

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

FEDERAL TRADE COMMISSION,
Plaintiff,

v.

NEXTGEN NUTRITIONALS, LLC, a limited
liability company,

STRICTLY HEALTH CORPORATION, LLC, a
limited liability company,

CYBER BUSINESS TECHNOLOGY, LLC, a
limited liability company,

ANNA MCLEAN, individually and as an officer or
manager of NEXTGEN NUTRITIONALS,
LLC, STRICTLY HEALTH
CORPORATION, LLC, AND CYBER
BUSINESS TECHNOLOGY, LLC,

and

ROBERT MCLEAN, individually and as an officer
or manager of NEXTGEN
NUTRITIONALS, LLC, STRICTLY
HEALTH CORPORATION, LLC, AND
CYBER BUSINESS TECHNOLOGY, LLC,

Defendants.

Case No. _____

**COMPLAINT FOR PERMANENT
INJUNCTION AND OTHER
EQUITABLE RELIEF**

Injunctive Relief Sought

Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint alleges:

1. The FTC brings this action under Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b), to obtain permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other equitable relief for Defendants’ acts or practices in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52, in connection with the

advertising, labeling, promotion, offering for sale, sale, or distribution of BioMazing HCG Full-Potency Weight-Loss Drops, Hoodoba, Fucoidan Force, Immune Strong, and VascuVite.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a) and 53(b).

3. Venue is proper in this district under 28 U.S.C. § 1391(b)(1), (b)(2), (c)(1), (c)(2), and (d), and 15 U.S.C. § 53(b).

PLAINTIFF

4. The FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces Section 12 of the FTC Act, 15 U.S.C. § 52, which prohibits false advertisements for food, drugs, devices, services, or cosmetics in or affecting commerce.

5. The FTC is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and to secure such equitable relief as may be appropriate in each case, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies. 15 U.S.C. §§ 53(b) and 56(a)(2)(A).

DEFENDANTS

6. Defendant NextGen Nutritionals, LLC (“NextGen”) is a limited liability company registered in Delaware with its principal place of business at 795 Commerce Drive,

Unit 1, Venice, Florida. NextGen transacts or has transacted business in this district and throughout the United States.

7. Defendant Strictly Health Corporation, LLC (“Strictly Health”) is a limited liability company registered in Delaware with its principal place of business at 795 Commerce Drive, Unit 1, Venice, Florida. Strictly Health transacts or has transacted business in this district and throughout the United States.

8. Defendant Cyber Business Technology, LLC (“CBT”) is a limited liability company registered in Delaware with its principal place of business at 5020 Clark Road, Sarasota, Florida. CBT transacts or has transacted business in this district and throughout the United States.

9. Defendants Anna A. McLean and Robert G. McLean are husband and wife. Robert McLean is the sole owner of NextGen and CBT. Anna McLean is the sole owner of Simply Health. Anna and Robert McLean split the day-to-day management and operating responsibilities for NextGen, Strictly Health, and CBT (collectively, “Corporate Defendants”). At all times material to this Complaint, acting alone or in concert with others, Anna and Robert McLean have formulated, directed, controlled, had the authority to control, or participated in the acts and practices of Corporate Defendants, including the acts and practices set forth in this Complaint. Defendants Anna and Robert McLean reside in this district and, in connection with the matters alleged herein, transact or have transacted business in this district and throughout the United States.

COMMON ENTERPRISE

10. Corporate Defendants have operated as a common enterprise while engaging in the deceptive acts and practices alleged below. At all times material to this Complaint, they have conducted the business practices described below through an interrelated network of companies that have a common business purpose, as well as common officers, managers, and products. Because these Corporate Defendants have operated as a common enterprise, each of them is jointly and severally liable for the acts and practices alleged below. Defendants Anna and Robert McLean have formulated, directed, controlled, had the authority to control, or participated in the acts and practices of the Corporate Defendants that constitute the common enterprise.

COMMERCE

11. At all times material to this Complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

DEFENDANTS’ BUSINESS ACTIVITIES

12. Defendants have labeled, advertised, marketed, distributed, and sold BioMazing HCG Full-Potency Weight-Loss Drops (“BioMazing HCG”), Hoodoba, Furoidan Force, Immune Strong, VascuVite, and other products. These products were sold through numerous websites operated by Defendants, including, but not limited to: www.biomazinghcg.com, www.hoodobadiet.com, www.furoidanforce.com, www.makemyimmunesystemstrong.com, www.vascuvite.com, www.nextgennutritionals.com, and www.strictlyhealth.com. Defendants sold their products

on both wholesale and retail bases.

13. BioMazing HCG is a liquid containing *Irvingia gabonensis* seed extract, L-arginine, L-ornithine, L-carnitine, chaste tree berry extract, wild ram root extract, black cohosh root extract, dong quai root extract, maca root extract, beta alanine, tribulus terrestris fruit, rhodiola rosea root extract, alpha-lipoic acid, and aspartic acid. The retail cost for a two-ounce bottle of BioMazing HCG is \$84.

14. Hoodoba is a capsule purportedly containing 750 mg of hoodia gordonii powder. The retail cost of a 60-capsule container of Hoodoba is \$54.

15. Fucoidan Force is a capsule containing 400 mg of Super-U-100™ Wild Hand-Harvested Atlantic Wakame (*Undaria pinnatifida*) and 250 mg of Reishi Mushroom (*Ganoderma lucidum*) extract. The retail cost for a 60-capsule container of Fucoidan Force is \$67.

16. Immune Strong is sold in 100-capsule containers. One serving (two capsules) contains 305 mg astragalus root; 300 mg reishi mushroom; 130 mg asian ginseng; 100 mg schisandra fruit concentrate; 100 mg agaricus (whole mushroom) concentrate; 65 mg agaricus blazei murill; 65 mg lycium concentrate; 45 mg dong quai root; 25 mg epimedium leaf; 25 mg bai-zhu atractylodes; 25 mg achyranthes; 25 mg chinese peony root; 25 mg eucommia bark; 25 mg grapefruit, lemon, and lime peel; 10 mg ligustrum fruit; 10 mg ophiopogon root; 10 mg polygala root; 10 mg poria; and 10 mg rehmannia root concentrate. The retail cost for a 100-capsule container of Immune Strong is \$49.

17. VasuVite is sold in 60-tablet containers. The recommended two-tablet serving contains 500 mg olive leaf extract; 300 mg hawthorn leaf and flower extract; 300 mg

grape seed extract; 250 mg calcium; 150 mg celery seed extract; 100 mg convolvulus pluricalis whole plant extract; 100 mg terminalia arjuna bark extract; 40 mg magnesium; 20 mg pomegranate fruit extract; 10 mg l-taurine; and 5.75 mg of zinc acetate. The retail cost of a 60-tablet container of VascuVite is \$47.

DEFENDANTS' ADVERTISING AND MARKETING

18. To induce consumers to purchase their products, Defendants disseminated or caused to be disseminated advertisements and promotional materials, including, but not limited to, the attached Exhibits A through K. These advertisements and promotional materials have contained the following representations or statements, among others:

i. Weight Loss Products

A. BioMazing HCG:

Why Biomazing

hCG Drops?

- Safe for Men & Women
- The Weight Stays Off!

FULL-POTENCY

BURN 1500-4000 CALORIES/DAY

YOU WON'T FEEL HUNGRY

Finally — a safe, effective and pain-free method that forces your body to feed off its existing fat reserves BioMazing™ HCG is the powerful and affordable premium weight-loss alternative to frequent and expensive HCG Injections. BioMazing™ HCG diet drops delivers the same 1-2 pounds daily weight loss by forcing your body to feed off current fat reserves.



* * *

How Does BioMazing™ HCG Work?

* * *

Once in the body, the drops signal the brain's hypothalamus to burn current body fat stores. This reaction means you will burn 1,500 to 4,000 calories of excess fat per day – that's 1 to 2 pounds of fat loss!

* * *

What is HCG?

Human Chorionic Ganodotropin (hCG) is a glycoprotein hormone that is naturally produced in large quantities during pregnancy to provide nourishment to the growing fetus. When a pregnant mother's caloric intake becomes too low, hCG is released to trigger the brain's hypothalamus to burn current fat stores . . .

The same "fat burning" effect is generated when BioMazing™ HCG drops are ingested for weight loss. . . . Even more, BioMazing™ full-potency hCG drops [sic] resets your metabolism and prevents your body from storing excess fat in the future.

Exhibit A, www.biomazinghcg.com.pdf

The hcg diet involves three phases that if followed thoroughly and merged with BioMazing™ HCG weight loss drops, can help customers shed up to eighty pounds inside of 40 days. BioMazing™ HCG drops or hcg shot users are expected to follow either a 21 or 40 day protocol . . . during which they are only permitted to ingest approximately five hundred calories each day. But whilst five hundred calories may seem like not enough . . . individuals do not feel famished

or fatigued whatsoever . . . given that BioMazing™ HCG is actively getting rid of body fat through the diet plan, the body is really obtaining 1000s of calories each day . . .

Exhibit B, www.biomazinghcg.com.pdf

Jim S.

Was ~~233 pounds~~

NOW ONLY 198 pounds!

* * *

“In 25 days, I lost 30 pounds.”

Janet P.

Was ~~217 pounds~~

NOW ONLY 158 pounds!

* * *

“The first day, I lost 3 pounds! The next day I lost 2 pounds, and on day three I lost 1½ pounds. . . Over a 3 and a half month period I went from 217 to 158 pounds. All told, I lost just under 60 pounds!

Nicole R.

Was ~~166.5 pounds~~

NOW ONLY 136 pounds!

* * *

And in just 6 weeks I had become a slender and elegant woman . . .

Exhibit C, www.biomazinghcg.com.pdf

B. Hoodoba Diet Pills:



Understanding Hoodia:

It's possible that the San Bushmen of the Kalahari Desert in South Africa might have just struck lightning in a bottle in the form of powerful appetite suppressant called Hoodia gordonii. Hoodia is embraced by many because it actually works...with no adverse side effects.

Dubbed the miracle plant, Hoodia gordonii which is indigenous to South Africa is said to contain a powerful molecule that mimics glucose called P57, which signals your brain into thinking you are full and don't need to eat.

This finding has the potential of literally bringing an end to obesity within the entire population, an achievement that would benefit more than 40% of the English-speaking world who are classified as overweight to chronically obese.

* * *

Scientific double blind laboratory tests have proven Hoodia's effectiveness in both rats and humans. The rat study confirmed that when given Hoodia, they no longer had the urge or desire to eat therefore they lost weight.

In an unprecedented human-trial study, morbidly obese people were sequestered in a controlled study room. They were not permitted to exercise. They were allowed an unlimited amount of time to read, watch television and eat throughout the day.

Half the controlled study group used Hoodia while the remainder was given a placebo. The study findings revealed that after 14 days the Hoodia members markedly reduced their average intake by 1050 calories per day.

Exhibit D, www.hoodobadiet.com

Real Life Success Stories from People Using Hoodoba® Hoodia Gordonii Pills

* * *

Stephanie, Peoria, IL.

“Of all the diet pills I’ve tried, natural and otherwise there is nothing that comes even close. I can surely say Hoodoba® diet pill is my savior. I lost 44 pounds in 10 weeks”



* * *

Elaine, Vancouver, Canada

Just wanted to share with everyone how I lost over 100 pounds in just 6 months. That's right, for all you skeptics (I know because I was one for a long time), this is not a typo, 110 lbs to be exact using Hoodoba hoodia diet pills, they worked like a charm"

* * *

Charlene, Bridgeport CT

"It is hard to start believing in yourself again when you look in the mirror and see a blimp. . . . I felt like there was no point in trying to lose so much weight. . . . Then came the new Hoodoba® diet pill which changed EVERYTHING! In less than 5 months I dropped a whopping 84 pounds.

* * *

Yvonne, Virginia Beach, VA

"I gained almost 50 pounds in the last three years despite my efforts to lose weight. . . . Then a friend pleaded with me to try the new Hoodoba® diet pills. . . . They literally fooled my stomach into thinking it was full. . . . It took just 3 month [sic] to lose all the weight I had gained in 3 years."

[right hand side of page shows “before” and “after” photos of purported Hoodoba® users]

Exhibit E, www.hoodobadiet.com

ii. Disease Fighting and Immune Support Products

C. Fucoidan Force:

What is Fucoidan?

Pronounced “Foo – Koy – Den,” this substance is a string of complex sugar molecules (also called a dietary fiber). While it does have wonderful fat-burning and blood pressure-reducing qualities, Fucoidan has been researched extensively mostly because of its unique anti-viral, anti-cancer, and immunomodulating qualities.

Fucoidan naturally occurs in the cell walls of certain forms of brown seaweed, brown algae, and a few species of marine animal life (including sea snails, sea cucumbers, and urchins). No land-based animal has been known to possess this amazing molecular compound, and it is likely this reason that Fucoidan’s health benefits have only just come to light.

* * *

Health Benefits

This naturally occurring health supplement can be an incredibly effective health aid once it has been extracted from the seaweed.

* * *

Below are some of the amazing health benefits that Fucoidan has to offer that have been researched and proven to be effective:

- *Helps fight off viral infections
- *Reduces cholesterol
- *Relieves HIV, HSV, and Hepatitis C & D symptoms
- *Removes the threat of free radicals
- *Reduces high blood pressure
- *Improves liver health
- *Contains anti-cancer properties
- *Relieves harmful chemotherapy & radiation side effects

* * *

Fucoidan is a natural chemical, and therefore does not have the harmful side effects of synthetic chemicals. It does not introduce unnatural chemicals into the body to fight off your infections for you. Instead, the Fucoidan stimulates your own immune system into defending you the way it is meant to.

HSV/HIV/Hepatitis & Antiviral Health

Some diseases, such as the herpes simplex virus, HIV, and Hepatitis C & D are inhibited by the immune-boosting effects of Fucoidan. These diseases are insidious – they hide within the remains of healthy cells so white blood cells cannot find them. Fucoidan helps the immune system by improving it and helping it seek out cells infected by the virus. There is no true cure for any of these viruses, but Fucoidan can help reduce the chance of outbreaks for HSV sufferers, and can help improve quality of life for those suffering from other viral diseases.

Cancer, Tumors, and Liver Fibrosis

Fucoidan can even help mitigate the effects of very severe conditions. In research studies, this natural substance has displayed the ability to combat cancer by inducing cancer cell apoptosis (cell death). In addition to apoptosis of existing cells, Fucoidan also protects healthy cells to reduce their chances of being overcome with the virus. Similarly, Fucoidan can be taken to reduce the size of tumors and decrease their chances of growing. If taken preventatively, it can even help reduce the chance of developing more tumors.

Hepatitis C is a common cause of liver fibrosis. Liver fibrosis occurs when the liver's healthy tissue is replaced with scar tissue, interrupting healthy liver function. Studies have shown that taking Fucoidan can help reduce the amount of fibrotic tissue in the liver, and can also prevent more fibrosis from occurring.

Exhibit F, www.fucoidanextract.com/fucoidan-overview



Exhibit G, www.fucoidanextract.com/fucoidan-health-benefits

How Fucoidan Works Against HIV/AIDS

*** * ***

With its powerful antiviral properties, fucoidan works to relieve and prevent the chronic symptoms caused by incurable infections. HIV/AIDS is a deadly viral infection that causes some of the most discomforting and life-threatening symptoms. Not only can fucoidan help to control the virus and sooth existing health conditions caused by the infection, it works to prevent uninfected individuals from contracting the virus Results from one study showed that fucoidan works against HIV/AIDS by protecting healthy cells from being infected. This means that fucoidan has the ability to protect non-infected persons from the virus and keep the infection from spreading to healthy cells in those already infected.

Exhibit H, www.fucoidanextract.com/fucoidan-health-benefits

D. IMS Immune Strong with Agaricus:

Super-Charge Your Immune System — Defeat the Common Cold, Flu, Viruses & Deadly Diseases

1-800-701-4556

There are a lot of ways to fall victim to deadly disease-causing agents. Every day we fight a new war against germs, toxins, viruses, bacteria, fungal infections and tumor cells. The fact that we survive at all is a miracle, you need a super-charged immune system to protect you from these assaults. Regrettably, most people have completely overlooked this critical factor and have left themselves exposed to major attacks on their health. But when you fortify your immune system with **Immune Strong™**, it's like shielding your health with an impregnable armour.

Rock-Solid Science

Find out now >>

Click the button above to see scientific proof of the power **Immune Strong™** has to boost the immune system

Ultimate Immune System Booster

Immune Strong™ with Agaricus:

- ✓ Works Wonders against Colds, Flu (Influenza) and Viruses.
- ✓ Offers an Easier Way to Stop the Wheezing, Sneezing and Hacking Fast!
- ✓ Helps prevent postnasal-drip triggered Sore Throats, Hoarseness & Infections.
- ✓ Keeps the Sniffles at bay. Helps prevent Cold & Flu related Congestion.
- ✓ Reduces health-related time-off from Work by a Whopping 97%.
- ✓ Combats deadly Ailments and Diseases including MS, HIV, AIDS and Cancer.



Buy 6 Get 2 FREE - \$299.70 ▼

Add to Cart

Immune Strong™ delivers...

- Serious Immune Protection from Seasonal & Daily Immune distress

Lifetime Money Back Guarantee
FREE Delivery US Orders over \$75



Exhibit I, www.makemyimmunesystemstrong.com

iii. Hypertension Treatment

E. VascuVite:



High blood pressure puts you at risk for heart disease and stroke
the leading causes of death in the United States

* * *

Do It Now Before It's Too Late

Proactive blood pressure management is key. High blood pressure increases the risk of heart attack or stroke as we age. Considering all the dangers it's important to start managing your blood pressure now. VascuVite™ can be a powerful ally. It is a one-of-a-kind broad spectrum formula that provides key bio-active compounds needed on a daily basis to help safeguard cardiovascular health.

* * *

—  Backed by the Latest Scientific Research

The VascuVite™ proprietary blend of ingredients is backed by new and relevant scientific research. Today's research. Today's Results! We use only peer-reviewed scientific research from respected medical journals to show the benefits of our ingredients.

Exhibit J, www.vascuvite.com

What Are Your Blood Pressure Numbers?

* * *



* * *



* * *



Above: Julia Kowalski, Age 68,
experienced a noticeable reduction in her
blood pressure.

Exhibit K, www.vascuvite.com

iv. Certification Program

F. Ethical Site Seal:

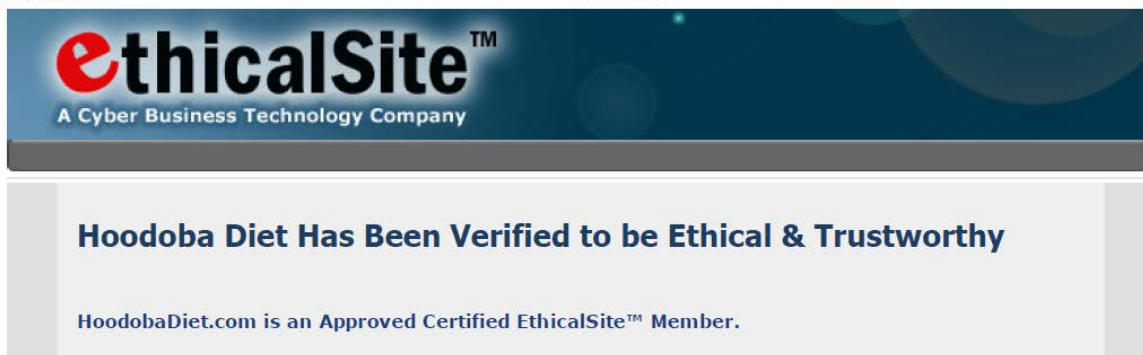
Many of Defendants’ websites including, but not limited to, those depicted in Exhibits A, E, and I, displayed an “ethical site” seal such as these:



The seals directed consumers to “click to verify.” Consumers who clicked on the seal would be taken to a website representing that the site in question has been “Verified to be Ethical & Trustworthy.” For example, the ethical site page for www.hoodobadiet.com contains the statements:

10/19/2016

Hoodoba Diet



Our Mission:

EthicalOnlineBiz's mission is to be your key adviser and the most reliable evaluator of trust in the online business marketplace — we know if you're going to spend money, you want to make sure it's with people you're going to trust.

EthicalOnlineBiz™ accomplishes this mission by:

- « Creating a community of trustworthy online businesses
- « Setting standards of ethics for the online marketplace
- « Focusing on how ebusinesses should treat the public — fairly and honestly in all circumstances
- « Encouraging & supporting best practices — ensuring high standards for trust are set & maintained

* * *

To display the *EthicalSite™ Validation Seal* and maintain its accredited eBusiness status, <http://www.HoodobaDiet.com> has agreed to follow the EthicalSite™ Code of Ethics:

Tell the Truth

- A. Adequately represent products and services, including clear and candid disclosures of all material terms.
- B. Communicate to customers all material facts about the product or service being sold.
- C. Ensure that all written materials are readily available, clear, accurate and complete.

Exhibit L, www.ethicalonlinebiz.com/members/consumerphasephp&company

DEFENDANTS' VIOLATIONS OF THE FTC ACT

19. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits “unfair or deceptive acts or practices in or affecting commerce.”

20. Misrepresentations or deceptive omissions of material fact constitute deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

21. Section 12(a) of the FTC Act, 15 U.S.C. § 52(a), prohibits the dissemination of any false advertisement in or affecting commerce for the purpose of inducing, or which is likely to induce, the purchase of food, drugs, devices, services, or cosmetics. For the purposes of Section 12 of the FTC Act, BioMazing HCG, Hoodoba Pure, Fucoidan Force, Immune Strong, and VascuVite are “foods” or “drugs” as “food” and “drug” are defined in Sections 15(b) and (c) of the FTC Act, 15 U.S.C. § 55(b) and (c).

Count I: False or Unsubstantiated Claims for Weight Loss Products

22. Through the means described in Paragraph 18, Defendants have represented, directly or indirectly, expressly or by implication, that:

- A. BioMazing HCG forces your body to burn off 1500 to 4000 fat calories per day;
- B. BioMazing HCG safely causes, or assist in causing, users to rapidly lose substantial weight, such as 1-2 pounds per day; 80 pounds in 40 days, 59 pounds in 3½ months, 30 pounds in 25 days, or 30 pounds in 6 weeks;
- C. Consumers who use BioMazing HCG will not feel hungry while following a 500 calorie per-day diet;
- D. BioMazing HCG resets your metabolism and prevents your body from storing excess fat in the future;
- E. Hoodoba is an appetite suppressant that makes you feel full without eating; and
- F. Hoodoba causes, or assists in causing, users to rapidly lose substantial weight, such as 100 pounds in 6 months, 84 pounds in 5 months, 50 pounds in 3 months, or 44 pounds in 10 weeks, with no adverse side effects.

23. The representations set forth in Paragraph 22 are false or misleading, or were not substantiated, at the time the representations were made.

24. Therefore, the making of the representations as set forth in Paragraph 22 of this Complaint constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§

45(a) and 52.

Count II: False Claims for Weight Loss Products

25. Through the means described in Paragraph 18, Defendants have represented, directly or indirectly, expressly or by implication, that:

- A. BioMazing HCG contains Human Chorionic Gonadotropin;
- B. Consumer testimonials contained in ads for BioMazing HCG represent the actual experience of consumers who have used the product;
- C. Tests prove that Hoodoba® brand Hoodia causes consumers to reduce average calorie intake by 1050 calories a day; and
- D. Consumer testimonials contained in ads for Hoodoba represent the actual experience of consumers who have used the product.

26. In truth and in fact,

- A. BioMazing HCG does not contain Human Chorionic Gonadotropin;
- B. Consumer testimonials contained in ads for BioMazing HCG do not represent the actual experience of consumers who have used the product;
- C. Tests do not prove that Hoodoba® brand Hoodia causes consumers to reduce average calorie intake by 1050 calories a day; and
- D. Consumer testimonials contained in ads for Hoodoba do not represent the actual experience of consumers who have used the product.

27. Therefore, the making of the representations as set forth in Paragraph 25 of this Complaint constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§

45(a) and 52.

**Count III: False or Unsubstantiated
Disease and Immune Support Claims**

28. Through the means described in Paragraph 18, Defendants have represented, directly or indirectly, expressly or by implication, that:

- A. Fucoidan Force fights cancer by causing cell death and reducing the size of tumors;
- B. Fucoidan Force can prevent persons not infected by HIV or AIDS from developing those diseases and can keep the infection from spreading to healthy cells in those already infected;
- C. Immune Strong prevents or reduces the risk of colds and flu;
- D. Immune Strong reduces health-related time-off from work by 97%; and
- E. Immune Strong combats deadly ailments and disease including multiple sclerosis, HIV, AIDS, and cancer.

29. The representations set forth in Paragraph 28 are false or misleading, or were not substantiated, at the time the representations were made.

30. Therefore, the making of the representations as set forth in Paragraph 28 of this Complaint constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

Count IV: False Disease Claims

31. Through the means described in Paragraph 18, Defendants have represented, directly or indirectly, expressly or by implication, that:

- A. Fucoidan Force is proven to help fight off viral infections;
- B. Fucoidan Force is proven to reduce cholesterol;
- C. Fucoidan Force is proven to relieve the symptoms of HIV, herpes simplex, and Hepatitis C & D;
- D. Fucoidan Force is proven to reduce high blood pressure; and
- E. Fucoidan Force is proven to improve liver health by reducing the amount of fibrotic tissue, and preventing more fibrosis from occurring.

32. In truth and in fact,

- A. Fucoidan Force is not proven to help fight off viral infections;
- B. Fucoidan Force is not proven to reduce cholesterol;
- C. Fucoidan Force is not proven to relieve the symptoms of HIV, herpes simplex, and Hepatitis C & D;
- D. Fucoidan Force is not proven to reduce high blood pressure; and
- E. Fucoidan Force is not proven to improve liver health by reducing the amount of fibrotic tissue, and preventing more fibrosis from occurring.

33. Therefore, the making of the representations as set forth in Paragraph 31 of this Complaint constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

Count V: False or Unsubstantiated Hypertension Treatment Claims

34. Through the means described in Paragraph 18, Defendants have represented, directly or indirectly, expressly or by implication, that:

- A. VascuVite reduces blood pressure; and
- B. VascuVite treats high blood pressure, returning it to normal or nearly normal levels.

35. The representations set forth in Paragraph 34 are false or misleading, or were not substantiated, at the time the representations were made.

36. Therefore, the making of the representations as set forth in Paragraph 34 of this Complaint constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

Count VI: False Hypertension Treatment Claims

37. Through the means described in Paragraph 18, Defendants have represented, directly or indirectly, expressly or by implication, that:

- A. VascuVite is proven to lower blood pressure; and
- B. Consumer testimonials contained in ads for VascuVite represent the actual experience of consumers who have used the product.

38. In truth and in fact:

- A. VascuVite is not proven to lower blood pressure; and
- B. Consumer testimonials contained in ads for VascuVite do not represent the actual experience of consumers who have used the product.

39. Therefore, the making of the representations as set forth in Paragraph 37 of this Complaint constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§

45(a) and 52.

Count VII: Ethical Seal Program

40. Through the means described in Paragraph 18, Defendants have represented, directly or indirectly, expressly or by implication, that:

- A. Sites displaying the Certified Ethical Site Seal have been verified by an independent, third-party certification program;
- B. Ethical Site™ has set standards of ethics for the online marketplace; and
- C. Ethical Site™ has independently verified that sites displaying the “Certified Ethical Site” seal are ethical and trustworthy.

41. In truth and in fact:

- A. Sites displaying the Certified Ethical Site Seal have not been verified by an independent, third-party certification program. Ethical Site™ is operated by Defendant Cyber Business Technology, owned and controlled by Defendants Anna and Robert McLean, who also own and control Defendants Strictly Health and NextGen, the companies running the sites displaying the Certified Ethical Site Seal;
- B. Ethical Site™ has not set standards of ethics for the online marketplace; and
- C. Ethical Site™ has not independently verified that sites displaying the Certified Ethical Site Seal are ethical and trustworthy.

42. Therefore, the making of the representations as set forth in Paragraph 40 of this Complaint constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

CONSUMER INJURY

43. Consumers have suffered and will continue to suffer substantial injury as a result of Defendants' violations of the FTC Act. In addition, Defendants have been unjustly enriched as a result of their unlawful acts or practices. Absent injunctive relief by this Court, Defendants are likely to continue to injure consumers, repeat unjust enrichment, and harm the public interest.

THIS COURT'S POWER TO GRANT RELIEF

44. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt and redress violations of any provision of law enforced by the FTC. The Court, in the exercise of its equitable jurisdiction, may award ancillary relief, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies, to prevent and remedy any violation of any provision of law enforced by the FTC.

PRAYER FOR RELIEF

Wherefore, Plaintiff FTC, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and the Court's own equitable powers, requests that the Court:

- A. Enter a permanent injunction to prevent further violations of the FTC Act by Defendants;
- B. Award such relief as the court finds necessary to redress injuries to consumers resulting from violations of the FTC Act, including, but not limited to, rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies; and

C. Award Plaintiff the costs of bringing this action, as well as such other and additional relief as this Court may determine to be just and proper.

Respectfully submitted,

DAVID C. SHONKA
Acting General Counsel

/s/ Janet Evans

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Dated: __11.17.17__

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

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YOU WON'T FEEL HUNGRY
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IT'S THAT GOOD

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Finally — a safe, effective and pain-free method that forces your body to feed off its existing fat

reserves BioMazing™ HCG is the powerful and affordable premium weight-loss alternative to frequent and expensive HCG Injections. BioMazing™ HCG diet drops delivers the same 1-2 pounds daily weight loss by forcing your body to feed off current fat reserves.

BioMazing™ HCG is the powerful and affordable premium weight-loss alternative to frequent and expensive HCG Injections. BioMazing™ HCG diet drops delivers the same 1-2 pounds daily weight loss by forcing your body to feed off current fat reserves.



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BioMazing™ Diet Drops HCG	Cost Per Cycle	Pain	Taste	Time / Amount	Performance	Weight Loss
	\$99.95	None	Mild	10 Drops 3x / Day	Steady	1 - 2 Pounds / Day
Vs. HCG Injections	\$700 - \$1,500	Yes	None	1 Shot Daily	Steady	1 - 2 Pounds / Day

Dosing Amounts

Because there are no international unit equivalents in BioMazing™ HCG diet drops preparations, there is no equivalence when comparing BioMazing™ HCG drops versus prescription dosing; however, using our own experience with hCG injections and BioMazing™ HCG weight loss drops, we have approximated the effectiveness of dosing between the two methods. This is NOT a scientific measurement, simply a comparison based on client experience.



Drops Vs. Injections CONVERSION TABLE

30 drops per day = 125 IU per day
 36 drops per day = 150 IU per day
 42 drops per day = 175 IU per day
 48 drops per day = 200 IU per day

1 Bottle = 30 Day Supply

Dr. Simeon's ORIGINAL
HCG
"Pounds and Inches"
Manuscript

+ Comprehensive Diet Instructions

Meals

Plans

Recipes

Unlimited Support

How Does BioMazing™ HCG Work?

BioMazing™ HCG diet drops are taken orally and held under the tongue to allow for rapid absorption. Once in the body, the drops signal the brain's hypothalamus to burn current body fat stores. This reaction means that you will burn 1,500 to 4,000 calories of excess fat per day — that's 1 to 2 pounds of fat loss! BioMazing™ HCG weight loss drops should be combined with Dr. Simeons' simple diet protocol to accelerate fat loss and speed up results. This diet protocol requires you to eat only around 500 calories per day, but while this seems drastic, the fat that is being burned by the BioMazing™ HCG is supplying your body with the sustenance and energy it needs to function just as if you had been eating thousands of calories all day long. You won't feel hungry or lethargic as with other forms of fasting, and your body won't hoard fat from going into starvation mode. The 500 Calorie Diet is far easier to stick to than you'd initially think — BioMazing™ HCG does a great job of eliminating the physical hunger you'd normally expect to feel when cutting calories to this degree.

What is HCG?

Human Chorionic Gonadotropin (hCG) is a glycoprotein hormone that is naturally produced in large quantities during pregnancy to provide nourishment to the growing fetus. When a pregnant mother's caloric intake becomes too low, hCG is released to trigger the brain's hypothalamus to burn current fat stores to provide nourishment and energy to both the mother and growing baby.

This same "fat burning" effect is generated when BioMazing™ HCG drops are ingested for weight loss. The body breaks down fat stores and quickly transforms them into energy — this results in long-lasting energy along with unprecedented weight loss. Even more, BioMazing™ full-potency hCG drops resets your metabolism and prevents your body from storing excess fat in the future.



Live Chat

Read Testimonials

Submit Your Testimonial
 Your Story can inspire others.
 Click Here



BioMazing™ HCG Diet Drops to Shed Weight — Exactly What you Need to Know

There is plenty of media hype all around the hcg weight loss program and diet drops weight loss phenomenon, although with a variety of inconsistent reviews and deceitful products available, it's nearly impossible to ascertain if the hcg diet is perfect for you.

HCG (Human Chorionic Gonadotropin)

HCG is a bodily hormone seen in the bodies of all men and women, however is often times found in significant volumes in mothers-to-be throughout their initial thirteen weeks of pregnancy. During this time, it is vital that the growing baby obtains plenty of nutrients to be able to get bigger and stay healthy — when a woman isn't consuming enough, the hcg present in her system tells the brain to liberate the woman's stashed excess body fat to feed the little one within her. This comparable fat-burning result likewise works whenever fat consumers take BioMazing™ HCG diet drops to shed weight or hcg shots.

Burn One to Two Pounds of Extra Fat Per Day

With world-wide morbid obesity rapidly expanding, it really is unbelievable to envision that there is an item out there which can help users to get rid of 1-2 pounds of weight daily...without working out. Yet as remarkable as this may sound, this is apparently completely true. Anytime BioMazing™ HCG diet drops or hCG shots are consumed in conjunction with a rigid hcg diet protocol, consumers are dropping an average of 1 to 2 pounds daily. Although the diet plan does significantly reduce the quantity and different types of food items you are permitted to take in, the outcome is simply well worth the hard work.

The 500 Calorie hCG Diet

The hcg diet involves three phases that if followed thoroughly and merged with BioMazing™ [HCG weight loss](#) drops, can help customers shed up to eighty pounds inside of 40 days. BioMazing™ HCG drops or hcg shots users are expected to follow either a 21 or 40 day protocol (dependent on just how much weight they have to eliminate) during which they are only permitted to ingest approximately five hundred calories each day. But whilst five hundred calories may seem like not enough to survive on, you may be astounded to learn that individuals do not feel famished or fatigued whatsoever, and are essentially getting plenty of nutrients and vitamins to keep healthy. If the 500 calorie diet program were conducted without BioMazing™ HCG diet drops, the metabolism would turn off and go into ketosis, but given that the BioMazing™ HCG is actively getting rid of body fat through the diet plan, the body is really obtaining 1000s of calories each day, not merely five hundred as it could seem.

BioMazing™ HCG Diet Drops vs. Injections

Are BioMazing™ HCG drops competitive with shots? While this can be a prevalent reason for dispute, it would appear that BioMazing™ HCG diet drops are every bit as powerful as hCG injections for weight loss. As they don't require a doctor's prescription and cost far less, BioMazing™ HCG drops result in the very same fat-burning effect in the brain as hCG shots do — and they create the same amount of fat dropped.



Exhibit B



Jim S.

Was 233-pounds

NOW ONLY 198 pounds!

"I am 192 pounds in this picture, after beginning this BioMazing™ [HCG diet](#) 3 1/2 weeks ago @ 223 pounds. In 25 days, I lost 30 pounds. My BMI has gone from 28 to 26, and I have dropped two pant sizes. This is simply amazing to me. I tried Nutrisystem, weight watchers, even half killed myself with P90X. The most I ever lost was 10 pounds, and actually gained more weight when I couldn't stay on their programs anymore.

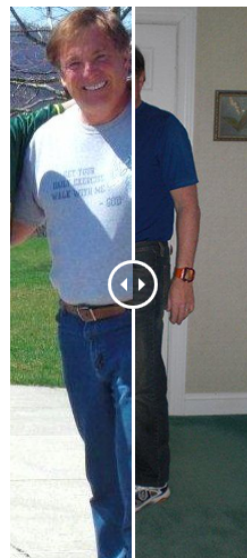
Each day, I could hardly wait to wake up and weigh myself. I always lost 1/2 -2 1/2 pounds. The key to this diet is to buy an inexpensive scale to measure your food in grams, eat only the foods they tell you, and stay on the diet completely.

After I started the maintenance phase, I was reluctant to begin eating a lot more food and actually continued to lose a couple more pounds. I eat only protein like chicken, beef, salmon, deli turkey & ham, and lamb chops, along with water based vegetables—tomatoes, asparagus, green peppers, radishes, and red cabbage. And, I have not gained a pound, even though I never ate this much food, in my life, in one day.

This is the most amazing diet I have ever been on. I plan to go back on it in about 90 days so that I can get down to 185 pounds, a weight that would put me at 24 BMI.

thank you,

Jim S."



Read more inspiring stories...



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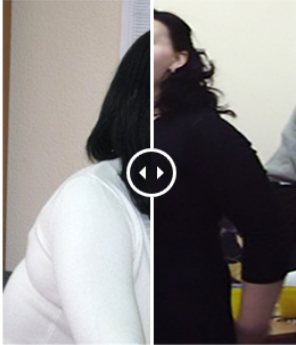
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[0](#)

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Janet P.



Was 217 pounds

NOW ONLY 158 pounds!

"A few months ago I was diagnosed with multiple herniated discs. My doctor wanted to operate but I decided to seek a second opinion. It was then I discovered that the excess weight I carried was the real problem and that unless it was addressed surgery was pointless.

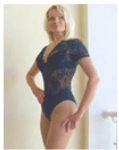
So I went online looking for [diet drops](#) which I'd read great things about. I bought the least expensive bottle thinking I'd save some money and gave it 2 weeks, but nothing happened. Then I went back and bought the most expensive product I could find, but all it did was gave me the runs and made my tummy hurt.

I was ready to give into the knife when I realized I just needed to find right diet drops. That's when I found Biomazing™ HCG! I kid you not.

The first day, I lost 3 pounds! The next day I lost 2 pounds, and on day three I lost 1½ pounds. From that point on I continued to lose about a pound each day (some days I lost nothing), until I arrived to where I am today. Over a 3 and a half month period I went from 217 to 158 pounds. All told, I lost just under 60 pounds!

Today my knees don't hurt. My hips don't hurt. My back doesn't hurt. I can run now. I have family that are diabetic and I've seen the hell it's put them through and I've told myself, I'm not going down like that. Biomazing™ HCG solved a lot of my problems.

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BioMazing HCG Diet Drops Testimo... x

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Nicole R.

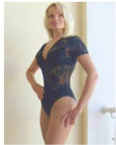


Was 166.5 pounds

NOW ONLY 136 pounds!

"I always wanted to be slim and graceful, but never was able succeed. And with age it became even more difficult as quietly year after year the weight increased. I tried several diets and exercises, but the forces I was up against was overwhelming. After dropping a few pounds I soon forgot about the diet and the pounds came back again. Noticing one of my slender colleagues at work using Biomazing™ HCG weight loss drops, I took an interest in her method of weight loss and decided to try it. So I ordered a bottle. On the recommendation of the diet I excluded the "bad" foods and changed the amount of daily intake. And in just 6 weeks I had become a slender and elegant woman who fell in love not only with herself, but with the harmony of nature, the pursuit of the ideal and the pleasure in life. And I learned not to give up at any age!

Read more inspiring stories...



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Understanding Hoodia

GREAT KALAHARI - BIRTHPLACE OF HOODOBA® HOODIA

Print | Tell a Friend



Understanding Hoodia:

It's possible that the San Bushmen of the Kalahari Desert in South Africa might have just struck lightning in a bottle in the form of powerful appetite suppressant called Hoodia gordonii. Hoodia is embraced by many because it actually works...with no adverse side effects.

Dubbed the miracle plant, Hoodia gordonii which is indigenous to South Africa is said to contain a powerful molecule that mimics glucose called P57, which signals your brain into thinking you are full and don't need to eat.

This finding has the potential of literally bringing an end to obesity within the entire population, an achievement that would benefit more than 40% of the English-speaking world who are classified as overweight to chronically obese.

In their quest to stave off hunger and maintain their focus during long hunting trips, the San Bushmen of the Kalahari uncovered the magic of the prickly plant which grows in the smoldering temperatures of the African Kalahari desert. The Hoodia plant has been a blessing for the San Bushmen for many generations. Because of Hoodia they're able to maintain a very low body fat percentage (11% on average), and remain unaffected if they go without eating for long periods of time.

Hoodia Works

The hypothalamus inside your mid-brain emits glucose sugar within the nerve cells. Eating food causes blood sugar levels to escalate, which in turn activates a feeling of "fullness" and compels most people to stop eating. Others either ignore the "fullness" trigger or have a malfunctioning hypothalamus, which causes them to continue eating despite the signals.

According to studies conducted at **Brown University** and elsewhere, the "miracle molecule," P57, within Hoodia accelerates the glucose effect to the extent that you feel "full" even without eating. It actually tricks your brain into believing that you just ate a full meal.

Scientific double blind laboratory tests have proven Hoodia's effectiveness in both rats and humans. The rat study confirmed that when given Hoodia, they no longer had the urge or desire to eat therefore they lost weight.

In an unprecedented human-trial study, morbidly obese people were sequestered in a controlled study room. They were not permitted to exercise. They were allowed an unlimited amount of time to read, watch television and eat throughout the day.

Half the controlled study group used Hoodia while the remainder was given a placebo. The study findings revealed that after 14 days the Hoodia members markedly reduced their average intake by 1050 calories per day.

The results are in. Hoodia is the "magic" diet pill that will be instrumental in helping to eliminate the obesity epidemic we are now facing.

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★★★★★ 612 Reviews

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Lose weight FAST with Certified Pure South African Hoodia

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Real Life Hoodia Stories



Results not typical - results may vary



Results not typical - results may vary



Results not typical - results may vary

This could be you!

Exhibit D

Testimonials

Some very Satisfied
(and very happy) Customers

GREAT KALAHARI - BIRTHPLACE OF HOODOBA® HOODIA

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Real Life Success Stories From People Using Hoodoba® Hoodia Gordonii Pills



Roger, Albany, New York

"It wasn't for lack of trying, but all my life I was known as the 'Fat Boy'. Truth is, I tried just about every diet pill, including those prescribed by my doctor without losing any real weight. So naturally, when I heard about this new all-natural "miracle" pill that has no side effects I almost passed on it. Thank goodness I didn't because look at me now! I lost over 60 lbs using the Hoodoba® Hoodia gordonii pills. Thanks, Roger."

See the transformation in Roger now! [See the new Roger!](#)

Results not typical - results may vary.



Stephanie, Peoria, IL

"Of all the diet pills I've tried, natural and otherwise there is nothing that comes even close. I can surely say Hoodoba® diet pill is my savior. I lost 44 pounds in 10 weeks flat. I have just one question. I have just one question. Why weren't these pills made available sooner?"

P.S. The news spread like wild fire through my office. My friends are all trying it now (even some who have little or no weight to lose). We're very happy with this product. It's going to be BIG hit! [Take a look at Stephanie now!](#)

Results not typical - results may vary.



Kimberly, Plymouth, England

After I saw how well the [Hoodoba® Pure](#) Hoodia diet pills succeeded in curbing my appetite, I decided to go all out with the [Hoodoba® Combo Pack](#). I was so happy to see that it finally did the trick for me -- I lost 37 pounds in all... and it happened very quickly. You folks definitely know what you're doing. My husband and my family are overjoyed because they knew how badly I wanted to regain my athletic look. We're sending our heartfelt thanks and my photos because we believe in helping others and if they help even one person succeed it will be well worth it." [See Kimberly Now!](#)

Results not typical - results may vary.



Elaine, Vancouver, Canada

"Just wanted to share with everyone how I lost I lost over 100 pounds in just 6 months. That's right, for all you skeptics (I know because I was one for a long time), this is not a typo, 110 lbs to be exact using Hoodoba® hoodia diet pills. they worked like a charm for me... and if they worked for me they will work for anyone because I'm was always a serious eater!! Anyways, I think it deserves to be made known because in my opinion there is nothing better!" [See Elaine!](#)

Results not typical - results may vary.



Michael, San Antonio, TX

"I found the silver bullet I've been looking for. These hoodia diet pills took away my desire for the foods I crave along with 35 stubborn pounds I could never lose. The source of the energy and vigor I felt remains a mystery... Even now, some eight and half weeks later I still can't believe how easy it was to do. It seemed I was dreaming the "impossible dream". The results came quicker than I ever expected. Just thought I'd let you know. Thanks for making my dream come through -- finally. My wife included the pictures." [See Michael Now!](#)

Results not typical - results may vary.



Tracy, Butte, MT

"This thing has totally killed my appetite. I used to be a food fanatic but with these new Hoodoba® hoodia diet pills I've lost 42 pounds without missing the goodies I used to die for. I feel myself strong, energetic and confident."

P.S. The best part is I didn't have to drive myself crazy with exercise to lose the weight. I just had to remind myself not to take it too much as I wouldn't eat or be hungry!" [See Tracy!](#)

Results not typical - results may vary.



Charlene, Bridgeport, CT

"It is hard to start believing in yourself again when you look in the mirror and see a blimp. I was embarrassed about it, that is the truth. Too much "comfort food," too little discipline, and very little exercise had taken its toll. I felt there was no point in trying to lose so much weight. It just seemed too monumental. I felt waves of exhaustion just thinking about it. Then came the new Hoodoba® diet pill which changed EVERYTHING! In less than 5 months I dropped a whopping 84 pounds. Now, I'm back to my poster girl self, life is exciting and everything is GREAT! My husband is dismayed by my newly sculpted bod. He says externally I'm a whole new woman. Many thanks. Hoodoba® worked where nothing else could!" [See Charlene Now!](#)

Results not typical - results may vary.



Gail, Vancouver, Canada

"I had trouble getting on the diet wagon and had fallen into an apathetic, depressed fat lady mindset. With these Hoodoba® hoodia diet pills I can face the sea of junk food



Real Life Hoodia Stories



Results not typical - results may vary



Results not typical - results may vary



Results not typical - results may vary

This could be you!



without caving in... I have become the master of my destiny. Special thanks must go to the maker of this most unusual diet pill. Without its help, I would be still be in dumps getting worse as each day goes by. This pill is simply marvelous!" [See Gail Now!](#)

Results not typical - results may vary.



Yvonne, Virginia Beach, VA

"I gained almost 50 pounds in the last three years despite my efforts to lose weight. I exercise most days and I tried to watch what I eat. I once joined weight watchers and gained weight on the program. I had tried medications and talking to my Doctor, nothing seemed to be of help. At the end of the day after I get home I was ready to eat the world. I have not lasted more than a few days on a diet during this last year. Then a friend pleaded with me to try the new Hoodoba® diet pills. To my amazement they actually worked! It was a magnificent deception. They literally fooled my stomach into thinking it was full. Taking Hoodoba® I didn't have to watch what I eat because I had no desire to eat. It took just 3 months to lose all the weight I had gained in 3 years. Thank you so much. Hoodoba® has given me a new perspective on life! Here are my photos." [See Yvonne Now!](#)

Results not typical - results may vary.

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★★★★★ 612 Reviews

Order Hoodoba® 500mg Liquid

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Lose weight FAST with Certified Pure South African Hoodia

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Results not typical - results may vary

The first folks to have their lives changed by Hoodoba.



Hoodoba® Hoodia Gordonii weight loss products are made by the original Hoodia brand that brought Hoodia Gordonii to America and was featured on CBS 60 Minutes.

MADE FOR YOU & ME
MADE IN
AMERICA

Hoodoba® Hoodia Diet Pills and Liquid Hoodia Extract are manufactured in the USA under strict FDA guidelines.



The Heart of the Matter

Worldwide fascination with hoodia has bred strong curiosity within the mainstream, but do most people know what real hoodia is? What is the difference between traditional Hoodia gordonii, the many cheap knock-offs and weak hoodia products that have arrived on the scene? There is some misunderstanding, and the need exists for clarity in defining authentic hoodia from the fakes and weaker adulterated versions.

People are beginning to realize that in order to obtain the desired results, concocted credentials and superficial skimming won't stand up to scrutiny.

What guidelines should we use to distinguish hoodia that works from shams?

First, do not rely entirely on C.I.T.E.S. as proof of authenticity (one will be included with your order if requested). Why? Even easier than in the "offline-world", documents in cyberspace can be easily manipulated (not merely whitened out) to appear quite convincing to the onlooker.

Moreover, even if the C.I.T.E.S. is real, it doesn't tell you how much, if any, of the hoodia actually made it into the finished product.

TRUTH IS, to be 100% certain what you have is the true full-strength South African hoodia there is only one thing you need to know...

- [FUCOIDAN OVERVIEW](#)
- [FUCOIDAN BENEFITS](#)
- [FUCOIDAN EXTRACT](#)
- [FUCOIDAN RESEARCH](#)
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BUY NOW

What is Fucoidan?

The Ocean's Secret to Improved Health

Many people today are searching for a natural health aide that can improve their general well-being or help improve symptoms of significant diseases. While there are many useful natural health aides on the market, one of the most significant natural health supplements has recently become more popular.

Though it has been largely neglected in Western parts of the world, brown seaweed has been consumed in East Asia for thousands of years. This “sea vegetable” has recently been the subject of more than a thousand clinical studies due to its remarkable [health benefits](#). Research has shown that certain species of brown seaweed – particularly wakame, kombu, hijiki, mozuku and bladder wrack – contain a complex sulfate polysaccharide called Fucoidan.

What is Fucoidan?

Pronounced “Foo – Koy – Den,” this substance is a string of complex sugar molecules (also called a dietary fiber). While it does have wonderful fat-burning and blood pressure-reducing qualities, Fucoidan has been [researched extensively](#) mostly because of its unique anti-viral, anti-cancer, and immunomodulating qualities.

Fucoidan naturally occurs in the cell walls of certain forms of brown seaweed, brown algae, and a few species of marine animal life (including sea snails, sea cucumbers, and urchins). No land-based animal has been known to possess this amazing molecular compound, and it is likely this reason that Fucoidan's health benefits have only just come to light.

A Proven Part of a Healthy Diet

In truth, it is surprising that no one caught on earlier to the amazing health benefits of brown seaweed like wakame. On the Japanese island of Okinawa, Fucoidan-rich seaweed has been a part of the traditional diet for thousands of years. This is significant because Okinawans have statistically had the highest rates of people living over 100 years of age since the beginning of recordings; Okinawa is also known to have an incredibly low mortality rates caused by cancer and cardiovascular diseases.

Sadly, since the 1960s and Western influence have come into Okinawan territory, these rates have begun to dip. As the Okinawan diet has changed, so has their longevity. In spite of recent dietary changes, Okinawa and the small Ryukyu Islands south of Japan still have the highest rates of centenarians in the world. Fucoidan is a completely natural substance found in brown seaweed. Because it has been consumed for thousands of years by most East Asian cultures, you can be assured that it is both safe and incredibly healthy for human consumption.

Health Benefits

This naturally occurring health supplement can be an [incredibly effective health aid](#) once it has been extracted from the seaweed. Fucoidan is even more beneficial to take as an extract than in its natural form; a person would need to eat nearly ten pounds of seaweed to gain the equivalent of 1.25 grams of Fucoidan extract. Since seaweed is naturally

What is Fucoidan? Fucoidan Extract

high in iodine, ten pounds of seaweed would lead to iodine poisoning and thyroid problems; thankfully, condensed and concentrated Fucoidan extract is available without the risk of iodine poisoning when taken appropriately.

Below are some of the amazing health benefits that Fucoidan has to offer that have been researched and proven to be effective:

- *Helps fight off viral infections
- *Reduces cholesterol
- *Relieves HIV, HSV, and Hepatitis C & D symptoms
- *Removes the threat of free radicals
- *Reduces high blood pressure
- *Improves liver health
- *Contains anti-cancer properties
- *Relieves harmful chemotherapy & radiation side effects

Many of Fucoidan's health benefits are in part due to its unique ability to boost the human immune system. Fucoidan is a natural chemical, and therefore does not have the harmful side effects of synthetic chemicals. It does not introduce unnatural chemicals into the body to fight off your infections for you. Instead, the Fucoidan stimulates your own immune system into defending you the way it is meant to.

HSV/HIV/Hepatitis & Antiviral Health

Some diseases, such as the herpes simplex virus, HIV, and Hepatitis C & D are inhibited by the immune-boosting effects of Fucoidan. These diseases are insidious – they hide within the remains of healthy cells so white blood cells cannot find them. Fucoidan helps the immune system by improving it and helping it seek out cells infected by the virus. There is no true cure for any of these viruses, but Fucoidan can help reduce the chance of outbreaks for HSV sufferers, and can help improve quality of life for those suffering from other viral diseases.

Cancer, Tumors, and Liver Fibrosis

Fucoidan can even help mitigate the effects of very severe conditions. In research studies, this natural substance has displayed the ability to combat cancer by inducing cancer cell apoptosis (cell death). In addition to apoptosis of existing cells, Fucoidan also protects healthy cells to reduce their chances of being overcome with the virus. Similarly, Fucoidan can be taken to reduce the size of tumors and decrease their chances of growing. If taken preventatively, it can even help reduce the chance of developing more tumors.

Hepatitis C is a common cause of liver fibrosis. Liver fibrosis occurs when the liver's healthy tissue is replaced with scar tissue, interrupting healthy liver function. Studies have shown that taking Fucoidan can help reduce the amount of fibrotic tissue in the liver, and can also prevent more fibrosis from occurring.

Many natural health supplements do not have the years of dedicated research that Fucoidan has had. Some people grow tired of these dubious claims, but there is no reason to look any further for a natural health aide that can truly boost your immune system and help protect you from potential diseases and disorders. The research doesn't lie, and the [health benefits of Fucoidan are undeniable!](#)

Still not convinced? Read more about Fucoidan's [health benefits](#) or some [research summaries](#) of the more than one thousand independently reviewed studies that are available on the U.S. National Library of Medicine.

Categories

- [Uncategorized](#) (10)

Search

Exhibit F, p. 2

- [FUCOIDAN OVERVIEW](#)
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BUY NOW

Furoidan Extract Health Benefits

What Can Furoidan Do For Me?

The Benefits of Brown Seaweed – Fact or Fiction?

Seaweed has been used in traditional Chinese medicine for hundreds of years. Though there is an understandable amount of skepticism regarding the use of Chinese natural medicine, some people may be surprised to find that there are actual benefits to consuming certain forms of seaweed – brown seaweed to be precise. This is because brown seaweed such as [wakame](#), [hijiki](#), [kombu](#), and [mozuku](#) all have unique complex molecules called Furoidan. Furoidan is a [dietary fiber](#) that benefits the body by doing more than just burning fatty lipids like cholesterol and triglycerides – it has a slew of research-driven health benefits as well.



What are the long-term effects of a Furoidan-rich diet?

Recently, information has come to light that the Furoidan present in brown seaweed may be responsible for the significantly low mortality rate caused by cancer and cardiovascular diseases on the Japanese island of Okinawa. Although things have begun to change since the 1960s and encroaching Western influence, the Okinawan people have had a very traditional diet that seaweed plays a large role in. Okinawans have statistically been one of the longest-living people since recorded age analysis, with as many as 34 centenarians for every 100,000 inhabitants, a ratio much higher than the rest of the world – a ratio that scientists are still scrambling to understand.

Is seaweed the only way to get the benefits of Furoidan?

Exhibit G



How Fucoidan Works Against HIV/AIDS

By Fucoidan Force | Fucoidan Facts, Fucoidan Health

2

Home » Fucoidan Health » How Fucoidan Works Against HIV/AIDS



Fucoidan's Antiviral Properties Help Control HIV/AIDS

With its powerful antiviral properties, fucoidan works to relieve and prevent the chronic symptoms caused by incurable infections. HIV/AIDS is a deadly viral infection that causes some of the most discomforting and life-threatening symptoms. Not only

can fucoidan help to control the virus and soothe existing health conditions caused by the infection, it works to prevent uninfected individuals from contracting the virus and strengthens the immune system against the common cold and flu.

The Incredible Results:

A few studies have been published in the National Library of Medicine database and, though more research needs to be done, fucoidan has already shown strong abilities against AIDS and HIV infection. Results from one study showed that fucoidan works against HIV/AIDS by protecting healthy cells from becoming infected. This means that fucoidan has the ability to protect non-infected persons from the virus and keep the infection from spreading to healthy cells in those already infected. Keeping the virus from spreading in a person who already carries HIV/AIDS could help to slow or halt the progression of the disease.

A separate study evaluated the effectiveness of fucoidan as a treatment for HIV/AIDS. There are many obstacles to treating this complex infection, including toxicity, resistance, and high expense of treatment. Scientists were interested in fucoidan as an anti-HIV-1 compound due to its [anti-herpes simplex activity](#). Of the five fucoidan compounds studied, two of the extracts showed potent anti-HIV-1 activity. Another interesting discovery was that this anti-HIV-1 activity was not a result of fucoidan working as a virucidal, but rather as a direct consequence of its ability to inhibit the early events of viral replication.

From the Experts



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Don't Be A Victim

Have you left yourself vulnerable to illnesses and diseases because you've neglected the key protector of your health — your immune system? Well, you don't have to become a victim or a statistic. And you don't have to suffer the daily distress or premature mortality associated with widespread immunonutrients deficiency. We have cut through the red tape to uncover and provide the hard-hitting data and scientific proof that has led to the creation of what studies have shown to be the world's Ultimate Immune-Boosting Supplement.

Why Immune Strong™ with Agaricus Works



- No Prescription
- No Chemicals
- All-Natural
- Gluten-Free

- No Additives
- No Side-Effects

WITH FDA & GRAS SAFETY RECOGNITION

Immune Strong™'s unique combination of 18 powerful antiviral, anti-inflammatory immune-boosting ingredients utilizes a multi-factorial breakthrough scientific approach to keep every facet of your immune system strong and operating at its peak.

The body is designed to protect and heal itself, but because the foods we eat are packed with pesticides and void of the critical immunonutrients we need to maintain our defenses, it's becoming more and more difficult to maintain good health. Whatever the cause of its inability to keep-up, the breakdown of your body's natural defense system is putting your health and your life in danger. In a world of deadly pathogens and disease-causing agents — **Immune Strong™** can keep you healthy, strong and disease-free. Taking a full-spectrum immune booster like **Immune Strong™** as part of your general wellness regimen can make all the difference between dying and living and keeping your health in tact.

Scientists Unlock the Secret of Natural Killer Cells and Prove You are Only as Strong as Your Immune System...

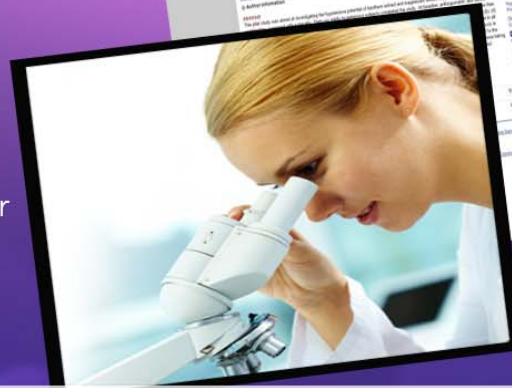
Exhibit I

The immune system is a vast complex network of biological processes



Ingredients Supported By Scientific Studies

Researchers identify natural extracts that lower blood pressure without the side effects.



Lower Your Blood Pressure Naturally, Now

We all know the modern lifestyle is full of stresses. Couple that with environmental pollution and a bad diet and high blood pressure can be fatal.

The latest statistics from the [CDC \[6\]](#) tell us:

- 70 million American adults have high blood pressure.
- In 2013, high blood pressure was a contributing cause to over 360,000 deaths.
- Despite the fact 70% of people with high blood pressure use medication to treat their condition, they're still dying at a rate of over 1,000 per day.

There is even more cause for concern. A review of clinical trials involving 8912 participants from 1946 to 2013 by an independent panel of medical



High blood pressure puts you at risk for heart disease and stroke the leading causes of death in the United States.

often over prescribed for at-risk patients, sometimes with dangerous side effects [7].

Those are some facts and scary numbers. They tell us clearly that the current approach to treating these issues doesn't seem to be working so well and something else is needed.

If you're at risk of developing high blood pressure; If you're struggling to keep your blood pressure low; If you've tried everything and nothing seems to be working, we have good news: VascuVite™ can provide the missing piece of the puzzle. It

What makes VascuVite™ Your Best Choice?

- Best Nutritional Shield Strategy for Natural Blood Pressure Management

VascuVite™ is the best nutritional shield strategy for natural blood pressure management, providing 11 key natural ingredients to maintain healthy blood pressure.

[Learn More](#)

- The Best All Natural BioActive Ingredients

We source the best heart-healthy ingredients that have proven blood pressure lowering effects - from oleuropein, a polyphenol in olive leaf, to the ancient healing power of Hawthorn, cherished worldwide for its medicinal qualities. VascuVite™ contains these superfoods:

Calcium

Magnesium

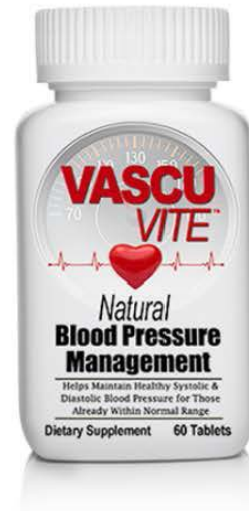
Zinc

Calcium, Seafood, and...

independent panel of medical professionals found that blood pressure medication was

combines powerful plant-based antioxidants and critical micro-nutrients necessary to help you get to the root of these challenges.

VascuVite™ Natural Blood Pressure Management



Do It Now Before It's Too Late

Proactive blood pressure management is key. High blood pressure increases the risk of heart attack or stroke as we age.^[6] Considering all the dangers, it's important to start managing your blood pressure now.

VascuVite™ can be a powerful ally. It is one-of-a-kind broad-spectrum formula that provides key bio-active compounds needed on a daily basis to help safeguard cardiovascular health. This multi-action formula maintains blood pressure within normal limits, naturally.



Scientifically Proven Ingredients Sourced From Nature



Magnesium



Ayurvedic Herbs



Celery Seed



Potent Berries



Olive Leaf

Celery Seed Extract

Olive Leaf Extract

Grape Seed Extract

Pomegranate Extract

Standardized Hawthorn Extract

Taurine

Convolvulus Pluricaulis

Terminalia Arjuna

[Learn More](#)

Backed by the Latest Scientific Research

The VascuVite™ proprietary blend of ingredients is backed by new and relevant scientific research. Today's research. Today's Results! We use only peer-reviewed scientific research from respected medical journals to show the benefits of our ingredients.

[Learn More](#)

30 Day Money Back Guarantee

We stand behind each bottle we sell! We're so confident that you'll be pleased with your purchase, all VascuVite™ purchases come with our industry-leading 30-Day Money Back Guarantee.

Free Shipping*

Free shipping on all bottles. Please note that free shipping does not apply to the monthly plan.

Very Important

Never stop taking your blood pressure medication without your doctor's permission.



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What Are Your Blood Pressure Numbers?



Did you know that your heart has to push blood throughout your entire body? It does this through a network of blood vessels called arteries. The force it takes to push your blood is called **blood pressure**. Your blood pressure rises with each heart beat (maximum blood pressure) and lowers when your heart relaxes (minimum blood pressure).

When you have your blood pressure measured, the results show as one number over the other. The first number, called **systolic**, measures the pressure in your circulatory system when the heart beats. The second number that measures when the heart relaxes between beats is called **diastolic**.

Maximum Blood Pressure – Systolic
Minimum Blood Pressure – Diastolic



Above: David Shelton, Age 55,
experienced a noticeable reduction in his

If you step on a garden hose, the pressure inside the hose rises because the flow of water is restricted. Similarly, when your arteries are restricted, blood pressure rises.



Sheila Henderson, Age 48,
experienced a noticeable reduction
in her blood pressure.

Proactive steps can be taken to maintain a healthy blood pressure range. Changes in diet, exercise, and targeted nutritional supplementation can help lower blood pressure and strengthen the cardiovascular system.

On occasion, our happy customers write us with their before and after blood pressure results. The changes can be dramatic. David Shelton, age 55, changed from 138/150 S/D to 116/79 S/D. Incredible!

We invite you to try VascuVite™ and send us your results! Results will vary based on the individual. Vascuvite™ comes with an Industry Leading 30-Day Money Back Guarantee. If you are not fully satisfied for any reason, you may return the rest of your VascuVite™ within 30 days from the order date for a refund.

What makes VascuVite™ Your Best Choice?

Best Nutritional Shield Strategy for Natural Blood Pressure Management

VascuVite™ is the best nutritional shield strategy for natural blood pressure management, providing 11 key natural ingredients to maintain healthy blood pressure.

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Magnesium

Zinc

Celery Seed Extract

Olive Leaf Extract

Grape Seed Extract

Pomegranate Extract

Standardized Hawthorn Extract

Taurine

Convolvulus Pluricaulis

Terminalia Arjuna

[Learn More](#)

Backed by the Latest Scientific Research

The VascuVite™ proprietary blend of ingredients is backed by new and relevant scientific research. Today's

Experienced a noticeable reduction in his blood pressure.



162/104

Before 118/80

After

JULIA KOWALSKI
AGE: 68

Above: Julia Kowalski, Age 68, experienced a noticeable reduction in her blood pressure.

When plaque is in the arteries around the heart (Atherosclerosis), blood pressure rises.



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research. Today's Results! We use only peer-reviewed scientific research from respected medical journals to show the benefits of our ingredients.

[Learn More](#)

30 Day Money Back Guarantee

We stand behind each bottle we sell! We're so confident that you'll be pleased with your purchase, all VascuVite™ purchases come with our industry-leading 30-Day Money Back Guarantee.

Free Shipping*

Free shipping on all bottles. Please note that free shipping does not apply to the monthly plan.

Very Important

Never stop taking your blood pressure medication without your doctor's permission.



Read More: VascuVite™
Heart-Healthy Ayurvedic
Ingredients

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\$27

Save \$20/month
\$9.95 shipping





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- A. Adequately represent products and services, including clear and candid disclosures of all material terms.
- B. Communicate to customers all material facts about the product or service being sold.
- C. Ensure that all written materials are readily available, clear, accurate and complete.

2. **Be Transparent**

- A. Openly identify the nature of the business and clearly disclose:
 - All policies, guarantees and procedures that weigh upon a customer's decision to buy;
 - Direct and effective means to contact the business;
 - The terms of any written contract;
 - Any guarantees or warranties accompanying a product;
 - Any restrictions or limitations imposed (e.g. limited supply, maximum number available per customer);
 - The business' return/refund policy;
 - Any recurring commitment into which the customer may be entering, including information on how future billing will occur;
 - Total cost of the transaction, including tax, shipping and handling, and other related charges;
 - Any required product labeling information; and

Exhibit L, p. 2

- The nature and terms of shipping, including any known delays or shortages of stock.

B. Provide:

- An opportunity to review and confirm the transaction before the sale is completed; and
- A receipt summarizing the transaction after the purchase.

C. Honor representations by correcting mistakes as quickly as possible.

3. **Safeguard Privacy & Secure Sensitive Data**

A. Respect privacy by disclosing to customers:

- What information they collect;
- With whom it is shared; and
- How it is secured.

B. Secure Sensitive Data

- eBusinesses that collect sensitive data (credit cards, bank account numbers, Social Security numbers or other personal financial information) will ensure that it is transmitted via secure means.
- eBusinesses will make their best effort to comply with industry standards for the protection and proper disposal of all sensitive data, both online and offline.

4. **Honor Customer Preferences & Embody Integrity**

A. eBusinesses agree to respect customer preferences regarding contact by telephone, fax and e-mail, and agree to remedy the underlying cause of any failure to do so.

B. Approach all business dealings, marketplace transactions and commitments with integrity.

C. EthicalSite.com has a zero tolerance policy for any company that sends out "spam" emails. Any member found distributing unsolicited bulk email will have their Trust Seal immediately revoked.