

It's easy to become discouraged with all of the ugliness and evil in the world, and the rampant rejection of the Lord. But in the book of Genesis, God spoke and creation appeared; which tells us that God is the creator and has control over all His creation. Paul explains this concept in Colossians 1:16-17 (NIV): *"For in him all things were created: things in heaven and on earth, visible and invisible, whether thrones or powers or rulers or authorities; all things have been created through him and for him. He is before all things, and in him all things hold together."* Ultimately, God has dominion over everything that happens in this fallen world, and nothing, whether good or bad, occurs without His knowledge and authorization.

We need to remember that God is always here to help, providing refuge, security, and peace regardless of the situations occurring around us. God will not fail to rescue those who love Him and call on His name. We must not fear when we *"hear of wars and rumors of wars"* (Matthew 24:1) and other end-time activities. Jesus told us through discourse with his disciples that these events will occur so that they/we could be calm amid the storm. Even so, as the events of our times more and more resemble the precursor to end times, there is no need to be gripped by fear. The Bible is clear: *"God is our refuge and strength, an ever-present help in trouble."* We must have confidence that God's power is

complete and His ultimate victory is certain. And because we are His children, despite whatever worldly troubles face us, we can rest assured that Jesus has overcome this world on our behalf, as it is written in 1 John 5:4-5 (NIV): *"...for everyone born of God overcomes the world. This is the victory that has overcome the world, even our faith. Who is it that overcomes the world? Only the one who believes that Jesus is the Son of God."*

How glorious it is that we live in God's world, created for us according to His plan. *If He is for us, who (or what) can be against us?* (Romans 8:31)

The Recoil of Essentials Oils: When Multi-level Marketing of Unproven Cures Infiltrates the Church

By W. Steven Pray

Introduction

It all began so innocently. In the 1970's, my wife and I were invited to a meeting that promised we would become rich. I specifically asked this trusted friend if it was related to Amway, and my friend denied it. We drove 200 miles to the mysterious meeting, and it turned out to be a pitch to sell Amway products, just as I had suspected.

Fast forward to the present day in a hypothetical situation based on actual events. You, a Christian pharmacist, are sitting relaxed in church, awaiting a spiritually uplifting sermon. After the pastor makes a few introductory remarks, the sermon takes an unexpected turn as he advises his flock not to get vaccinated for coronavirus. Rather, he touts the efficacy of a popular brand of essential oils in preventing and treating coronavirus. He reveals that his family can sell these products to his parishioners. Your curiosity is piqued. You carry out an online search and find that the Federal Trade Commission (FTC) has warned this Multi-Level Marketing (MLM) company to cease advertising their products as treatments and preventives for COVID. You also discover that the minister's family is recruiting church members to sell the products with them, claiming that "joining the team" is a once-in-a-lifetime business opportunity, able to yield extravagant wealth for all participants. The family is holding recruitment meetings in church buildings. Among the oils they sell are bottles labeled "forgiveness," "faith," "finances," and "humility." The family claims that their lemon oil improves circulation; and a product called "Thieves" (a popular essential oil) can kill "germs."

This article will explore the encroachment of MLMs in churches, how they may be pyramid schemes in disguise, examine fraudulent medical products sold through MLMs,

and provide Biblical references relevant to the issue.

What Is An Illegal Pyramid Scheme?

A crucial point in this discussion is the definition of pyramid schemes: they are illegal investment frauds in which victims are convinced to give a predator money by promises of extravagant profits.¹ As more and more people join the scheme, the early investors are paid off with money from later investors, making it appear that the promise of great profits is indeed true. Eventually, the scheme collapses, and later investors are left with nothing. A Securities and Exchange Commission (SEC) investor alert entitled, "Beware of Pyramid Schemes Posing as Multi-Level Marketing Programs," listed hallmarks of a pyramid scheme²:

1. Promises of high returns in a short time period
2. Easy money for little work
3. Buy-in required
4. Recruiting others yields fantastic bonuses
5. No physical products are sold

What is Multi-level Marketing?

Simply put, MLM is presented to proposed investors as a money-making opportunity.³ On the surface, that seems harmless enough. Some well known examples of early entrants into MLM are Amway, Tupperware, and Mary Kay.^{4,5} Each one promised significant profits through "direct selling" products to others, and also by recruiting others into the MLM. MLM schemes have proliferated to such a degree that an exact number of companies is impossible to ascertain. A discussion of MLMs would be appropriate for a secular journal, but it especially has a significant and compelling impact in the life of the Christian pharmacist. The first of many worrisome issues for the Christian pharmacist are the legal concerns that underlie MLMs.

How Does MLM Differ From Illegal Pyramid Schemes?

The SEC investor alert clearly stated that “fraudsters” often pitch MLMs that are actually illegal pyramid schemes: “a type of fraud in which participants profit almost exclusively through recruiting other people to participate in the program.”²

A key difference between pyramid schemes and MLMs is the compensation plan for participants. MLMs avoid being pyramid schemes if participants can make money via direct sales. Indeed, every new recruit who buys into the MLM is expected to start selling the company’s products.

However, the typical MLM compensation plan does not end with direct selling. Those who buy into the program are also given the authority to recruit others into the MLM. Each new recruit begins at a lower pyramid level, and they are referred to as the person’s “downlines.” This is the origin of the term “multi-level.” The original “upline” may earn 10% of each downline’s product purchases. In an ideal MLM world, each participant’s downlines recruit others, who then recruit others.³ The original upline earns a further percentage of all those below him/her. The upline’s income grows exponentially due to the ever-expanding swarm of worker bees below him/her. The typical MLM’s compensation plan is structured so that the miniscule revenue from direct sales or the products is dwarfed by fabulous riches that only happen when (and if) the person concentrates heavily on recruiting downlines. Doing so allows uplines to advance upward in the pyramid. For the typical MLM, growing a pyramid is the real method by which the upline earns those promised fantastic commissions and bonuses.⁴

The FTC also provided valuable advice to consumers about MLMs in a book entitled, “The Case (for and) Against Multi-Level Marketing.”³ After examining the compensation plans of 350 MLMs, the FTC identified a major red flag: if the participant’s primary income comes from recruiting others to sell products rather than the person directly selling to others, it resembles a pyramid scheme.^{1,3,8} The FTC referred to this type of MLM as a “recruitment-driven MLM.”

High Pressure Recruitment Tactics

Most people are familiar with the high-pressure tactics used to sell expensive timeshares. A recruitment-based MLM uses the same persuasive methods to spur potential victims

to buy into the program.^{1,4} In the words of the FTC, “prospects are lured into the scheme with exaggerated product and income claims.”³

The author of the FTC book (mentioned above) attended such a program held in a church building. Several speakers gave glowing accounts of their success in the MLM, (e.g., building new houses, buying SUVs and kayaks, and much more), with a sharp focus on the accumulation of material objects. Other speakers gave tips and procedures (e.g., online video selling) to ensure instant financial success without much effort. It was made clear that failure to join the sponsor’s pyramid would be tantamount to missing out on a once-in-a-lifetime, life-changing golden opportunity. The presentation was pervaded by a shameless appeal to rampant greed. In fact, greed, while not mentioned, was the ever-present driving force. Speakers virtually promised that buying into the program would allow the attendees to become wealthy enough to quit their normal jobs, pay off their mortgages, dissolve credit card debt, and retire within a few short years. No speaker cautioned the attendees of the pitfalls of buying excessive inventory or the inability to find buyers for their products.

What are the Odds of Success in an MLM?

The highly analytical, scientific mind of the Christian pharmacist can easily grasp the fallacy in the recruitment phase of an MLM. Like illegal chain letters, it assumes an infinite number of gullible new recruits eager to join and anxious to recruit their own set of downlines.³ The MLM top hierarchy hopes that prospective recruits never realize that it only takes a few active uplines to saturate their city’s market. In an even smaller society such as a church, saturation can occur with only one active upline. Market saturation means that downlines who were promised amazing riches cannot successfully recruit downlines to sell under them (i.e., join their team), and they are reduced to peddling the product themselves.

The Attorney General of Michigan provided an example of market saturation.⁴ Every MLM began with one or more of the company’s founders at the top of the imaginary pyramid. Suppose for the purpose of this example that each new downline recruits only two downlines. The rapid progression to market saturation can be illustrated by this table:⁴

Level in the MLM	Number of New Downlines Recruited at This Level	Total Number of Members Searching for Downlines
1 (originator)	1	1
2	2	3
3	4	7
4	8	15
5	16	31
6	32	63
7	64	127
8	126	255
9	256	511
10	512	1023
11	1024	2047
12	2048	4095
13	4096	8191
14	8192	16383
15	16384	32767

The reality may be far worse, since this illustration assumes each upline only recruits two downlines. In a real MLM, there may be thousands of uplines recruiting as many downlines as possible. The educated, rational person can easily see that every new level requires more and more gullible victims. The pyramid falls apart as fast as a chain letter when new recruits cannot be located. In the words of the FTC, "Just as in the chain letter, MLM assumes both infinite markets and virgin markets, neither of which exists in the real world. Thus, MLM with its endless chain of recruitment is inherently flawed, unfair, and deceptive... MLMs are also extremely viral and predatory. This is advantaged for the founders (TOPPs, or top-of-the-pyramid promoters) and the MLM company, but works to the detriment of new recruits."³ This quote from the FTC justifies use of the term "predators" for those pushing recruitment-based MLM, and also justifies the term "victims" for those who buy into the false and deceptive promises of MLM. The FTC also labeled recruitment-based MLMs as "perverse," and observed that they "can become Ponzi schemes."³ Various sources suggest that the typical MLM participant may earn only \$85-\$600 yearly, **before expenses**.

The sad fact is that those at the top of the pyramid (i.e., the company's originators) are sure to become wealthy, a phenomenon found in "top-weighted" MLMs.³ At least 99% of those investing in a MLM will spend more on products than they will ever earn.^{3,6} According to the Michigan Attorney General, "There are horror stories of people with a basement or garage full of merchandise" that MLMers claim "is so fantastic it will sell itself"... but that in reality, no one will buy.^{4,6,7} The practice of urging downlines to invest heavily in product is known as "inventory loading."⁸ The upline earns their 10% from every purchase in that full basement, whether the downline sells it or not.

The above advice from federal sources elegantly describes the illusion of MLMs for anyone considering joining one. Is there evidence that MLMs have penetrated churches? Unfortunately, the answer is affirmative. Internet searches provide anecdotal reports of ministers and church people using Christ's flock as a fast way to riches.

Is Selling for Individual Profit in a Church Setting Acceptable?

The New Testament gives guidance against selling in the church. Despite the pervasive cruelty and evil that Jesus witnessed in the Roman Empire, the Bible only recorded one example of Jesus becoming so angry that He took violent action. The incident, found in all four Gospels, is a lesson for us today. During the Passover just preceding Christ's death, He entered the Temple in Jerusalem. He was dismayed to discover money changers who were charging poor Jewish pilgrims "high exchange rates for the privilege of turning (their) local money into shekels."⁹ The money changers loaned money at exorbitant interest rates to poor peasants who were required to purchase a lamb or dove for the mandatory Temple sacrifice. Even the Temple's high priests gained revenue from the scam. It is no wonder that Jesus overturned their tables and said that the Temple is a house of God, not a den of thieves. In the same manner, church members selling anything for their individual profit within church walls is a blatant corruption of the house of Christ.¹⁰

Is Recruiting Church Members as Downlines Acceptable?

The second issue to consider is church members recruiting other church members as downlines, whether on church property or in the upline's home. In Paul's letter to the Philippians, he exhorts church members not to be motivated by selfish ambition.¹¹ Pushing others to join an MLM to increase one's profits is the absolute definition of selfish ambition. Christ's church should be a place to quietly reflect on one's mortality, accept the sacrifice of our Savior, develop plans to spread the Gospel, and unselfishly serve others.

People in the church have their guard down, trusting fellow Christians not to have a selfish agenda. Yet the church community may be polluted with desperate members who have bought expensive inventory they cannot sell and become increasingly frantic to find downlines. These possibilities can result:

- The MLM predator spends time during a sermon looking around to locate potential purchasers of products and identifying downlines.^{5,7}
- A new person visits a church and is immediately hit with a pitch to join an MLM.^{7,10}
- The congregation is urged to tithe. At the same time, they may be urged to invest heavily in an MLM enterprise, even to the point of securing a second mortgage.
- If a church member successfully recruits a downline from the same congregation, the two are now in competition for new recruits. Church members hear it from two sides, and those gullible enough to buy into the MLM must choose one friend or the other.
- Meetings that once were devoted to Bible study can be hijacked and changed into parties intended to sell product and recruit for the MLM.^{7,10,12-14}
- Rather than seeking ways to support other church members in their Christian walk, the upline is busy with crass materialism, trying to enrich himself/herself.⁷

As a result of these potential problems when MLM infiltrates the church, members can become disgusted and drop their membership. MLMs in a church setting give people another reason not to engage in organized religion.

Accounts of MLM in the Church

Most individual churches are not forthcoming about the encroachment of MLMs among their members. It is highly unlikely that a church would advise prospective members (or their local community) that those attending will be confronted with MLM uplines selling products and frantically recruiting downlines. For this reason, there has never been statistically valid survey research exploring the extent of MLMs in churches across the US.

Lacking reliable research, the concerned Christian pharmacist is forced to resort to the Internet, where various articles and blogs discuss the issue. Some of these accounts are summarized below:

- A senior pastor described the tactics that MLM uplines in the church use to scoop in potential downlines, such as promising that the MLM will "build the next church building or bless the missionaries."⁶
- A minister actively solicited members into his MLM and often missed church to attend MLM conferences. The

writer alleged that membership had dropped by more than 50% due to these antics.⁶

- A family rose to leadership positions in a church; one member believed they planned to alter the church's curriculum to include MLM-related teaching.⁶

- A church reported many instances during prayer meetings in which MLMers invited people to parties and gave them product samples.¹⁵

- A pastor recalled that he tuned in to a radio sermon delivered by a minister he respected. He was appalled to hear the minister devoting his messages to MLM recruitment.¹⁶ The writer pointed out that the minister violated the sacred "trust given by Almighty God for the express purpose of furthering the Gospel."¹⁶

- A woman visited a church for the first time, taking a church directory home.⁷ That afternoon, she began calling church members she had never met, a technique known as "cold-calling."¹⁷ Each call was an arm-twisting solicitation to join her MLM. The plan imploded when she called the pastor's wife, alleging that she and her family had decided to join that church. Then she began her pitch. When the pastor's wife made it clear she was not interested, the woman's attitude changed from sweet to sour. She asked if others in the church were already recruiting for that MLM. The pastor's wife answered in the affirmative. The woman abruptly hung up and never returned to the church.

- A minister was recruited into an MLM by another minister and bemoaned the fact that he "nearly drowned" in the quagmire.¹⁸ The experience forced him to conclude, "It is extremely unlikely that one can be a multi-level conquistador without great cost to his Christian character, possibly his eternal wellbeing."

- A pastor's wife revealed in a Facebook post that she was selling essential oils.¹⁹ The announcement created profound disagreement and discord in her husband's flock, as evidenced by dozens of comments either approving or criticizing the move.

- The mother of a new baby was visited by another church member who kindly brought a baby gift basket. However, the caller began a recruitment pitch for her MLM's baby skin care line. Within seconds, the victim realized that instead of being cared for, she was the latest potential target for a MLM predator.¹²

- A couple (the "Smiths") invited close friends (the "Johnsons") to dinner.⁷ Mr. Smith "accidentally" spilled gravy on the tablecloth. Mr. Smith said he would take care of it and went into the kitchen. He returned with a bottle of cleaning fluid and began to remove the stain. As he did so, he touted the amazing stain removal properties of the cleaning fluid and began a pitch for the Johnsons to become his downlines in selling the product. The Johnsons were saddened and appalled at being so openly manipulated and deceived. They reluctantly ended the friendship with the MLM predators.

MLMS and Medical Fraud

MLMS can easily veer into fraud if they make unsupportable claims regarding recruitment. But the fraud is multiplied greatly when the product being peddled meets the legal definition of fraud. According to the FTC, "MLMs typically sell overpriced potions and lotions touted to prevent or cure a wide range of maladies," making them no better than peddlers of fraudulent snake oil.³ The FTC has taken great pains to expose MLM marketing of fraudulent medical products through advertisements, websites, and other online

materials.²⁰ However, the FTC has limited power over MLM schemes because the person-to-person direct product sales leave no paper trail. Lay persons can make overblown and fraudulent claims to cure cancer or other dreaded and incurable diseases without fear of legal reprisals.

Food and Drug Administration (FDA) Definition of Health Fraud

In a consumer-oriented document entitled "How to Spot Health Fraud," the FDA educated the public to avoid health fraud.²¹ The FDA defined health fraud as "articles of unproven effectiveness that are promoted to improve health, well-being or appearance." This includes drugs, devices, foods, or cosmetics, whether intended for use in or on humans or animals.^{21,22}

Aromatherapy with Essential Oils

The FDA and the National Cancer Institute both discussed essential oils as "aromatherapy."^{23,24} Aromatherapy is a poorly documented practice of using natural plant oils to improve health. A few oils have been proven safe and effective, such as menthol in external analgesics (e.g., BenGay) and in products for cough or sore throat (e.g., Hall's Lozenges).

MLM selling of essential oils is a phenomenon of massive proportions – a highly profitable craze driven by a pack of untruths and downright lies. The phrase "essential oils" (synonymous with "volatile oils") has a scientific/chemical meaning. Unfortunately, the word "essential" is intentionally misused by MLMers who make the case that they are essential for health. These unproven pseudomedical products are alleged to cure or prevent many medical conditions, but those sold by MLMers are clearly fraudulent. None were ever submitted to the FDA with proof of safety and efficacy in treatment or prevention of any medical condition.

The "Intended Use" Aspect of FDA Regulation

Under federal law, essential oils are regulated according to the intended use, which is determined by (1) label claims, (2) claims made on websites, (3) advertising, (4) what consumers expect the product to achieve, and (5) how the product is marketed.²³

Are Essential Oils Cosmetics?

The FDA considers essential oils as cosmetics if their intended use is limited to cleansing or making the body more attractive (e.g., soap, shower gel, cologne).²³ As cosmetics, their manufacturers are not required to obtain premarketing approval from the FDA.

Are Essential Oils Drugs?

Essential oils must be regulated as drugs if their intended use is therapeutic, such as treating or preventing disease, or affecting the structure or function of the body.²³ Claims that require drug regulation include such statements as helping sleep, improving alertness, decreasing anxiety, relieving colic, reducing pain, and relaxing muscles. Under current law, drugs making such claims must meet FDA requirements to prove both safety and efficacy before they are marketed. Failure to do so is legally defined as health fraud.^{21,22} Of course, the "therapy" part of "aromatherapy" is a tacit admission that essential oils and similar products are intended for therapeutic purposes, opening a wide door for their being subject to FDA regulation as drugs.

FDA and FTC: Anti-Fraud Activities

Both the FDA and the FTC pursue health fraud.²⁵ The FTC prosecutes fraudulent advertising, while the FDA prosecutes manufacturers that commit health fraud in the areas of safety, manufacturing, and product labeling. Labeling includes the actual product label, as well as package inserts and literature that accompanies the product. However, the FDA's resources are limited, forcing the agency to follow a priority system.²¹ Products that pose a direct risk to consumers due to their potential to cause injury or adverse reactions receive the agency's top priority for health fraud investigation. Indirect risks occur when a product is not directly harmful but could cause the patient to delay or completely forego legitimate medical help; these products are assigned a lower priority for investigation. When the FDA explained this system, they also admitted the following startling fact: "While we remain vigilant against health fraud, many fraudulent products may escape regulatory scrutiny, maintaining their hold in the marketplace for some time to lure increasing numbers of consumers into their web of deceit."²¹

The FDA'S Warning Letters to Essential Oil Firms

On August 22, 2014, the FDA revised its aromatherapy document. Exactly one month later (September 22, 2014), the FDA took decisive action against two leading Utah-based marketers of essential oils. The FDA issued one warning letter to Gary Young, the CEO of Young Living; and another to David Stirling of doTERRA International.^{26,27}

The Young Living letter followed the FDA's review of websites and social media accounts (e.g., Facebook, Twitter, Pinterest) used by consultants whom the firm referred to as Distributors.^{16,26} The FDA also reviewed a product guide found on the Young Living website and discovered drug claims as defined by law (e.g., intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease). Young Living oils for which drug claims were made included rosemary, myrtle, sandalwood, eucalyptus, peppermint, ylang ylang, frankincense, and orange. All were found to be in violation of the Food, Drug and Cosmetic Act.

The FDA provided numerous direct quotes in which Young Living's paid consultants promoted their products for conditions with widely varying etiologies, such as viral infections (including Ebola), Parkinson's disease, post-traumatic stress disorder, dementia, and multiple sclerosis. None are diagnosable or treatable by nonmedical personnel. The treatment claims made by Young Living placed those oils into the category of prescription drugs lacking proof of safety and efficacy for those claims. The FDA also classified specific oils such as cinnamon bark, "Thieves," oregano, "Impower," rosemary, myrtle, sandalwood, and others as "new drugs" because they are not generally recognized as safe and effective for use under the conditions prescribed, recommended, or suggested in the labeling. Under federal law, these and other "new drugs" may not be introduced or delivered for introduction into interstate commerce unless an FDA-approved application is in effect for the drug. The application would only be approved on the basis of scientific data and information demonstrating each drug's safety and efficacy.

The FDA continued its warning by noting that many of the Young Living oils are defined as prescription drugs for some

of the claims since, in light of their toxicity or other potential for harmful effects, the method of use, and/or the collateral measures necessary for their use, they are not safe for use except under the supervision of a practitioner licensed by law to administer them.

The FDA then spoke directly to the labeling. It noted that some of the oils were misbranded because their labels did not carry adequate directions for use by a layperson for all of their claims. The FDA noted that Young Living labeled some of their products as "dietary supplements." This labeling was also found to be illegal, since the legal definition of dietary supplements is limited to products that are ingested. When Young Living recommended use of an oil for topical application or by inhalation, it should not have labeled them as dietary supplements. Further, the claims made for them clearly fit the definition of drugs rather than that of dietary supplements.

The doTerra letter was similar to the Young Living letter.²⁷ The FDA conducted the same sort of review carried out for the Young Living products. The FDA found the company's paid consultants promoting such oils as melaleuca, oregano, "On Guard," clove, eucalyptus, frankincense, geranium, lavender, lemongrass, myrtle, peppermint, rosemary, wintergreen, clary sage, and vetiver for such serious medical conditions as viral infections (including Ebola), bacterial infections, cancer, brain injury, autism, endometriosis, Grave's disease, Alzheimer's disease, tumor reduction, and ADD/ADHD. The FDA's explanations of applicable law and the means by which doTERRA transgressed were virtually identical to those committed by Young Living.

Essential Oils and Covid Fraud

The onset of the global coronavirus pandemic presented a ripe field for health fraud. In February of 2020, the SEC Office of Investor Education and Advocacy issued an Investor Alert warning potential investors of certain publicly-traded companies engaged in investment fraud by claiming on the Internet that their products or services could prevent, detect, or cure coronavirus.²⁸ The long list of "fraudsters" cited by the SEC did not include privately owned MLMs.

The FTC and FDA were again forced to go on the offensive in April of 2020. The FTC sent warning letters to 10 different MLMs "regarding health and earnings claims they or their participants are making related to coronavirus."^{29,30} Some falsely claimed that their products would treat or prevent coronavirus disease. Companies receiving letters included doTERRA, Pruvit, Total Life Changes, Tranont, Modere, Zurvita, and Arbonne. The letter sent to doTERRA International serves as an example of the problem.³¹ After a review of social media posts made by doTERRA, the FTC found that the company "unlawfully advertises that certain products treat or prevent Coronavirus Disease 2019 (COVID-19) and misrepresent that consumers who become doTERRA business opportunity partners are likely to earn substantial income." The FTC warned doTERRA to cease making these unlawful claims immediately.

In April of 2021, the FTC sent another round of fraud warning letters to companies making claims to prevent or treat coronavirus.^{30,32}

Health Hazards of Essential Oils

Some MLM marketers have worked tirelessly to make essential oils appear to be safe and effective for various medical problems. However, it is clear from the FTC's and FDA's warning letters that essential oils are fraudulent if any medical benefit is claimed.

But are they hazardous? Their potential health hazards fall into 4 categories:

1. Indirect hazards. Indirect hazards arise when consumers choose to use unproven therapies rather than seeking appropriate medical care. In one example, a mother refused to seek medical care for her 7-year-old son's severe streptococcal infection.^{33,34} Instead, she reportedly administered dandelion tea and oil of oregano, and he died 10 days later. She was sentenced to 3 years in prison.

2. Accidental ingestion by children. Having unproven essential oils in the household poses ingestion hazards to young children due to their natural curiosity, their tendency to place things in the mouth, and the deceptively pleasant odor of the oils.^{35,36} Some essential oils are highly toxic if taken internally, such as camphor, wintergreen, clove, lavender, eucalyptus, thyme, and tea tree oils.³⁷⁻³⁹ Further, ingestion of any essential oil poses a risk of aspiration because children often choke when trying to swallow them due to their bitter taste. This allows a small amount to enter the lungs, resulting in lipid pneumonia.²⁶ Less than 2.5 mL of any inhaled essential oil can be deadly if aspirated.

3. Problems with topical application. Essential oils are widely recommended for topical application, even to newborns.^{24,39} This practice can cause skin irritation and contact dermatitis. The skin of a child is thinner than that of adults, so they can quickly absorb toxic amounts of the oils. For example, tea tree oil is a skin irritant and contact allergen.⁴⁰ When citrus oils are applied to the skin, the unwary individual can suffer sun sensitivity.²⁴ One study revealed that lavender and tea tree oil block or decrease androgen in boys who have not yet entered puberty, resulting in abnormal breast growth.²⁴

4. Intentional oral ingestion of essential oils for unproven medical uses. There are reports of people ingesting essential oils for unproven medical uses, resulting in injury and death.^{39,41,42-45} Articles in medical journals have discussed the toxicities of essential oils such as cinnamon, tea tree (*Melaleuca*), peppermint, and eucalyptus.⁴⁶⁻⁵¹

5. Questionable Quality. Essential oils and other non-FDA approved products are marketed by hundreds of small businesses. FDA's manpower is limited; which affects its ability to carry out the intense scrutiny needed to prove that each manufacturer is following Current Good Manufacturing Practices. Therefore, products such as essential oils may be adulterated, subpotent, superpotent, and/or toxic.

Remaining Silent

When the Christian pharmacist first becomes aware of MLMs recruiting in church, especially those peddling fraudulent medical remedies, there are only 2 main options. The first is to do nothing. Remaining silent avoids the

discomfort of confronting other church members. Unfortunately, this also gives unspoken approval to the predators, allowing them to continue to deceive the flock.

Challenges in Taking Action

The second option is far more difficult. The Christian pharmacist can educate the church members that essential oils as sold by MLMs have never been proven safe or effective for any use, and any medical claim is contrary to real medical science. If the Christian pharmacist chooses to confront a MLM member, he/she must be aware of the following:

1. Characteristics of typical MLM members often show:
 - Complete lack of training in any medical field. Untrained lay people have sold unproven or worthless medicines to others for centuries. No federal, state, or local agency is empowered to stop neighbor-to-neighbor sales of pseudomedical products. Thus, a person's next-door neighbor may give medical advice on using an oil to cure depression, infections, digestive problems, or dementia.
 - Desperation to acquire the riches promised by the MLM.
 - Cultish and compulsive personality traits.³ Researchers find that some MLM victims are "MLM junkies," possessing traits similar to drug addicts.³
 - MLM members may be facing looming issues, such as maxed out credit cards, impending bankruptcies, imminent divorces, and thoughts of suicide. All of these situations can stem from desperate financial straits caused by confidently (but mistakenly) over purchasing inventory that cannot be sold.
 - Disregard or absolute denial of the validity of logic and science.

2. These arguments pit the Christian pharmacist squarely against Christian brothers and sisters who may distrust science, know nothing of scientific methodology, and deny the rationale for evidence-based medicine.

The justifications that essential oil proponents use to sell these products can be especially seductive to Christians. They include the following:

- God made everything on earth, including herbs.
- Plants are to be used for medicine.
- Herbs were created to serve man.
- Herbs are natural, and natural medicine is superior.

Addressing these arguments is simple. God indeed made everything on earth, including plant carcinogens, venoms, arsenic, mercury, cyanide, and poisonous mushrooms just to name a few. These things are indeed "natural", but they're certainly not safe – in fact, some herbs contain deadly hepatotoxins.

Active Opposition to MLMs

Actively opposing MLMs requires the Christian pharmacist to use his/her vast knowledge base to offer concrete medical reasons to avoid and reject medical fraud. We share several characteristics that reduce our gullibility and give weight to our advice:

- We are educated in scientific methodology, including statistics and research design.
- We appreciate the thorough nature of the FDA OTC

Review, and we recognize that many heavily advertised OTCs making medical claims are not FDA-approved as safe and effective (e.g., homeopathics, “dietary supplements” and other fraudulent items). This knowledge alerts us to the fraudulent nature of essential oils and other products hawked by MLMs.

- We have scientific minds that demand evidence to support medical claims.
- We have the background needed to uncover and understand the publications from the SEC, FTC and FDA, and their indictments of recruitment-based MLMs and unproven essential oils.

Biblical References that Refute MLM

The Bible contains many references that clearly refute the attractive MLM pitches, as seen in this list. (All Scripture is taken from the New International Version, unless otherwise noted.)

1. *“You can earn money beyond your wildest dreams. You can buy new houses, cars, and kayaks. You can get rich fast.”*

- Hebrews 13:5 – “Keep your lives free from the love of money and be content with what you have.”
- Matthew 6:21 – “For where your treasure is, there your heart will be also.”
- Proverbs 12:11 – “...those who chase fantasies have no sense.”
- 1 Timothy 6:9 – “Those who want to get rich fall into temptation and a trap and into many foolish and harmful desires that plunge people into ruin and destruction.”
- 1 Timothy 6:10 – “For the love of money is a root of all kinds of evil. Some people, eager for money, have wandered from the faith and pierced themselves with many griefs.”

2. *“You must never forget your primary goal: expanding your business.”*

- Matthew 6:33 – “...seek first his kingdom and his righteousness...”
- Matthew 22:37-39 – “Jesus replied: “‘Love the Lord your God with all your heart and with all your soul and with all your mind.’ This is the first and greatest commandment. And the second is like it: ‘Love your neighbor as yourself.’”
- Ecclesiastes 12:13 – “...here is the conclusion of the matter: Fear God and keep his commandments, for this is the duty of all mankind.”

3. *“You must recruit others to make your business successful. Every person in your church is a potential downline, and their sales can earn passive income. Turn every social interaction into an opportunity to sell products and recruit downlines.”*

- Philippians 2:3 – “Do nothing out of selfish ambition or vain conceit. Rather, in humility value others above yourselves.”
- James 3:16 – “For where you have envy and selfish ambition, there you find disorder and every evil practice.”
- John 13:34 – “Love one another.”

4. *“Essential oils are proven safe and effective.”*

- Proverbs 14:15 (NASB) – “The naive believes everything, but the sensible man considers his steps.”

Be Prepared for the Consequences

When the Christian pharmacist directly confronts MLM predators, the predator may become angry, frustrated, and aggressive; they might argue and debate with you, appeal to the Bible, and threaten to end the friendship.⁵² Although a broken relationship can be upsetting, consider what Paul said in 1 Corinthians 15:33 (NIV): “Bad company corrupts good character.”

Conclusion

Multi-level marketing in some cases has been characterized as a potent and deceptive fraud that ensnares countless thousands of unwary victims. When MLM predators seek to sell in churches and recruit others to join their pyramid scheme, the mission of the church is grossly perverted. Christian pharmacists are uniquely positioned to speak out against the interlinked frauds of recruitment-based MLMs and the selling of unproven pseudomedical frauds.

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Dr. W. Steven Pray is Bernhardt Professor of Pharmacy Emeritus at Southwestern Oklahoma State University, having recently retired after 42 years in academia. He holds a B.S. in Pharmacy from Southwestern State College, a Master of Public Health from the Oklahoma University College of Public Health, and a Ph.D. in Clinical Pharmacy/Pharmacy Practice from Purdue University. He has authored and co-authored more than 400 articles in pharmacy and medical journals, as well as four textbooks covering nonprescription product therapeutics. He is a populist speaker, having presented hundreds of hours of educational programs about nonprescription product therapeutics.

The Nearness of God

By Nena Lindrose

On September 4, 2021, I stepped on a loose stone while hiking in the Roan Highlands and broke my left ankle. The Roan Highlands straddle the Tennessee/North Carolina border and are part of the Southern Appalachian Mountains. The highest elevation is 6,285 feet. The mountain range is divided into 2 sections: Section 1, which lies west of Carver's Gap, is characterized by dense, evergreen forests and contains the world's largest Rhododendron Garden. Section 2, which lies east of Carver's Gap, is known as Grassy Ridge and is the longest stretch (approximately 7 miles) of grassy bald in the Appalachian Mountains. Grassy Ridge has 3 peaks: Round Bald, Jane Bald, and Grassy Ridge Bald. These grassy balds reward hikers with magnificent panoramic views that include 3 states: North Carolina, Tennessee, and Virginia.

My friend Marlene Simpson and I hiked most of the east range that afternoon. Just before 6:00 PM, we decided to turn around and begin the long hike back to my car, which was parked at Carver's Gap. The accident occurred a few minutes after we started our trek back. As I balanced myself on my right foot with the aid of my hiking stick, Marlene quickly caught up and helped me remain upright. I tried putting my injured foot down to take a step, but it was quickly obvious that walking off the mountain would be impossible. It seemed that our only option was for Marlene to leave me there and hike off the mountain so she could get cell service and call 911. Concerns for how long that

could take – and the possibility of being alone on top of the mountain at night – made the decision difficult.



(From left to right: Sasha, Mike Konrad, Vitali Navitski, Matt Stone – 9/4/21)

In His book, "Letters to Malcolm", C.S. Lewis said, "We may ignore, but we can nowhere evade, the presence of God. The world is crowded with Him. He walks everywhere incognito."¹ During those first few moments as we struggled to make a decision on how to proceed, I am sure I "ignored" the presence of God. Caught up in the pain and anxiety of the moment, I believed my safety and survival depended on