliates are compensated in three ways: (1) direct retail sales to
11 consumers, (2) commissions earned on online product sales, and (3) bonuses.

12 21. Affiliates who sell SBH products through direct retail sales to customers
13 retain 100% of any profit realized on those sales.

14 22. Affiliates also earn Tier Commissions of 10% on any of their own purchases,
15 as well as on purchases made through the affiliate's unique e-commerce site, which is a
16 mirror of the SBH e-commerce portal.

17 23. Affiliates can also earn Tier Commissions on their downline Affiliates'
18 product sales as follows:

- 19 • Tier 1: 10%
- 20 • Tier 2: 6%
- 21 • Tier 3: 4%
- 22 • Tier 4: 3%
- 23 • Tier 5: 2%

24 24. There are no minimum monthly volume requirements or a minimum
25 number of downline affiliates required to earn Tier Commissions.

26 25. SBH also has a number of bonus programs: Auto-Order Bonuses,
27 Accelerator Generation Infinity Bonuses and BAM Bonuses.

28

1 26. Auto-Order Bonuses are a loyalty rewards program, which allows affiliates
2 to earn a 5% product credit on personal auto-orders plus additional \$65 or \$130 product
3 credit for enrolling 5 or 10 customers/affiliates in a \$60 monthly auto-order.

4 27. Auto-Order is not required to earn any other SBH commissions.

5 28. Accelerator Bonuses are one-time bonuses available to affiliates whose
6 downline affiliates purchase a promotional product business pack.

7 29. SBH Affiliates earn a minimum of \$15 and up to \$30 for the sale of the \$125
8 Product Starter Pack.

9 30. A \$125 Product Starter Pack contains \$156 worth of product (as calculated
10 by the listed wholesale price of each product if purchased individually).

11 31. SBH Affiliates earn a minimum of \$75 and up to \$125 for the sale of the
12 \$500 Accelerator Pack.

13 32. A \$500 Accelerator Pack contains \$605.00 worth of product (as calculated
14 by the listed wholesale price of each product if purchased individually).

15 33. SBH Affiliates earns a minimum of \$325 and up to \$500 for the sale of the
16 \$1995 Super Accelerator Pack.

17 34. A \$1995 Super Accelerator Pack contains \$2198.00 worth of product.

18 35. An affiliate whose team reaches \$15,000 in purchases in their team network
19 becomes a Super Business Affiliate and earns a 1% “Generation Infinity Bonus” on all
20 purchases (customer or affiliate) in his network.

21 36. Super Business Affiliates can earn up to an additional 3% “Generation
22 Infinity Bonus” based on the sales purchases performance of their affiliate team.

23 37. SBH Affiliates earn one-time BAM bonuses for hitting certain team and sales
24 milestones.

25 38. BAM bonuses range from \$1,000 to \$5 million and depend on the number of
26 downline affiliates and their product purchases in the earning affiliate’s network.

1 39. The BAM Bonus is the only SBH bonus that requires a certain number of
 2 downline affiliates to qualify. However product purchases must be made by those certain
 3 number of downline affiliates in an effort to promote more retail sales.

4 40. SBH marketing and training emphasize that retail sale of the products is
 5 always the first step toward getting paid as a SBH Affiliate.

6 41. In my first-ever video presentation on the SBH program on October 31,
 7 2017, I referred to retail sales as “number one.”

8 42. SBH hosts “Daily Heat Calls” during which affiliates are encouraged to
 9 share their retail success stories.

10 43. From July 2017 through January 13, 2020, SBH hosted the following
 11 affiliate trainings/check-in events:

- 12 • 609 Daily Heat Calls
- 13 • 358 Facebook Live Videos

14 44. Scott Harris and Thomas Sacca also operate as Senior Field Advisors for
 15 SBH.

16 45. SBH Senior Field Advisors are responsible for verifying SBH Affiliates’
 17 compliance with training including sales scripts and recruitment scripts.

18 46. Senior Field Advisors are responsible for responding to and resolving
 19 support tickets submitted through the Success By Media support center.

20 47. Senior Field Advisors also assist SBH Affiliates with offloading unwanted
 21 product to other affiliates or customers through direct sales.

22 48. SBH Terms of Use can be access via a link on the bottom bar of the SBH
 23 website. (www.successbyhealth.com). A true and correct copy of the SBH Website is
 24 attached hereto as Exhibit 1.

25 49. SBH Shipping Terms can be accessed via a link on the bottom bar of the
 26 SBH website. A true and correct copy of the SBH Shipping Terms is attached hereto as
 27 Exhibit 2.

28 50. From July 2017 to January 2020, SBH logged 33,473 product transactions.

1 51. Of the total product transactions logged by SBH, 33,123 were successfully
 2 processed and delivered.

3 52. From May 30, 2018 through January 10, 2020, SBH shipped 21,920 orders.

4 53. The average time to fulfill (from invoice to shipment from warehouse) those
 5 orders placed between May 30, 2018 and January 10, 2020 was 3.933 days.

6 54. Any backordered items would be designated as such on the “Product
 7 Catalog,” the e-commerce platform within SBH’s website.
 8 (<https://successbyhealth.com/product-catalog>).

9 55. From July 2017 to January 2020, Success By Media issued 172 refunds on
 10 SBH products.

11 56. Success By Media received 134 chargeback requests from SBH purchasers’
 12 credit card companies, 44 of which were later reversed when SBH established that the
 13 complaining purchaser received the product ordered.

14 57. Based on my experience in the direct sales industry, SBH’s rate of
 15 chargeback occurrences is low.

16 58. SBH Senior Field Advisors also work with Affiliates or customers
 17 considering a refund to offload product through sale to other customers or Affiliates.

18 59. Any product resold through direct retail sales would not be logged in SBH
 19 records as a refund, but resulted in purchasers being compensated for unwanted product.

20 60. My wife Lina Noland was born and raised in Colombia.

21 61. Lina relocated to the United States from Colombia after we got married in
 22 November 2012.

23 62. Lina and I have always wanted our son, who is bilingual, to experience life
 24 in a Latin American country.

25 63. We considered spending part of the year in Colombia where Lina’s family
 26 still lives, but decided against it due to security concerns.

27 64. After researching for several years which Latin American countries were
 28 safest for foreign nationals to live and work in, we determined that we would visit

1 Uruguay to assess whether it would be a place that our family could live part-time and
2 possibly expand and launch other businesses.

3 65. We traveled to Uruguay for the first time in August, 2019 and spent
4 approximately nine days there before traveling to Colombia to visit Lina's family.

5 66. We returned to the United States on September 3, 2019.

6 67. After returning to the United States, we again visited Uruguay in October
7 2019. I returned on January 13, 2020 with Lina and our son.

8 68. We do not own real estate in Uruguay, but leased an apartment and a
9 office/media facility for Success By Media's operations.

10 69. We did establish a Uruguayan bank account.

11 70. We also financed one car and two all-terrain vehicles in Uruguay for our
12 personal use and the company's use.

13 71. Success By Media listed three job openings for positions with Success By
14 Media in Uruguay: an Executive Assistant, an Office Manager, and Model Talent. True
15 and correct copies for those job postings are attached hereto as Exhibit 3.

16 72. As of February 6, 2020, Success By Media has received over 100
17 applications in responses to those postings, and I conducted several in-person interviews
18 at our office location there.

19 73. I make payments to the Nestmann Group from as a subscription for access to
20 reports other materials for individuals and business owners looking to live or expand their
21 businesses abroad.

22 74. Prior to the service of the Complaint and Temporary Restraining Order in
23 this matter, the FTC never notified me of any concerns regarding Success By Media's or
24 SBH's business practices or asked me to provide any information regarding the same.

25 75. The FTC never made any requests of me pursuant to the 2002 Permanent
26 Injunction issued in *F.T.C. v. Netforce Seminars*, 00-cv-2260-PHX-FJM, authorizing the
27 same.

28

1 76. In May 2019, I learned of the FTC's investigation through a bank subpoena
2 issued by the FTC to Wells Fargo bank.

3 77. On May 20, 2019, I, through counsel, sent a letter to the FTC offering to
4 cooperate with the ongoing investigation. A true and correct copy of that letter is attached
5 hereto as Exh. 4.

6 78. After that letter was sent, the FTC did not make any requests of me personally
7 or of Success by Media.

8

9 DATED February 6, 2020.

10

11 James D Noland Jr.

12 James D. Noland, Jr.

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EXHIBIT 1

David G. Eisenstein, Esq.

Attorney-At-Law

2588 El Camino Real, Suite F-139
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Email: Eisenlegal@gmail.com

also admitted in Arizona

May 20, 2019

Jonathan W. Ware
Federal Trade Commission
600 Pennsylvania Avenue, NW
Drop CC-9528

VIA EMAIL ONLY TO jware1@ftc.gov

Re: James D. (“J.D.”) Noland/Settled/Terminated Civil Action Case No.: 00-2260 PHX
FJM (*FTC v. Netforce Seminars, et al.*)/**Federal Rules of Evidence, Rule 408**
Confidential Offer of Settlement

Dear Mr. Ware,

As we discussed by telephone earlier today, I represent James D. Noland Jr., Success By Media, LLC and its divisions (collectively referenced herein as “SBM”) with respect to the Commission’s ongoing review to assure compliance with the Final Judgment and Order for a Permanent Injunction as to J.D. Noland signed by U.S. District Court Judge Frederick J. Martone on July 1, 2002, and filed July 8, 2002 (the “Injunction”).

My purpose in corresponding with you at this time is to convey my clients’ offer of cooperation in the Commission’s ongoing review to assure compliance with the Injunction. It is our hope that you will agree that my clients’ cooperation will help expedite the Commission’s review.

Please advise at your earliest convenience as to whether the offer of cooperation set forth in this correspondence is acceptable.

Sincerely,

/s/ David Eisenstein
David G. Eisenstein, Esq.

DE/dge

cc. James D. “J.D.” Noland

EXHIBIT 2



Referring Affiliate: Success By Health (o)

ES



Affiliate Login



AFFILIATES FOUNDATION RESOURCES ▾ NEWS

MYCOCAFÉ COFFEES

PRODUCTS

SUCCESS BY HEALTH BRINGS YOU BACK TO THE BASICS

The human body can live to 120 years of age

In a world full of fad diets and trendy workouts, it is hard to know the best course of action when taking control of your health and wellness. Success By Health brings you back to the basics. We believe that when cared for correctly, the human body can live to 120 years of age. We have created the most powerful nutritional products, and the most up to date, customizable, fitness and nutrition plans. We will be a guide and a resource to you the entire way, as we understand that in order to live in true health and complete wellness, we must address it from all aspects of life.

One of our key nutritional components, is maximizing the full potential of the "Myco World" (medicinal mushrooms). Ganoderma (Reishi Mushroom) is known as the "King of Herbs" and has over 3 million pages of third party documentation. There are also other powerful mushrooms that we cultivate that can combine to provide your body with the most potent nutritional properties available in the world.

We will be a guide and a resource to you the entire way, as we understand that in order to live in true health and complete wellness, we must address it from all aspects of life:

MENTAL EMOTIONAL PHYSICAL SOCIAL FINANCIAL SPIRITUAL

Pro

HAPPY CUSTOMERS

The most amazing products I've used and with great results!

Brenda L

AFFILIATE PROGRAM

Make Money Referring Our Products & Services

Through our powerful affiliate program, we allow everyone the opportunity to profit from our company's products and success. The Success By Health (SBH) Affiliate Program is simple to join and requires no monthly product purchases to earn commissions. Simply refer our products and services to others and earn! Our program pays up to 35% (or more) on every order that the company receives that is referred by our affiliates. Our Affiliate Program includes a powerful 6 Level Affiliate Payout.

READ MORE

SBH CEO's Company Vision Message



OUR PRODUCTS

BEVERAGES

NUTRACEUTICALS

BUSINESS PACKS

COMBO PACKS



[BEVERAGES](#)[NUTRACEUTICALS](#)[BUSINESS PACKS](#)[COMBO PACKS](#)

BLOG



INTUITIVE EATING AND REAL HEALTH

Let's talk about food. It may seem like a weird topic for a success and lifestyle blog. Let me explain why it affects everything you do.

We tend to forget that food is just food. It is not inherently good or bad. Our judgements make it that way and our bodies respond to food based on those judgements and beliefs just like your bank account responds to your judgements and beliefs about money.

[READ MORE](#)


5 WAYS TO BE MORE PATIENT WITH YOURSELF AND YOUR BUSINESS

What do long lines, weight loss, and babysitting all have in common?

Okay, yeah maybe they cause stress, or they're situations we don't really like to be in- but the real answer is, they're all situations where we could use a little extra patience.

[READ MORE](#)

AFFILIATE INFO

Success By Health (o)
EM: info@successbymedia.com
PH: 8885989990


[Contact](#)


ORGANIC GANODERMA



Success By Health's Ganoderma and other nutritional mushrooms are Organic.



PRODUCTS

G-FYX

[MYCOCAFÉ GOURMET BLACK COFFEE](#)

[MYCOCAFÉ GOURMET LATTE](#)

[SBH USA ACCELERATOR PACK](#)

LEGAL

[Disclaimer](#)

[Terms of Use](#)

[Refund/Cancellation Policy](#)

[Privacy Policy](#)

[Shipping Policy](#)

[Support](#)

RED 2020
MILLIONAIRE WORKSHOP

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EXHIBIT 3

Referring Affiliate: Success By Health (o) [ES](#) [f](#) [Affiliate Login](#)
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EXHIBIT B

FTC vs. Noland
Expert Report: Michael A. Fahlman
February 6, 2020





In the matter re:

Federal Trade Commission

vs.

James D. Noland, Jr. et. al.

United States District Court

for the District of Arizona

Case #: CV-20-00047-PHX-DWL

Expert Report of:

Michael A. Fahlman, CPA, CFF, CIRA

February 6, 2020



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Appendix:

A – Curriculum Vita of Michael A. Fahlman, CPA, CFF, CIRA



I. Qualifications

1. I am a Certified Public Accountant, Certified in Financial Forensics by the American Institute of Certified Public Accountants (“AICPA”), and a Certified Insolvency and Restructuring Advisor. I regularly provide clients, including legal counsel, boards of directors, executive management and governmental entities, with accounting, compliance, financial, economic, forensic and fraud-related consulting services.
2. I have testified and presented my findings and opinions over 100 times, including federal and state court, arbitration, mediation, government and regulatory hearings, law enforcement inquiries, and special investigation committees. I have been before the Securities Exchange Commission, the Department of Justice and the Federal Bureau of Investigation on financial fraud cases. I also serve as an independent neutral arbiter in post-merger disputes and issue final and binding decisions.
3. I am a Managing Director at Berkeley Research Group, LLC (“BRG”). BRG is a leading global strategic advisory and expert services firm that provides independent expert testimony, litigation and regulatory support, authoritative studies, strategic advice, and document and data analytics to major law firms, Fortune 500 corporations, government agencies, and regulatory bodies around the world. Prior to BRG, I was the west region managing partner for Grant Thornton LLP’s (“GT”) forensic and dispute practice. In that role, in addition to my professional practice, I worked with GT’s national and legal offices on large complex investigations, regulatory inquiries and fraud related matters. I had responsibility in assessing and concluding on complex financial statement, audit and fraud related issues. I was also a national quality control partner for forensic investigation and dispute consulting engagements. Prior to GT, I was the turnaround Chief Financial Officer and Vice President of a 72-unit multi-state retail company.
4. I am the Chairman of the AICPA’s Forensic & Litigation Services Committee (“FLS”). The FLS is focused on identifying, collecting, developing and disseminating technical, industry, legislative and regulatory issues related to forensic accounting along with practice management tools through such vehicles as newsletters, AICPA Online, publications, continuing education and conferences. I am the immediate past-Chair of the AICPA’s Damages Task Force, which is focused on providing members technical guidance on economic damages matters. I regularly provide technical guidance, present, and author material on damages issues for the AICPA.
5. In addition to the AICPA, I am a past co-chair of the Economic Damages committee of the American Bar Association. This committee is focused on providing content to members of the ABA regarding economic damages issues. I also regularly provide damages content for the ABA. In



addition to providing content for both the AICPA and ABA, I teach at universities, bar associations, and law firms on the topics of forensic accounting and damages.

6. I have worked on numerous alleged fraud cases, including multi-level marketing cases such as this case. I analyzed alleged fraud claims for multi-level marketing organizations during my career at Grant Thornton LLP, including assisting the national legal office and audit practice with assessing audit and fraud risks at multi-level marketing organizations. I also taught continuing professional education regarding financial fraud for Grant Thornton LLP's multi-level marketing clients.
7. My curriculum vita accompanies this report at **Appendix A** and includes seminars I conducted, articles I published, and testimony I provided in the last four years.

II. Assignment

8. I was retained by Gordon & Rees, Scully Mansukhani on behalf of Success by Media Holdings, Inc., Success By Media, LLC, James D. Noland and Lina Noland ("Defendants") in the above referenced case number CV-20-00047-PHX-DWL. I am billing at \$695 per hour for this matter. I was asked to provide independent financial forensics and economic analysis and opinions regarding the Federal Trade Commission's ("FTC") claims that the Defendants were operating an illegal pyramid scheme.
9. More specifically, I was asked to evaluate information, opinions or testimony provided by the FTC and its witnesses and provide rebuttal opinions (if any). Further, I understand I may be asked to testify and present demonstrative information at hearings or trial in this matter.
10. Hereafter, "I" means me and individuals working for me on this engagement, except for the "**Opinions**" and "**Signature**" sections below which are solely mine.

III. Information and Material Analyzed

11. I analyzed the FTC's Complaint For Permanent Injunction and Other Equitable Relief, the FTC's expert report submitted by Stacie Bosley, Ph.D. (the "Bosley Report")¹, a declaration by the FTC's data analyst Amanda Wilson (the "Wilson Declaration")², and had discussions with Defendants' counsel. I understand discovery is ongoing and that additional information may become available to me after this report, and that I may be asked to consider such information and potentially update my report and opinions.

¹ Plaintiff's Exhibit (PX) 3 to the FTC's Complaint For Permanent Injunction and Other Equitable Relief

² Plaintiff's Exhibit (PX) 5 to the FTC's Complaint For Permanent Injunction and Other Equitable Relief



IV. Case Background

12. This section is based on information that I have been provided. This section is not intended to be an exact recitation of the facts, provide any legal determinations or conclusions, or expert opinions; it is included solely to provide an overview of relevant information and context for the work performed and opinions provided below.

The Dispute

13. The FTC has filed suit against Defendants alleging violations of the Federal Trade Commission Act (the “FTC Act”); the Mail, Internet, or Telephone Order Merchandise Rule (the “Merchandise Rule”); and the Rule Concerning Cooling-Off Period for Sales Made at Homes or at Certain Other Locations (the “Cooling-Off Rule”). The FTC seeks to obtain temporary, preliminary, and permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, and disgorgement of ill-gotten gains, among other relief.³

Direct Selling, Multi-Level Marketing, and Pyramid Schemes

14. Direct selling is described by the Direct Selling Association (“DSA”) as a type of business model that provides entrepreneurial opportunities to individuals as independent contractors to market or sell products and services. This usually occurs outside of a fixed retail establishment, through one-to-one selling, in-home product demonstrations, or online. Compensation to direct sellers is based on sales and may be earned based on personal sales or the sales of others in their sales team.⁴ Direct selling includes a variety of distribution methods, including multilevel marketing (“MLM”).

15. MLM is one type of distribution and compensation method. The FTC recognizes MLM as a type of direct selling and is used by hundreds of companies.⁵ According to the FTC, most MLMs suggest making money by selling products to “retail” customers not involved in the MLM, and by recruiting new participants and earning commissions based on their personal and retail sales.⁶ The recruits and their recruits become part of the direct seller’s sales network or “downline.”

³ Complaint, ¶1 and ¶¶136-137.

⁴ <https://www.dsa.org/statistics-insights/factsheets>, p. 2.

⁵ <https://www.dsa.org/about/faq>.

⁶ <https://www.consumer.ftc.gov/articles/0065-multi-level-marketing-businesses-and-pyramid-schemes>.



16. Pyramid schemes are defined by DSA as illegal business operations seeking to defraud customers by manipulating their salesforce to enrich company leadership at the expense of individual participants.⁷ Pyramid schemes compensate its sales members primarily for recruiting new participants, rather than for selling products and services to customers or purchasing them for personal consumption.⁸

Relevant Case Law

17. When evaluating whether an MLM operates as a pyramid scheme, it is my understanding that several court cases address this type of business structure. These cases include the commonly referred to “*Kosco*” case, the “*Omnitrition*” case, and more recently in 2014, the “*BurnLounge*” opinion issued by the 9th Circuit.
18. I am not an attorney and provide no legal opinions on these cases or how they are to be applied. Further, I did not include an explanation of these cases here as I understand the parties will have briefed the Court on these legal and case precedent matters. However, based on my review of these cases and through discussion with counsel, I understand that there is a two-prong test discussed in the *BurnLounge* opinion that bears on whether an MLM business is an illegal pyramid scheme.

V. Work Performed and Bases for Opinions

19. I have opinions in this case for the following categories:
 - a. Dr. Bosley’s Improper Opinions Regarding Fraud and Intent
 - b. Dr. Bosley’s Failure to Properly Perform a Financial Forensic and Economic Analysis

Dr. Bosley’s Improper Opinions Regarding Fraud and Intent

20. The Bosley Report generally concludes that the Defendants are allegedly marketing a pyramid scheme and are misrepresenting to consumers the amount of money they are likely to make by joining SBH.⁹ Dr. Bosley’s opinion that SBH is a pyramid scheme is based heavily on her evaluation of YouTube videos and other promotional and training materials, her assessment of the Defendants’

⁷ <https://www.dsa.org/about/faq>.

⁸ <https://www.dsa.org/about/faq>.

⁹ Bosley Report, ¶140.



intent related to the videos and materials, along with her interpretation of what a consumer may believe from such material. Dr. Bosley further evaluates and apparently opines on what may be motivating consumers to engage with the Defendants in elective arms-length economic transactions.

21. In forming her opinions, Dr. Bosley improperly provides opinions concerning the Defendants' intentions, consumers' intentions for participating in the business opportunity, as well as the Defendants' "fraudulent marketing program." Dr. Bosley opines that "SBH and Mr. Noland are promoting a fraudulent marketing program, using deceptive and prohibited income representations."¹⁰ This is in violation of generally accepted methodologies – and professional standards – for experts providing testimony on the elements of a financial fraud claim.
22. For example, the American Institute of Certified Public Accountants ("AICPA")'s Statements on Standards for Forensic Services No. 1 ("SSFS 1") establishes authoritative professional standards when providing expert opinions in financial fraud cases. While an expert may provide opinions – when based upon generally accepted methodologies correctly applied – regarding certain elements of a fraud claim, SSFS 1 prohibits an expert witness "from opining regarding the ultimate conclusion of fraud."¹¹ The reason SSFS 1 establishes this requirement is to prevent experts from inappropriately stepping into the shoes of the trier of fact by providing an opinion as to someone's intent and whether something is a fraud. This issue was addressed in a November 4, 2019¹² AICPA presentation on SSFS 1, which noted:

As defendants correctly observe, there is no such thing as a 'fraud expert.' Fraud requires an inference about a defendant's mental state, and it is counsel's job – not an expert witness's – to establish a link, through argument between the evidence and the defendant's intent.¹³

23. Similarly, according to the Public Company Accounting Oversight Board ("PCAOB") which establishes auditing standards for public companies, Auditing Standard ("AS") 2401 states that "[f]raud is a broad legal concept" and auditors are prohibited from making "legal determinations of whether

¹⁰ Bosley Report, ¶145.

¹¹ AICPA Statement on Standards for Forensic Services No. 1, ¶10.

¹² Due to the importance of this issue, this presentation was repeated on November 5, 2019 and January 14, 2020.

¹³ United States ex. rel. Dolan v. Long Grove Manor, Inc., United States District Court for the Northern District of Illinois, Eastern Division, July 12, 2018



fraud has occurred.”¹⁴ AS 2401 further specifies that “the primary factor that distinguishes fraud from error is whether the underlying action...is intentional or unintentional.”¹⁵

- 24. In addition, according to the Association of Certified Fraud Examiners (“ACFE”)’s *Fraud Examiners Manual* and Code of Professional Ethics, “[n]o opinion shall be expressed [by an ACFE member] regarding the guilt or innocence of any person or party.” Such role is reserved for the trier of fact.¹⁶
- 25. These generally accepted methodologies in the financial fraud profession are consistent with the Federal Rules of Evidence.¹⁷ However, regardless of a violation of the Federal Rules of Evidence, the Bosley Report’s opinion on fraud and intent is fundamentally flawed and is directly contradictory to generally accepted standards and methodologies, and is therefore inappropriate and unreliable.¹⁸

Dr. Bosley’s Failure to Properly Perform a Financial Forensic and Economic Analysis

- 26. I understand a key element of proving that an MLM is an illegal pyramid scheme is whether the participants received rewards for recruiting other participants into the program, which were unrelated to the sale of the product or services to ultimate users. In accounting and financial vernacular, the question is whether economic benefit is exchanging hands to recruit others, or for the sale and consumption of product or services.
- 27. While generally accepted methodologies – and professional standards – do not allow an expert to opine on fraud and intent, they do allow an expert to perform analyses that may be helpful to the trier of fact in its evaluation of factual and legal elements, including fraud and intent.¹⁹ Per SSFS 1, “[a] member

¹⁴ AS 2401, Consideration of Fraud in a Financial Statement Audit, AS §2401.05.

¹⁵ AS 2401, Consideration of Fraud in a Financial Statement Audit, AS §2401.05.

¹⁶ ACFE 2018 Fraud Examiners Manual, 2.1237.

¹⁷ I have no opinion whether the Bosley Report is in violation of the Federal Rules of Evidence.

Rule 704 Opinion on an Ultimate Issue: “No expert witness testifying with respect to the mental state or condition of a defendant in a criminal case may state an opinion or inference as to whether the defendant did or did not have the mental state or condition constituting an element of the crime charged or of a defense thereto. Such ultimate issues are matters for the trier of fact alone.” **See also**, AICPA Forensic & Valuation Services Practice Aid, Serving as an Expert Witness or Consultant, 2019, p. 76.

¹⁸ In certain instances, Dr. Bosley also appears to render legal conclusions. According to the ACFE, “...testifying expert witnesses give opinion testimony, which is based upon their specialized knowledge and experience about case issues, but experts may only give opinion testimony in areas that will aid the fact finders in reaching their verdict. Additionally, in some jurisdictions, experts may give opinion testimony on ultimate issues (i.e., the basic conclusions upon which the outcome of a case depends), but they cannot offer legal conclusions or educate the jury on the principles of law. However, there are some jurisdictions that do not allow expert opinions at all, and in such jurisdictions, experts are restricted to providing technical information.” ACFE 2018 Fraud Examiners Manual, 2.1237.



may provide expert opinions relating to whether evidence is consistent with certain elements of fraud or other laws based on objective evaluation.”

Actual Commissions

28. As an example, an expert may perform data analysis and compare the results of that analysis to certain considerations a trier of fact may find useful. In this case, how actual commissions are paid to participants or “Affiliates” are important from a financial forensic perspective. To perform this analysis, an expert can examine the timing, nature and form of actual commissions paid by SBH, and whether – and how much of – those commissions were for product sales, versus commissions for alleged recruitment. That type of financial and economic analysis is critical in assessing whether participants received rewards for recruiting other participants into the program, which were unrelated to the sale of the product or services to ultimate users.
29. Dr. Bosley did not perform that analysis. Nonetheless, Dr. Bosley concluded – without analyzing actual commission data – that “Affiliate compensation is overwhelmingly triggered by recruitment and recruitment-associated purchases, not to sales of ultimate users.”²⁰ While Dr. Bosley acknowledges that “some share of SBH compensation may be tied to sales to ultimate users,” she determines that the [Defendants’] compensation and training system is designed to predominantly compensate participants for recruitment of new Affiliates through a system of induced purchases.” Dr. Bosley’s opinions are not based on a generally accepted financial forensic analysis.

Retail Sales and Internal Consumption

30. In another example, Dr. Bosley could have analyzed the participants’ product purchases and evaluated what amount of product purchases may have been for personal consumption. As I understand, personal consumption of product is deemed to be retail sales for purposes of evaluating whether an MLM is an illegal pyramid scheme. Therefore, those internal consumption transactions would then be treated as payments to the Defendants – and corresponding commissions to participants – for product

¹⁹ Which is consistent with Federal Rules of Evidence, Rule 702. Testimony by Expert Witnesses: “If scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence to determine a fact in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education may testify thereto in the form of an opinion or, otherwise, if (1) the testimony is based upon sufficient facts or data, (2) the testimony is the product of reliable principles and methods, and (3) the witness has applied the principles and methods reliably to the facts of the case.”

²⁰ Bosley Report, ¶142.



sales, and not recruitment. That financial and economic analysis is critical in assessing whether participants received rewards for recruiting other participants into the program, which were unrelated to the sale of the product or services to ultimate users. Dr. Bosley did not perform that analysis.

31. Dr. Bosley also failed to properly consider whether some of the product may have re-sold by the participants below, at or near the wholesale price, and not at the \$35 example in the Bosley Report. Consistent with my understanding of personal consumption, these types of transactions would be deemed product sales, and not recruitment. That financial and economic analysis is critical in assessing whether participants received rewards for recruiting other participants into the program, which were unrelated to the sale of the product or services to ultimate users. Dr. Bosley did not perform that analysis.

Product Included in Packs

32. Dr. Bosley also could have analyzed the internal consumption and actual value of the product included in the Defendants' discount multi-product packs. That type of financial and economic analysis would bear on: i.) the evaluation of internal consumption; ii.) payment of commissions for product versus recruitment; and iii.) calculation of participants' net loss versus net gain (discussed below). Dr. Bosley did not perform that analysis.

Professional Training

33. Dr. Bosley also could have performed an analysis of the value of professional training. Dr. Bosley seemingly opines that the Defendants' training services it offers are meaningless and of no value to the participants. However, professional business training is a generally accepted method of developing people, growing revenue, and expanding businesses in corporate America. Those professional trainings cost money and are of economic value to the attendee. Dr. Bosley's analysis fails to properly evaluate the value of the professional training services provided by the Defendants, which would impact her calculation of participants' net loss and net gain.

Calculation of Participants' Net Loss and Net Gain

34. The previously described types of analyses are consistent with the types of generally accepted methodologies employed by the financial forensics profession and would likely be helpful to the trier



of fact in this case. Not only did Dr. Bosley fail to perform those analyses, but the limited data analysis included in the Bosley Report is misleading and unreliable.

35. Dr. Bosley had a copy of the Defendants' financial data the FTC obtained through its subpoena power.²¹ However, rather than providing a robust financial and economic analysis, Dr. Bosley glossed over data analysis and provided approximately only three (3) pages – out of an 80 page report – of information regarding the Defendants' actual financial data.
36. Dr. Bosley's own words demonstrate that her views are based on her suppositions as to what may happen, not what actually happened financially. Dr. Bosley concludes that the “anticipated result of SBH's program, as designed, is an endless recruitment chain, with a strong emphasis on recruitment over sales to ultimate users.”²² From a financial forensics perspective, the structure of a compensation model itself may not be sufficiently instructive in analyzing the financial aspects of an alleged illegal pyramid scheme.
37. Dr. Bosley's three (3) pages of purported data analysis is almost exclusively about her calculation of the “Net Loss” or “Net Gain” for “Affiliates.” Dr. Bosley apparently provided this profitability analysis in an attempt to demonstrate or support her position that “[f]rom an economic perspective, a pyramid scheme exists when a compensation structure is designed to create a perpetual recruitment chain that dooms the vast majority of participants to financial loss.”²³
38. However, Dr. Bosley's calculation of “Net Loss” and “Net Gain” is forensically flawed and unreliable. As discussed above, Dr. Bosley failed to properly account for the following items:
 - a. Retail sales and internal consumption;
 - b. Resale of product below, at or near wholesale price;
 - c. Value of product included in discount packs; and
 - d. Value of provided professional training.
39. The failure to include each of these economic components causes Dr. Bosley's calculation to be inaccurate, flawed, unreliable, and forensically unsound. Dr. Bosley's purported calculation is not in

²¹ I also understand that the Defendants provided the opportunity to the FTC to engage in discussions with the Defendants and for the Defendants to share internal SBH financial data with the FTC; however, the FTC did not take such opportunity. I have not yet had sufficient time to analyze SBH's internal data. Further, I understand the Defendants are working with the receiver in this case to obtain all relevant SBH data, and that I may be asked to perform data analysis.

²² Bosley Report, ¶145.

²³ Bosley Report, ¶10.



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February 6, 2020

compliance with generally accepted financial forensics methodologies to calculate “Net Gain” and “Net Loss.”

VI. Opinions

40. In my opinion:

- a. Dr. Bosley’s opinion on fraud and intent is fundamentally flawed and in violation of generally accepted standards and methodologies, and is therefore inappropriate and unreliable;
- b. Dr. Bosley failed to evaluate critical financial and economic elements in analyzing an alleged illegal pyramid scheme, rendering her analysis and opinions incomplete; and
- c. Dr. Bosley’s purported calculation of “Net Gain” and “Net Loss” is not in compliance with generally accepted financial forensics methodologies and is flawed and unreliable.

VII. Signature

I completed this report on February 6, 2020.

/e/ *Michael A. Fahlman*

Michael A. Fahlman

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Michael A. Fahlman Expert Report
February 6, 2020
APPENDIX A - Curriculum Vitae

Michael A. Fahlman, CPA, CFF, CIRA

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 2 North Central Avenue | Suite 1700 | Phoenix, AZ 85004

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Mr. Fahlman is a Certified Public Accountant and is Certified in Financial Forensics by the American Institute of Certified Public Accountants, and is also a Certified Insolvency and Restructuring Advisor. He assists clients, including legal counsel, boards of directors and executive management, with complex commercial litigation, economic damages, valuation, dispute resolution, investigations, and distressed businesses. He has served in the testifying expert and consulting expert roles in litigation, arbitration and mediation, and as an independent third party in alternative dispute resolutions.

Mr. Fahlman is the Chair of the American Institute of Certified Public Accountants' Forensic & Litigation Services Committee ("FLS"). The FLS is focused on identifying, collecting, developing and disseminating technical, industry, legislative and regulatory issues related to forensic accounting along with practice management tools through such vehicles as newsletters, AICPA Online, publications, continuing education and conferences. He is the immediate past-Chair of the AICPA's Damages Task Force, which is focused on providing members technical guidance on economic damages matters. In addition to the AICPA, Mr. Fahlman is a past co-chair of the Economic Damages sub-committee of the American Bar Association. This group is focused on providing content to members of the ABA regarding economic damages issues. Mr. Fahlman is a regular contributor and reviewer of content for both the AICPA and ABA, and teaches at universities, bar associations, and law firms on the topics of forensic accounting and damages.

Mr. Fahlman has been before the Securities and Exchange Commission on alleged fraudulent financial reporting and other GAAP matters, and has presented on fraud related cases before the Department of Justice and the Federal Bureau of Investigation. His experience includes other professional services engagements with companies ranging in size from Fortune 500 to privately held small businesses.

Prior to BRG, Mr. Fahlman was a Partner at Grant Thornton, LLP, and prior to that served as the turnaround Chief Financial Officer and Vice President of a 72-unit multi-state retail company.

Mr. Fahlman's experience includes:

- Damages analysis and calculations in a variety of industries for a multitude of claims, including: breach of contract, business interruption, intellectual property, construction defect, fraud, wrongful death, employment law and preferential treatment issues, accounting and audit malpractice, ponzi scheme, money laundering, and fiduciary duty.
- Fraud investigations including: revenue recognition, application of GAAP, stock option back-dating, asset tracing and money laundering, hedge fund trading, complex commercial transactions, related



party and sham transactions, fraudulent financial reporting, asset misappropriation, internal controls, customer and vendor schemes, and payroll schemes.

- Litigation support including: alleged white-collar crime (CEO, CFO, COO, and Controller), deposition preparation for fact and expert witnesses, rebuttal of expert opinions, testimony and cross preparation, document productions and requests, interrogatories, admissions, document management, database creation and management, research, and document analysis among other.
- Independent CPA services including: post acquisition disputes related to the application of generally accepted accounting principles and the interpretation and application of contracts, financial statement audits, attestation examinations, and benefit plan audits.
- Consulting for multiple commercial disputes involving large international firms' professional accounting and auditing malpractice and application of GAAP and GAAS.
- Consulting services including: implementation of accounting systems, processes and internal controls, Sarbanes-Oxley implementation, Oracle/PeopleSoft/Hyperion/Quick Books implementations, reconstructing historical accounting records and information dating to the 1800s.
- Executive Management position included: recapitalizing the debt and equity financing, negotiating contracts, negotiating terms with lenders, market concentration and expansion, complete market divestment with no lawsuits (assets sales and transfers, buyouts, lease assumptions), negotiating with potential acquirers, cash flow valuation, acquisition due diligence, and overall responsibility for finance and accounting department.

PRESENT EMPLOYMENT

Managing Director – Berkeley Research Group, LLC

PREVIOUS POSITIONS

Partner – Grant Thornton, LLP
 Chief Financial Officer – AAW, LLC
 Senior Consultant – Arthur Andersen, LLP

PROFESSIONAL AFFILIATIONS

- Certified Public Accountant
- Certified Financial Forensics
- Certified Insolvency & Restructuring Advisor
- American Institute of Certified Public Accountants – Chair of Forensic & Litigation Services Committee
- American Institute of Certified Public Accountants – Past Chair of Economic Damages Task Force
- Arizona Society of Certified Public Accountants – Past member of Forensic & Litigation Services Committee



- American Bar Association – Past Co-Chair of Expert Witness Damages Committee
- Association of Insolvency & Restructuring Advisors

TESTIMONY (last 4 years)

1. Nolan Ryan vs. Timothy Hammer et. al., American Arbitration Association – AAA Case No. 01-17-00007362 (Deposition – January 2020)
2. Publications International, Ltd. vs. Phoenix International Publications, Inc. and Jiangsu Phoenix Education Publishing Co. Ltd., Supreme Court of the State of New York, County of New York, Case # 651334/2106 (Deposition – December 2019)
3. Fremont Emergency Services (Mandavia), Ltd vs. Rocky Mountain Hospital and Medical Service, Inc. d/b/a Anthem Blue Cross and Blue Shield, et. al., Judicial Arbitration and Mediation Services (Deposition – January 2019)
4. High Purity D.R.A.W., Inc. vs. Sanveo, Inc. et al., United States District Court – Arizona, Case #: 2:17-cv-01784-HRH (Deposition – December 2018)
5. Ophir Corporation vs. Honeywell International, Inc., United States District Court – Arizona, Case #: CV-1702083-PHX-GMS (Deposition – October 2018)
6. Goldwater Bank, N.A. v. First Western Financial, Inc., First Western Trust Bank, Craig Mattson, Stacey Slick, Kent Harding, et al., Superior Court of the State of Arizona – Maricopa County, Case #: CV2015-009825 (Trial – September 2018)
7. Bridgepoint Construction Services Inc. v. Vista Oceano La Mesa Venture, LLC, Superior Court of the State of California – Santa Barbara County (Deposition – September 2018)
8. Brycon Corporation v. Avella of Deer Valley, Inc. American Arbitration Association (Arbitration – August 2018)
9. Brycon Corporation v. Avella of Deer Valley, Inc. American Arbitration Association (Arbitration – July 2018)
10. Sajid Veera v. Banana Republic, LLC et al., Superior Court of the State of California – Los Angeles County (Deposition – June 2018)
11. Brycon Corporation v. Avella of Deer Valley, Inc. American Arbitration Association (Deposition – March 2018)
12. Avella of Deer Valley, Inc. v. Archicon Architecture and Interiors, LLC et al., Superior Court of the State of Arizona – Maricopa County, Case #01-16-0002—9664 (Deposition – March 2018)
13. Wision Investments, LLC. v. Hirschler Fleischer; J. Benjamin English, United States District Court – Arizona, Case #: 2:16-cv-03302-PHX-SPL (Deposition – February 2017)
14. Goldwater Bank, N.A. v. First Western Financial, Inc., First Western Trust Bank, Craig Mattson, Stacey Slick, Kent Harding, et al., Superior Court of the State of Arizona – Maricopa County, Case #: CV2015-009825 (Deposition – October 2017)
15. LDJH, LLC v. Yellowjacket Oilfield Services, LLC and Tommy Robertson and Gerardus Smith, District Court of 15th Judicial District in Grayson County, Texas, Case #: CV-15-1228 (Trial – March 2017)
16. Board of Trustees of the Plumbers and Pipefitters Local 525 et. al v. Yard Plumbing, Inc. et. al, United States District Court – Nevada, Case #: 2:16-cv-01522-RFB-CWH (Deposition – March 2017)
17. LDJH, LLC v. Yellowjacket Oilfield Services, LLC and Tommy Robertson and Gerardus Smith, District Court of 15th Judicial District in Grayson County, Texas, Case #: CV-15-1228 (Deposition – November 2016)
18. Arizona Natures Wellness v. Sally Koenig Trust, et al., Superior Court of the State of Arizona – Maricopa County, Case #: CV2015-005522 (Hearing – October 2016)

PUBLICATIONS & THOUGHT LEADERSHIP

- “SSFS 1 - The New Forensic Standards” (American Institute of Certified Public Accountants – January 2020 presentation)
- “Expert Witness Skills Workshop” (American Institute of Certified Public Accountants – November 2019 Instructor)
- “SSFS 1 – The New Forensic Standards” (American Institute of Certified Public Accountants – November 2019 presentation)
- “Damages Case Law Update” (American Institute of Certified Public Accountants – September 2019 webinar)
- “Damages – When are they Foreseeable” (American Institute of Certified Public Accountants – November 2018 presentation)
- “Professional Standards for Forensic Engagements” (American Institute of Certified Public Accountants – November 2018 presentation)
- “Forensic Accounting Evidence – Know Your Audience and the Expectations” (American Institute of Certified Public Accountants – November 2018 presentation)
- “How to tell an Attorney NO” (American Institute of Certified Public Accountants – November 2018 presentation)
- “Best Practices from the Bench, the Bar, the Board Room and the Bean Counters” (Association of Insolvency and Restructuring Advisors – June 2018 presentation)
- “Linking Causation to Damages” (American Institute of Certified Public Accountants – November 2017 presentation)
- “Valuing Intellectual Property and Trade Secrets in Litigation” (American Institute of Certified Public Accountants – November 2017 presentation)
- “Commercial Damages Case Study: Start to Finish” (American Institute of Certified Public Accountants – November 2016 presentation)
- “Forensic Valuation Mock Trial” (Maryland Association of Certified Public Accountants – October 2016 presentation)
- “Expert Witness Skills Workshop” (American Institute of Certified Public Accountants – September 2016 Instructor)
- “Ethical Issues in M&A Disputes” (University of Texas Law CLE – October 2015 presentation)
- “Financial Issues in M&A Disputes” (law firm – October 2015 presentation)
- “Attaining Reasonable Certainty in Economic Damages Calculations” (American Institute of Certified Public Accountants – Forensic & Valuation Services Practice Aid – August 2015)
- “Attaining Reasonable Certainty in Damages Calculations” (American Institute of Certified of Public Accountants – Webinar – May 2015)
- “Reasonable Certainty Standard, Part III” (American Bar Association – May 2015 podcast)
- “The Neutrality of Expert Testimony” (American Bar Association – November 2014 article)
- “Commercial Damages” (American Institute of Certified Public Accountants – November 2014 presentation)
- “Rebuttal Reports” (American Institute of Certified Public Accountants – November 2014 presentation)
- “Foundations in Financial Statement Analysis: Introduction and Case Study” (Maricopa County Bar Association – June 2014 presentation)



- “Expert Methodologies: Must They be Subject to Peer Review” (American Bar Association – May 2014 article)
- “Reasonable Certainty Standard, Part II” (American Bar Association – April 2014 podcast)
- “An Introduction to the Reasonable Certainty Standard” (American Bar Association – November 2013 podcast)
- “Calculating Lost Profits – 101” (law firm – October 2013 presentation)
- “Comcast Decision: Split Class” (American Bar Association – April 2013 article)
- “Reserving and Disclosing for Loss Contingencies” (Panel with major law firm – presented to Corporate Counsel members – January 2013)
- “Expert Witness Skills Workshop” (American Institute of Certified Public Accountants – January 2013 Instructor)
- “Attaining Reasonable Certainty in Damages Calculations” (American Institute of Certified Public Accountants – November 2012 presentation)
- “Understanding the FCPA, and how to respond” (Accounting and compliance department of multiple corporations – June 2012 presentation)
- “Understanding the FCPA, and how to respond” (Accounting and compliance department of an international corporation – May 2012 presentation)
- “Increase Recovery...by managing expert costs” (Attorney at Law magazine – April 2012 article)
- “Senior Executive Investigations – When Allegations Point to the C-Suite or Board” (Institute of Internal Auditors: Seattle Chapter – March 2012 presentation)
- “Post-Acquisition Trouble Spots and How to Avoid Them” (law firm – February 2012 presentation)
- “The New World of Fraud Detection: FCPA, Dodd-Frank and Beyond” (Institute of Internal Auditors: San Gabriel Valley Chapter – February 2012 presentation)
- “Post-Acquisition Trouble Spots and How to Avoid Them” (law firm – January 2012 presentation)
- “Damages for Newly Formed Entities” (CalCPA – October 2011 presentation)
- “Post-Acquisition Trouble Spots and How to Avoid Them” (law firm – October 2011 presentation)
- “10 Common Misconceptions Increase the Likelihood of FCPA Violations” (Attorney at Law – September 2011 article)
- “Damages for Newly Formed Entities” (American Institute of Certified Public Accountants – September 2011 presentation)
- “Post-Acquisition Trouble Spots and How to Avoid Them” (law firm – September 2011 presentation)
- “Understanding Financial Information & Finding the Evidence” (law firm – May 2011 presentation)
- “Business Damages Measurement: Lost Profits or Business Valuation?” (Attorney at Law – January 2011 article)
- “Look Before You Leap: Considerations When Determining the Necessity, Scope, and Protocol of an Internal Investigation” (Oregon State Bar – November 2010 presentation)
- “Employee Theft, Fraud and Trade Secret Misappropriation” (Joint seminar with law firm – November 2010 presentation)
- “Advising Clients on Financial Fraud” (Arizona State Bar – October 2010 presentation)
- “Lost Profits v. Valuation in Litigation” (American Institute of Certified Public Accountants – September 2010 presentation & article)



- “Complexities of Tribal Gaming Investigations” (Institute of Internal Auditors – April 2009 presentation)
- “Post-Acquisition Trouble Spots and How to Avoid Them” (Maricopa County Bar Association – May 2008 presentation)
- “Occupational Fraud Case Study” (University of Southern California – April 2008 presentation)
- “Understanding Financial Reports & Finding the Financial Evidence” (Maricopa County Bar Association – April 2008 presentation)
- “Working with Expert Witnesses” (law firm – January 2008 presentation)
- “Occupational Fraud Case Study” (Arizona State University – April 2007 presentation)
- “Post-Acquisition Dispute Trouble Spots and How to Avoid Them” (law firm – September 2006 presentation)
- “Corporate Occupational Fraud” (Thunderbird School of Global Management – July 2006 presentation)
- “The Practical Witness – Assess Damages Early and Often” (American Bar Association – June 2006 article)
- “Fraud Detection and Internal Controls” (law firm – April 2006 presentation)
- “Understanding Financial Statements & Tax Returns” (law firm – March 2006 presentation)
- “The Litigation Process – Discovery & Damages” (accounting firm – February 2006 presentation)
- “Fraud Detection and Investigation” (law firm – January 2006 presentation)
- “Discovery and Production” (accounting firm – October 2004 presentation)

EDUCATION

B.S. Accountancy Arizona State University



EXHIBIT C

Friends of SBH

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 That's It, I'm Nail ... 20+



Joined  Notifications  Invite Members  More

 Write Post  Photo/Video  Live Video  More

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 Photo/Video  Watch Party  Tag Friends 

NEW ACTIVITY 

 **Karen Hyatt** shared her first post. 
 New Member · 51 mins

I am not making any medical claims

I was just getting started with SBH when all of this happened. I became a user of the products first and have lost 10 pounds and 16" since early December. I am feeling better than I have in decades. Knowing that I now can't get the products that have helped me feel so much better is awful.

Also, my husband and I had decided to invest in the business and in my going to the Convention and then Convention had to be cancelled and the company was shut down. Needless to say that investing in our business and then not being able to work it has been devastating for our finances and incredibly stressful for both of us. The overreach of the FTC has definitely created hardship for our family.

  2

 Like

 Comment

 **Carleigh Sherfield** is with  Gemma Evangelista. 
 New Member · 52 mins

This is one of our affiliates who was able to retail her way to starting her business.

After discussing how she wanted to get started, she decided on the

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 James McKee (1) 

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+ Enter name or email address...

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- | | |
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|  Tim Young |  Iris Taggart Herring |
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DESCRIPTION

The SBH Family coming together: SO VOICES are Heard: Products and Bus

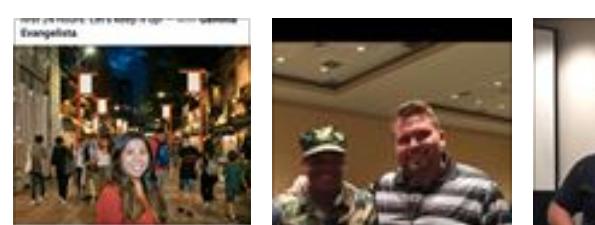
GROUP TYPE

General

CREATE NEW GROUPS

Groups make it easier than ever to share with friends, family and teammates.

RECENT GROUP PHOTOS



starter pack, but did not have the money initially to pay for the pack. She was able to presale 4 bags at retail to pay for her pack. This allowed her to start with 4 customers, no debt, and a little profit in hand. We taught her that retail is the back bone of this company and why not give it a try before you even get started. Retail works!

*No income claims are meant from this post. This is a personal experience from this affiliate.

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^ POSTS



**Carleigh Sherfield ➤ SBH Heat
(Success By Health)**

...

Sep 28, 2019 at 6:05 PM ·

Please give a warm SBH welcome to **Gemma Evangelista**! She's pushing for her Power Bonus and has already retailed product in her first 24 hours. Let's keep it up! — with **Gemma Evangelista**.



Write a comment...



8

Like

Comment



Write a comment...



Britney Pineau shared her first post.

New Member · 3 hrs

...

***No medical claims.

At the beginning of January 2020 my little boy (13 months old at the time) was diagnosed with the flu type B. Being this little he is unable to take most medications that are prescribed. They told us to give him tylenol,

motrin and an antihistamine. Just two days later my husband came down with the flu as well. We are a family that prefers to stay away from medications if there is an option for a natural remedy. My husband drank 2-3 G-FYX a day and my little boy would get some as well. They both were well and without flu symptoms within days when we were told that PJ, our son, would start to feel better in approximately three weeks.

Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 42 of 163
My husband had never taken our products in the 2+ years I have been an affiliate with SBH. He reaches for the G-FYX almost daily now. While they were sick I was the one taking care of them and did not get any symptoms whatsoever. If this doesn't make you a believer in our products and what they can do for our bodies I don't know what will.

We will continue to take these products until we run out. I don't know what we will do when we run out because of the over reach of the government making it to where we can not order more.



20

5 Comments

Like

Comment



Dwayne Samuel Hosey I'm having a G FXY as I'm reading your amazing story. I'm so grateful for these products.

Like · Reply · 3h · Edited

4



Rebecca Lynn Chick Last week I too felt like I was coming down with the flu....body aches, fever, etc. but I had to go to work because I have to get my Bill's paid!!!! With the FTC Overreach I cannot afford to stay home....

I too consumed about 3 GFYX's daily for the 4 ... See More

Like · Reply · 3h

4



Mara S Conyers Rebecca Lynn Chick that G-Fyx is no joke. And right now with the FTC being...well, for the lack of a decent word, you know where I'm going, anyway, I am making sure I only use my G-Fyx when needed. But it does work.

Like · Reply · 2h

1



Debby Armentrout Last night Claire came home, body aches, face feeling hot, I suggested GFyx and a couple of the 120's tablets(we call them "the big boys", she teaches at a preschool (mini Petri dishes of germs), she feels fine today! We're so happy to have access to such fabulous products! No medical claims! Just feeling great!

Like · Reply · 2h · Edited

4



Vincent Marquez Amazing.

Like · Reply · 1h

1



Connie Godfrey shared her first post.
 New Member · January 28 at 6:07 PM

...



Connie Godfrey shared her first post.

New Member · January 28 at 6:07 PM

Can We talk about SBH and what this company the CEO Jay Noland and ALLLL the supplements has done for ME. NOT making any Medical claims but this is MY story!!! This over-reach of an abrupt temporary closure has caused a hardship for me. I was diagnosed in 2018 with Kidney cancer. What CEO of a multi-million dollar company will call you and give you love and advice when such a tragic diagnosis is pronounced upon you. Well

Mr. Noland called me to give me comfort and hope. He did the same when my Father recently passed away. Oh by the way I am NOT one of his top earners. SOOOOO it was'nt about the money can we say COMPASSION and that AGAPE LOVE? Are we talking NOW? Let's go on. Now when i had my surgery and Kidney removed the surgeon stated that the cancer was concealed with a vaccum around it to which it could not spread to other Organs. No radiation or Chemo. I attribute much of my healing to the supplements that i had been taking from SBH. It is a hardship that i now cannot get those supplements from SBH. Also SBH assisted my Father a better quality of life last year. He had pancreatic cancer last summer. He was in the VA Hospital in Cleveland Ohio. I walked into his room in August 2019 he was extremely frail had not eaten in weeks. i made him a cup of SBH Rooibos he literally said "Oh i feel something" Made him another cup. Before i left he starting eating. Over the next several month he was walking to the cafeteria and eating and went on day trips out of the hospital (he drove himself). Unfortunately the cancer consumed him December 13. I truly believe the SBH supplement gave our family more months and memories with my Father. I now have a better quality of life. More energy no need to take anymore inhaler for the Asthma. I look forward when we can get back to Health and Wellness For ALL. "WE ARE THE PEOPLE."

33

6 Comments

Like

Comment



Jo Dee Nylander-Baer Eloquent!

Like · Reply · 1d

2



Jill Christopher Rosenkrantz What a gift to have that extra time with your dad!

Like · Reply · 1d

1



Connie Godfrey Jill Christopher Rosenkrantz yes I hold on to that time every day

Like · Reply · 10h



Patricia Manzano And what a gift we still have YOU in this world for another 50 years!

Like · Reply · 4h



Rebecca Lynn Chick Beautiful Connie Godfrey

Like · Reply · 3h



Sharon A. Whalen Whitaker What an amazing testimony. You are such an inspiration Connie. I love the times i spent with you. You are beautiful inside and out. Love you very much.

Like · Reply · 1h



Write a comment...



Karyl Darigan

New Member · 19 hrs

...

This is not an income claim,only my own personal experience

Due to the overreach of the FTC, I can no longer order my product that I retail on a monthly basis. As a 67 year old retiree my \$1000-\$1500

It saddens me even more that we as SBH are now unable feed, clothe and house our orphans in Kenya, our homeless in Las Vegas and our sex traffic survivors in Colombia, all of whom depend on SBH. They are the motivation behind our CEO and Founder Jay Noland's starting SBH and now they are left with no help.

1️⃣ 25

4 Comments

Like

Comment



Mara S Conyers 🖐 The FTC should really be ashamed of themselves. 😢

Like · Reply · 19h

1



Tina Louise Overcomer 🖐 Mara S Conyers you got that right! So sad! 😢

Like · Reply · 18h

2



Jo Dee Nylander-Baer ⭐ Well said--- This government overreach goes way beyond us!

Like · Reply · 7h



Ulla Edsköld Ramstedt 🖐 Well said, I feel so sorry for everybody who depend on SBH, especially the orphans in Kenya 😢

Like · Reply · 2h

1



Karyl Darigan

New Member · 4 hrs

...



I joined SBH as a Founding Member in 2017. I did so because of my trust in and respect for Mr Jay Noland. In the time since, I have been to many of his trainings. I grew up morbidly obese, shy and lacking in self confidence. Through his training, honest, raw and empathetic I have had a true transformation

1️⃣ 20

Like

Comment



Write a comment...



Ronnie McHaffie

New Member · 6 hrs

...

I am not making any medical claims . We went to an event in Branson MO and heard there that the Aller G was good for hormones. My wife started taking them . She noticed a significant decrease in her HOT flashes. I noticed she was a lot more level or balanced in her moods . So I m really worried what's going to happen when we run out ! We are down to 4 bottles ! This could be very hazardous to my wellbeing! I am also allergic to dog dander, cats, lots of trees , you name it I got lots of allergies. Well

when we started taking Aller G , I was able to stop taking shots for allergies, and got off all over counter and prescription allergy medicine ! It got so good that I got my wife a Basset hound dog that sleeps in the bedroom with us ! Before this if I tried to stay at a place that had dogs or cats or even burnt wood for heat I would have to leave . Nose would stop up and couldn't breathe! No problems now! My allergies would cause me to get sick , transfer to a bronchitis, then if I didn't get on it quickly it would go to pneumonia! Had this happen several times ! I would miss 10 to 15 days a year of work or more ! Now that FTC has us shutdown this will seriously impact me and my family deeply !



4 Comments

Like

Comment



Jo Dee Nylander-Baer INFLAMMATION=HOT FLASHES
(Says Health Coach Jo Dee)

Like · Reply · 6h

2



Ronnie McHaffie Jo Dee Nylander-Baer thanks did not know that

Like · Reply · 5h



Ronnie McHaffie Lisa McHaffie

Like · Reply · 5h



Write a reply...



Debby Armentrout Thanks for sharing your experience!
Always learning more helpful information!

Like · Reply · 5h



Write a comment...



Jo Dee Nylander-Baer

Admin · 21 hrs

...

Today? I went on my monthly delivery to a Holistic Doctor's Office to deliver G-Drops. This has been a 6 month old retail client. 24 bottles of G Drops that I purchased at wholesale for \$29 and would re-sell at Retail for \$47 for a unit profit per bottle for \$18. Unfortunately? The office manager had seen the information circulating concerning the basis-less allegations and Government overreach from the FTC and cancelled this order! This monthly Retail profit of \$432 will not happen this month -- Or may NEVER happen again--- \$2593 profit gained in the past and now gone, for mine and my husband's future.



49

Like

Comment

**Mathilda Augustsson** This makes me so sad...

Like · Reply · 21h

**Jo Dee Nylander-Baer** JUST the facts!!

Like · Reply · 21h

**Debby Armentrout** The damage to SBH is so unfortunate!

Like · Reply · 21h

1

**Jo Seph** Counter sue the FTC???

Like · Reply · 20h · Edited

1

**Robert Boisvert** I agree makes me so sad , what the FTC has done , hearing everyone's stories is down right Heart wrenching

Like · Reply · 20h

**Klella Farris** I am so sorry Jo Dee, this is so heart breaking, I'm at such a loss for words with all this. This is detrimental to so many people.

Like · Reply · 19h

**Robert Boisvert** Keep the faith SBH

Like · Reply · 19h

**Sharon A. Whalen Whitaker** This breaks my heart for you and your husband **Jo Dee** and all of the SBH affiliates and customers.

Like · Reply · 18h · Edited

**Brooke Sherfield** So sad..

Like · Reply · 18h

**Melanie Summers** Jo Dee... I cannot tell you how sad this made me.

Like · Reply · 16h

**Clayton Miller** Facist Trade Commission! Socialist Communism at work already folks! Some people will try to tell you that Facism & Communism are opposites. Not true! They're both dictatorships! Facism regulates & takes control of the majority of your life & let's you... [See More](#)

Like · Reply · 15h



Jo Dee Nylander-Baer replied · 1 Reply 6 hrs



Write a comment...

**Jo Dee Nylander-Baer**

Admin · 9 hrs

...

11 am PT/

Noon AZ-MT/

1 pm CT/

2 pm ET

Dial-in number (US): (605) 472-5427

Access code: 680759#

International dial-in numbers: <https://fccdl.in/i/jodee47>

Online meeting ID: jodee47

Join the online meeting: <https://join.freeconferencecall.com/jodee47>



Like

Comment



Write a comment...



Timothy Pennington

New Member · 21 hrs

...

I decided to Join SBH in Oct 2017 and became affiliate #55 in the company. The next pay cycle I earned \$600 in commissions after only investing my \$49 (not purchasing any product) and referred 1 Affiliate. I decided to reinvest my commissions to purchase a \$500 pack. I've became a product of the products. By sharing the products, retailing and referring a small circle of friends (12) my commissions have grown over the past 2 years to become my primary income. I've NEVER missed a paycheck since I joined until Jan 15th when the FTC overreached and issued a TRO against SBH.

In the previous companies I've joined, I would've only earn \$50 compared to every \$150 with SBH's plan. Because SBH Pays on 100% of gross income with no qualifications vs The normal industry standard of paying 75% of gross into a pool that requires qualifications before receiving payouts. These other comp plans bank on breakage of up to 60% of their payouts limiting the ability to earn income.

With SBH, I've earned more commissions with a smaller team of affiliates, (less than 400) because everyone immediately earns without limitations based on qualifications.

The FTC overreach has impacted every Affiliate within SBH and has directly impacted my personal household and many others primary (necessary) income. I can truly testify that SBH has the best and most favorable commission plan in the Direct Sales industry by allowing NEW affiliates a way to earn income. A far cry from what the FTC has labeled to be a Pyramid Scheme... 😢



1 Comment

Like

Comment



Homer Krehbiel This is so true. FTC did not do its job. We have to fight back!

2

Like · Reply · 9h



Write a comment...





Mathilda Augustsson shared her first post.

New Member · Yesterday at 12:37 PM

** This is no income or medical claim only my own experience written with my own words**

10 years ago I started High school, something that was a new experience in so many ways for me. I was excited to go to school in a new town and to get to know new people but it was also the worst years of my whole life. I was bullied from the first year in high school until my last year in college. This was a really hard time for me and the worst damage from all these years was that I was...

[Continue Reading](#)



43

20 Comments

[Like](#)[Comment](#)**Justin Amber Wehrle** Much Love Mathilda Augustsson!

Thank you for sharing and being so open. ❤️



1

[Like](#) · [Reply](#) · 1d**Mathilda Augustsson** Justin Amber Wehrle Thank you so much for taking your time to read and comment ❤️ appreciate you!

1

[Like](#) · [Reply](#) · 1d**Brooke Sherfield** Beautiful story Mathilda ❤️ Love you 😊

1

[Like](#) · [Reply](#) · 1d**Mathilda Augustsson** Brooke Sherfield Thank you so much dear, love you! Back to back ❤️❤️

1

[Like](#) · [Reply](#) · 1d**Cynthia Heavin Farley** Thank you for sharing and being so open. So sorry that you went they that but so happy you found SBH. 😊😊❤️

2

[Like](#) · [Reply](#) · 1d**Mathilda Augustsson** Cynthia Heavin Farley I appreciate your words very much, SBH change life 🙏❤️

1

[Like](#) · [Reply](#) · 1d**Debby Armentrout** Oh my goodness, bless you, and look how far you've come! I'm sure your story will give hope to others 😊😊

2

[Like](#) · [Reply](#) · 1d**Mathilda Augustsson** Debby Armentrout Thank you so much, I agree with you and believe that to and that's why SBH is needed 🙏❤️

1

[Like](#) · [Reply](#) · 1d**Maria Stade** You and Emil are an amazing team and we are all so honored to be part of your trainings so we can develop better persons as individuals and as business persons. You are giving it all and showing great leadership, Thank you for sharing your story SBH... [See More](#)

2

[Like](#) · [Reply](#) · 1d

 **Mathilda Augustsson**  Maria Stade Thank you so much for your kind words. I believe in you and to see you grow and create your dreamlife is priceless   

Like · Reply · 1d 



Ulla Edsköld Ramstedt  You and Emil are so amazing and I know how hard working you two are and I love to see how you two fulfill each other. I am glad that I have seen you both grow so much during the time I have been involved with SBH  

Like · Reply · 1d 



Mathilda Augustsson  **Ulla Edsköld Ramstedt** I love to hear that - your words warm my heart very much! The development you have done since we first meet is amazing, that is what makes us do this every day  

Like · Reply · 1d



Donna Stacy  Wow! What an amazing and inspirational personal story you shared! I'm so proud of your accomplishments and happy to know you! Many blessings and stay strong!   

Like · Reply · 1d 



Mathilda Augustsson  **Donna Stacy** Thank you so much dear! I'm happy to know you and to be a part of SBH with you   

Like · Reply · 1d 



Melanie Summers  What an inspirational story! Much love! I can't wait to meet you!

Like · Reply · 1d



Julia Lindvall   We love you very much 

Like · Reply · 1d



Diana Grimaldi Pupp  Awesome testimony Matilda! So happy for you! Thank you for sharing!

Like · Reply · 23h



Diane Hasler  Thank you for sharing  I'm so happy you found yourself! Have faith! SBH will come out on top!!

Like · Reply · 20h



Klella Farris  I cried reading this **Mathilda Augustsson**, your words touched my heart. You are a great inspiration and have accomplished a great deal. Your an amazing person and I'm honored to be a part of your SBH family and friend. Stay strong, have full faith, no ... See More

Like · Reply · 18h



Francois Hewing  **Mathilda Augustsson** we are with you and believe in everything that is within you. All the good!!! 

Like · Reply · 15h



Write a comment...



Ryan Dutka is with Lisa Dutka.

New Member · January 26 at 1:58 PM

•••

Well hello everyone, I know we are all feeling a bit confused and uncertain currently, but with the products that we have why should we.

Our story started about a year and a half ago when our youngest daughter fell. She tore her PCL ligaments off her knee and it also pulled a bone shard. We took her to the hospital, then to a very well known and respected knee surgeon in Canada. After a consultation, he was leery on doing such a invasive surgery, on an 10 year old girl. His main reason was, that she was not finished growing and if he should touch the growth plate in her knee that would be a far greater obstacle to overcome.

Our daughter was fitted for a custom knee brace, which she needed to keep on, for as many of the 24 hours, 7 days a week as possible. This, along with routine pain medications, kept our daughter in as little amount of pain that was tolerable.

The pain medication played havoc with her digestive system, and kept her lethargic (zero pep in her step). We needed to look at a different option for our daughter. The option of rotating pain medications and a knee brace, was no life for our feisty daughter.

We were introduced to SBH products, with my wife's nursing background she had a lot of questions before trialing this on our daughter. Each question was answered to her satisfaction.

We purchased a bag of G-FYX and brought it home.

Within 3 days Olivia was off ALL pain medication. Within a week and a half she started complaining her brace not fitting her properly.

We took her in to the knee specialist, and brace fitting office.

With everyone's surprise all of her 29 measurements were substantially smaller. The inflammation was gone from her leg, and she required a brand new, SMALLER brace to be made!

Today, no knee brace needed and no more pain. Olivia is back to her fun and feisty self.

As parents this was an awful thing to watch our Daughter go through, but thanks to G-FYX it helped her to be pain free and helped get our daughter back to her normal self again, just a bit of a slower pace with the knee brace.

With all this said, we have many more testimonials with G-FYX.

We have other friends and family that have also experienced feeling better from their symptoms of arthritis, cron's, fibromyalgia, IBS and many other conditions.

These are not medical claims, just TRUE stories of how just ONE of the wonderful SBH products have improved our lives.





57

6 Comments

Like

Comment



Kent Trobaugh Incredible!...Happy for You!

4

Like · Reply · 4d



Roger Burnett Wow, that's great

2

Like · Reply · 3d



Julia Lindvall Absolutely Amazing!

2

Like · Reply · 3d



Joe Shoemaker Awesome

1

Like · Reply · 23h



Klella Farris Wow, incredible testimonies.

I too take G-FYX due to fibromyalgia and it's the only product on earth that helps control my pain since I'm UNABLE to take dr prescribed pain meds, because my body rejects man made comical induced meds, only all natural herbs work for my body.

1

Like · Reply · 18h



Sharon A. Whalen Whitaker What an amazing testimony.

1

Like · Reply · 18h



Write a comment...



Brooke Sherfield

New Member · Yesterday at 4:34 PM

...

The overreach of the FTC has put a strain on my family. SBH has been my and my husband's only source of income for a while now. The day the TRO was set in place, my husband and I were traveling visiting family in Las Vegas before heading to Kickoff 2020 in San Diego. We had spent a little more than we usually do that first half of the month on flights to get to the training, extra travel expenses, etc... because we knew our SBH check would hit the account on the 15th like does every single month. That check was going to be enough to cover our apartment rent. This is the first time in 2.5 years we didn't get paid. We now had to focus 100% on retail to pay for our upcoming bills, which required extra time and effort. I've been retailing product that I didn't have on hand and having a friend ship it out. Within these two weeks, we've already sold

enough product to pay for our rent, but what happens when we run out of product? The FTC has stopped all product orders for the SBH site and we have a limited amount of inventory. Once we run out, we will have to seek other means of income which will limit our freedom and the time my husband and I spend together. My customers that take these products to help with issues they have in their body will no longer be able to receive them. (No medical claims). This overreach hasn't just put a strain on my family financially, but it has also decreased my and my customer's health. This overreach has impacted thousands of others in a similar way.

[Like](#)[Comment](#)

Suzy Q Monroe I want to do the 😬 face bc this is absolutely sickening that the FTC completely overran our lives because of untruths. So the retail aspect that stated wasn't happening or available in SBH is the one thing that is truly helping all of us. Stay strong

[Like](#) · [Reply](#) · 1d

7



Dwayne Samuel Hosey Shaking my head....

[Like](#) · [Reply](#) · 21h

1



Klella Farris I'm sorry Brooke, I know this is a really hard time for thousands of people, in many ways financially and physically, mentally, spiritually, the only positive thing I can see is how it's bringing ALL SBH family and friends even closer then ever and sup... [See More](#)

[Like](#) · [Reply](#) · 18h

1



Jerry Spradlin It's a joke what the FTC is doing

[Like](#) · [Reply](#) · 18h

2



Sharon A. Whalen Whitaker

[Like](#) · [Reply](#) · 18h

1



Write a comment...



Robert Boisvert shared his first post.

[...](#)

New Member · 19 hrs

****No Income claims ****

Just this past monday I was working as usual at my job Working at State University.

I turned one of my co-workers into a repeat customer last year she loves SBH Coffee especially Latte, She was standing by the catering Room and

yelled to get my attention, she asked if i had any bags of coffee on me i said No not today but tomorrow yes , I asked her how many would she like ? At first she called them Cappuccino, I said their Latte, she smiled and i said well give me 3 bags i replied , so you want 3 latte and 1 black she said yes, i said well to be Honest with you i dont know when il be able to order more at this time , all products are on back order , i couldn't tell her the real reason why. I kind of hinted just google it like everyone else is. I called home to find out i had my other box had products inside so i told her i have more she just told me she'll stock up for her and her husband so i Sold (13 latte (1) black i sold ea. bag for \$40 profitting \$280 in One day. I packed all the coffee into a box for her. She is Happy prefered Customer. Oh, did i mention her n her husband Own and run the (66) Gas Stations. I felt very Excited . About the retail Sale.



20

[Like](#)[Comment](#)[Write a comment...](#)**David Yates**

New Member · 21 hrs

...

"No medical claims or income claims"

I have an affiliate that joined Jan 3rd, 2020. He sampled the G-burn and saw results. He purchased a bottle and has sampled some out to a few of his friends. So when the FTC became involved and shut down SBH products, my first thought was about this individual and my other customers whom are benefiting from our products, along with myself. What are they going to do if they can not get a product that helps them.

This individual contacts me tonight and ask about the site, he could not purchase a product that HELPS them. So, I explained what was going on and told him I will send them out a bottle.

See I have not been focused on the business side, after having stroke in 2016, my focus has been on my health first, however, the potential SBH offers, to HELP me financially is the most promising that I have seen. I understand that if I don't WORK, I don't get anything. The plan works, I have to work the plan.

I joined a direct sales business years ago, bought product and watched it collect dust (it did not sale itself). Imagine what would have happened if I actually did something with it.

I understand protecting consumers, however in my opinion more consumers are being effected in a negative direction due to this shut down based on false accusations.



12

[Like](#)[Comment](#)[Write a comment...](#)**Julia Lindvall**

Rising Star · January 27 at 8:35 PM

...

** No Income Claims **

SBH Family,

This is from our hearts to all of you guys.. We are sharing our story with



37

6 Comments

[Like](#)[Comment](#)

Diane Hasler Fear not! Know that Jay is innocent and the truth will win! SBH will be up and running again soon! I believe this with all my heart!
By the way, congratulations!

[Like](#) · [Reply](#) · 2d

Julia Lindvall Diane Hasler We believe that 100% ❤️

[Like](#) · [Reply](#) · 2d

Angela Hellard You and Mark are Family to me, and even though an ocean separates us, love crosses that divide ❤️. Hang in there, as we pray for swift resolution! I Love Team Sweden!!!

[Like](#) · [Reply](#) · 2d

Julia Lindvall **Angela Hellard** We appreciate your words to us so much ❤️❤️❤️❤️

[Like](#) · [Reply](#) · 2d

Diana Grimaldi Pupp **Congratulations** to you both! Our SBH family is so beautiful. We just need to pray this is resolved ASAP!

[Like](#) · [Reply](#) · 21h

Maria Stade ❤️ To You **Julia Lindvall** ! Trust that all will be solved soon. SBH do not deserve this, none of us have been prepared for this. But we need to understand that things like this can happen and this is not the first time and surely not the last.. There will ... [See More](#)

[Like](#) · [Reply](#) · 21h · Edited[Write a comment...](#)

Stephan Renaud shared his first post.

...

New Member · Yesterday at 4:41 PM

I have been involved with SBH as an affiliate since February 2019.

I have been involved in direct sales for over 25 years and through my career I have built very large teams of network marketing professionals, where my team and I have generated millions of dollars in product sales and earned great commissions doing so.

Before I joined SBH, I did a complete due diligence on Jay Noland and what was being offered with SBH.

One of the main reasons I joined was because of the quality of the products being offered but also because of the integrity of the message he shared; the basis of any business, no matter what the industry, is to have quality products to market, which SBH offers.

When you want to build a team in direct sales, you have to continually share the products you have to offer with people and this consists of regular efforts on your part as an affiliate or independent distributor. The more you sell, the more commissions you will make.

What impressed me the most about Mr. Noland was that he was sharing exactly that in his message: You have unlimited possibilities with SBH, but

The problem with a lot of people involved in direct sales is that they think, and sometimes promote, that everything will happen all by itself with minimal efforts on your part, that you can become financially independent almost by magic!

That is not what Jay Noland and SBH is all about and definitely not the message being shared. On the contrary!

Last Fall, I even invited my 21 year old son to become an affiliate of SBH, telling him that if he was ready to work hard, there was a very interesting opportunity for him. My son was immediately impressed by some trainings conducted by Mr. Noland and some of the leaders. It is all about personal accountability and integrity.

We were both very excited to be at the SBH event in San Diego, which was unfortunately cancelled a couple days before we travelled.

The direct sales industry is proven and a solid vehicle for anybody who is willing to work. That is what I saw at SBH and the message shared by Jay Noland and the core leadership team, including my wonderful new friend and team leader, Jo Dee Baer.

Sincerely,

Stephan Renaud



3 Comments

Like

Comment



Jo Dee Nylander-Baer Thank you Stephan Renaud--- The Canadian and French flag of SBH

[Like](#) · [Reply](#) · 1d



Melanie Summers Thank you for sharing. Your message is spot on, Mr. Renaud. I have been in direct sales before myself. Years ago, I felt as though I WAS lead to believe all I had to do was build a team and then sit back and watch the money flow uphill! There was NO tr... [See More](#)

[Like](#) · [Reply](#) · 1d



Dwayne Samuel Hosey Powerful

[Like](#) · [Reply](#) · 21h



Write a comment...



Jo Dee Nylander-Baer shared a link.

...

Admin · Yesterday at 4:10 PM

TONIGHT: "Think & Grow Rich Mastery" VIDEO Series on ZOOM
Continues: Tuesday through Friday 7 pm ET/6 pm CT/5 pm AZ-MT/4 pm PT <https://zoom.us/j/5820754348> Phone # 929-205-6099

zoom

ZOOM.US

Join our Cloud HD Video Meeting now

Zoom is the leader in modern enterprise video communications, with an

8

1 Comment

Like

Comment



Marcie Molnar Thanks so much Jo Dee. Your time and love is appreciated.

Like · Reply · 22h



Write a comment...



David Yates

New Member · 22 hrs

...

I am making NO income claims. This is my retail business.

I have an individual that bought a 7day sample and bought a bottle of G-Burn a 6weeks ago for a profit of \$22.00. They contacted me a day ago and said they Need another bottle for a retail profit of \$15.00.

The retail sales I have, pay my water and telephone bill.

I have never be promised or guaranteed to make any money with this business. The training is actuate and if I get out and apply what I learn, the work produces repeat customers. I make retail profits by working to sale my inventory.

16

Like

Comment



Write a comment...



June Hans

New Member · January 28 at 8:52 PM

...

I am posting this on behalf of an affiliate that doesn't have Facebook.

"My name is Pamela and I am an affiliate with SBH, Success by Health. I am writing from my viewpoint, but I do not know how many thousands of lives have been put on hold.

I am so disappointed to hear the Federal Trade Commission was taking my company to court taking away my chances of earning money and



Like

Comment



Julia Lindvall Amazing story ❤️ Pamela, thank you for sharing this with us 🙏

Like · Reply · 1d

2



Carleigh Sherfield Wonderful story of how supplementing income can be huge for people! So sorry how this time has hurt you.

Like · Reply · 1d

2



Ulla Edsköld Ramstedt What an amazing story, I got tears in my eyes reading this. Thank you for sharing 🙏😊

Like · Reply · 1d

2



Andy Laurens Me too but since I'm a guy I just say the tears are winter allergies. 😊
Seriously, this is an amazing, touching story.

Like · Reply · 1d

3



Maria Stade This show how it is possible to start with almost nothing. Thank you for sharing your story. From nothing to something it is possible to make a living with SBH over time.

Like · Reply · 1d

1

Melanie Summers

New Member · Yesterday at 3:22 PM

...

Every year, one of the Christmas parties we always attend has a small gift exchange between friends. We try to give homemade gifts. This past Christmas, I arranged a sachet of each of our beverages in a coffee mug with a bit of red filler and wrapped them up in clear wrap with a bow. Yesterday, one of the gals from the party called me and ordered 2 bags of Latte! She was the 5th person since Christmas to call me and order bags of various coffee. You know you have a good product when people call you out of the blue to buy your product at retail prices!

This sounds like a happy story, right? However, let's step back and take a closer look... I have product on hand right now, but what is going to happen to my retail business if this government overreach and temporary restraining order doesn't end soon? We wanted to hold off dipping into my annuity for another year, but it looks like the hold on my extra retail cash income plus commissions from my business is forcing my husband and me to rethink our retirement plans. This is one of the main reasons we invested in this SBH business - and it IS an investment -- to allow us to retire and not worry about making ends meet with our paltry Social Security checks and less than ample pensions. Who knows what the economy will be in another year? 5 or 10 years? As Senior Citizens, what will my husband and I do if we can't rely on this business in the future?

[Like](#)[Comment](#)

Debby Armentrout Absolutely true, we've all invested in a company that we could see the benefits and help with our retirement!

[Like](#) · [Reply](#) · 1d

3



Write a comment...

**Suzy Q Monroe**

New Member · Yesterday at 2:36 PM

...

**Not an income claim, personal experience by one of my affiliates. **

Senior year of high school can be extremely pricey, with prom, school trips, graduation, pictures and other misc items.

One of my affiliates needed help raising money to go to Hawaii with the band. He became an affiliate, ordered product and set up a fundraising vendor event outside the UPS store where he sold cups of hot and iced coffees.

He enjoyed his band trip with the help of retail profits from his SBH business before he had graduated high school.



22

2 Comments

[Like](#)[Comment](#)

Debby Armentrout And the burden was lifted off the parents!

[Like](#) · [Reply](#) · 1d

1



Suzy Q Monroe Debby Armentrout yes ma'am.

[Like](#) · [Reply](#) · 1d

Write a reply...



Write a comment...

**Taylor Barrett**

New Member · January 28 at 12:59 PM

...

** no medical claims — personal experience only**

2018 was a strange year. It started off with me working 30 hours per week at the same time that I was a full time college student, studying nursing. Needless to say, it was stressful. Later on that year I felt a lump in my throat. Test after test, by April 2018, the doctors concluded that it was cancer. Being a healthy, 18 y.o. college student, you'd never expect that. My family and I had always been more natural so we didn't seek the surgical route.

In June 2018, I was introduced to SBH, I was mainly interested in the products as they were all natural and the research I had done on the ingredients was promising. In July I visited a naturopathic Doctor as well as took all of the products.

Months later, still taking the products, as well as cutting out sugar from

my diet, I could feel the (6) tumors in my neck shrinking! This astounding result lead me to pursue SBH full time. So I dropped out of school, quit my job and made SBH my only source of income.

Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 61 of 163
And now, when I take the products, I can have a more loose diet, and not worry about what it will do to my health thanks to the products at SBH!

A more recent update: I got an ultrasound in December 2019, and the final results came back mid January. They can't even find some of the tumors, and the ones that remain have shrunk! I can only attribute this to an overall healthy diet and taking SBH products.

49

8 Comments

Like

Comment



Vincent Marquez This is powerful!

Like · Reply · 2d

1



Jerry Ayers Wow

Like · Reply · 2d

1



Julia Lindvall Incredible to hear Taylor ❤️ Makes me very happy to hear about your amazing results!

Like · Reply · 2d

1



Klella Farris That's such a great incredible story and testimony Taylor Barrett, I'm so happy to hear how your getting healthier. SBH and our products help me to. Without them I would live in pain.

Like · Reply · 1d

1



Diane Hasler It's like a miracle, Taylor!! These products are very healthy and healing! I'm so happy for you! Keep eating healthy and taking SBH products! ❤️

Like · Reply · 1d

1



Roger Nash Awsome testimonials young lady. Blessings to you, bunches !!!

Like · Reply · 1d

1



Jill Christopher Rosenkrantz That's phenomenal, Taylor!!!! I'm thrilled for you!!!

Like · Reply · 1d

1



Rebecca Lynn Chick Incredible testimony Taylor Barrett! Thanks for sharing!

Like · Reply · 1d

1



Write a comment...

Smiley face icon Camera icon GIF icon Video icon



Suzy Q Monroe

New Member · Yesterday at 2:24 PM

...

Not an income claim, my personal experience

I joined SBH November 29, 2017, became a founding affiliate with the knowledge that product was in pre production. I went to a local training

I've never done direct sales but it clearly made sense, buy product at wholesale and sell at retail, with the possibility that those retail customers may become wholesale customers down the road, which I would still earn commissions on, but wouldn't have to spend the time delivering products. That was a huge win/win in my mind.

I received black coffee and immediately started talking, sharing and selling and have not stopped in over 2 years.

I sold most of my coffee within a couple weeks and had to order more so I chose to order \$500/month.

With my retail profits I've been able to pay off credit card bills, take my family on fun trips and adventures and living in AZ, we have high electric bills during the summer and my retail profits have helped me pay my electric bills, too, among other things.

I have customers that continue ordering products from me because they don't want to order online or they want the products now!

With the FTC over reach, I'm starting to run low on products and am unable to order more which will affect my retail profits and ability to pay basics like electric bills.

Again, not an income claim, my personal experience.



Like

Comment



Write a comment...



Timothy Pennington

New Member · Yesterday at 1:09 PM

...

I've been a strong supporter of the Direct Sales industry for over 25 years. During my experience, I've always been loyal to both the products/services and the company brand. During my experience, there's been various reasons for changing companies. Either technology changes or companies going out of business. These changes have always been a SAD experience, because of my loyalty.

SBH has been such a "Breath if Fresh Air" for my career in Direct Sales for the following reasons.

- 1) No Barrier to Entry (\$49 Membership)
- 2) No Auto Order required
- 3) No Enrollment Qualifications to earn commissions
- 4) I'm paid on my personal orders...
- 5) 5STAR Quality Products at reasonable prices

For anyone in the industry, you realize these are game changers and SBH provides the most FAIR infrastructure for millions in the industry who have never been successful in other opportunities they have tried. I was definite that SBH would be my home for many years to come, because of the Success of the leadership, products, and commission structure. Once again, I compare my decision to other MLM - direct sales companies I've been with.

NEVER have I been impacted this way in my personal experience during my career and clearly testifies to me that the FTC has overreached in their decision against SBH.

[Like](#)[Comment](#)

Jerry Welch Thanks, well said , and so have I been n others also, BUT I HAVE HOPE OF MY SUCCESS IN SBH , TO RISE FROM ASHES , FROM THOSE TO HAVE IGNITED THESES DESTRUCTIVE EFFORTS TOWARD THE COUNTLESS OF PRECIOUS PEOPLE, WHO WANTED TO BECOME SUCCESSFUL IN AND HAVE A BETTER LIFE IN CORPORATE AMERICA, AND ENTERPRISE, THROUGH SBH (SUCCESS BY HEALTH).....

NAILED IT

4

[Like](#) · [Reply](#) · 1d · Edited

Dwayne Samuel Hosey Testify my friend. So true

[Like](#) · [Reply](#) · 1d

1



Robert Boisvert You nailed it , very well said, that's what sets Us apart , that's what really makes US different and unique

[Like](#) · [Reply](#) · 1d · Edited

2

[Write a comment...](#)**Jo Dee Nylander-Baer**

Admin · Yesterday at 1:48 PM

...

Friends and Family Calls: MONDAY through FRIDAY:

11 am PT/

Noon AZ-MT/

1 pm CT/

2 pm ET

Dial-in number (US): (605) 472-5427

Access code: 680759#

International dial-in numbers: <https://fccdl.in/i/jodee47>

Online meeting ID: jodee47

Join the online meeting: <https://join.freeconferencecall.com/jodee47>

5

[Like](#)[Comment](#)[Write a comment...](#)**Jo Dee Nylander-Baer**

Admin · January 25 at 10:25 PM

...

We know that Success By Health's: Mr. Jay Noland; Mrs. Lina Noland; Mr. Scott Harris; and Mr. Tommy Sacca are all presently going through a challenging time. We have created this page so we in SBH can share our experiences for our FTC Case. We want to come together so that the FTC/Receiver can know 'Who' SBH is and 'What' SBH means to us.

We believe in the Products: coffees; teas; and supplements. SHARE your

experiences on how your own body/personal health has been impacted.
Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 64 of 163
We also believe in our Business/Income Opportunity. SHARE the money
you've made and how it's impacted your life. FTC doesn't presently know,
so it is up to each Affiliates story and voice to be heard. 100% Positivity
and NO NEGATIVITY. Let the WORLD know about US: "Success By
Health"!



14 Comments

Like

Comment



Ann Giles Curt Fullerton

Like · Reply · 4d



Ann Giles



Like · Reply · 4d



Barry Braxton ❤️❤️❤️ Big Time.

Like · Reply · 4d



Lori Werling ❤️❤️❤️ ABSOLUTELY ❤️

Like · Reply · 4d



Birgit Bonin ❤️❤️❤️

Like · Reply · 4d



Dwayne Samuel Hosey Indeed ❤️❤️❤️

Like · Reply · 4d



Mathilda Augustsson SBH family ❤️

Like · Reply · 4d



Kent Trobaugh Success By Health has Changed My Life for
the Better and I Want to Do the Same for Others !! ✅🎯🔑❤️

Like · Reply · 4d

2



Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 65 of 163

Dwayne Samuel Hosey Success by Health has been the answer to my prayers. A place where I can have answers to all my necessities in life and help others who are in search of the same. I've never been in a environment where all people from all walks of life Unite and share in on a even platform and love it. My personal growth has done wonders under the training tools and events. SBH has changed my life and I'm forever grateful.

Like · Reply · 4d



Don Underhill It has been my great pleasure to be a Founding Member and enthusiastic wholesale customer of a wide array of outstanding health products for over two years. I have used most of the SBH health products daily and also sold them to many friends and family... [See More](#)

Like · Reply · 4d · Edited



Jo Dee Nylander-Baer Thanks for your story Don Underhill Personal Use and Supplementing your income is a lot of what people do in Direct Sales

Like · Reply · 4d · Edited



Don Underhill Jo Dee Nylander-Baer concur . One of the greatest pleasures of my life to be a part of SBH & tremendously positive Affiliates at every level. Truely Remarkable.

Like · Reply · 4d



Write a reply...



Robert Boisvert ABSOLUTELY!

Like · Reply · 1d



Homer Krehbiel

New Member · Yesterday at 12:37 PM

...

This is my story and I make no medical claims. At some time in every person's life, they will come to this reality, "health is my biggest wealth." Since taking the SBH Products for the last 28 months I have not been sick or had a cold. You can have millions of dollars but if you are sick the money doesn't matter. Believe me, at 74 this is important and if the over-reach by the FTC CAUSES ME TO LOSE THESE PRODUCTS I WILL BE DEVASTATED.



Like

Comment



Write a comment...



Mike Gilbert shared his first post.

New Member · Yesterday at 12:36 PM

...

testimonial & mindset

Truly thankful for Mr. Jay Noland
Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 66 of 163
From bootcamp, I became STRONG then MVP, I gained maximum
POWER 

Most of my life I've been fighting wars within myself, but I've
CONQUERED myself...

Mr. Jay Noland has helped build me into the strongest man that I've ever
been!

 G-Burn

I've lost 45-50lbs from boot camp to MVP that was around 3-4month
When I first started I was taking two a day and now I take one a day!
Loving the Products!

#LIMITLESS



  34

 Like

 Comment



Write a comment...



Allen Boone

 New Member · January 27 at 10:34 PM

...

I've had the privilege of meeting Mr. Jay Noland six times and attended two of his very effective training events. I've heard him say numerous times that there are no guarantees to making financial success in SHB. However, he has put together an incredible leadership team of corporate staff along with an amazing infrastructure to provide high quality products and services. The key thing to analyze and compare is how an affiliate identifies themselves within the company. I strongly encourage the FTC to make sure they compare an affiliate's financial success based upon how they identify themselves within the company and their achievement goals. SBH is comprised mostly of members who are customers and people who identify themselves as number ones. Number ones are people who just want to enjoy the benefits of getting products

at wholesale prices with no desire to use SBH as a primary source of income. However, affiliates who identify themselves as twos and threes apply a disciplined work effort to make a great income through SBH. If the FTC chooses to compare all affiliates as equal, they will have a very skewed analysis of the financial success of affiliates. This is especially true since SBH is a young start-up company!

14 likes 26

3 Comments

Like

Comment



Lori Werling Beautifully said, Allen!

Like · Reply · 2d

1 like



Allen Boone Thank You Lori!

Like · Reply · 2d



Renieca Harris Words of Wisdom!! I ditto Lori's statement!!

Like · Reply · 1d

1 like



Write a comment...



Taylor Barrett

New Member · January 28 at 12:04 PM

...

This is my own personal income experience and not an income claim

Due to the overreach of the FTC, I am unable to order my product that I retail and use personally. Each month, I order at or over \$250 in wholesale product that I retail and use myself. With the sudden stop in my commission, I am left unable to pay for my living expenses, as SBH was my only source of income.

14 likes 29

3 Comments

Like

Comment

[View 1 more comment](#)



Irene Sturgeon Prayers for quick return

Like · Reply · 1d

1 like



Margo Buscher What is the charge? Why did this happen?

Like · Reply · 1d

1 like



Write a comment...



Justin Amber Wehrle shared her first post.

New Member · Yesterday at 10:51 AM

...

I have been an affiliate with SBH for a little over 2 years. When i signed up, the products were just beginning to be produced.

I honestly am healthy, so it has taken me a while to think about what to share. What it has done for me personally is helped keep myself and my husband healthy. I used to get ear infections often and I haven't since taking the products. Neither of us have had hospital visits and our energy

has sustained us (even as the parents of many growing children). Making no medical claims, just what I have seen our products help with.

Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 68 of 163
I have seen our products help with people I have known for a long time, with their sleep, search for a healthier coffee, weight loss, pain management, blood pressure etc. That is one of the best things about SBH to me, helping others feel better so they can really live. Without this company, many of my friends and family would be hurting.

21

Like

Comment



Write a comment...



Tammy Taylor Blake

New Member · Yesterday at 10:51 AM

...

coffee drinker at Heart

I now drink black coffee every day up to 5 since becoming a SBH affiliate in November 2019. I used to be a heavy coffee drinker for many years but stopped because it created major issues with my health. Discovering SBH black coffee changed that for me. The first thing I noticed was more mental clarity and a major increase of energy, allowing me to start exercising again. My fatigue was gone. Also, the stomach issues I once experienced were gone. Coffee is one of the loves of my life. I am making no medical claims here but for me, changing my store brought coffee for SBH Myco Black has given me my energy back and so much more.

14

Like

Comment



Write a comment...



Tammy Taylor Blake

New Member · Yesterday at 10:51 AM

...

coffee drinker at Heart

I now drink black coffee every day up to 5 since becoming a SBH affiliate in November 2019. I used to be a heavy coffee drinker for many years but stopped because it created major issues with my health. Discovering SBH black coffee changed that for me. The first thing I noticed was more mental clarity and a major increase of energy, allowing me to start exercising again. My fatigue was gone. Also, the stomach issues I once experienced were gone. Coffee is one of the loves of my life. I am making no medical claims here but for me, changing my store brought coffee for SBH Myco Black has given me my energy back and so much more.

9

Like

Comment



Write a comment...



Jo Dee Nylander-Baer

Admin · January 28 at 6:48 PM · James McKee

...

Written up on behalf of blind Affiliate: James McKee:
[Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 69 of 163](#)
My name is James McKee I am a country founder and affiliate with SBH. I have been an affiliate for over 2 years. I am blind. In the U.S. 70% of blind people do not have any income. I am so glad to be an affiliate with Success By Health. I am currently generating a direct sales profit of \$150 - \$300 monthly plus other commissions and bonuses when my team purchases and sells products to their customers. SBH is making it possible for me to get some financial independence. I have been working with other people, that are blind, to help them get financial independence.

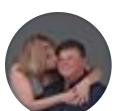
One of the best things about SBH is the training. The company trains everyone, that way everyone gets 100% of the information 100% of the time. The training is broken down into simple task/ideas that make it easy to follow(even as a blind person)

I cannot believe that Government Overreach t order against SBH is wrong. This action has caused me financial hardship.

Please allow us to do business again.

[Like](#)[Comment](#)**Julia Lindvall** [Like](#) · [Reply](#) · 2d**Klella Farris** So very heartfelt[Like](#) · [Reply](#) · 2d**Carleigh Sherfield** Everyone can with some effort make retail profits. This shows it so well.[Like](#) · [Reply](#) · 1d**Angela Hellard** Inspirational! Thank you for sharing![Like](#) · [Reply](#) · 1d**Vicki Lea** You are an inspiration.[Like](#) · [Reply](#) · 1d**Jerry Welch** [Like](#) · [Reply](#) · 1d**Don Underhill** Love your heart Brother... [Like](#) · [Reply](#) · 1d**Robert Boisvert** Very Much Heart felt[Like](#) · [Reply](#) · 1d**Connie Godfrey** Love it [Like](#) · [Reply](#) · 1d

Write a comment...

**Charlie Vickers** shared his first post.

...

New Member · January 28 at 10:29 PM

I was introduced to SBH in 2017. I am the 297th person to join. In fact, I joined as a founding affiliate. From the first time I heard the mission of SBH, I knew that I was home.

My first event was in Las Vegas at the Founders event. Ever since that time I have heard nothing but truth that is literally transforming my life. I have read the accusations against people whom I have come to sincerely trust and love with all my heart. Without reservation I am here to say that every accusation is a complete lie. I stake my reputation and my life on it.

Mr. Noland, Mrs. Noland, Mr. Harris and Mr. Sacca have the highest integrity of anyone that I have met in my life.

I personally have never witnessed these lies in the entire time that I have

Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 71 of 163

The government has overstepped their boundaries in so many ways. The financial devastation that has affected so many families without due process is unacceptable and criminal at its core. All of this is in addition to helpless orphans in Kenya who depend on this company for their existence.

The real atrocity is how this situation been handled. Perhaps Congress, Senators as well as the President himself needs to be involved.



Like

Comment



Write a comment...



Mary Shinn shared her first post.

New Member · January 28 at 10:29 PM

...

I have been with SBH about 7 months, I started on the Coffee and to this day I have not drank any other coffee, my friends that are customers are just like me. Do not care to put the other stuff in their mouth.

I did not get in it for the money just the product. Fell in love with it the first four day of samples. I do not want to be with out it.

I have made money every month. It is a blessing what the products have done for me. Thanks SBH



Like

Comment



Write a comment...



Jo Dee Nylander-Baer

Admin · January 26 at 6:31 PM

...

PLEASE NOTE: 1.) Any of the following testimonies about the SBH products/Ganoderma or personal medical condition are NOT intended to be interpreted as medical claims. Only that the body put in the proper condition can create miracles & heal itself.

2.) Any Testimonies on Business/Income made with SBH are personal experiences only. We are not making general income claims

3.) Any Personal Testimonies about Training/Personal Development are personal to that individual

[Like](#)[Comment](#)

Robert Mehler Please be sure and include a medical / income disclaimer on each of your individual posts as we have always been directed to do from day 1 of SBH. We show the utmost respect for the rules and regulations governing our beloved Direct Sales industry, while wanting to share the wonderful results so many of us have had and witnessed thru SBH.

[Like](#) · [Reply](#) · 4d

6



Jessie Laine Powell Done.

[Like](#) · [Reply](#) · 4d

3



Julia Lindvall Thank you for sharing this very important information

[Like](#) · [Reply](#) · 4d

3



Mara S Conyers Understood and that you.

[Like](#) · [Reply](#) · 2d

Renieca Harris Will do. Thanks

[Like](#) · [Reply](#) · 1d

Write a comment...



Penny Younce Willett

Rising Star · January 27 at 10:59 AM

...

My short version:

I was married 12 years, was content....divorced for reasons beyond my control and was devastated. I had 2 small children and I was scared to death. Went to college, earned a BA degree in Elementary Education, couldn't get a job, took a state job....I made \$100 above income requirements for public assistance, WITH A BA DEGREE!!

SBH gave me hope in a more prominent future. I was NEVER promised I'd be wealthy, nor would I promise someone else that... What I was taught was that: I get out of this the work I put into it, but I can CHOOSE my future... I have the confidence to offer people products that are GOOD for them and will improve their quality of health... also their life financially if they choose... I keep pushing through when times are hard, no matter how hard..... my past doesn't define my future... what if I grew up in a toxic family...so what? I can still do this business!!! It is mine!!!!..... I never have to worry about money again, not because I'm rich or SBH would provide all my desires, but because no matter what, I always have amazing products to sell that are GOOD and we have something EVERYONE needs, therefore...I always have a way to live....I could go on and on but the point is, I'm 47 years old, SBH and our leaders have had a more positive impact on me and my family more than anyone or anything else. For the first time in my life because of SBH, our family has no limits. With SBH, our family don't have to struggle financially. My credit score raised and so did income vs. Ratio at the local bank for a home loan BECAUSE I PROVED MY INCOME GROWTH..... With SBH, we always have a way to make it, EVEN IF I LOSE MY LITTLE JOB.....

Now, because of this FTC overreach....I may have to get a second job.

I was NEVER promised a certain income
Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 73 of 163
I was NEVER forced to do anything
I NEVER paid for something I didnt get
I NEVER missed my commission when it was owed to me
I certainly NEVER LIED about my products nor any income claims to sell or grow in any way, I would never do that.
SBH has been a blessing in so many ways. I can NOT comprehend why ANYONE would want to stop it, so many will struggle without it. 😭

1 33

2 Comments

Like

Comment



Diane Hasler I Know all SBH family can agree with what you've said!

Like · Reply · 1d

1



Dwayne Samuel Hosey 100% Diane..

Like · Reply · 1d



Write a comment...



Kara Kennedy

New Member · January 28 at 11:59 AM

...

Why I became an SBH Affiliate:

For the past 2 years I have been an entrepreneur trying to get a PR firm and online magazine off the ground after a 10 year plus career in PR with a university. It was a pretty high-profile job that no longer was fulfilling. I left that comfort zone to start my own business under the guise that I would have money to start my PR firm.

When the money didn't materialize, I had to find clients fast. It has been a constant struggle to maintain ...

Continue Reading

1 27

2 Comments

Like

Comment



Kent Trobaugh Belief! !! ❤️

Like · Reply · 2d

1



Vicki Lea Yes! I've seen the change in you that Mr. Noland and SBH inspired!!!

Like · Reply · 1d

1



Write a comment...



Lori Werling

New Member · January 28 at 10:15 PM

...

I am by NO MEANS making ANY medical claims here. The following is coming from my own personal experiences.

In late April 2019 I was putting together my health and wellness business, Optimal Health Solutions LLC. I literally called OUT LOUD one day, "what are my solutions to go with my BEMER?" (BEMER is a non evasive

I said to myself, "What are we circulating 😊?"

"What I need is the best quality most effective nutrition I can find!"

Well, within hours I had a message from Miss Connie on a business networking site. Our hearts and interests seem to fall in line and we set up a special meeting. It was completely serendipitous when I was face-to-face with an old family friend, Ann, who was there to present SBH to me. We both own BEMER systems and want high quality products for the best results. I was very impressed with the Success By Health product line right away and excited to sample things.

We also spent time talking about the company and its vision. I saw plenty of solid opportunities to implement these products into my business to help change lives. It is like the piece that completes my puzzle.

By May 1st I was IN!!! Taking G-Burn and drinking my Myco Cafe Black with a touch of pure cane sugar and LOVING IT!!! These are truly my favorite nutritional products I've encountered in over 20 years working in the health and wellness industry. The Best ❤️

I am so grateful for all of the love, truth, realness, integrity, positivity, encouragement, and support that I have experienced since joining Success By Health. I have seen such an outpouring of effort and energy into things being done just right and in excellent respectable form so we as affiliates have something to be very proud of.

The guidance, teaching and leadership has been priceless. I have been on the most amazing journey of finding my definite purpose and putting into action the means to reaching my biggest dreams!

I am so very proud to be a part of Success By Health. ❤️

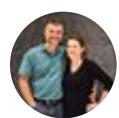


Like

Comment



Write a comment...



Buddy Wright shared his first post.

...

New Member · January 28 at 9:46 AM

No income claims

In December 2017, my wife and I joined SBH primarily for another stream of revenue. At that time, the status of our state pensions were at risk as we were both employed in the school system. Immediately into the business, we experienced great success with retail sales of the SBH products. We quickly saw the power of retail when we had gained over 30 retail customers, and we were able to pay our mortgage with retail profit! When we realized we were making mo... [See More](#)

[Like](#)[Comment](#)

Julia Lindvall Your story is so amazing ❤️ We wish you and your family nothing but the best ❤️

[Like](#) · [Reply](#) · 2d

1



Brooke Sherfield Making that retail profit! 😊

[Like](#) · [Reply](#) · 2d

1



Debby Armentrout Awesome opportunity and products!

[Like](#) · [Reply](#) · 2d

Vicki Lea Awesome

[Like](#) · [Reply](#) · 1d

Write a comment...

[OLDER](#)

Jerry Ayers

New Member · January 28 at 5:35 PM

...

I received this from one of my team members Valorie VanOrden today. Tears, endless tears cascading down my face. Crying, sadness from feeling of great loss of freedom, encouragement of friends and people whom I don't know. Caring people who will be friends in the future, waking up in the middle of the night thinking this is not really happening. this is like a bad dream. I am 73 years old and the over reaching by the FTC imposed upon SBH has compromised my health and dreams. I now experience insecurity like I have been robbed and cheated by a thief, namely the FTC and their TRO. My emotions of joy and happiness have been replaced with anger, deep hurt and fear of not paying my bills. My concern is also for the others members of the SBH family who have helped the unfortunate and now can not. Happiness has been replaced with deep sadness. Our right of the "Pursuit of Happiness" has been denied and my Freedom as a United States citizen has been violated!



30

2 Comments

[Like](#)[Comment](#)

Jerry Ayers Well said

[Like](#) · [Reply](#) · 2d

Diane Hasler Very well said!!! Have hope!! SBH has nothing to hide! The truth will win!!

[Like](#) · [Reply](#) · 1d

1



Write a comment...



Tyler Sherfield

Rising Star · January 26 at 10:52 PM

...

SBH is how I provide for myself and my family. It is my only source of income. Due to the overreach of the FTC, my income was cut off without warning. This has left me unable to pay for living expenses and continues to negatively impact my credit.

Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 76 of 163

46

4 Comments

Like

Comment



David Yates No doubt.

Like · Reply · 3d



Lori Werling Right on

Like · Reply · 3d



Dwayne Samuel Hosey FTC's overreach shut down of SBH!

This is impacting hard working people with good hearts, whom only seek to impact this world for good. You have a company in SBH who chooses to be humble and hustle for their dreams and goals. We are constantly reminded... [See More](#)

Like · Reply · 3d · Edited

13



Eileen Wolphagen Oh my

Like · Reply · 1d



Write a comment...



Kelly Mathews Murunga shared his first post.

...

New Member · January 28 at 6:49 PM

DISCLAIMER: NO MEDICAL CLAIMS.

Late last year I traveled to the USA and Met Homer and Sarah Krehbiel who introduced me to SBH. While staying with them I learnt more about SBH e.g, what the company was about, who the founders were, the company's code of conduct (WHICH THE CEO MR. NOLAND TOOK VERY SERIOUSLY) the products that the company was currently producing and was in the market and future plans for the company. I got so excited and was ready to join (WITHOUT BEING FORCED) this great company which later became like a second family to me. While still in the US I got to try out some of the products like G-Fyx, Gburn and Life 120. These were tremendous products for my body. I started sharing with friends and family back home about this amazing products two of them being my Dear wife and Her Sister in Law who was suffering from severe hypertension. Our inlaw informed us of how she, her parents, siblings and aunties all suffer from High blood pressure, Arthritis and Diabetes. I told her of how these products were herbal and how they cleanse our systems.

She was interested and asked me to take a few products with me back home so that she could use. As soon as I got home I organized for her to receive a packet of Gfyx and Life 120. 2 days After she started she noted significant drop in her blood pressure. She took some to her mother who had been suffering from Arthritis and for 11 years she never left her bed before 9am. just 2 days after trying the products, she woke up on the 3rd day at 6am and went out to her farm. the 4th day she woke up even earlier. She called her daughter to thank her for what she called a miracle drink en pill.

this is just 1 of the several positive feedbacks I have received since I got back home in November of 2019.

God bless SBH Family.



Like

Comment



Write a comment...



Jerry Ayers

New Member · January 26 at 11:58 PM

...

I was just beginning to make enough income per month to seriously thinking about retiring from my job and doing this full time helping others with their challenges.. However, now the overreach of the FTC cost me \$600 in cancellation fees for airfare and the lack of SBH revenue killed all hopes of leaving my job. I just feel sick in my heart for the loss of revenue for many charities that the revenue of this company was helping. Personally this shutdown for the past 14 days has cost a loss of revenue support for one of my foundations charities of \$1200.00. The longer this shut down continues the damage it is doing to the innocent health wise and financial wise is devastating.



3 Comments

Like

Comment



Penny Younce Willett

Prayers for this situation! Its very sad for us all.....



Like · Reply · 3d



Irene Sturgeon

Prayers

Like · Reply · 2d



Margo Buscher

Any light at the end of the tunnel?

Like · Reply · 2d



Write a comment...



Cassandra Louise Andréasson shared her first post.

...

New Member · January 28 at 4:37 PM

No income claims

I heard about SBH for the first time in October 2019 and I got in contact with the Swedish team. Everyone welcomed me with opened arms and I could feel the positivity and creativity that these people spread in the atmosphere around them. Some things that we all have in common is that we are committed, determined and passionate about our job, goals and especially our future. No one can be 100% sure about how the future will turn out to be like, but I can be 100% sure that SBH will affect my professional journey in positive manners from now on.

[Like](#)[Comment](#)**Julia Lindvall** [Like](#) · [Reply](#) · 2d

Write a comment...

**Jerry Ayers**

New Member · January 28 at 5:35 PM

...

I received this from one of my affiliates Valorie VanOrden today. This is not a financial claim but her own personal story. Results can vary per individual.

The \$30, \$20, \$15, and \$10 in retail sales have been much appreciated in the ability to put gas in my truck, food on the table and to help pay off a bill. There have been a priceless feeling of happiness in seeing the smile on a retail customers' face because of their joyfulness, satisfaction with these products.



19

[Like](#)[Comment](#)

Write a comment...

**Dwayne Samuel Hosey** shared his first post.

New Member · January 28 at 5:09 PM

...

I joined SBH in Oct of 2017 and immediately became a country founder because of the vision and mission of the company. Making no income claims whatsoever!!! But I was extremely excited that a company would use a % of income made from each sale of products to feed, clothe and educate orphans in Kenya Africa and other important things like clean water initiatives and at risk homeless teens and more. The FTC outreach shut down of SBH! This is shocking and unexpected. This is impacting hard working citizen of all walks of life with good hearts. This company and its affiliates only desire to support our families and impact the world for good. Through humility hustle and health we can achieve the financial freedom of our choice. Numbers have always told the whole story and leadership has always said that 80% would only just supplement there income in this industry. SBH took the think and grow rich theory to heart. And the energy was clear and evident. Multiple streams of income in this company was built on honor and integrity. SBH was constantly training us and encouraging us to striving for level 10 energy in these 6 pillars of life. The Physical-Financial-Spiritual-Emotional-Mental and Social. Building strong people 1st. That impact is huge to those we share this energy with. Now out of the blue! The FTC government overreach has cut off are resources financial physical emotionally socially mentally and for some spiritually . I'm making zero health and income claims. But I can not imagine not being able to feed my body all of SBH products. As a former professional athlete, I learned how my body responds to a great diet and exercise. I retired in 2002 and I since lost access to great nutrition and great income opportunity. A month within joining SBH 2017. My physical health felt strong and rejuvenated and my financial vision was clear again.

I had strong allergies all my life.. From netty pots to over the counter prescription drugs, nose bleeds, constantly congested from pollen and grass environments, cats you name it. I used the Aller G Stop and my body responded like never before. Changed my life! I began selling SBH products and testimony after testimony on how well my customers bodies started feeling. The products themselves doesn't heal you of anything. But the body when fed proper minerals and nutrition tends to respond so much better.

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I haven't achieved all that my capacity has for financial freedom yet, but I was sure on my way. This really doesn't make sense to cut off good people who clearly are helping so many people in so many ways. Let's get this right please!

31

2 Comments

Like

Comment



Ulrika Kersting Yes, Please, Let's get this Right!

Like · Reply · 2d

2



Angela Hellard Amen Dwayne! You are awesome and wonderful! Thanks for stating so well how much this has hurt us on so many levels.

Like · Reply · 2d

1



Write a comment...



Jerry Ayers

New Member · January 28 at 5:10 PM

...

I received this from one of my affiliates Valorie VanOrden today:

WOW! I am so excited about the product G-Burn. I have lost 4 inches in my waist and twenty pounds. Every morning I look in the mirror in the bathroom. Wow there is less belly fat. It is a beautiful sight. It is like Christmas morning. I am getting the concave stomach I want to have. I have had this belly fat since 1977 and 1981 when I had two children. The G-Burn has also given me more energy. This is God's Blessing to give me a Great Body.

This is not a medical claim but simply what the products have done for me. Individual results may vary.

23

Like

Comment



Write a comment...



Mara S Conyers shared her first post.

New Member · January 28 at 5:09 PM

...

no medical claims being made, just a personal testimony

I have degenerative discs in my lower back as well as a herniated disc. The past month, the pain had gotten really bad, to where my tailbone feels bruised and I'm walking hunched over, holding onto things. At the direction of my team leader, I began taking the Ganoderma supplement, 2 pills, 3 times a day as well as drinking 2 packs of G-Fyx, one in the AM and one in the PM.

My morning routine always starts with 2 sachets of coffee.
Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 80 of 163
Once I started this, my pain lessened and I've been able to walk much better. Not to mention feeling better.

I love these products and will continue to use them as long as possible.

Best coffee ever. To lose these products, is to lose vitality and life.

#MyCoCafefromSuccessbyHealth

#Ganoderma

#G-Fyx

#ITWORKS

14

Like

Comment



Write a comment...



Ulla Edsköld Ramstedt shared her first post.

...

New Member · January 28 at 9:44 AM

Making no medical claims

Here are my testimonials using SBH products:

MYCOCAFÉ BLACK COFFEE

I changed my 2-3 cups of traditional coffee to MycoCafé Black Coffee (with milk). I have IBS (Irritable Bowel Syndrome) so my stomach is always swollen. But after 2,5 weeks with MycoCafé my stomach was much less swollen.

When I know that I am going to sit down for a couple of hours, I always wear a dress or skirt/pants that is not tight. But after 4 weeks with MycoCafé I could sit a whole day with jeans without having to open one or two buttons or get cramps. Last time I could do that, was more than 10 years ago.

I have had chronical pain for almost 20 years, but after 2 months I realized that I didn't had pain anymore from my whiplash and my rheumatism in my feet, and my ishias was gone that I have had for five years.

G-BURN

I lost 20 lbs. (9 kg) with help of G-burn.

I really wanted to see that it was G-burn that helped me to lose weight, so I didn't change any food or training during this time. I have tried for many years to come down under 132 lbs. (60 kg), but it never happened even if I changed my food and my training. My goal was to lose 15 lbs. (7 kg) and come down to 121 lbs. (55 kg), but it was so easy to lose a little bit more. I also use G-burn before I'm going to exercise, it gives me so much energy, so I can run longer and faster and lift heavier weights. I love G-burn, that is my favorite product.

G-FYX

G-fyx has helped me with jetlag, twice when I was getting a panic attack. I don't have pain in my body since I started with the black coffee, but when I was hurting my knee (I had to jump on one leg down the stairs) I took G-fyx and the same evening I was walking 5 km on my treadmill without any pain.

G-CLEAR

When I was going thru my divorce, I had a really hard time to sleep. So I took G-clear and could sleep really good for the first time in more than a month. It made me relax and sleep deeper and not wake up more than a couple of times during the night.

G-DROPS

I take G-drops every day, both inside my body and on my skin. I got rid of my eczema on my foot, perfect when I got mosquito bites last summer, it hydrates my skin and I don't have as much headache as I used to have. I

22

6 Comments

Like

Comment



Julia Lindvall Your testimonials Ulla is so amazing! I'm very lucky to know how the products have helped you in so many ways ❤️

Like · Reply · 2d

1



Ulla Edsköld Ramstedt 🤝 Me too, I love our products
Julia Lindvall 🙏😊

Like · Reply · 2d

1



Ulla Edsköld Ramstedt 🤝 Here is how I looked like before and after G-burn 😊



Like · Reply · 2d

3



Angela Hellard 🤝 Thank you for sharing Ulla! I'm so thankful to know you, and count you as part of my family ❤️

Like · Reply · 2d

1



Ulla Edsköld Ramstedt 🤝 So nice to learn to know you on our event, you are a part of my family too Angela 🙏😊

Like · Reply · 2d

1



Angela Hellard 🤝 Much love Ulla!!!

Like · Reply · 2d

1



Write a reply...



Sharon A. Whalen Whitaker

New Member · January 28 at 3:11 PM

...

I am making no medical claim. This is my story.

Before i joined Success By Health i stayed at home and mostly in my bedroom. With having fibromyalgia, IBS, fatigue, traveling anxiety and having anxiety from having body aches and pain and fatigue from the fibromyalgia to the point I didn't want to move. My stomach issues was so bad i loss weight from not being able to eat the food my body needed. On top of this i have chronic sinusitis and very bad seasonal allergies, food

intolerance and food allergies. Nothing has helped me with these issues
[Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 82 of 163](#)
and i refused the meds for the fibromyalgia because the side effects
outweighs the benefits. When my good friend [Penny Younce Willett](#) (Im
so thankful for her) introduced me to SBH in March 2018 and i saw the
wonderful line of products and i joined.

Aller-G-Stop has been the best support i have ever had for my sinuses
and allergies. I also had been dealing with a skin rash for 1 1/2 years
called granuloma annulare. The cause of the rash is unknown and the
treatment did nothing. It was bad and very itchy very uncomfortable.
When i started taking Aller-G-Stop for the support of my upper
respiratory issues about a week later i noticed i had not been itchy on my
sides and stomach and i looked down and the rash was gone. I was so
amazed and thankful to how my body responded to this.

G-Clear has been wonderful to me and helping me feel calm and happy.
Latte coffee. I had not drank coffee in years because it would upset my
stomach so bad. MycoCafe coffee changed that. It does not burn my
stomach and it helps with my IBS.

Im so grateful for these products i do not ever want to be without them.
January 2019 for the first time in my life i went to Orlando Florida to the
SBH kickoff. I never been on a plane nor to another state. With the
mentorship from Mr. Jay Noland and coaching me on self growth and the
wonderful products helping my body i went to Florida. I thought i was
dreaming. Success by health has made my life so much better in self
growth and my health and i am forever grateful.

Now with the shutdown i am devastated that I can't order my products
that has been supporting my body's needs and my mentor Jay Noland i
miss being able to have his support of positive motivation.

I want to add about the great people i met on this journey with SBH. They
all are wonderful outreached loving people who care and love others and
that means so much to me and my family.



1 Comment

Like

Comment



[Angela Hellard](#) Thank you for sharing with us! Our amazing
products have changed my quality of life as well. I have
fibromyalgia too, and have found that the GFYX takes down my
swelling and pain - I highly recommend that you try it! Hang in
there!

Like · Reply · 2d



Write a comment...



[Jo Dee Nylander-Baer](#)

Admin · January 27 at 5:48 PM

...

As many of you know? The preliminary hearing that was to happen today
was postponed (at SBH's Attorney's request)-- The ACTUAL Hearing
date is: February 12th. Please pass the word!

[Like](#)[Comment](#)

Amber House Justin Amber Wehrle
Chris Walker
Amanda Bieber

[Like](#) · [Reply](#) · 3d

2



Brooke Sherfield Carlos A Mendoza Matt Wells Buddy
Wright Taylor Barrett

[Like](#) · [Reply](#) · 3d

1



Maria Stade Conny Sjögren

[Like](#) · [Reply](#) · 3d

1



Tyler Sherfield Mike Gilbert Elaine McCaffrey

[Like](#) · [Reply](#) · 2d

2



Barry Braxton LaVerne Barnes

[Like](#) · [Reply](#) · 2d

Klella Farris Thank you Ms. Jo Dee Nylander-Baer, greatly appreciate this info.
I look forward to our attorneys doing a phenomenal job of showing the world that we are a REAL and LEGIT, LEGAL company that's thriving and changing lives daily, so we can all get back to changing more lives!
The world is waiting for us!... [See More](#)

[Like](#) · [Reply](#) · 2d

Klella Farris Betty Rodriguez
Elizabeth Roberts
Cassandra Roberts... [See More](#)

[Like](#) · [Reply](#) · 2d

Theresa Donerson Thanks for the update!!

[Like](#) · [Reply](#) · 2d

Francois Hewing
 New Member · January 28 at 2:26 PM

...

*No income claims are being made and results vary based on effort and following a specific set of instructions. There is no guarantee's made or implied for any individual based on my personal results.

Opportunity

Since I have joined Success By Health in 2017 I have been taught by Mr.Noland, Mrs. Noland, Mr. Harris, and Mr. Sacca and all of the leaders within Success By Health that the Plan laid out is sell retail Five bags of coffee a week and offer the same opportunity to o...

[Continue Reading](#)

[Like](#)[Comment](#)**Dwayne Samuel Hosey** Strong truth[Like](#) · [Reply](#) · 2d

1

**Angela Hellard** Beautifully stated! Love you ❤️!!![Like](#) · [Reply](#) · 2d

1

**Francois Hewing** Angela Hellard love you right back[Like](#) · [Reply](#) · 2d

1

**Debby Armentrout** Well said![Like](#) · [Reply](#) · 2d

1

**Kent Trobaugh** Belief! [Like](#) · [Reply](#) · 2d

1

**Melanie Summers** I could not say this any better! Each one of us has been affected negatively by this FTC overreach and temporary restraining order.[Like](#) · [Reply](#) · 2d

1



Write a comment...

**Amber House** shared her first post.

New Member · January 27 at 5:56 PM

...

No medical claim in this testimonial, but Aller-G-Stop has helped me tremendously with allergies that I typically suffer from year around! I usually end up with 3-4 sinus infections a year, but since starting this amazing supplement almost two years ago, I've only had two. In both cases, they occurred when I ran out of the product. I had also been searching for a healthy coffee for years before SBH. I love the MycoCafé black coffee and despise the thought of being forced to go back to a traditional brand of coffee! Because of the over-reach of the FTC, my health may suffer when I run out of these products at the beginning of next month if I'm not able to order more by then!

[Like](#)[Comment](#)**Amber House** Justin Amber Wehrle[Like](#) · [Reply](#) · 2d

1

**Justin Amber Wehrle** Amber House yes!! we will get you Allergystop as long as we can.[Like](#) · [Reply](#) · 2d

1

**Amber House** Thank you!![Like](#) · [Reply](#) · 2d

Write a reply...



Write a comment...

**Scott Roberts** shared his first post.

...

New Member · January 28 at 3:22 PM

I became an SBH affiliate in September 2018. I do a lot of work in the medical ancillary field. I've lost track of how many times I have been taken advantage of by vendors. Promises, never paid, etc. That has never been the case with this company. They do things with integrity.

12

[Like](#)[Comment](#)

Write a comment...

**Penny Younce Willett**

...

Rising Star · January 28 at 2:26 PM

Look what showed up on my timeline: 1 YEAR AGO TODAY



← Memories

**Penny Younce Willett**

...

Jan 28, 2019 at 6:01 PM ·

I just returned from Orlando, FL launching our new business!!!! It was phenomenal!!! I feel very blessed to be a part of this company.

We now have a new product that supports your body healing itself!! Many testimonials to share with you **NO MEDICAL CLAIMS HERE!!** I only have 2 bags of this miraculous blend....I will be getting more but for now, I have a limited supply.

I need a few to try it with me and notice what it may help in your body that could improve your health!!

I have seen blood under a microscope before this, and 30 mins after....TRUST ME, this is designed to support your health and your body's natural healing of itself, no medical

Like

Comment



Irene Sturgeon Is that the Gfix

Like · Reply · 2d

1



Klella Farris G-FYX and I can't live without it!
It helps control the pain I have from fibromyalgia

Like · Reply · 2d

1



Irene Sturgeon Klella Farris I'm starting today

Like · Reply · 2d



Klella Farris Irene Sturgeon you will love it and you will
feel so good!

Like · Reply · 2d

1



Write a reply...



Klella Farris



Like · Reply · 2d



Lauryn Jackson

New Member · January 28 at 3:11 PM

...

* no medical claims, only personal experiences*

February of 2018, my grandparents joined SBH to be customers and earn 10% on their monthly orders. After two months of consistent use of the products, my grandfather had lost 40 lbs, his overall health had improved tremendously, and he was cleared for hip replacement surgery. the doctor said his recovery would take at least 4-6 months, but because he had been drinking the G-FYX and taking the nutraceuticals, he was walking without a cane in just four weeks!

These products have helped my grandparents get their life and health back. My grandmas liver levels are finally going back to normal after almost 23 years. My grandpa went from 10+ pills a day, to now one or two prescriptions and a handful of our SBH nutraceuticals.

Due to the overreach and the FTC shutting down our ability to order these products, I am absolutely terrified that in the next few weeks, my grandparents will no longer have access to these products and their health will begin to slowly decline.



Like Comment

Write a comment...

John Murunga shared his first post.
 New Member · January 28 at 12:58 PM

***No Medical or Income Claim**

In Africa not all Roads are paved so dust is everywhere. The dust and cold were serious issues to my mum who was allergic to both. Imagine even when we were burning up because of the hot sun, she would have several sweaters on and an inhaler in the other hand. My dad on the other hand had been diagnosed with a heart condition and we as a family could not afford the medical treatment required, which could only be done in the USA or India.

While on a visit to the US we visited with Sarah and Homer Krehbiel and they introduced me to SBH and helped register me with SBH. I bought me a bottle of life 120 which I brought to my mum who is 76 and my Dad now 80

Today my mum rarely over dresses in warm clothes no longer has the allergic reactions to cold or dust. Now that they have been introduced to G-FYX they are more active. On the other hand being a volunteer church minister in Bungoma Kenya without any support being part of SBH has put food on my table every month and helped pay fees for my kids.

25 2 Comments

Like Comment

Angela Hellard Bless you Brother!! 1
Like · Reply · 2d

Kelly Mathews Murunga I can confirm this. These are my grandparents and I have seen their health get transformed from bad to really good.
Like · Reply · 2d

Write a comment...

Maria Stade shared her first post.
 New Member · January 27 at 11:36 PM

Dear SBH family this is my testimonial also some parts of my life that I have not told before. (Sorry if I don't spell so well, I do my best)

My aches and pains started in my teenage. And became chronic when I was around 20. Now I'm 51 and I have tried all kinds of pain relievers. Most of them I can't eat and none of them seems to help long term. I have been using chaga and have been studying "medical mushrooms for some years" I was so lucky to bump into SBH and was eager to try the ga...

[Continue Reading](#)

49 12 Comments

Like Comment

Jerry Ayers  Oh Maria I am literally in tears for what the FTC and their overreach has cost you and the people you touch. Stand strong because Quitters never win and Winners never quit. This temporary set back will not define who we are as a Family but instead will make us stronger and more committed to our dreams.

Like · Reply · 2d

4

Julia Andersson  Amazing ❤️

Like · Reply · 2d

1

Ulla Edsköld Ramstedt  Amazing story Maria 🙏❤️

Like · Reply · 2d

1

Amanda Elzer 

❤️ ❤️

1

Like · Reply · 2d

Linda Huff  Thank you for sharing your Amazing story.

Like · Reply · 2d

1

Julia Lindvall  We love and appreciate you Maria ❤️ Thank you for sharing your story with all of us.. 🙏

Like · Reply · 2d

2

Sharon A. Whalen Whitaker  Wow such an amazing testimony. Your such an inspiration. Thank you for sharing your story Maria.

Like · Reply · 2d

1

Angela Hellard  Thank you for sharing your story, and your heart ❤️. Much love for you!!

Like · Reply · 2d

1

Emil Carlsson  Thank you Maria! You are awesome and such an inspiration ❤️

Like · Reply · 2d

1

Elaine McCaffrey  Thank you Maria Stade for sharing your testimony and inspiration. ❤️ SBH sister 😊

Like · Reply · 2d

1

Mathilda Augustsson  Lovely testimonial ❤️ Appreciate you!!

Like · Reply · 2d

1

Donna Stacy  Thank you for sharing from your heart, Maria! You're an inspiration and a wonderful example of how much SBH helps people both with improved quality of life as well as providing an income for those who cannot work a job due to health constraints! Praying for a quick and positive response from the FTC!! ❤️🙏❤️

Like · Reply · 2d

2

Write a comment...



Marcie Molnar shared her first post.

New Member · January 28 at 1:36 PM

...

I make no medical or financial claims in relationship to SBH. This is simply our story

Like many others who find themselves approaching retirement age, it became obvious that we would not be able to live off of our Social Security benefits alone. The need to supplement our income through employment is not necessarily a bad thing. I believe that it can help an individual feel motivated and can keep the mind sharp; however, it is our experience in working hard and sacrificing much to help an employer achieve success that has brought us to the realization that there is no security or loyalty in working for others.

After dedicating 13 years to a major corporation with perfect attendance as a top producing Territory Manager, my husband found himself unemployed due to "downsizing". I was employed for nearly 10 years as one of the first employees of a start-up company when they let me go after selling to a global corporation. If you have ever tried to find a position as a senior citizen, you understand how great the challenges are. Although our work ethic is outstanding and our dedication to the companies that we have worked for was great, we now know that there is no guarantee that your position is secure. Even with excellent referrals and recommendations, it's nearly impossible to find employment at our age.

A few months ago, we decided to take a leap of faith and put our energy into building our own business through SBH, hoping that we can make the transition to being self-employed within the next couple of years. Shortly after signing up however, my husband was diagnosed with severe degenerative disc disease. We are now aware that his employment at his current company may come to an end sooner than anticipated. We were hoping to build our SBH business before this day comes, but with the shut-down, we now are very concerned.

One of the issues with my husband's recent diagnosis is pain caused by inflammation. We understood that G-FYX may be able to help his body. My husband's personal experience has been that it has indeed helped him. A side benefit that he has experienced has been a decrease in mucus both in his nose and his lungs, and he personally has also lost 10 lbs which has helped eliminate some weight around the middle which is beneficial for his condition. Because of the FTC shut down of the ordering system on the SBH website, I have personally stopped taking the products so that my husband doesn't run out.



21

Like

Comment



Write a comment...



...



Sherry Harrod

New Member · January 28 at 1:02 PM

Due to medical conditions over several years my weight increased by 30+ pounds. I tried many different supplements to help me lose the weight with no success because my body did not respond well to them. They made me extremely nauseous and/or caused me to have major jitters and my heart would feel like it was going to explode. In July 2018 I decided to give SBH's G-Burn a try. I was thrilled with how my body responded to the product because I had a much needed boost in energy, I had zero jitters, zero nausea, my heart did not race and I lost 26 pounds over a 6 month

period by taking only 1 capsule per day! My body continues to respond well to the G-Burn because I have maintained my weight loss for one year now. I'm not making any medical claims, I'm just sharing my experience. To say I would be devastated if I could no longer purchase my G-Burn would be an understatement!

10

Like

Comment



Write a comment...



Joe Shoemaker

New Member · January 28 at 1:00 PM

...

I have been taking ALLER-G-STOP since I received my product around Labor Day 2018. I have not had any sinus problems. If I feel my sinuses start to feel bad I just increase the dosage. Well I am out of ALLER-G-STOP now and I need my order.

15

Like

Comment



Write a comment...



Joe Shoemaker

New Member · January 28 at 1:00 PM

...

Since I joined SBH on 08-07-18 I have been taking G-BURN since I received the product I ordered. I weighed 245lbs and today I weigh 191lbs. I feel great but I am out of G-BURN now. I need to order more G-BURN.

11

Like

Comment



Write a comment...



Debby Armentrout

New Member · January 28 at 1:00 PM

...

SBH came into my life in September of 2017. Always interested in health, Mr. Noland's trainings and simple plan , proved to me that Simple Retail of a product that people use everyday (COFFEE, HOT CHOCOLATE, TEA, etc), could generate extra money for anybody to help with their bills, whether it's gas,groceries,light bill, student loans or in my case, supplement Social Security. My family's income took a severe hit in the downturn of the economy in 2008 era. Many retirement 401K's were decreased. I saw an opportunity that could help me and my family!!!!

This Grave Disruption of Business by the FTC is baseless and causing harm financially and physically.

The beauty of our company is that you CAN choose to participate on several levels, become a customer all the way to creating an income. Like Girl Scout cookies, pick what suits you!

Sometimes new can companies fall short in growth, products,etc. SBH

offers trainings (if you purchase an expensive car, you have to go to their driving school) optional , BUT to be prepared for SUCCESS you need to be PREPARED! SBH offers cutting edge Products for easy consumption.

Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 92 of 163
This unjust shutdown of business is harmful to many people including the Kenyan Orphanage that depends on our retail for SUPPORT as does the Homeless Teenage population in Las Vegas.

The many faces of SBH include, veterans, senior citizens, single parents, grand parents, farmers, teachers, professionals, persons with disabilities, millennials,an inclusive group, working to provide for their families,future families and their own future. This shutdown has caused severe damage to ALL.



Like

Comment



Write a comment...



James Irving

New Member · January 27 at 7:57 PM

...

I am not making any medical or products claims but what I know is i was once over 467 lbs and now I am 283 lbs lighter. That is an entire person that i have lost. And what do i have to thank for it. G BURN!!! The natural metabolism booster and appetite suppressant has enabled me to get my life back. Having a heart situation, I have to be very careful but when you put the body in the right conditions ...well lets just say I have more energy then i have had since high school and i weigh less than i did my senior year .



 Like

Comment



Jill Christopher Rosenkrantz  You may be half the weight,
but you're twice the man that you once were!

Like · Reply · 2d



Debby Armentrout Thanks Rev James awesome

Like · Reply · 2d



Write a comment...



Rhonda Nash Wright is with Buddy Wright.



Since July 2018, the commissions thru SBH and retail sales of SBH products have been the sole source of income for our family of 5. Due to this FTC shutdown and the government overreach, this income was halted without ANY warning which has caused great financial hardship for our family. This drastic cut off has left us scrambling to find a way to pay for our living expenses and provide for our 3 children! THESE are some of the faces directly affected by these baseless allegations and the longer this draws out, the more they will be negatively impacted!



 Like

 Comment



Lisa Dutka 



2

Like · Reply · 2d



Penny Younce Willett  I pray for you guys often!

2

Like · Reply · 2d



Brooke Sherfield  Beautiful faces 😊 we need SBH for our family

2

Like · Reply · 2d



Angela Hellard  What a precious family ❤️

2

Like · Reply · 2d



Walter Nash  This hits home.

3

Like · Reply · 2d



Melanie Summers  My prayers are with you, as with every other SBH affiliate.

2

Like · Reply · 2d



Donna Stacy  Your family as well as the other SBH families have been in my thoughts and prayers since this was announced! May we all find peace as we wait for a positive outcome! ❤️🙏❤️

3

Like · Reply · 2d



Write a comment...



Jo Dee Nylander-Baer

Admin · January 26 at 11:29 PM

...

As a leader, my MAIN focus is and has been since the shut down: To keep my SBH Team/SBH all together--- I use the word: "Keeping " Because without the part-time people who supplement their income together--- which are 80% of the Company--- These Affiliates are ones who counted on the \$200 to \$400/month: Checks to pay that ONE BILL---Like the electric bill----OR? Their grocery bill---- Their car note? Because of the Government over-reach? We may have a whole new round of Orphans that need money to survive--- Like the Kenyan Orphans.

[Like](#)[Comment](#)

Suzy Q Monroe All of THIS!!!! Senior citizens, those on disability, single parents, college kids, so many lives are being negatively impacted and for those that live paycheck to paycheck are unfortunately now trying to scramble to figure out how to keep roof over their head, lights on and/or food on the table.

[Like](#) · [Reply](#) · 2d

1



Karyl Darigan Yes! It was the supplement to my social security income! At 67 it was my light at the end of the tunnel. Worse yet for those who relied on this as their total income. And especially, the orphans who rely on SBH for housing, food and education.

[Like](#) · [Reply](#) · 2d

1



Debby Armentrout Such an UNNECESSARY inconvenience and BURDEN to the thousands that were able to enjoy the extra money and great Products! A supplement to my small amount of Social Security I received, helps with monthly bills , compromised NOW and for the orphanage i... [See More](#)

[Like](#) · [Reply](#) · 2d

Write a comment...

**Andy Laurens** shared his first post.

...

New Member · January 28 at 11:59 AM

** No Medical Claim - Personal Experience Only **

I'm a mid-50's guy that has spent my adult life dealing with an issue where every small cut I get, regardless of where on my body; if it breaks the skin layers and bleeds – it will automatically get infected. Doesn't matter if I instantly clean it out, use H2O2, put a covering on it – nothing helps, it will get infected. Thus, I have to have ointments such as triple-antibiotic close by me at work (I have a physical job) and at home as that's been the only way to stop this from happening. I've taken vitamin and mineral supplements all my life (even as a child growing up) including immune-boosting ones that are supposedly high-quality. Doesn't matter.

That is, until SBH.

I've now proven this multiple times and each time it's the same result. I've sliced my fingers at various times over the past few months and without exception the cut gets red and painful for a day then just heals up...no ointment needed.

The ONLY change is – SBH products.

As my SBH inventory dwindles due to the court-enforced TRO I find myself wondering if I better restock my antibiotic ointment, which is not a natural way to assist my body in healing.



16

[Like](#)[Comment](#)

Write a comment...



Friends and Family Calls: MONDAY through FRIDAY:

11 am PT/

Noon AZ-MT/

1 pm CT/

2 pm ET

Dial-in number (US): (605) 472-5427

Access code: 680759#

International dial-in numbers: <https://fccdl.in/i/jodee47>

Online meeting ID: jodee47

Join the online meeting: <https://join.freeconferencecall.com/jodee47>



Like

Comment



Write a comment...



Walter Nash shared his first post.

New Member · January 28 at 9:47 AM

...

I can only tell you what SBH has done for me. About a year ago I was overweight struggling at work to the job I was hired to do. I was on 5 doctor prescribed medications for Parkinson's high blood pressure high cholesterol prostate issues and stress. Because of being introduced to the products I've lost 25 lbs. gotten off of prescribed medications with their numerous side affects. My family has noticed a significant positive change in me as well as a significant physical appearance. That in turn has a positive mental effect. Not being able to have continuous access to the products with the situation the company is in . Well it's easy to see the affect it's going to have on me and my family.



1 Comment

Like

Comment



Angela Hellard Hang in there honey!!!

Like · Reply · 2d

1



Write a comment...



April Mathers Brown

New Member · January 27 at 9:38 PM

...

SBH has dedicated leaders (Jay Joland, Tommy Sacca, Scott Harris, **Jo Dee Nylander-Baer**, Jill and **Allen Boone**,) that have and are willing to go the extra mile to help affiliates build their business to include one on one coaching and excellent leadership training. I am halted in my ability to build my business and suffered financial costs and inconvenience from the cancelled kickoff and training. This was money I really did not have or want to lose. I have felt very supported by the leaders in this business and hope to resume my business.

[Like](#)[Comment](#)

Ulrika Kersting I hear ya! The FTC's sudden overreach, I was practically on my way to the airport (coming from Europe) to get to our Kick-off event and training, did cost me about \$1,300 non-refundable expenses. 😞

[Like](#) · [Reply](#) · 2d

April Mathers Brown **Ulrika Kersting** So sorry to hear about your financial loss. I hope we get to meet in the near future. SBH is family!

[Like](#) · [Reply](#) · 2d · Edited

Ulrika Kersting Thank you, April, I trust we will!

[Like](#) · [Reply](#) · 2d[Write a reply...](#)

Jo Dee Nylander-Baer is with **James Irving** and **Rob Nancy Baird**.

•••

Admin · January 28 at 10:11 AM

This past weekend, our Central Florida Team (4 Team Members and myself) -- went to a large local Flea Market-- where we have frequently done a Retail Vendor Booth over the past year-- In the past, we have cleared anywhere from \$500 to over \$1000 doing this weekend venue. In this day and age? In this day and age of the Internet? People naturally say: What's your website? We have to now must say: Our website is temporarily down for ordering. Our retail sales profits last week were \$50.00--- Less than the booth expense. This Government overreach has caused a grave disruption in business--- and Harmed this local team and countless families in their Daily Living.



35

[Like](#)[Comment](#)[Write a comment...](#)**Sherry Harrod**

New Member · January 28 at 9:47 AM

•••

On March 5, 2019 I received great results from my Endocrinologist. I've had hyperthyroidism for many years and for 3+ years I had to have a yearly check for a swollen lymph node on the left side of my thyroid and a nodule on the right side of my thyroid. The results showed the lymph node issue is 100% gone and the nodule is so minuscule that I no longer have to be checked and my endocrinologist released me. The only thing that changed is that I began taking Success By Health supplements In July 2018 and I continue to take them every day. I am not making any medical claims, I'm just sharing my experience. I am very concerned if these products are no longer available my health will suffer the consequences.



[Like](#)[Comment](#)

Write a comment...

**Julia Lindvall**

· January 27 at 8:24 PM

...

**** No Income Claims ****

SBH Family,

Mark and I want to share our story with SBH here with you guys.. Our Friends and Family..

Mark and I got the honor to be a part of SBH 2017 and launch our company in Europe and Sweden!

Our opportunity with SBH have changed our lives forever! The biggest thing for us is all the people that we have been able to meet and see how THEIR lives has been able to change in so many different ways because of the opportunity with SBH.

I was 19 years old 2017, Mark was 20 years old. We just finished highschool and both of us had a huge dream to have a big impact on other peoples lives all around the world. We wanted to help people change their lives and we wanted to own our time, work from wherever we wanted and be happy EVERYDAY!

SBH Family.. We got this amazing opportunity with SBH. I feel strong emotions when I'm writing this down for you.. I came to the US for the first time in my life with my love [Mark](#). I was 19 years old, we went to an event with Mr.Jay Noland and since that date our lives have never been the same. I totally open with you here.. I was shaking, I was so afraid, insecure about myself and for the fact that English is not my first language. Mr.Nolands training and coaching have helped me become up to this point the woman I visualized myself as maybe being in 20 years.

I'm 22 years today and I know my worth 100%. I am not afraid of anything. I have been able to meet people that we love and be able with my passion to help them and guid them to what they dream about. I have so much power inside of me but at the same time I have learned to control myself and my feelings. I have traveled the world with Mark and our amazing team that we love so much..

I quitted my job when I was 19 years old, Mark was 20 years old and SBH have been giving us the opportunity to work from wherever we want since that age. So many times the last months have I been speaking more English than Swedish. I'm 100% confident standing on stage speaking English today and feel that I can give my best and hopefully help the people that are listening to me to FEEL that everything they dream about, they can achieve!

We love our CEO with family. We love our staff all SBH affiliates with everything we have ❤️



50

21 Comments

[Like](#)[Comment](#)**Diane Hasler**

Julia, you and Mark are incredible !! A perfect match and I'm in awe of all you have accomplished with SBH! ❤️



2

Like · Reply · 2d

Julia Lindvall  Diane Hasler We appreciate you guys so much ❤️

Like · Reply · 2d

Diane Hasler  Julia Lindvall

Like · Reply · 2d

Kent Trobaugh  Belief !!

Like · Reply · 2d

1

Julia Lindvall  Kent Trobaugh always ❤️

Like · Reply · 2d

Angela Hellard  I love y'all too! Such a wonderful and powerful testimony to the goodness of our company and "family"!

Like · Reply · 2d

1

Julia Lindvall  Angela Hellard ❤️❤️

Like · Reply · 2d

Sharon A. Whalen Whitaker  We love you all too Julia Lindvall.

Like · Reply · 2d

1

Julia Lindvall  Sharon A. Whalen Whitaker ❤️❤️

Like · Reply · 2d

1

Debby Armentrout  You've come along way from the first trip to San Diego ! Your impromptu birthday 🎉, was just the beginning! 🎉🎉 No stopping you all! You and Mark are so special, Blessed to know you all!

Like · Reply · 2d

2

Julia Lindvall  Debby Armentrout Thank you so much beautiful Debby for your words to us ❤️ We appreciate it very much ❤️

Like · Reply · 2d

Jo Dee Nylander-Baer  MY eyes are filled with tears reading this!! What an honor to know you both (And have occasional yoga together on trips)

Like · Reply · 2d

2

Julia Lindvall  Jo Dee Nylander-Baer What an honor to know you and your husband ❤️ We love you so much ❤️

Like · Reply · 2d

Klella Farris  I cried reading this, I'm honored to have spent that first birthday with you before we were even SBH, standing in that house after the event, you have grown so much and I'm blessed to have such an amazing young couple in my life from all the way around... See More

Like · Reply · 2d

3

Julia Lindvall replied · 5 Replies



Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 100 of 163
Ulrika Kersting Thank you so much for sharing, Julia! I have faith that we will be able to see each other keep growing! ❤️

Like · Reply · 2d

2



Julia Lindvall ★ Ulrika Kersting 100% ❤️

Like · Reply · 2d

1



Write a reply...



Write a comment...



Melanie Summers

...

New Member · January 27 at 11:37 PM

I have been taking G-Burn and G-FYX for about 8 months now. I've been taking the full spectrum of SBH supplements for about 6 months. I've been an affiliate of SBH for 4 months. I am not making any medical statements or claims, but I have or others have noticed the following:

- 1) My massage therapist noticed my spider and varicose veins are fading. She thought I had vein treatment. She is now a personally referred affiliate.
- 2) My hair stylist noticed my hair was growing back on spots on my head that had lost hair, particularly on the sides of my head over my ears. She is now a personally referred affiliate.
- 3) Our friend Jo Dee mentioned at some point in time she mixes G-Drops in her facial regimen. I have to thank her publicly right now, because my products last longer; but most noticeable are the age spots on my face are nearly gone.
- 4) Everyone has seen my before and after pics... The G-Burn and G-FYX has dramatically helped me lose weight, recover from workouts almost immediately, and continues to help me control my appetite.
- 5) My out of control blood pressure is now normal - it's high at one point was 180/120. That was a bit concerning...
- 6) My cholesterol was high -- all normal ranges now.
- 7) I was pre type 2 diabetic... Not anymore.
- 8) I was taking 40 mg of citalopram daily, an antidepressant; Not anymore.
- 9) I was eating antacids like they were candy.

As a matter of fact, I don't remember the last time I swallowed a pill that wasn't an SBH supplement. I turned 65 this past December. On my birthday, I did 65 military style pushups as other people counted! I sold several bottles of G-Burn that day!

I should mention I have my husband on these supplements, too. He is in the best shape of his life, and will be 67 next month. As senior citizens, where will our health be if we no longer have access to these products?

[Like](#)[Comment](#)

Ulrika Kersting Wow, thanks for sharing, [Melanie!](#) Your testimonial speaks for itself! I repeat myself, I firmly believe that nobody should ever have to miss these products or the income opportunity!

[Like](#) · [Reply](#) · 2d

1



Write a comment...

**Roger Burnett** shared his first post.

...

New Member · January 27 at 1:56 PM

My wife and I joined SBH at the end of June 2018, both of us still working 40 hours a week , the last night I worked was August 2, 2018, I worked nights and my wife worked days Monday thru Thursday. On Friday the 3rd of August I had a heart attack, was unconscious for 8 days, in ICU for 11 days, in hospital for 14 days, then in September I had a defibrillator/pacemaker combo placed in my chest and a long recovery ahead. With my wife's help we finally got to go to a training w... [See More](#)



40

3 Comments

[Like](#)[Comment](#)

Kent Trobaugh Happy for You!

1

[Like](#) · [Reply](#) · 3d

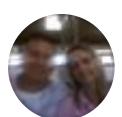
Donna Stacy Wow! So happy to hear! G-FYX as well!!

[Like](#) · [Reply](#) · 3d

Tina Louise Overcomer Awesome

[Like](#) · [Reply](#) · 2d

Write a comment...

**Jason S. Whitaker** shared his first post.

...

New Member · January 27 at 8:06 PM

****NO INCOME CLAIMS****

My wife, Sharon had joined SBH in March of 2018. Myself being a police officer wanted to wait and verify everything was legit. In all my inquiries regarding who, what, when and why, I came to the conclusion with facts that Jay Noland and SBH was legally sound. So in July 2018, I made the decision to join with my wife. Since then, my wife and I have enjoyed working our business in SBH and consuming the great products. Mr. Noland and the entire executive team not only gave us the opportunity to make residual income, but importantly taught me ways of being a better leader. In addition, SBH and Jay Noland's guidance allowed [Sharon A. Whalen Whitaker](#) to do things she had never imagined doing before like, public speaking, traveling and flying to other states. My goal after retirement from law enforcement was to continue to build our SBH business even more. My testimony about being involved in SBH is more than making residual income, it's about learning about your capabilities

and loving each other and changing lives. I was never promised no specific income and new up front going into the business, because it was fully explained to me. SBH and its products have changed my life for the better!

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29

4 Comments

Like

Comment



Penny Younce Willett



Like · Reply · 2d

2



Francois Hewing Thank you for being a modern day hero sir!!! Thank you for the testimony.

Like · Reply · 2d · Edited

2



Klella Farris Thank you for sharing that, for your testimony.

Very true about the income, ones income is solely based on one's effort, the more the effort the greater the income, the lesser the effort the lesser the income, same as with anything else a person does.

If you sit on the couch, NOTHING GETS DONE, get OFF THE COUCH, and EVERYTHING CAN GET DONE!

Like · Reply · 2d

2



Klella Farris



2

Like · Reply · 2d



Cynthia Heavin Farley

New Member · January 27 at 11:36 PM

...

Making no medical claims

The products by SBH are second to none. Aller G Stop has helped me tremendously. Before Aller G Stop I would have to get a steroid allergy shot along with taking over the counter antihistamine and nasal spray plus inhaler. But since SBH Aller G Stop, that is all I take. I have not gotten steroid shot now for two years. My husband has lost 50 lbs taking G Burn. These products have not helped only us but our extended family and friends lose weight, helped with pain and inflammation with G Fyx. My mother in law has struggled with her weight her whole life but now she will not go without her G Burn as she too has lost 50 lbs. SBH products are wonderful. And it's so great to hear the awesome testimonies from our customers

11

Like

Comment



Write a comment...





2017 was an interesting year for me...

I had just spent 21 years trying to learn how to become financially successful and found myself about \$140,000.00 in student loan debt...

I was about to graduate as a Doctor of Physical Therapy, and my clinical instructors (people with the same degree) were telling me they couldn't pay their student loans... "we can only afford the interest... Hopefully our loans get forgiven in 25 or 30 years..."

I knew I had to do something... I literally started 6 businesses that year in a panic trying to get myself out of the mess I had created...

My wife and I made limited supplemental income with some. Others, we were losing money...

Finally, in September of 2017 (that same year), I was introduced to SBH...

My wife and I, determined to make something work and refusing to live under a mountain of debt for the rest of our lives, put our heads down and went to work...

We were extremely excited, because for the first time, we had been shown a plan that produced results for us...

We were able to sell products that people were actually happy to pay for... This blew our minds seriously... We thought we had struck gold. We continued to sell the products, and people continued to give us positive feedback!

Then we started sharing the opportunity with others, and within the FIRST pay period... Brooke and I were able to earn more through retail profits and commissions than we had ever been able to earn from any jobs we had ever had in the same amount of time...

We had proven to ourselves that it worked...

We both went on to graduate and worked only 3 months each before we were making enough money to go completely full time with SBH. It was a dream come true for us to be able to work together, on our own terms...

Vendor events have been great for us, and have produced anywhere from a couple hundred dollars to a few thousand in profits for a given event. Some are one day events, others a weekend, and some last an entire week. And I'm always proud to say that I've never worked a vendor event that I'm aware of in which the vendors around us outperform us. We seem to always do more volume. I believe it's partly due to the incredible sales training we've received, and partly due to how much people love our products... All you have to do is give them a little taste 😊. Retail... It just works!

Aside from the retail sales (the backbone of what we do in SBH), I've always gotten commission checks twice a month without fail.

My SBH business is the first that I've ever had success with, and my wife and I are extremely grateful to have been given the opportunity!

Looking forward to growing more in the future!

*** None of the information included in this post is intended to be interpreted as a guarantee of income. This is my personal story. Individual results may vary significantly.



35



Like



Comment



Write a comment...





New Member · January 27 at 10:34 PM

Making no financial income claims.

When my husband approached me about SBH, little did I know, he was already in. And to be honest I was not on board at first. As we had been involved in many other companies MLM and never really made any money. But I was proven wrong with SBH. SBH has supplemented our income and helped to make car payments or just ever day bills. BUT now with this shut down it's been a hardship. Not only has SBH helped us financially and helped with our health, we have made some wonderful friends. SBH is not just a company, it's a family. SBH FAMILY !!

We have the upmost respect for Mr. Jay Noland, Tommy Sacca and Scott Harris.



2 Comments

Like

Comment



Lisa Dutka We may never had met. So happy to have your family in our lives

Like · Reply · 2d

1



Cynthia Heavin Farley Lisa Dutka Right back at ya.



Like · Reply · 2d

1



Write a reply...



Write a comment...



Jessie Laine Powell

New Member · January 27 at 10:50 PM

...

SBH was my primary source of income. This unexpected shutdown of SBH has affected me greatly. Giving up my 9 to 5 job in May of 2019 to become a full time affiliate quickly became a reliable source of income, allowing me the freedom and ability to pursue my ultimate passion which is music. The SBH trainings and conferences shared evaluable educational knowledge that I needed to excel and achieve each financial goal I set for myself monthly. Selling product and recruiting new affiliates (without making any financial guarantees)and continually meeting new people, expanded my reach to introduce awesome people to awesome products. As an independent recording artist, being able to supplement my income through SBH gave me much financial relief and the ability to pursuit the music. These statements make no financial claims that everyone will duplicate my journey with SBH. My hope is that SBH will be released from the FTC shut down sooner than later. With no notice given to SBH about the FTC shutdown, it has left me with no steady income now. How can people take care of their financial responsibilities in a household? The government has shown no consideration of this fact. It has affected me! Regarding the CEO and Founder of SBH Mr. Jay Noland, he pours into each affiliate nothing but positive uplifting life changing energy. SBH has become like family. This organization is not just about selling products and recruiting affiliates oh no, there is a much great purpose here. Uplifting the world and expanding our reach to make the world a better place, taking care of the less fortunate also truly transforming lives and household in a positive way is the mission and what I experienced first hand. I miss my SBH family.

[Like](#)[Comment](#)

Write a comment...

**Jo Dee Nylander-Baer**

Admin · January 27 at 10:49 PM

...

After our April 2019 Training with Mr. Jay Noland I was invigorated to "up my game" with Retail: Since Retail Sales are the backbone of our Company. Within 60 days? My Retail Profit DOUBLED what I was receiving with Social Security (\$1199 per month)--- Retail Sales which led me to building a larger business. Now? Because of the Government's over-reach? This Retail and expansion cycle has nearly halted this for me and others on my team.



31

[Like](#)[Comment](#)

Write a comment...

**April Mathers Brown**

New Member · January 27 at 9:32 PM

...

In no way does my testimony make income claims. This is my personal experience and it cannot be guaranteed for anyone else.

Financial - I earned my first commission check shortly after I started with the company. I'm working toward replacing my income so I can leave my full time job and be debt free. I also intend for my sons to go to college without incurring debt.

The inability to continue to build my business is significantly hindering my ability to achieve my goals.



19

[Like](#)[Comment](#)

Write a comment...

**Ronnie McHaffie**

New Member · January 27 at 3:46 PM

...

Our journey in SBH started in April of 2018. At that time the reason I got involved was because of the Latte . I loved it and was tired of the high price buying it retail outlets (3 to 6 dollars a cup) . I could enjoy my hot Latte for 1.05 a cup !

So late July we purchased a super accelerator pack. My Wife was very skeptical. And she said we can't afford these products. But I said well we already got em we might as well try em. A little history for you my wife has fibromyalgia. Everything we tried big pharmaceutical wise the side effects was worse than what it was helping ! About a month after trying g clear she told me that she really felt happy, went to sleep quicker , got in to the dream sleep and slept longer! She was a lot more focused at work . And just clearer headed without the brain fog ! Not to mention when she

got sooo much pain relief help from G Fyx and the Hemp infused Clic !
[Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 106 of 163](#)
She says she is 85% pain free ! So when my wife feels better than my quality of life increases ! I tell you when you have young children it's pretty dang rough to explain to them why mommy can't go to the park, why don't you get in the floor and play mommy ? That's rough ! And I pray none of you have to go through that with your kids ! So from my personal experience with SBH I got my wife back and Life ! That is what SBH Means to me !

141

6 Comments

Like

Comment



Kent Trobaugh So Happy for Both of You !!

Like · Reply · 3d

1



Mathilda Augustsson A fantastic story - so happy what the SBH products has done for you and your family 🙏

Like · Reply · 3d

1



Ulrika Kersting Thanks for sharing, Ronnie! Man, do I love these products!!!

Like · Reply · 3d

1



Caressa Chandler Marquez So happy that your wife feels better! ❤️

Like · Reply · 2d

1



Lisa Dutka I completely can relate to what your wife was going through. Nothing has helped my fibromyalgia discomfort better than SBH products. My pain and brain fog are almost gone, and I feel like I have my life back. Forever great full. Love being able to do more with my family. ❤️

Like · Reply · 2d

2



Sharon A. Whalen Whitaker Thanks for sharing. My eyes are filled with tears for I understand the struggle i am a fibromyalgia warrior too. Thanks to SBH i am moving forward for once in many years. God Bless you and your family and our SBH family.

Like · Reply · 2d

2



Write a comment...



Allen Boone

New Member · January 27 at 9:19 PM

...

I've had limited experience in direct sales, but extensive experience working with various industries and a 33 year career in the Army. I've served in numerous command and staff positions through Division level. I served three years as an Inspector General, received trained in investigation techniques by the Army and Air Force, and worked with thousands of people around the world. I've had the privilege of becoming an affiliate of SBH in July of 2019. I've met many exceptional people who are committed to improving the lives of others physically and financially. I've purchased SBH products at wholesale prices, used them to improve and maintain my health while helping others do the same. I am not making a medical claim, but SHB Essentials, Time Capsule and G-Clear helped me reduce my blood pressure and handle stress better. SBH G-

FYX has reduced pain and inflammation in my body to the point that I no longer take any prescription medications. I feel more energy and am physically stronger since taking the Life 120 Vitamins, G-Drops and using SBH products. I've had customers who became SBH Affiliates because their health was substantially improved. This inspired them to get SBH products at wholesale prices and share them with others as an additional source of income.

23

Like

Comment



Write a comment...



Linda Huff shared her first post.

New Member · January 27 at 9:18 PM

...

I became a SBH affiliate on November 25, 2017 at the age of 75. A friend shared the MycoCafe black coffee with me. It is the best coffee I have ever tasted. I researched Ganoderma and found it has many health benefits and has been used for thousands of years by other cultures. I added essentials, g-shield, and g-drops to the coffee and immediately noticed I had more energy and focus. As new products were released I added them to my daily regimen. I now take all the products on an as needed basis. The results for me (I am making no medical claims) my overall health is exceptional. Now at 77 the only prescribed medication I take is a blood pressure pill if needed. The headaches which I had frequently are now rare, my allergies are under control, I have more energy and focus. To sum it up getting the correct nutrition provided the raw materials for my body to produce optimal health for me to enjoy. The interruption in my ability to purchase these products presents a risk to my good health and peace of mind. It also saddens me that the abrupt action to stop operations of SBH has negatively affected the orphanage school in Kenya and the organization in Las Vegas that works with homeless teenagers.

13

Like

Comment



Write a comment...



Jill Christopher Rosenkrantz

New Member · January 27 at 9:17 PM

...

Here are just a couple ways of how the government's overreach with SBH has affected me. I got married on January 11th. My husband and I spent two nights at a resort 4.5 hours away from home. We would've stayed there longer, but cut our trip short so that we could pack and leave again for the company kickoff event two days later.

We left our honeymoon and drove the 4.5 hours back home, only to get a message that the company kickoff event was cancelled. We made the tough decision whether or not to go ahead and fly to California. We had planned to extend our trip for a total of twelve days, to enjoy more honeymoon time away and also build our business in California. We decided to cancel our hotel reservations and have our airfare credited toward a future trip, in anticipation that we will have our kickoff event later in the year, and have yet to have a real honeymoon.

My only two sources of income for 2019 were maintenance and SBH. I gave up my maintenance payments in order to get married. I anticipated having my continued income from SBH and also having it increase from the launch of VOZ and the passes the we were due to receive in January. The TRO of our company has left me with no source of income for the immediate future.

The temporary shutdown of our company has also completely halted the momentum of my business that I have worked so hard to build in my team.



33

Like

Comment



Write a comment...

**Jill Christopher Rosenkrantz**

...

New Member · January 27 at 9:16 PM

My first experience with SBH products was in using G Drops. I met with my up-team leader and was having severe stomach upset and pain at the time. She shared some G Drops with me to put in my water as a sipped on soup broth during our lunch. By the time I finished my second glass of water, my stomach had stopped hurting and my GI distress completely stopped. I continued using the G Drops the next week in my water bottle as I was on a trip to Universal with my daughter. It was the first time that I didn't suffer from abdominal symptoms due to dehydration when I traveled!

I'm not making medical claims. This is my personal experience.

I use the nutraceutical products on a daily basis. The Aller-G-Stop has controlled my nasal congestion that had me taking over the counter decongestants 2-6 a day for the past few years. I am completely off of them now. I have more energy, feel better, and have gotten sick much less than I usually do. The G-FYX also helps me feel much less achy than I do when I am not drinking it daily.



26

Like

Comment



Write a comment...

**Jill Christopher Rosenkrantz**

...

New Member · January 27 at 9:15 PM

I have been in direct sales for over sixteen years, and involved in seven other companies in that amount of time. In my first few weeks with SBH, my up-team leader asked me what my biggest check had been with any other companies. I told her, and she assured me that I'd beat that amount easily if I continued working the way that I was. My second check, which was for a two-week period, far exceeded my highest check in any other direct sales business! I have also continually received a paycheck for every single pay period that I have been with the company.

These are not income claims, only my personal experiences.

[Like](#)[Comment](#)

Write a comment...

**Allen Boone**

New Member · January 27 at 9:14 PM

...

In the short time I've been involved in SBH, my wife and I have received financial income that helped us pay multiple bills, allowed us product credits to obtain free products, and enabled us to be part of a growing organization that improves people's lives all over the world. I've been very impressed with the expertise, knowledge, skill, and abilities of the Founder, Mr. Jay Noland, the President, Mr. Scott Harris, the Chief Visionary Officer, Mr. Tommy Sacca, and all of SBH staff members. Their work ethic and selfless service to support affiliates and customers is very effective. It is sad witnessing the governmental overreach that has caused unnecessary stress on all SBH corporate leaders, affiliates and their families. Restraining the operations of SBH / VOZ has created a financial hardship within numerous families across the full spectrum of corporate interests, halted our momentum to grow, and thus has robbed affiliates and consumers from improving their health and wellness.



27

[Like](#)[Comment](#)

Write a comment...

**Homer Krehbiel**

New Member · January 27 at 8:44 PM

...

I am almost 75 years young. Started my business career at age 10 in 1955. To show what hard work can do in 1955 I bought a Holstein heifer calf by the time I was 19 I owned a dairy herd. I am making no FINANCIAL CLAIMS here because effort, determination, passion, and hard work will determine your results. I have been approached many times to get involved in an MLM but when I investigated they all required me to BE ON AN AUTO-ORDER in order to get paid. Thought that was illegal? SBH WAS DIFFERENT. For a yearly membership fee of \$49 I could join and get paid for the purchase of my products with NO AUTO-ORDER REQUIRED, WOW I thought, I checked out the simple commission plan and joined 9-5-2017. First, payday 9-23-2017, my check was more than 3X my membership fee. Next payday, 10-08-2017(33 days after joining) my check was 4 figures. Total pay for the first 4 months was 5 figures. SBH pays 2 times every month and guess what I NEVER MISSED A PAYDAY UNTIL THE FTC overreached and caused me to miss my 1-15-2020 check. As senior citizens, this caused a HUGE HARDSHIP for my wife and me. I MEAN HUGE.



35

[Like](#)[Comment](#)

Write a comment...





New Member · January 27 at 8:07 PM

Me and Mathilda are working with SBH fulltime and we have been working almost every hour awake and with the situation right now makes everything complicated. We both quit our jobs back in the days and SBH is the reason we got to do this together and be able to do all the things we love.

Since the FTC freezed all the assets to SBH we HAVE to live and use our savings to pay the bills as we always use to pay them with the commision earned and the retail profits.

1 like 21

Like

Comment



Write a comment...

Smiley face, camera, GIF, video icons



James Irving

New Member · January 27 at 8:07 PM

...

I am not making any financial claims. My family had just reached a level were we were not juggling everything to make our bills. SBH had provided us a way for [Ami Irving](#) not to work an outside job but just retail product. We were beginning to be able to put money aside for our daughters future and for my retirement (I turned 50 this year) since most Pastors do not have any kind of retirement plan in place. The money we were making from retail was the solution for our future. Now that future is in a desperate questionable status since the government overreach. Some would say go find a regular job. Well, In July of this year Ami was involved in a severe car accident that has left her walking with a cane or walker and is not able to hold a regular time job. So for her to go back into the regular work force is out of the question. SBH was our hope for future and life. Now that is not available since we cannot order product to sell. This action has put not only our future in question but even making our mortgage payment this month (Jan 2020) is not looking great which would not have been a problem except i cannot sell product.

1 like 27

Like

Comment



Write a comment...

Smiley face, camera, GIF, video icons



Julia Lindvall is drinking Coffee with Mark Mael.

Rising Star · January 27 at 8:07 PM

...

** No medical claims **

SBH Family,

Mark and I started to consume or incredibly products around 2 years ago. They have helped us so much in so many different ways!

I wasn't able to DRINK COFFEE before..

This is our coffee testimonial:

I have never been able to drink traditional coffee. My body always got stressed when I drank it (2 cups a year) and my stomach could not take it. [Mark](#) is an amazing barista and when it comes to coffee, he only like very few varieties.. First time Mark tried our Mycocafe he loved it.. The

taste is so smooth and when he gave me a sample I could for the first time in my life feel so good when I drank COFFEE!! I have never felt one negative effect from our coffee, ever.

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Today I drink 1-3 cups of our coffee and other hot beverages EVERYDAY! After drinking water and taking our supplements every morning I always drink one cup of coffee. The coffee makes us very focused and we feel very stable and calm in our body. Our bodies feel healthy and we do not ever get a caffeine crash!

We never drink any other coffee than our Mycocafe. Our family, friends and people that we care about loves it! My parents have changed totally to mycocafe, drinks it at home and at their work. They feel so much more focused and their stomachs are calm..

We are forever thankful for our amazing coffee, other hot beverages, we are so grateful for all our products! Can not live without them!



Coffee
Food & Beverage

93,467 Likes
409 talking about this

 Like Page

  18

 Like  Comment

 Write a comment...



 **James Irving** 
 New Member · January 27 at 8:06 PM

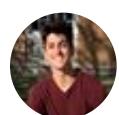
I am not making any financial claims or medical claims for our company or those involved in the company. I am a pastor of a small church in rural Florida. My wife, Ami and daughter Annie were living pay check to pay check barely making ends meet. Some months I had to go without my heart medication just so we could pay the bills. Almost a year ago I was introduced to SBH and the great products they have. I tried one of the products which was designed to calm the nerves and help with anxiety. (Ever since my heart surgery sleeping was elusive for me) Friends of mine introduced me to Ms. Jo Dee Nylander-Baer who sold me at retail price a bottle of G Clear, G Essential and G Drops. That night I slept 9 hours straight. The following night... another 9 hrs. The third night my wife had to shake me awake because I was sleeping through my alarm. I knew then that SBH was real and a company of integrity. I joined the company and immediately began retailing product. My wife and I made enough money from selling products that within two months we were caught up on our bills and Ami was able to quit her job and go full time retailing SBH products. I am still pastoring because that is my calling. The retail of SBH products has enabled my family to not struggle and for that I am eternally grateful.

  26

 Like  Comment

 Write a comment...



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New Member · January 27 at 7:56 PM

To whom it may concern,

I have been a part of Success by Health since November, 2019. I am very fortunate to say, without making an income claim, that I was able to leave my job within two weeks of enrolling.

Men and women my age (18 years old) are usually looking for a path to get started on their life. Whether if that's college, a full time job, or a path not many seek, which in this particular case, is time and financial freedom. I never saw myself going into student loan debt for college, and I never saw myself working for anybody else. I wanted to be a leader amongst a group of individuals who sought the same path that I have endeavored, freedom. I was searching for quite some time for a vehicle, to take myself and my family, to the dreams and heights that we most desired.

That is when I was thrown the keys to the rocket ship, I found Success by Health.

Due to this being my story, I do not request empathy, but I do request an understanding of the circumstances presented. I never had an idol in my life, especially that of a male figure. The opportunity to being able to meet someone of astounding providence and fortitude, is truly an honor. As said, I have been searching for a leader to follow so I may carry out my dream of helping the masses. However, that is when on January 13, 2020, we were informed that the Federal Trade Commission(FTC) cut all assets and we were told to go on hold for an upcoming event that was dated for January 18-20, 2020. I have not, to this day, been able to meet the idolized figure of mine, because of this governmental overreach that has robbed me of my dreams.

Since the cutoff, I have not been able to receive any further income from my new source of revenue. I will not speak for anyone else a part of Success by Health, but from what I witnessed, those who have replaced their incomes entirely, like myself, are no longer able to receive payments for necessities required to live on a day to day basis.

Since November, 2019, my life has truly been formulating into the dreams I have always hoped for. To this day, I have faith in Success by Health, it's products and services, but mostly, in its CEO and Executive staff.

Thank you and best regards,

Vincent Marquez



32

Like

Comment



Write a comment...



Jo Dee Nylander-Baer

Admin · January 27 at 7:36 PM

...

Emailed From my former Retail Customer, now Affiliate-- who uses our products for a 10% on personal consumption--- And was beginning to supplement her income? "I am desperate for some allergy top for my son. This is the first product that he responded to for his allergies... And his body responded to. He has a bleeding disorder"--- Samantha Nazario

[Like](#)[Comment](#)

Write a comment...

**Emil Carlsson**

New Member · January 27 at 7:11 PM

...

**** No income claims ****

Since i started doing SBH part-time with Mathilda in October 2019 i have had the opportunity to quit my regular 7-16 job and have been doing this fulltime since the 1th of December 2019. I've learned so much on this road and it is all because SBH and mostly from europe people that i'm spending time with almost everyday.

I have never witnessed and met so many kind-hearted people with the exact common goal as we have and sharing the same passion and with a clear vision that brings us all togheter with a culture that i've never seen anywhere before.

No one can touch us.



26

1 Comment

[Like](#)[Comment](#)**Julia Lindvall** [Like](#) · [Reply](#) · 2d

Write a comment...

**Curt Fullerton** shared his first post.

New Member · January 27 at 7:06 PM

...

This is not a medical claim however I have suffered with hypertension with my bp hovering around 200 over 100 the past 5 years and doctors have tried 10 different medication combos and have been unsuccessful. I started taking G-fyx, Essentials, G-drops, and G -shield and have notice my bp average has dropped to around 160 over 80 the past 3 months. Its still high but im able to exersize now and couldnt before. I need these incredible products in my life.



23

[Like](#)[Comment](#)

Write a comment...

**Amanda Elzer**

New Member · January 27 at 5:52 PM

...

I would also like to express my opinion about this company. The training we get is worth so much, Mr. Noland - no one can teach as u, and everyone else I've heard so far is just fantastic, I hope I can teach half as

good as u guys one day! And this have been so perfect to have as an extra income now when I'm at home with my kids, to not have to worry about money and just spend as much time with my family as possible. And also I have to say, I've been working on alot of diffrent places both "ordinary" work places and a little bit in direct sales and never ever have I felt so much love and caring from a company both from all u other affiliates, our team in sweden is just wow, and also from the executive staff. I mean who am I, I've only been here for a few months but still you all treat me and my family with so much love and I could'nt be more greatfull that I have found all of this company and all of u and I hope this is just a bump in the road on our very long journey together.

100 30

2 Comments

Like

Comment



Julia Lindvall Incredible testimonial! We appreciate you and your family so much

Like · Reply · 3d

2



Mathilda Augustsson Appreciate you very much!! So happy to see you grow with SBH and creating the life that you want for your husband and 2 little girls

Like · Reply · 2d

1



Write a comment...



Lauryn Jackson

New Member · January 27 at 6:48 PM

...

Disclaimer- This is not an Income Claim

I joined SBH on December 10th, 2017 while I was a full time student-athlete in college. I purchased an accelerator pack and sold the products in smaller packs, to make more retail profit, overall. This opportunity helped me earn money while I was in school to pay for my tuition, food, and my car payment. I saved some of my profits and invested in a super accelerator pack in March 2018 and retailed the products within approximately a month. In March of 2019, I voluntarily purchased a USA Founders Pack and was able to sell it in approximately six weeks.

[Like](#)[Comment](#)

Jo Dee Nylander-Baer You just grew your business through selling retail and re-investing !

[Like](#) · [Reply](#) · 2d

3



Lauryn Jackson Jo Dee Nylander-Baer yes ma'am! even having 15+ hour long days, retailing these products was still possible.

[Like](#) · [Reply](#) · 2d

3

[Write a reply...](#)

Brooke Sherfield Retail is

[Like](#) · [Reply](#) · 2d

3

[Write a comment...](#)**Emil Carlsson**

New Member · January 27 at 6:56 PM

...

**** G-BURN testimonial ******** No Medical Claims ****

I first started taking G-BURN in May last year after being bedridden for nearly 4 months after I hurt my ankle badly so I needed surgery to get it fixed. So I gained a lot of weight and my physical health was rock bottom at that time so I needed a change.

I remember being so skeptical about it as I tried different kinds of weight-loss products before - but I was so wrong. The picture up front is the one before and the picture in the bottom are the results in just 2 months. I lost 12kg (Don't know how much that is in lbs) in just 2 months and didn't change my diet and I didn't workout more than I usually do and felt better than ever before.

I'm so glad I came across this product because I have had probably the best experience for myself and I have helped a lot of people out there getting better health and that is something I will cherish forever.

Före

Efter

30

2 Comments

Like Comment

Julia Lindvall So awesome!!
Like · Reply · 2d

Mathilda Augustsson Since we didnt saw eachother for almost 1 month Emil Carlsson because I moved to Amsterdam it was like a whole new person when we saw eachother in the end of June 😊 Love this product ❤️
Like · Reply · 2d

Write a comment...

Elaine McCaffrey shared her first post.
 New Member · January 27 at 6:59 PM

I became a member of SBH in July of 2018 and have loved being a part of this 'family' since then. I've been part of other direct sales companies in the past but none compare to this one! The positive atmosphere and personal growth development have done so much for me personally and I'll never turn back to who I was before! I've grown into a more confident, stronger self esteemed person that has realized I can still dream and make a difference in helping people become free and live the life they want to live. ME.... just one person can make a difference! I want to thank Mr. Jay Noland for his insight, love, passion and commitment to making the personal development series so that I can overcome my past and grow into the person I was born to be! Stand STRONG SBH family, we will overcome this! Much love to ALL my SBH family everywhere ❤️

[Like](#)[Comment](#)

Write a comment...

**Lauryn Jackson**

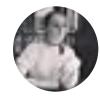
New Member · January 27 at 6:54 PM

...

This is my own personal income experience and not an income claim
Due to the overreach of the FTC, I am unable to order my product that I retail and use personally. Each month, I order at least \$250 in wholesale product that I sample and retail. My retail profit is approximately \$600 each month and without any product, I am quickly losing out on my biweekly and monthly retail sales that helps to pay for living expenses.



23

[Like](#)[Comment](#)

Write a comment...

**Brooke Sherfield**

New Member · January 27 at 6:53 PM

...

One of my customers who's been consuming the Latte and the Time Capsule.

"I have been using the Mycocafe coffee for about 2 weeks. I feel like it has increased my energy level. I am also taking the Time capsule. Using both has really made a difference. " - Sharon Wilson

*** these statements are one individual's personal testimonial and are not to be interpreted as medical advice. Individual results may vary significantly.

I have been using the Myco Cafe coffee for about 2 weeks. I feel like it has increased my energy level. I am also taking the time capsule. Using both as really made a difference.



13

[Like](#)[Comment](#)

Write a comment...

**Amanda Elzer**

New Member · January 27 at 5:46 PM

...

I can't go without my G-Burn anymore!
So I started taking G-Burn a couple of months ago and I love it first and

foremost because it gives me so much energy, which I don't have a lot of with two small kids and one of them infant so a lot of awake time at night still, and also because it takes away all of my bad cravings and I've always got a bloated stomach but no more! I also lost 2kg without doing a thing and all of this with just one G-burn a day. But the last 2 weeks I've...

See More



2 Comments

Like

Comment



Emil Carlsson Love it! 😍



Like · Reply · 3d



Mathilda Augustsson Amazing!! 🙌😊

Like · Reply · 3d



Write a comment...



Brooke Sherfield

New Member · January 27 at 6:05 PM

...

From my dad who is a very skeptical person.. our black coffee passed the test!

"..It has a flavor of its own and to be instant, it tastes more like a brewed coffee. Most other instants can be bitter." -Jody Stewart



Like

Comment



Write a comment...



Tina Louise Overcomer shared her first post.

...

New Member · January 27 at 5:59 PM

The FTC has made it really difficult to share info with others! I enjoy the extra income that we make with SBH! It has helped with paying our bills and using it as groceries and gas money!

This is my personal experience. NOT making any income Claims!



Like

Comment



Write a comment...



Becky Baker

...

New Member · January 27 at 5:46 PM

In no way does my testimony make income claims. This is my personal experience and it cannot be guaranteed with anyone else.

I delved into this business on July 8, 2019 and haven't looked back. The benefits are numerous:

Financial - I earned my first commission check 2 weeks after I enrolled

and have been earning steadily since. I'm working toward replacing my income so I can leave my full time job. Due to severe back problems it is a hardship for me to continue working in the capacity that I do (nurse and teacher) and I must have an income. The inability to continue to build my business is significantly hindering my ability to achieve that goal, thus creating a situation where I have to continue to work the way I currently do.

1 Like 21

Like

Comment



Write a comment...



Becky Baker

New Member · January 27 at 5:46 PM

...

In no way does my testimony make medical claims. This is my personal experience and it cannot be guaranteed with anyone else.

Products - GFXY has been a literal Godsend for my son and me. As mentioned before, I have significant back pain from a thoracic spine fusion due to severe scoliosis. GFXY has reduced the pain in my back and helps me get through the day.

My son has had difficulty focusing on high school and it hinders his ability to stay on top of his school work. However, he is laser focused since starting on GFXY. His grades have significantly improved because he is able to focus and get his work turned in on time. Without steady access to GFXY, my son and I experience a loss of the physical benefits, thus decreasing our quality of life.

1 Like 21

Like

Comment



Write a comment...



Ulrika Kersting

New Member · January 27 at 11:01 AM

...

One of my G-FYX testimonials that clearly shows what the body can handle when fed the right nutrition: I have been to the dentist this morning,

preparation work for new crowns in the upper jaw in the back, he also had to work on my gums for that matter. He said I might have some pain when the anesthesia wears off! I was thinking, "Great! Let's see if I can G-FYX it!"

I could tell my dentist was a little surprised by my eyes lighting up in joy.
... See More

Like

Comment



Julia Lindvall This is so amazing! Love G-FYX so much..
Thank you Ulrika for sharing this

Like · Reply · 3d

1

Ulrika Kersting replied · 1 Reply



Write a comment...



Penny Younce Willett

Rising Star · January 27 at 10:58 AM

...

These little girls have been offered the opportunity to compete at Disney in May for the Nationals. I had just been approved to do a fundraiser. I was going to head it up to help fund the trip using our wonderful gourmet beverages. These girls were going to get all the profits for their work. A couple of the little girls can ONLY go if we can raise the money, because their parents can't afford the extra expense.....

Because of the overreach by the FTC, we may not be able to help 😞. All of these children worked equally to get here and should be competing nationally together.



Like

Comment



Jerry Ayers Penny Younce Willett message me because I would like to donate beverages to help them out!

Like · Reply · 3d

2

Mathilda Augustsson replied · 7 Replies



Write a comment...



Carleigh Sherfield

New Member · January 27 at 3:35 PM

...

Product testimonial on Roibos tea:

I got my tea! I picked it up from the post office this morning and then I had to stop and get a hot water so that I could try it right away. It's yummy!

-Jennifer Slagle (SBH customer)

To: Jennifer Vinez Slagle

I got my tea! I picked it up from the post office this morning and then I had to stop and get a hot water so that I could try it right away. It's yummy! Do you have a list of the ingredients?



JUN 7, 2019 AT 7:44 AM

Awesome 😊



 Like

 Comment



Write a comment...



Francois Hewing

New Member · January 27 at 3:28 PM

...

*This testimonial is from actual active Success By Health affiliates who were brought into the company by myself (Francois Hewing) and who were taught specifically how to make a retail profit from our line of products and have been adversely affected financially because of the over reach of the FTC.

Hannah and Kameron

Myself, Hannah Doleman along with my husband Kameron Doleman joined SBH in 2018. Francois Hewing got us in since then we were able to build a retail client base which loves our products. We sell at farmers market and other local markets where we earn about 400 dollars a week in sales. The FTC overreach has effected us because it has hindered us from being able to order product and make retail sales. By doing so, we are not able to make an extra 400 dollars a week which we use for bills.

Sincerely, Hannah & Kameron Doleman

  30

 Like

 Comment



Write a comment...



Diane Hasler

New Member · January 27 at 11:02 AM

...

I always received my bonuses and commissions on time. Right now I'm missing that extra income. I'm also worried should I run out of certain SBH products! From the first day I took the G Fyx, I have not experienced any inflammation pain! I take it everyday, sometimes twice a day. I have Fibromyalgia and G Fyx is like a miracle! I also take G Burn everyday. It energizes me in the morning and really curbs my appetite! I take several SBH products everyday. They help me feel healthier! And best of all, I feel blessed to be part of the SBH family! I've made so many wonderful friends in SBH!

[Like](#)[Comment](#)**Julia Lindvall** Thank you for sharing dear Diane [Like](#) · [Reply](#) · 3d

1



Write a comment...

**Angela Hellard** shared her first post.

...

New Member · January 27 at 11:29 AM

I'm not making any medical claims, but I want you to hear my personal experience with SBH products. In late January 2019, my friend [Sherry Harrod](#) brought me some packets of G FYX to try. I have fibromyalgia, and have been sick with endotracheal bronchitis since November 2018. I was having to use a rescue inhaler every 2/12 to 3 hours to try and keep my lungs open. Within 5 minutes of drinking the G FYX, my lungs opened up and I got the first good breath I had had in 2 months. As I continued to take the G FYX, I began to recover, and didn't have to use the rescue hardly at all. I also began to notice that I had marked improvement with my fibromyalgia pain - so much so, that I was able to discontinue one of my maintenance meds for the fibro (my Doctor approved).

My quality of life has improved markedly with the SBH Products, and it would be devastating to me if they weren't available. At this time I currently use : GFYX, GSIELD, Essential, GDrops, and of course I drink the Black coffee (which is delicious!).

I have a family type relationship with the other members of SBH. We are striving to make a positive impact on the world around us, and we are accomplishing this! The training I have received from Mr. Jay Noland has had a positive and very beneficial impact on my life. These positive changes have been witnessed and remarked on by my family and friends. I love our products, our SBH family, and Mr Noland, Mr Harris, Mr Saccia, Mrs Lina Noland, and all of our staff who work so hard to help us change the world and lives around us for better.



22

1 Comment

[Like](#)[Comment](#)**Julia Lindvall** Your story is so amazing [Angela!](#) Appreciate you [Like](#) · [Reply](#) · 3d

2



Write a comment...

**Jo Dee Nylander-Baer**

Admin · January 27 at 11:29 AM

...

Friends and Family Calls: MONDAY through FRIDAY:

11 am PT/

Noon AZ-MT/

1 pm CT/

2 pm ET

Dial-in number (US): (605) 472-5427

Access code: 680759#

Join the online meeting: <https://join.freeconferencecall.com/jodee47>



25

6 Comments

Like

Comment



Marcie Molnar Thank you for keeping us connected [Jo Dee Nylander-Baer](#)

Like · Reply · 3d



Jerry Ayers very thankful for your dominating leadership

Like · Reply · 3d



1



Robert Mehler Spread the word to your teams !!

Like · Reply · 3d



Ronnie McHaffie Joey [Cynthia Heavin Farley](#)

Like · Reply · 3d



Ronnie McHaffie THANKS

Like · Reply · 3d



Cynthia Heavin Farley Diane Hasler

Chuck Tingler

Like · Reply · 3d



Write a comment...



Diana Grimaldi Pupp

New Member · January 26 at 8:16 PM

...

I've been with Success By Health since October 1, 2017. I truly believe God puts in your path what you need before you even know you need it. In May of 2018 I was diagnosed with stage 3 triple negative breast cancer. By August I was only able to work my "full time job" about 2 days a week, 3 on a good week. My SBH business helped make up for what I wasn't earning at my FTJ. Having that extra income saved us from going into debt. I had regular customers I sold retail to and with my team working behind me, my family survived what could have been a very bad situation.

Also, I have been drinking the beverages and taking the Nutraceuticals daily since joining and I can't imagine not having them in my life. When I don't have them the aches and pains of old lady life rushes back in. It's scares me to death to think I won't have what I need to live as I'm living now both with the products and the extra income.

Mr. and Mrs. Noland, Mr. Harris and Mr. Sacca have never been anything but honest about the business. Mr. Noland stating he didn't want our money if we didn't want to work the business. Mr. Harris and Mr. Sacca telling us we need to work the business to the level of income we want to come to us. Training was always amazing. I'm not the same person I was 2.5 years ago. My confidence has soared because the training not only helping me with my business but also because I had issues from a 19 year abusive marriage. I am who I am today because of SBH, because of the Nolands, the Harris', the Sacca's and my entire SBH family. I will forever

28

1 Comment

Like

Comment



Mathilda Augustsson What SBH has done for you is amazing ❤️ Much love!

Like · Reply · 3d

1



Write a comment...



Brooke Sherfield

New Member · January 27 at 2:04 PM

...

I got my mom loving these products!

"My testimonial to Life 120 Vitamins. I do not get bloated at all and I seem to be more regular. I love the product." -Becky Smith

** these statements are one individual's personal testimonial and are not to be interpreted as medical advice. Individual results may vary significantly.



Mom

1/27/20 8:33 AM

My testimonial to life 120 vitamins. I do not get bloated at all and I seem to be more regular

I love the product

21

Like

Comment



Write a comment...



Kara Kennedy

New Member · January 27 at 11:16 AM

...

G-FYX relieves my pain. I fell last April when my dogs pulled me down stairs in the rain trying to chase after dogs that were off-leash. I ended up in the emergency room with a badly sprained ankle and a bruised rotator cuff. I dealt with the pain for months. I tried a sample pack of GFYX Vicki Lea had given me in July and immediately felt the difference with no recurring pain in my arm and shoulder. I bought a bag and since then two other bags. I am now using it daily or every other day.

I am grateful that this product was invented. It gives me energy and makes me feel good. I love GFYX! I NEVER want to be without it.

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I am not making medical claims I am just expressing my personal experience with GFYX.

10 20

Like

Comment



Write a comment...



Lori Werling

New Member · January 27 at 11:04 AM

...

In late April 2019 I was putting together my health and wellness business, Optimal Health Solutions LLC. I literally called OUT LOUD one day, "what are my solutions to go with my BEMER?" (BEMER is a non evasive physical vascular therapy that increases your micro blood circulation by 30% and ALONE it's not an easy thing to explain or sell to people.) I said to myself, "What are we circulating 😊?"

"What I need is the best quality most effective nutrition I can find!"

Well, within hours I had a message from Miss Connie Godfrey on a business networking site. Our hearts and interests seem to fall in line and we set up a special meeting. It was completely serendipitous when I was face-to-face with an old family friend, Ann Giles. We both own BEMER systems and want high quality products for the best results. I was very impressed with the Success By Health product line right away and excited to sample things.

We also spent some time talking about the CEO of SBH, Mr Jay Noland, his vision, and the business and I saw plenty of solid opportunities to implement these products into my business.

By May 1st I was IN!!! Taking G-Burn and drinking my Myco Cafe Black with a touch of pure cane sugar and LOVING IT!!! These are truly my favorite nutritional products I've encountered in over 20 years working in the health and wellness industry. TheBest❤️

Mr Noland has always shown so much love, truth, realness, integrity, positivity, encouragement, professionalism ... so many wonderful qualities. I see that he puts so much heart, effort and energy into things being done just right and in excellent respectable form.

Thanks to his guidance, teaching and leadership I have been on the most amazing journey of finding my definite purpose and putting into action the means to reaching my biggest dreams!

I am very proud to be a part of Success By Health ❤️

Thank you Mr Noland. I appreciate you.

All my love to you and your precious wife, Lina.

10 24

Like

Comment



Write a comment...



Lashawna Wiser-Fleming shared her first post.

...

New Member · January 27 at 11:03 AM

Regardless of the uncertainty right now, one thing is for sure, the products here are second to NONE. I took weekly allergy shots for 3 years and they were doing ok...but when the cost with high deductible insurance forced me to think long and hard, I went looking for a possible

alternative. What I found was Aller G stop and it has been AMAZING. I didn't have to just suffer from my allergies after stopping the shots, I had HELP! I don't miss a day because they WORK!!

I also can drink coffee for the first time with no headache or sour stomach. Love that Ganoderma!! ❤️ ❤️

1 like 21 comments

Like

Comment



Write a comment...



Vicki Lea

New Member · January 27 at 11:01 AM

...

Fruits and Veggie I have experienced something very positive that I never would have expected with the Fruits & Veggie. When I take Fruits & Veggie, I have found that at meal time, I do not have the same usual appetite and feel full prior to finishing a meal. In fact, I am hardly able to eat even half of my small meal that I usually would have no problem finishing. It's a great feeling to need to eat less food because the Fruits & Veggie is supplying the nutrition that my body is telling me that it needs.

1 like 18 comments

Like

Comment



Write a comment...



Ulrika Kersting

New Member · January 27 at 11:00 AM

...

After having tried all the nutraceuticals and having experienced the thankfulness of each cell in my body, living the feeling of getting younger and healthier instead of getting older at age 55, and knowing about all these wonderful testimonials here, and after having studied the outstanding commission plan I emphatically believe that nobody should ever be deprived of the opportunity to become healthier and wealthier through SBH!

To me, Mr. and Mrs. Noland, Mr. Harris, and Mr. Sacca are the most honorable people I've ever met, and SBH is a true and honest opportunity to set oneself free.

I believe and trust that everybody who takes an honest close look will be able to see that.

1 like 19 comments

Like

Comment



Write a comment...



Teresa Jefferson

New Member · January 27 at 11:00 AM

...

This is a testimony from my daughter's fiancé, this is his personal story and not a medical claim.

Landon Clements

Since starting GClear, I have been able to stop taking all of my ADHD prescriptions. GClear also helped me off my depression pill as well.

LC

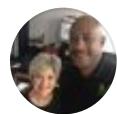
15

Like

Comment



Write a comment...



Teresa Jefferson

New Member · January 27 at 10:59 AM

...

{Personal Statement, No Income Claim}

When we started SBH in 2018, I was looking for a second job, something part-time, to supplement our income while our son was in college. A friend introduced us to the SBH products, as we began having some positive health results we also realized there was a business/income possibility too. At first I just wanted to retail enough SBH to cover the cost of products we wanted to take a month, that happened, so I wanted to cover the cost for products for my kids and my Mom to take as well, we were able to do that. We were doing a steady income with SBH via commissions and retail that we had covered not only the products my family loved taking but also covered the expenses of traveling to watch our son play basketball in college, and help with his college expenses as needed. The over-reach of the FTC and the TRO has taken that income away with no notice. It worries me how I'll cover watching him play in February, the travel expenses for that. I worry how I'll not only cover the cost of the products my family loves taking but how to even order them. This has been very stressful for me for the past two weeks, causing me loss of sleep and added worry.

13

Like

Comment



Write a comment...



Kent Trobaugh shared his first post.

New Member · January 27 at 10:59 AM

...

I personally joined SBH in Oct. of 2017 for many reasons. At the time I was very involved with taking care of my mother who was very ill. Without making income claims, I was truly looking forward to an extra Income stream that I could hopefully create in my spare time. Within a short

period of time I could see that happening with the Amazing Products that SBH provides that I could retail for immediate income and the Hope of creating an actual Residual income for my future. What I found to be the most valuable to me at the time, and I needed the most was the Daily Support, and Motivation that came with our Training! Taking care of my mother took a real toll on me and if it were NOT the Extra \$100-\$300 and Love and Support that I felt from People in SBH, I'm not sure that I could have made it through. I know that I am just one of many where you have Hope again and rely on an opportunity like SBH to Help survive and supplement your Income. It saddens me to see how sudden things can change with an immediate shut down by the FTC...it feels like a complete over reaching on their part where working with SBH and managing through these claims while continuing to do business would have helped protect many families and individuals like me to Enjoy their Healthy Products and Extra Income.

~Kent



Like

Comment



Write a comment...



Rhonda Marinakis shared her first post.

...

New Member · January 27 at 10:58 AM

I can't help but be concerned that this overreach from the government will affect the well being of many of my patients! These products have helped so many, including myself! Let's pray they open there eyes and see the mistake they have made and we can get back to using the wonderful products we have come to depend on to better our health! There wouldn't...

See More



Like

Comment



Write a comment...



Mike King shared his first post.

...

New Member · January 26 at 8:05 PM

I first met Mr. Jay Noland in April 2017 at a Training session when I was in another Network Marketing company. At that point, I had been in Network marketing for 4 years. I had been to several trainings and even had some personal coaching but none of that compared with Mr. Jay Noland's training. The others were filled with nuggets and approaches that work

for the individuals doing the training. But none of them had broken it down to a system with steps for progression. Above...
[Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 130 of 163](#)

[Continue Reading](#)



2 Comments

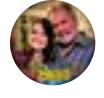
Like

Comment



Debby Armentrout Great comments, Mike thank tou

[Like](#) · [Reply](#) · 3d



Don Underhill Spot on Mike King✓ Every word on point.

[Like](#) · [Reply](#) · 3d



Write a comment...



Carleigh Sherfield

New Member · January 26 at 11:33 PM

...

I began with SBH in September of 2017. By applying the training provided by Mr. Noland and the executive staff, I was able to move to a part-time position as a Physician Assistant in November 2017 and completely walk away from my job in May 2019 which made our entire household income to be solely from SBH commissions and retail profit.

Due to the over-reach of the FTC, my husband and I are unable to cover our monthly bills on time and has increased our credit card debt.



1 Comment

Like

Comment



Penny Younce Willett Prayers for this to be resolved soon



[Like](#) · [Reply](#) · 3d



Write a comment...



Vicki Lea

New Member · January 27 at 12:41 AM

...

Aller-G-Stop I've had allergies all my life - cut grass, dust, pollen, and cats. I have not had many options to help my allergies. My cat allergies have been so bad that I could not visit any home with cats without having a severe reaction. It would only take 10 minutes and my eyes would start itching, my nose would begin to run and I would then have swelling behind my ears. That would lead to one week of swelling and I would have to go to the doctor to get a shot.

With AllerGStop, it's the first time that I've had any relief from my allergies including my cat allergy. I can be in a home now with cats without an allergic reaction. I never thought it would be possible to find a solution to my Allergies - Aller-G-Stop is that solution for me! I'm not making any medical claims. This is simply my personal story.

[Like](#)[Comment](#)

Sharon A. Whalen Whitaker Vicki same with me as well as i had to have sinus surgery before. Nothing has helped me like Aller-G-Stop. Same for my husband and kids. We don't ever want to be without it. Im not making medical claims either. When you go from at least 2 sinus infections a year to none then thats the support that your body needs.

[Like](#) · [Reply](#) · 3d

3



Vicki Lea Exactly!!!

[Like](#) · [Reply](#) · 3d

2

[Write a reply...](#)

Diane Hasler

New Member · January 27 at 12:44 AM

...

This is a testimonial from one of my team members: From Jennifer Stack. I have to tell you something. I had labs drawn last week and had an appt with my Dr. Yesterday. My labs were perfect. PERFECT. Usually I have high cholesterol, high triglycerides, elevated liver enzymes and usually my A1C is too high. But last week they were perfect. So perfect in fact, that I questioned that there might be a mix up with the results!!! The ONLY thing I was doing differently was taking the g burn and Essential. I didn't change my eating habits or anything. Just using the two ganoderma products. Idk if that's the reason but it's the only thing I changed so I'm going to assume it is.

I have heard similar testimonies from other team members!



19

[Like](#)[Comment](#)[Write a comment...](#)

Vicki Lea

New Member · January 27 at 12:39 AM

...

I've owned businesses as an entrepreneur and have worked several other Direct Sales Opportunities.

In the past, I was NEVER able to earn much money through Direct Sales because of my lack of training and the way products were priced.

SBH is the FIRST TIME that I have actually received effective training to earn \$\$\$. And the reasonable pricing of SBH products has allowed for me to sell the products at retail prices. I've been extremely pleased with my ability to earn from the sale of SBH products. It's actually been a breath of fresh air to experience the results that I've been able to achieve.

[Like](#)[Comment](#)

Write a comment...

**Debby Armentrout**

New Member · January 26 at 11:49 PM

...

Not making any income claims, but my business with SBH has been more profitable than with any other company, I have worked with. The overreach of the FTC has severely affected my income and that of my family. The training that was canceled on short notice caused lost revenue, lost ticket money, lost opportunity. Mr. Noland has training programs that ensure success , with work or just improved health with the use of these products. Simple enough, but there is more to our company. We support an orphanage in Kenya, and homeless teenagers in Las Vegas. These groups have also been impacted without our funds for their daily needs. Hundreds of people and families are depending on us. It is essential that we are able to resume business!

21

[Like](#)[Comment](#)

Write a comment...

**Suzy Q Monroe**

New Member · January 26 at 11:48 PM

...

*****No income claims*****

As most of the US gets ready for bed tonight, trying to mentally prepare for a commute, job they dislike while spending time away from their family, then a commute back home to do it again the rest of the week, just waiting for the weekend to roll around, I am doing the opposite.

I'm enjoying the peacefulness of an evening with my family, knowing I no longer have to dread Monday, an alarm clock, or going to a job that was slowly eating at my health, mentally, emotionally, socially, spiritually and physically.

March 2018, I was able to resign from a 17 year career in law enforcement, because of the products I was selling from SBH and the retail I was making, combined with the commissions, helped replace my income, within 3 months.

Again, this is not an income claim.

30

[Like](#)[Comment](#)

Write a comment...

**Jo Dee Nylander-Baer**

Admin · January 26 at 11:47 PM

...

Business wise--- Being a 20 year Direct Sales Professional--- I've been honored to earn a substantial living--- 12 years of this time was with Direct Sales being my ONLY income and providing the sole source of income single mother of 2 sons. But With SBH? I've had the honor to build a substantial team and to have more people making consistent checks (many with a comma in them)-- than I've EVER witnessed in my 20 year Career.

This FTC shut down and Government overreach has caused great financial harm to me and my husband—Since my husband is 78 and 12 years older than I am? I am a large portion of our household income. As Senior Citizens—This income was to supplement our Social Security and to gain back what was devastatingly lost financially in the Great Recession of 2006-2008. This opportunity has now been suddenly and drastically taken from us.

1️⃣ 2️⃣ 3️⃣ 36

Like

Comment



Write a comment...

Smiley face icon Camera icon GIF icon



Jo Dee Nylander-Baer

Admin · January 26 at 11:41 PM · This product testimon...

...

A Certified Health coach and Holistic Nutritionist for 40 years, I've been associated with Direct Sales Companies for 20 of my 40 years. I postponed retirement, because of the Ganoderma being the main/overriding common ingredient: found in all SBH beverages and supplements. I discovered Ganoderma when my mother was diagnosed with Stage 4 pancreatic/liver cancer in 1982. A ganoderma protocol allowed my mother 2 ¾ years of quality of life: Well beyond her 6 weeks to live diagnosis. I too contracted a situation with Stage 4 melanoma 20 years ago and re-acquainted myself to ganoderma to bring my body back to optimal health. So when, Success By Health—and with my background/history with Ganoderma, the delivery system with Success By Health's version/nanotechnology, and my professional background—I became convinced that this needed to be brought to the masses. These products are too viable to be removed from the market!

I'm not making medical claims-- But the body (ANY-body's BODY put in the right condition can heal itself) --I have received health benefits—Too numerous to detail—But to include my body being able to repair enough to be 90% pain free (after having 4 critical car accidents); increased vitality, mental clarity, and energy—plus nightly better/sound sleep.

1️⃣ 2️⃣ 3️⃣ 40

Like

Comment



Write a comment...

Smiley face icon Camera icon GIF icon



Tevis Sherfield

New Member · January 26 at 11:35 PM

...

SBH was my and my wife's only source of income.

We used the income generated by our SBH affiliate business to pay for rent, groceries, gas, mobile service, insurance, utilities, PT license renewal fees, student loans, CC payments, and any and all other expenses.

Do to the overreach of the FTC, our entire income and ability to pay for these ongoing expenses (listed above) was immediately cut off without warning.

1️⃣ 2️⃣ 26

Like

Comment



Write a comment...



Carleigh Sherfield

New Member · January 26 at 11:34 PM

...

Personal development testimonial:

I began with SBH over 2 years ago. Since then, I have listened to and studied one of Mr. Noland's personal development courses nearly every day. I have also attended I believe 13 trainings led by Mr. Noland. I can say without a doubt the confidence I have gained in all aspects of my life is priceless. My personal relationships have strengthened over the last 2 years. My belief in myself has also grown tremendously. I truly believe my life has significantly improved due to these amazing trainings, and I will continue to improve because of them!

1️⃣ 2️⃣ 27

Like

Comment



Write a comment...



Carleigh Sherfield

New Member · January 26 at 11:32 PM

...

No medical claims whatsoever, but after beginning G-Burn, I lost 16 pounds in 6 weeks. I also love the energy it gives me and no jitters. I have taken similar products in the past but I couldn't stand how it made me feel about an hour after taking them. I don't get this feeling at all with G-Burn.

I also love the taste of our coffee and the fact that I don't get jitters or a crash like I do with traditional coffee.

1️⃣ 2️⃣ 22

Like

Comment



Write a comment...



June Hans

New Member · January 26 at 4:36 PM

...

Dyshidrotic eczema, is a skin condition in which very painful blisters develop on the palms of my hands. The blisters are itchy and really painful because the blisters rub against each other between my fingers. It is hard to do anything with my hands until they heal. These blisters normally last for about two to four weeks when treated with steroid creams and are related to seasonal allergies and stress.

Routine to heal hands before SBH

Morning
2 claritin
3 advil
1 zantac
Triamcinolone

Before bed
2 claritin
3 advil
1 zantac
1 benadryl
Triamcinolone

As Needed

-wearing gloves so fingers dont rub
-3 advil
-Soak with ice -water and vinegar
-Soak with ice -water and Domeboro (aluminum sulfate tetradecahydrate/calcium Acetate Monohydrate

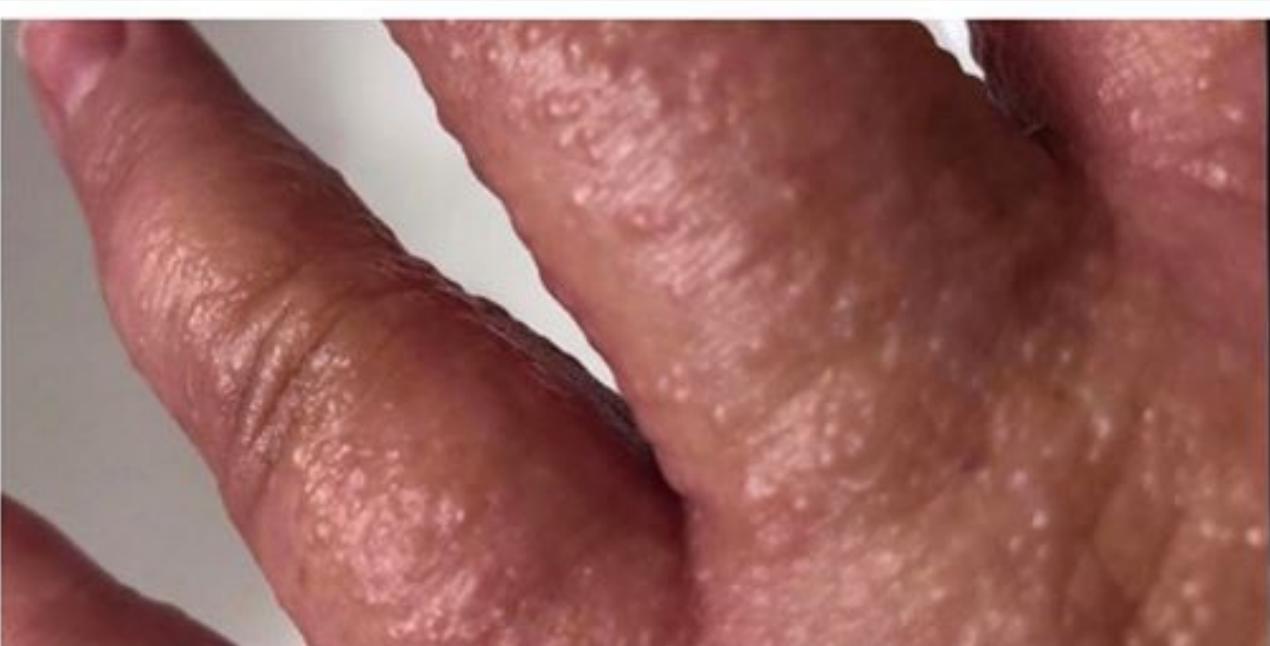
1st treatment with SBH ESSENTIALS AND G DROPS.

I used a paste of SBH Essentials and G Drops and let it dry and stay on my hands over night. I was so delighted when the blisters were gone when I woke up in the morning. The swelling was down, the redness was gone and I could use my hands right away.

EVER SINCE I have taken SBH PRODUCTS DAILY orally and I haven't had a reoccurrence since. Its been a year and a half. No reoccurrence! Prior to this I had it several times a year, for weeks at a time, for many years.

No reoccurrence since SBH entered my life. I am concerned if I can't have access to our products.

I am not making medical claims of SBH products , this is my personal experience and I am so excited for my results and hope this can help others.



 Like

 Comment

[View 6 more comments](#)



Rob Nancy Baird  Great

Like · Reply · 3d

 1



Caressa Chandler Marquez  Amazing results! 

Like · Reply · 3d

 1



Write a comment...



Jo Dee Nylander-Baer created the group **Friends of SBH**.

...

 Admin · January 25 at 8:52 PM



23

3 Comments

 Like

 Comment

[View 1 more comment](#)



Ann Giles  The Shield at work! Let's grow this to support SBH and each other.

Like · Reply · 4d

  3



Elaine McCaffrey  Thank you so much Jo Dee for creating this page! 

Like · Reply · 3d · Edited



Write a comment...



Tyler Sherfield

 Rising Star · January 26 at 3:45 PM

...

In September of 2017 I saw the opportunity with Success By Health. I immediately recognized a few things...

1. The products were designed to provide the body with superior nutrition. (And they weren't extremely "fancy." They were basic and clean, which I loved!)
2. The products were at a price point that would allow anyone to make retail sales. (Something that I hadn't really seen in the industry. Most other products I had seen were priced very high. I'm not saying that's a b...)

[Continue Reading](#)



Like

Comment



Ulrika Kersting Dear [Tyler](#) and [Carleigh](#), when I read your post all I could think was, ditto, ditto, ditto, exactly, true, true, true, and so forth! Thank you, I know you were speaking from the bottom of the heart from many of us!

Like · Reply · 4d

7



Don Underhill One hundred percent true. I concur completely with [Tyler Sherfield](#). No fake promises. Just raw truth and an invitation to find where you want to fit in. Everyone is welcome at whatever level you want to participate.

Like · Reply · 4d

6



Dwayne Samuel Hosey This speaks 100% truth in my life as to how I feel and personally experience with SBH. Integrity is what this company is built on. Mr. Mrs. Noland- Mr. Scott Harris and Mr. Thomas Sacca are very honorable people. They are a blessing to be around.

Like · Reply · 4d

5



Ulrika Kersting 100% agreed!!!

Like · Reply · 4d



Jill Christopher Rosenkrantz I totally agree, [Tyler](#)!!! The facts have never been sugar coated. The corporate staff has never been anything but honorable and truthful. The products allow the body to heal itself and function as it should. And our SBH family is united in standing in support of our beloved company and corporate leaders!!!!

Like · Reply · 4d

5



Debby Armentrout Everything I meant to say but you said it so eloquently!!! Thank you Tyler

Like · Reply · 3d

1



Melanie Summers No one sugar coated anything for me. I wasn't wearing a pair of rose colored glasses when I decided to be a part of this company. I didn't make a knee-jerk decision. My husband and I talked it over for awhile before I decided to join this company. I've... [See More](#)

Like · Reply · 3d

5



Elaine McCaffrey 100% how I feel as well! SBH has changed my life for so much better and I'm SO thankful for being introduced to it!

Like · Reply · 3d

2



Write a comment...



Rob Nancy Baird

New Member · January 26 at 10:51 PM

...

Due to the excessive government overreach our income has been impacted and without products being available our health will be impacted also. This overreach directly cost me money with the training being cancelled on short notice and unable to obtain full refunds on money spent. Jay Noland is an inspiration to me. He had taught me how to live a better life and to live healthier. He has helped me understand that having money is not about what you do for yourself but what you can do for others. This shutdown is impacting orphans in Kenya ,children in Columbia and homeless in Las Vegas.

19 26

Like

Comment



Write a comment...



Penny Younce Willett

Rising Star · January 26 at 10:50 PM

...

This gentleman is a business owner in my community. He has his employees contact me for more Latte....they have started texting SOS 😱 they claim hes difficult to work for without it....he just loves it!! Below is his testimony! No medical claims, just simply his experience ❤️ I cannot imagine us without these products because of an over reach by the FTC ❤️



Since drinking your latte just once a day gives me energy and curbs your appetite I've lost 30 pounds since using this product

19

Like

Comment



Write a comment...



Tevis Sherfield

New Member · January 26 at 10:46 PM

...

Personal development testimonial:

The personal development and mindset training that Mr Noland has created with MDE and TAGR Mastery Course is second to none.

In college, I had the privilege to be trained by a man that has assisted in coaching the minds of Olympic teams. He has also personally coached Georges St. Pierre and Evan Longoria among other great athletes to keep their mindset sharp at all times. I have only great things to say about the training... But with that said...

The training Mr. Noland has created in MDE and TAGR Mastery Course takes mindset training to an entirely different, much higher level.

Since I began with these courses, my energy, attitude, and even my finances have improved dramatically. I literally have a great day everyday!!! I could never say that before...

There are many great mindset and PD coaches out there, but I've never learned from one who can relate, empathise, inspire, and motivate AND... Give me the TRUTH... so I don't have to guess. I apply and produce results. Nobody can do that like Mr Noland can.

I feel confident that I can take these courses and apply to any task (whether that be a profession, sport, or even raising children) and excel to a level that I would have never been able to reach without them.

1 Like 21

Like

Comment



Write a comment...



Penny Younce Willett

Rising Star · January 26 at 10:36 PM

...

No medical claims or weightloss guarantees here!! We have known that from the start, just shared experiences ❤️ These products have improved lives for many and in many different ways.

X Penny Younce Willett



Aug 14, 2018 at 8:09 AM · • 51%

A friend of mine on gburn has lost 7 more lbs and informed she loves it also for the pain relief she gets!! What will it do for you?
#itake2adayeveryday
#itsmorethanjustweightloss
#moreaboutyourhealth



16

Like

Comment



Write a comment...



Rob Nancy Baird

New Member · January 26 at 10:36 PM

...

We have been in SBH for a year now. Not making any medical claims but we have experienced much better health. I had taken Claritin D for over 20 years. The Allergy Stop has let me stop taking it. I feel better in general my skin is stronger and my hair has become thicker thanks to SBH products and Ganoderma. Thanks to the coffee I am able to have morning coffee without upsetting my stomach.

[Like](#)[Comment](#)

Write a comment...

**Rob Nancy Baird**

New Member · January 26 at 10:35 PM

...

Since being in SBH we have made more money than we ever did with any other company. Not making any income claims but we have supplemented our income and done some travel thanks to SBH.



26

[Like](#)[Comment](#)

Write a comment...

**Sean Demps** shared his first post.

New Member · January 26 at 10:22 PM

...

I've been with SBH since May 2019. I absolutely love our products. I never drank a lot of coffee in the past because I always got heartburn and upset stomach. Since drinking our coffee "MYCOCAFE" I do not have these issues anymore and I don't have the caffeine crash like I did before.

Also since taking G-Burn I have shed 15 pounds. Love the increased energy without the jitters.

Also love that I am able to share these products with others and make retail profit from doing so.



20

[Like](#)[Comment](#)

Write a comment...

**Jerry Ayers**

New Member · January 26 at 9:57 PM

...

I have lost 35 lbs and kept it off for the first time in 3 years. G-Burn is amazing. G-FYX is simply amazing as it has calmed digestive inflammation thus ending several issues associated with it. I also love the fruit and veggies as it gives my body a boost in those nutrients that no longer exist in our food supply. But most of all, I love the close association with other affiliates, some I have never met personally, but are truly FAMILY. This is an amazing company. The future is very bright.



21

[Like](#)[Comment](#)

Write a comment...





New Member · January 26 at 8:50 PM

There's something else that makes me proud to be an Affiliate with SBH. It's the children we help. The orphanages we fund and the young people who still want to go to school and make something of themselves but they are homeless. Where will they be without Success By Health. A portion of everything we sell goes for the kids. We have to help the kids!



1 Like 26

1 Comment

Like

Comment



Patricia Manzano I agree, Diana!

I have such happiness and satisfaction from hearing the reports every time we (SBH) purchase new shoes or uniforms for them, or dig a well for fresh water or create toilets for them! I love that we create a better environment for many others as we offer better health to ourselves and our customers!

Like · Reply · 3d

2



Write a comment...

Smiley face icon Camera icon GIF icon



Tevis Sherfield

New Member · January 26 at 8:49 PM

...

An acquaintance of mine, Andrew Monk, sent me this message after just a small sample of aller-G-stop in November. I thought it was powerful and wanted to share!

***This is 1 individual's testimonial following use of a product and is not to be interpreted as medical advice. Individual results may vary.



NOV 21 AT 4:48 PM

Definitely gonna be getting
me some allergy stuff too. I
tried it out myself for starters.
I have dropped both my
allergy medications already.



NOV 21 AT 6:25 PM

I told you that stuff is
incredible! That's awesome
man



Like

Comment



Write a comment...



David Yates

New Member · January 26 at 8:49 PM

...

I have been with Success By Health (SBH) since Dec 2017 and it is one of the best decisions I have made in my life.

The products offered by SBH are top quality in my opinion and have made an impact on me and my doctor, among others.

i started my health journey in 2015, I had a stroke in 2016, I joined SBH in 2017 and life began to change. Many factors played a part in the improve from the products, the awesome people I have come to know, the insight of Mr Jay Nolan, Mr Scott Harris, Mr Tommy Saccia, and the entire SBH family. They have always been honest, upfront, people of integrity and honor. Always doing what they said they would do.

The personal growth I have experienced has moved me forward as a person. The journey has revealed the parallels with the direct sales and my Christian walk have helped me in so many areas as a person. In my opinion , I am a better person for the experience and the people I am associated with now. No one is excluded and everyone is encouraged to participate at their level And pace they choose.

I have never been pressed to do anything and this is one thing I love about Mr Nolan's and SBH. There is no pressure to participate.

I am in way making any medical claims I am only staying how the products have helped me. i used to considered a type 2 diabetic by the medical field. Through prayer, exercise, watch my diet, I have good accountability partners and with the encouragement of my SBH family and SBH products, I have been released by my doctor from needing to control my sugar with medicine. I am no longer a diabetic according to the medical doctor. The product give me, my body the proper nutrients it needs to perform the way it was designed to function.

In regards to income, I am not making any income claims. This is my experience from a business. I have made retail profits by retailing SBH products. I been a sales person to some extent, but my advertising has been mostly my testimony and results from using the products.

SBH is a prayer answered for me. It gives me the ability to improve my life in several areas. All of which need to balanced.

Again, this is my personal experience with SBH and I will not and would not want to do this with anyone else except the wonderful and experience people I stand with in SBH.

Love you Men and Women that I call my Success By Health Family. I look forward to the grea things we will accomplish going forward.



Like

Comment



Write a comment...



Kara Kennedy

New Member · January 26 at 8:40 PM

...

G- Burn is the best weight loss product I have ever used. I have tried many other things to try to lose weight and nothing has helped me. This is the first product I've used that has given me rapid results. I take it daily and NEVER want to be without it!



Like

Comment



Write a comment...





Case 2:20-cv-00047-DWL Document 72-1 Filed 02/06/20 Page 146 of 163

New Member · January 26 at 8:27 PM

I wanted to share a black coffee testimonial from one of my customers who's been struggling with really bad acid reflux.

My conversation with Alex Smith below.

* Testimonials of SBH products are NOT intended to be interpreted as medical claims.

Yes, I did. I love it! It's all I've been using and I've given some packets to friends as well.

Great! I knew you would! Has it helped with your acid reflux any?

It definitely has helped. My entire digestive system is pretty sensitive since I had my cholecystectomy, and I think this has helped a lot with all of it but especially the heart burn.

18

Like

Comment



Write a comment...

Smiley face icon, camera icon, GIF icon, and a small icon with a question mark.



Carleigh Sherfield

New Member · January 26 at 8:19 PM

...

This is a testimonial I received from a customer (results may vary):

Needed to lose a little weight after beaching it the past few months. I've lost 6 lbs in 2 weeks taking one of these a day. I haven't changed my eating or workout routine at all.

-Terri Sykes (SBH Customer)



Terri Loftis Sykes

Needed to lose a little weight after beaching it the past few months. I've lost 6 lbs in 2 weeks taking one of these a day. I haven't changed my eating or workout routine at all. Boost of energy & no jittery feeling at all. Carleigh Sherfield can hook you up if you're interested. — with **Carleigh Sherfield**.

JUN 24, 2019



You, Tyler Sherfield and 9 others

5 Comments

1 like 22

Like

Comment



Write a comment...



Carleigh Sherfield

New Member · January 26 at 7:59 PM

...

Day 3..The swelling in my ankles is almost completely gone!!!!
Prescription meds didn't touch it
Its the only change it has to be that (be that)
-Laura Parrish (G-Burn customer)

This is not a medical claim and individual results may vary.

To: **Laura Parrish**



SEP 2 AT 9:51 AM



Day 3.. The swelling in my ankles is almost completely gone!!!!!! Prescription meds didnt touch it

Wow! That is amazing! I didn't expect it to happen that quickly but I am so glad it did!!!

SEP 2 AT 10:32 AM



Its the only change it has to becthat

20

Like

Comment



Write a comment...



Penny Younce Willett

Rising Star · January 26 at 7:46 PM

...

My products before and after you cant filter a drivers license....



25

1 Comment

Like

Comment



Patricia Manzano G-Burn is terrific and so effective! We can't keep it in stock!

Like · Reply · 3d

1



Write a comment...



Jerry Spradlin shared his first post.

New Member · January 26 at 7:27 PM

...

I've been with SBH for 2 years and can say with full confidence that the products that we have to offer are the absolute best I've ever tried. As a former Professional Ballplayer of 18 years, I've taken many supplements over those years, and nothing compares to the products from SBH. When you find something good, you stick with it, with no need to look elsewhere. Thank you SBH for putting out such quality supplements. I will support this company for the rest of my life.





133

Like

Comment



Write a comment...



Melanie Summers

New Member · January 26 at 3:44 PM

...

Just for kicks and giggles, I did some research on my last job before retirement. My last paycheck, after teaching for 42 years, grossed \$1062.72. I became an SBH member only four months ago on September 29, 2019. Since that time, I've worked very hard to build this business, and it's been well worth it! I retail anywhere between \$100 to \$150 dollars profit a week between supplements and our beverages, been able to receive many personal products in coffees, G-Drops, and other supplements through product credits, and my January 14th paycheck was \$1121.32. That paycheck was more than my last regular teaching job's check!

In addition, my health and happiness is an all time high because of these (IMHO) great products! My medical doctor is amazed at my transformation and told me to "continue to do whatever I'm doing." I have lost 72 pounds, no longer take anti-depressants, and hit the gym 4 times a week. I'm not making any medical claims but the kids at the gym have a hard time keeping up with me! Please refer below to my picture.

There is no price tag that I can place on my health as a result of consuming a variety of my SBH supplements. Again, no medical claims, just my personal health diary and my PCP telling me to continue doing what I'm doing... Just as importantly, I have replaced my income of before. As a matter of fact, it was more than my teacher's paycheck after 42 years in that profession. I can't speak for anyone else, but SBH has significantly improved my life in health and income. As a 65 year old woman, I really don't know what I will do without this company.



Like

Comment



Jill Christopher Rosenkrantz I feel the same way Melanie!

Like · Reply · 4d



Write a comment...



Brooke Sherfield

New Member · January 26 at 3:45 PM

...

I've been a part of Success By Health since Sept. 7, 2017.. almost 2.5 years now and I have nothing but great things to say about the company! I started with only a few months left of college and Tevis and I realized that with the massive accumulation of student loans we had and the not so great income our degrees offered, we needed an additional source to help us pay our debt.

After meeting Mr. Noland, Mr. Harris, and Mr. Saccia at a training event, we knew that these men were the most genuine and kind-hearted people we could have met to be in business with! Due to the leadership that is second to none and the success we were having, I decided that I was going to cancel all of my graduate school plans and pursue this rewarding company full time. What I had chosen was not a mistake... after applying Mr. Noland's training and putting in my effort, I worked at my (2) jobs for only 3 months and Tevis woked as a DPT for only 3 months and then we were able to live our dream: to be able to not work jobs so we're not tied to one area and spend all of our time with each other or whoever else we want.

I've now been to I think 15 trainings Mr. Noland has done and he's taught me everything I need to know to do great at this business if I just apply it... But not just that... he's taught me WAY more than just business! The amount of personal development I've gained is mind-blowing. When I first met the exec. staff, I had anxiety and fear of a lot of things (although I didn't let it show) like being confident in what I was saying, leading a group, speaking in front of people, speaking on calls, presenting, etc... and looking back at where I started and comparing it to now...WOW! Huge difference! I'm watching others in my team experience the same thing I have and it's a beautiful sight

The products have changed my life as well. Before SBH, I went to the ER three times due to heart palpitations, tachycardia, and high BP all at the same time which on the third visit found out it was because of traditional coffee. After finding this out, I went almost a year without my favorite drink. SBH coffee is the only coffee I am able to drink without it causing heart problems! (*no medical claims)

The nutriceuticals are also phenomenal! Even being in my early 20's, I noticed a difference in my energy, hair, skin, nails, vision, and my acid reflux since taking these products. I've watched these not only impact my family, but many others.

I cant even explain the love I have for the exec. staff and everyone in SBH. We've created such a strong bond that I now call my family. I will do anything for my SBH family and I fully expect to be able to impact others lives through SBH in the near future. Back to back



1 Like 42

1 Comment

Like

Comment



Jill Christopher Rosenkrantz I feel the same way about the training and personal development we've received from Mr. Noland and our SBH family!!!

Like · Reply · 4d

1



Write a comment...



Birgit Bonin shared her first post.

New Member · January 26 at 3:44 PM

...

Testimonium

My name is Birgit Bonin. I am a certified sports teacher since 35 years and a certified health care provider since 20 years. I am working since 20 years in my own practice in Germany.

Since August 2018 I am member of the company "Success by Health". It is the first time, that I work in a company that operates based on Direct Sales. Because of my great success in using the products for my clients and for myself from the really beginning, (both the Beverages ...

[Continue Reading](#)

1 Like 21

Like

Comment



Write a comment...



Debby Armentrout

New Member · January 26 at 3:43 PM

...

I have been in SBH since the beginning in September 2017. I had been to a training with Mr. Noland in Nashville (March 2017) and was so impressed with his sincerity, honesty and knowledge of health, success and how human nature and training effect our own success!

I have been in 3 other health and wellness companies in the past 25

years. With a son who has a chronic illness, I've always searched for products that would enhance wellness naturally rather than prescription medicines. Many times the products are either over promised and under delivered or companies change them!

I'm so happy with my decision to start with the SBH products! An amazing start to each day, from energy, and stamina, to actually helping others enjoy their lives more.

As a swim teacher, the training is intense and daily skills necessary for safe experience, I have seen better athletic performance (from me and my daughter) with these products! Lost weight, I feel I'm aging back the clock(at 68)! I had an accident 12 years ago and surgery for a broken knee cap. The shooting pain when walking was not only making me feel crippled but was limiting daily activities. All the products have helped especially the combination in the GFYX! I was using many of the ingredients separately because they help with inflammation but not like the GFyx packet!

The opportunity to supplement my income, to provide more experiences with family and my 8 grandchildren, has come about thru the trainings, and programs initiated with Nr Noland. I wasn't able to make the extra money with the other companies, like with SBH.

The virtual trainings, the live events, encourage everyone to achieve more in their lifetime, help more and be part of a phenomenal program.

My Dad is 93, retired dentist, pacemaker for 25 years and he enjoys better stamina, and takes these products Everyday! He notices the difference in how he feels!

My 2 sisters in Va., are benefiting also from the SBH products. My youngest sister Joel, had chronic facial pain from a car wreck 40 years ago, with minimal relief and was not able to function daily with all the prescriptions for pain! Much improved and a better quality of life, for sure! My other sister Missy, had a brain tumor 2 years ago and surgery and chemo treatments, working with a nutritionist, and health coach, she has benefited her recovery!

We are excited about the future and the lives that are being enhanced thru these products and this company.

To Better healthy everyday,
Debby



24

Like

Comment



Write a comment...



Teresa Jefferson shared a post.

New Member · January 26 at 11:59 AM

...

Second step to taking back my health with SBH products was working with my Dr to come off my high blood pressure. This post highlights that final day.

I am not making medical claims of SBH products , this is my personal experience and I am so excited for my results and hope this can help others.



Teresa Jefferson is 😊 feeling excited with **Craig Jefferson**.

May 15, 2019

Last day I have to take this little pill for high blood pressure! Yay! One year ago I took Claritin every day, used an inhaler, took medicine for acid reflux and high blood pressure. No more!! Thank you SBH products!!

www.healthieryou-jefferson.com

Like

Comment



Robert Mehler Teresa has definitely enjoyed great results while using SBH products. We make no medical claims regarding SBH products - it's just wonderful that she was able to work with her medical practitioner to stop taking a pharmaceutical. Here's to your health, Teresa!!

Like · Reply · 4d



Teresa Jefferson Robert Mehler right! My Dr had told me that if I got control of my weight, overall health and diet that I could lower my prescription meds, that was a personal choice for me, something I wanted to do for myself and my future health in the long term.

Like · Reply · 4d

1



Write a reply...



Jo Dee Nylander-Baer updated the group cover photo.

...

Admin · January 25 at 9:06 PM



59

1 Comment

Like

Comment



Kent Trobaugh SBH Strong !!

2

Like · Reply · 4d



Write a comment...



Sharon A. Whalen Whitaker

...

New Member · January 26 at 12:37 PM

I have been with Success By Health for almost 2 years. This company has been the best thing for me and my family. My husband, my children and myself has had great improvement with the supplements and the mentorship from Mr. Noland. I have never been so grateful to have my life back in feeling better physically and emotionally. I been able to do things I have never done and some things in years.

I have been in direct sales since May 1, 2016 and with previous company i

literally only made \$150 in commission and in 16 months and zero dollars retail. Success BY Health has changed all that. Retail has been amazing and my commission wows me. I don't want to ever lose the supplements and the money i earn from SBH. It would not only devastate me but my family, friends and customers. I love my SBH family.

31

Like

Comment



Write a comment...



Francois Hewing

New Member · January 26 at 12:36 PM

...

SBH has meant a lot to my maturation. My mindset is stronger because of personal development by Mr. Noland, Mr. Harris, Mr. Saccia they have challenged me to grow as a human being and to really recognize it's not all about me but that I need and must help others but to take action and do so. These products have helped me and my family/friends in such a way that it brings tears to my eyes. G-Burn with weight loss, focus and energy (my wife 20+ pounds), life 120 is amazing if so... [See More](#)



23

Like

Comment



Write a comment...

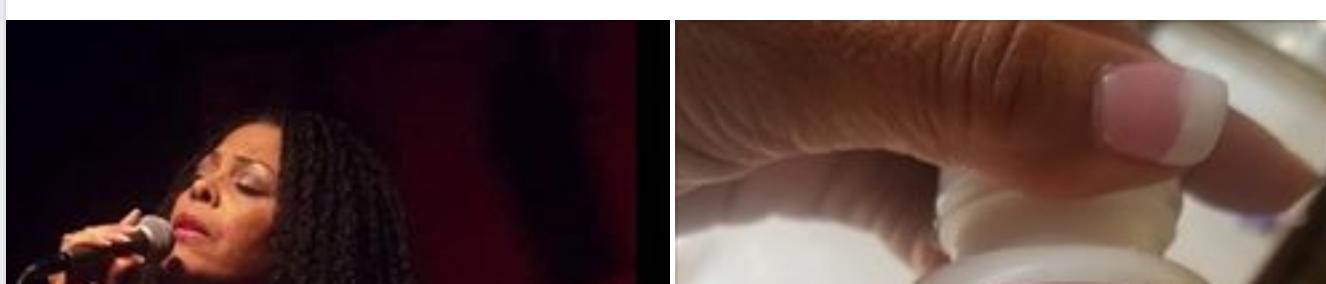


Jessie Laine Powell

New Member · January 26 at 12:36 PM

...

2 to 3 years ago I was diagnosed with Sarcoid. It was only this year that I started feeling this disease active in my body. Being a professional recording artist your breathing is important and critical to my livelihood. Having discomfort in your lungs hinders the performance. I was introduced to SBH nine months ago. When trying the Ganoderma Essential, I found that it gave me immediate relief, I am talk with in 3 - 5 minutes of digesting four capsule the pain was totally... [See More](#)





29

Like

Comment



Write a comment...



Penny Younce Willett

Rising Star · January 26 at 12:36 PM

...

SBH has impacted my life VERY positively!! I have NO complaints at all with this company. WE ARE FAMILY!!! There have many times I dont know what I would have done without SBH and THE POSITIVE TRAINING that has changed me to a better and stronger person, mentally and financially, not to mention I'm so much healthier.....
I have used my profits to fund my trainings, pay car payments, pay for vacations, SBH commissions completely funded my daughters competition cheer fees last year ❤️
I DONT EVER WANT TO BE WITHOUT SUCCESS BY HEALTH or the products.....

24

Like

Comment



Write a comment...



Sherry Harrod

New Member · January 26 at 11:21 AM

...

Every body that knows me knows the excruciating pain I was in for almost 4 years with my feet. I had shots, steroids, boots, socks, straps, a cast, physical therapy and chiropractic treatments.....none of which helped with the pain. The only shoes I was able to "tolerate" on my feet are the Skechers with inserts shown on the left in the picture. After just 3 days on the G-FYX released at our company launch in January 2019, I had no pain in my feet! I bought the shoes on the... [See More](#)



20

5 Comments

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Jason Bruner

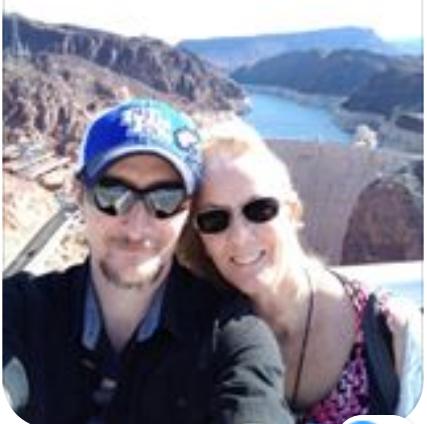


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1



Jason Bruner



Like · Reply · 4d

1



Jason Bruner



Like · Reply · 4d



Jason Bruner



Like · Reply · 4d

1



Jason Bruner



Proof is in the pudding as they say 😊

1

Like · Reply · 4d



Write a comment...

😊 📸 🎨 😄



Patricia Manzano shared her first post.

...

New Member · January 26 at 11:21 AM

I've been with Success by Health for nearly two years and I can't say enough about the amazing supplements. They have impacted both my life and my husband's life in a very significant way. We have many customers who feel the same!
I'd be devastated if I couldn't continue to use them!

[Like](#)[Comment](#)

Write a comment...

**Teresa Jefferson** shared a post.

New Member · January 26 at 11:21 AM

...

A picture speaks a thousand words. Here is my weight loss and health improvement in the first year of using Gburn, I shared it in April 2019.

I am not making medical claims of SBH products , this is my personal experience and I am so excited for my results and hope this can help others.

**Teresa Jefferson**

April 4, 2019

Wow what a difference a year with SBH makes! I can't wait to see what I achieve this next year. Not only have I lost 35 lbs but I breathe easier, no longer on C...

[See More](#)

26

[Like](#)[Comment](#)

Write a comment...

**Jo Dee Nylander-Baer** updated the description.

Admin · January 25 at 10:59 PM

...

The SBH Family coming together: So our



29

Like

Comment



Write a comment...



Alyse Marinakis shared her first post.

New Member · January 25 at 9:41 PM

...



Suzy Q Monroe is feeling fantastic at Hilton Orlando Lake Buena Vista - Disney Springs Area.

January 25, 2019 · Lake Buena Vista, FL

"Your secret to success? Keep things simple" Jay Noland

Reiterated by Alyse Marinakis

"Just because it's simple doesn't mean it has less value."

[... See More](#)

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Write a comment...



Damon Wright and 250 other people are in this group.



 See All Members