

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES**

In the Matter of

**HEALTH RESEARCH LABORATORIES, LLC,
a limited liability company,**

**WHOLE BODY SUPPLEMENTS, LLC,
a limited liability company, and**

**KRAMER DUHON,
individually and as an officer of
HEALTH RESEARCH LABORATORIES, LLC
and WHOLE BODY SUPPLEMENTS, LLC.**

DOCKET NO. 9397

COMPLAINT COUNSEL’S OPPOSITION TO RENEWED MOTION TO QUASH

Respondents have made their prior counsel, Olshan Frome Wolosky LLP (“Olshan”), central to this matter by blaming consultants engaged at Olshan’s suggestion for Respondents’ admittedly unlawful advertising. Consequently, what those consultants told Respondents before they chose to run their deceptive advertising is crucial to determining the appropriate scope of relief. Yet Respondents refuse to produce their consultants’ work, and their consultants dubiously claim they no longer possess it. As a result, Complaint Counsel had no choice but to seek this important nonprivileged material from Olshan directly.

Respondents claim attorney-client privilege, but their blanket assertion that everything Olshan may possess is allegedly “confidential” does not meet their burden. To prove consulting materials are privileged, Respondents must establish that the consultants worked exclusively to help Olshan provide legal advice, or that they are the “functional equivalent” of Respondents’ own employees. Here, neither is true. Accordingly, because Olshan possesses relevant, nonprivileged documents not available elsewhere, Respondents’ motion must be denied.¹

¹ Complaint Counsel’s March 30 motion to reschedule the evidentiary hearing to permit more time for discovery is pending before the Commission.

BACKGROUND

A. Whether Respondents Acted Deliberately

Importantly, Respondents have asserted to Complaint Counsel that both Olshan and certain consultants Olshan directed them to engage approved the advertisements at issue.² CCX-A ¶2. Of course, whether Respondents acted deliberately is relevant to the scope of relief. See, e.g., *Telebrands Corp. v. FTC*, 457 F.3d 354, 358 (4th Cir. 1996). Following the legitimate advice of qualified professionals counsels against broad relief whereas ignoring or failing to obtain such advice suggests deliberateness. As such, nonprivileged communications with consultants that Olshan possesses are critical to the scope of relief.³

B. Naturopathic Consultant Inna Yegorova

Communications with Olshan’s “go-to” substantiation consultant, Inna Yegorova, are particularly important. Significantly, Yegorova’s work commenced years before the FTC began investigating the supplements at issue on December 18, 2018⁴—Respondents engaged Olshan on January 7, 2015. CCX-B ¶2. Olshan suggested that Respondents hire Yegorova on January 19, 2015, and Respondents engaged her directly as a consultant. See CCX-A ¶4.

██ which is alternative medicine “that employs an array of pseudoscientific practices branded as ‘natural,’ ‘non-invasive,’ or

² In fact, Respondents have refused to pay Olshan’s last invoice and demanded that Olshan put its liability carrier on notice. CCX-A ¶3.

³ Notwithstanding the ALJ’s order compelling production, Respondents have stated that they may not comply fully, or at all. CCX-A ¶13; see also Mtn. to Reconsider (Apr. 13, 2021) at 3 (“advis[ing] the ALJ that the **Respondents do not intend to produce documents**”) (emphasis added). However, assuming Respondents eventually produce the communications within their custody, Olshan possesses documents from their file that Respondents do not. CCX-A ¶11.

⁴ On January 7, 2015, the FTC sent a CID to Respondents, CCX-B ¶2, which did not cover diabetic neuropathy claims. It encompassed cardiovascular health claims, although the FTC narrowed it to exclude them later that month. CCX-C, Att. 1. The FTC first expressed “concerns” about the claims at issue on December 19, 2018, during a separate investigation by a different division. CCX-C, Att. 2.

promoting ‘self-healing.’”⁵ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] In fact, Respondents previously planned to call Yegorova to testify about the supplements’ “[d]evelopment, review, revision, and/or approval of advertising and marketing,” as well as “substantiation related to claims” in that advertising. Witness List (Jan. 29, 2021) at 4-5.

Notably, Yegorova performed similar functions for other marketers that engaged Olshan attorneys Sheldon and Andrew Lustigman. For instance, the Commission secured an industry ban against Glenn Braswell, a promoter who marketed pills that supposedly treated emphysema and Alzheimer’s disease, among other things.⁶ Sheldon Lustigman represented Braswell,⁷ and testimony from one of Braswell’s marketers revealed that Yegorova served as his scientific “director” who sometimes reviewed ads. CCX-C, Att. 5 188:15-19; 204:8-205:6.

Likewise, the FTC sued Olshan client Nordic Clinical in 2017 for claiming through direct mail that their supplements could relieve pain “26 times longer” than competitors, and accelerate recovery in physical therapy by “368%.”⁸ Yegorova testified that she { [REDACTED]

[REDACTED]

⁵ *Natropathy*, Wikipedia (accessed Mar. 1, 2021); *see also* CCX-C ¶4 Att. 4, Kimball Atwood, M.D., *Natropathy: A Critical Appraisal*, www.medscape.com (Mar. 1, 2021).

⁶ *FTC v. Braswell*, No. 3-cv-3700 (C.D. Cal. May 27, 2003) (ECF No. 1).

⁷ *FTC v. Braswell*, No. 3-cv-3700 (ECF No. 759) at 29. Sheldon Lustigman then worked for his own firm.

⁸ *FTC v. Mile High*, No. 20-cv-21622 (S.D. Fla. Apr. 17, 2020) (ECF No. 1).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

As Complaint Counsel’s prior discovery motions made plain, Respondents generally refused to produce documents, including Yegorova’s materials. That refusal continues and, in any event, Respondents likely do not possess all relevant communications with Yegorova. *See supra* at 2 n.2. Complaint Counsel also subpoenaed Yegorova directly. However, consistent with her questionable document destruction practices, Yegorova denies possessing responsive material. CCX-C, Att. 7.

C. Marketing Consultant Kent Komae

While working with Olshan, Respondents engaged other consultants including Kent Komae, who [REDACTED]

[REDACTED] CCX-A ¶6. Notably, the FTC sued A.S. Research for claiming through direct mail that their supplements could, among other things, reduce pain “83%” in a month and provide a “30% increase in flexibility in just 7 days”—improvements substantial enough that mobility-limited patients could give up their walkers.⁹ [REDACTED]

[REDACTED]

Unsurprisingly, the A.S. Research ads are strikingly similar to Respondents’ ads (and, in fact, both sets are strikingly similar to the Nordic Clinical ads referenced above). CCX-D ¶2 Att. 1 (visually illustrating similarities).

Respondents have not produced Komae’s materials. When Complaint Counsel subpoenaed Komae, he responded: “I did *not* work on the projects mentioned in the Subpoena . . .

⁹ *FTC v. A.S. Research*, No. 19-cv-3423 (D. Colo. Dec. 5, 2019) (ECF No. 1) at 10. In both *Mile High* and *A.S.*, the Commission secured a monetary judgments and detailed conduct relief through consent orders.

.. I have no documents[.]” CCX-C, Att. 9 (Komae’s emphasis). [REDACTED]

[REDACTED] Consequently, as with Yegorova, it is likely Olshan has relevant, nonprivileged communications from Komae.¹⁰

D. Respondents’ Position

Respondents’ position concerning the Olshan subpoena has varied. First, before moving to quash initially,¹¹ Respondents explained that they cannot access their file at Olshan, CCX-A ¶11, although Olshan cannot withhold them “absent a substantial showing of good cause[.]” *Sage Realty Corp. v. Proskauer Rose*, 294 A.D.2d 190, 191 (N.Y. App. 2002). According to Respondents, Olshan will not produce the files until Respondents pay Olshan’s bill, but Respondents refuse given Olshan’s alleged malpractice. CCX-A ¶11.

Second, also before moving to quash initially, Respondents asserted that seeking information from former counsel is improper, CCX-A ¶12, which makes little sense because Respondents have refused to comply with discovery generally and, in any event, they deny possessing everything Olshan does. Furthermore, Complaint Counsel’s attempts to obtain the material from the consultants directly have failed because they deny possessing any documents, although (as also discussed above), [REDACTED]

Third, Respondents’ motion cites privilege, but it contains no argument or detailed evidentiary support. In fact, its only support is a declaration from Respondents’ CEO who states that the subpoenaed materials are “confidential,” CCX-B ¶2—he does not assert, let alone establish, any privilege.

¹⁰ There are other consultants as well. For example, Respondents proposed to call Dr. Richard Cohen to testify about substantiation. Witness List at 6. Dr. Cohen [REDACTED] yet Respondents have produced only limited material reflecting this review, CCX-A ¶9, and Dr. Cohen denied possessing any, *id.* ¶10.

¹¹ Respondents filed an earlier motion that the ALJ denied without prejudice.

Notably, Respondents' motion *does not contend* that the subpoena seeks irrelevant information. Nor could Respondents honestly so contend, because their communications with consultants are plainly relevant to whether they acted deliberately.

Legal Standard

As the party asserting a privilege, Respondents must "provide sufficient underlying facts to establish the privilege claim." *Hoechst Marion*, 124 F.T.C. 649, 659 (1997) (quotation omitted).

Argument

I. Blanket "Confidentiality" Assertions Are Inadequate.

Respondents' motion simply asserts that all subpoenaed documents are necessarily privileged because Olshan represented Respondents. However, this "blanket assertion of attorney-client . . . privilege[] is insufficient to satisfy [Respondent's] burden." *Hoechst Marion*, 124 F.T.C. 649, 659 (1997) (quotation omitted); *see also Union Oil Co.*, No. 9305, 2003 WL 21642422, *4 (June 30, 2003) ("Turner's bald assertion, with no detail or explanation . . . is not sufficient to sustain its burden."). In fact, Respondents' two-paragraph declaration asserts only that the materials are "confidential," CCX-B ¶ 2, however "the fact a document may be 'confidential' alone does not insulate it from discovery." *Brown-Thomas v. Hynie*, 2020 WL 6737757, *8 (D.S.C. Nov. 17, 2020); *see also U.S. Bank Nat'l Ass'n v. PHL Variable Ins. Co.*, 2016 WL 1258466, *2 (D. Minn. Mar. 30, 2016) ("[A] document is not automatically privileged merely because it involves an attorney and a client or because it is labeled privileged or confidential."). Because blanket "confidentiality" assertions cannot satisfy Respondents' burden, their motion must be denied.

II. Respondents Have Not Established That Consultant Materials Are Privileged.

Communications with consultants are privileged in only two situations: (1) when the consultant's role "is limited to helping a lawyer give effective [legal] advice," *Export-Import Bank v. Asia Pulp & Paper*, 232 F.R.D. 103, 113 (S.D.N.Y. 2005) (citing *U.S. v. Kovel*, 296 F.2d

918, 922 (2d Cir. 1961)); and (2) the consultant is “so thoroughly integrated” into the company that she qualifies as the “functional equivalent” of an employee, *see Export-Import*, 232 F.R.D. at 113. Neither circumstance applies here.

A. Respondents Have Not Proven Their Consultants Limited Their Work To Helping Olshan.

As discussed above, Respondents make clear—in communications to the FTC through Olshan—that their consultants’ functions included, among other things, [REDACTED]. Thus, they were “not employed by [Olshan] attorneys specifically to assist them in rendering legal advice,” and they had functions other than placing “information gained from [Respondents] into usable form for their attorneys to render legal advice[.]” *USPS v. Phelps Dodge Ref. Corp.*, 852 F. Supp. 156, 161 (E.D.N.Y. 1994); *see also FTC v. TRW, Inc.*, 628 F.2d 207, 209-12 (D.C. Cir. 1980) (explaining communications with consultant hired to study “[a] company’s complex computerized credit reporting system” would have been privileged if consultant was hired to put company’s computerized credit reporting system into a more understandable form for lawyers); *In re G-I Holdings*, 218 F.R.D. 428, 434 (D.N.J. 2003) (privilege only where the consultant functions as a “translator” between the attorney and client); *U.S. v. Chevron Texaco Corp.*, 241 F. Supp.2d 1065, 1072 (N.D. Cal. 2002) (for privilege to apply, consultant must “interpret[] the client’s otherwise privileged communications or data to enable the attorney to understand” them). Because the consultants here had roles beyond helping Olshan give advice, their communications are not privileged unless Respondents have proven they are *de facto* employees—which, as discussed below, they were not.

B. Respondents Have Not Proven That the Consultants Are the “Functional Equivalent” of Employees.

To determine whether a consultant is a *de facto* employee, courts consider various factors including their responsibilities, what information they possess, and “whether there was a continuous and close working relationship” with the company “on matters critical to the

company's position in litigation." *Export-Import*, 232 F.R.D. at 113 (citation omitted).

Critically, Respondents' have the burden to show the consultants' integration into their corporate structure, *see id.*, which requires "a detailed factual showing," *A.H. v. Evenflo Co.*, 2012 WL 1957302, *4 (D. Colo. May 31, 2012); *see also Energy Capital Corp. v. United States*, 45 Fed. Cl. 481, 492 (2000) ("[A] detailed factual showing is necessary to establish the relationship between a third party that is sought to be included within the . . . attorney-client privilege[.]").

Importantly, Respondents have made no such showing, nor could they. At least with respect to the supplements at issue, the consultants could not have worked entirely "on matters critical to [Respondents'] position in litigation," *Export-Import*, 232 F.R.D. at 113, because, as discussed above, their work started before the FTC began investigating the supplements at issue in the Complaint and, in fact, before the FTC filed any action against Respondents.¹² Indeed, if they were working in anticipation of litigation, they violated their document retention obligations by failing to preserve material. *See, e.g., Osf Healthcare Sys.*, No. 9349, 2012 WL 1561035, *2 (Mar. 27, 2012) ("[T]he duty to preserve evidence arises when a party knows or should know that certain evidence is relevant to pending or future litigation.").

Additionally, at least some consultants spent considerable time working for other parties—at minimum, as explained above, Yegorova and Komae worked for other FTC defendants at approximately the same time. *See Export-Import*, 232 F.R.D. at 113 (consultant working 80-85% for principal insufficient). There is also no evidence that these consultants "ever appeared on behalf of" Respondents, "corresponded with third parties as a representative of [Respondents]," have "been viewed by others" as Respondents' employees, or "maintained an office" with Respondents. *Steinfeld v. IMS Health*, 2011 WL 6179505, *3-*4 (S.D.N.Y. Dec. 9, 2011) (citing these factors).

¹² *See FTC v. Health Research Laboratories*, No. 17-cv-467 (D. Me. Nov. 30, 2017) (concerning other products and claims than those at issue here).

Finally, there is no evidence that the consultants had any decision-making authority. *See, e.g., Narayanan v. Sutherland Glob. Holdings Inc.*, 285 F. Supp. 3d 604, 617 (W.D.N.Y. 2018) (consultant not functional equivalent of employee where company, not consultant, retained authority to make decisions about the subject the consultant was hired to address). In short, Respondents have not proven their consultants are *de facto* employees, nor could they. *See, e.g., In re Currency Conversion Fee*, No. MDL-1409, 2003 WL 22389169, *2 (S.D.N.Y. Oct. 21, 2003) (consultant providing “standard trade service” not functional equivalent of employee).

Conclusion

For these reasons, Respondents’ motion must be denied.

Respectfully submitted,

s/ Jonathan Cohen

Elizabeth J. Averill

Jonathan Cohen

Federal Trade Commission

600 Pennsylvania Ave, NW, CC-9528

Washington, DC 20580

(202) 326-2993 (Averill); -2551 (Cohen)

Eaverill@ftc.gov; Jcohen2@ftc.gov

(202) 326-3197 (facsimile)

Complaint Counsel

STATEMENT CONCERNING CONFIDENTIALITY

The content of the foregoing submission and certain exhibits contain information designated confidential or otherwise subject to confidential treatment pursuant to the standing Protective Order. Accordingly:

- Complaint Counsel has attached a copy of the Protective Order;
- Complaint Counsel will immediately provide notice to two third-party submitters of confidential material (this Statement serves as notice to Respondents);
- Complaint Counsel has attached a copy of each page of this filing on which confidential material appears; and
- If the Commission intends to disclose any confidential material in a final decision, it should contact:

With respect to CCX-A ¶6 and CCX-C ¶8:

Albert Shawe Watkins, Esq.
Kodner Watkins, LC
7733 Forsyth Boulevard, Suite 600
St. Louis, Missouri 63105
(314) 727-9111; AlbertSWatkins@kwklaw.net

With respect to CCX-A ¶6 and CCX-C ¶8:

Sheldon S. Lustigman, Esq.
Olshan Frome Wolosky LLP
1325 Avenue of the Americas
New York, New York 10019
(212) 451-2262; SLustigman@OlshanLaw.com

With respect to all other confidential material:

Joel Reese, Esq.
Reese Marketos LLP
750 N. Saint Paul St., Suite 600
Dallas, Texas 75201
Joel.reese@rm-firm.com
Counsel to Respondents

Complaint Counsel disagrees with certain of Respondents' "confidential" designations and reserves the right to challenge those designations.

s/ Jonathan Cohen
Jonathan Cohen
Federal Trade Commission
600 Pennsylvania Ave, NW, CC-9528
Washington, DC 20580
(202) 326-2551; jcohen2@ftc.gov

CERTIFICATE OF SERVICE

I certify that I served a copy of the public version of Complaint Counsel's Opposition to Motion to Quash on counsel for the Respondents on April 14, 2021 via electronic mail, and the nonpublic version via SFTP.

Joel Reese
Joshua Russ
Reese Marketos LLP
750 N. Saint Paul St., Suite 600
Dallas, Texas 75201
Joel.reese@rm-firm.com
Josh.russ@rm-firm.com

I also served one electronic copy of both public and nonpublic versions via the Administrative E-Filing System and one electronic courtesy copy to the **Office of the Secretary** via email to ElectronicFilings@ftc.gov.

I served one electronic courtesy copy via email to the **Office of the Administrative Law Judge**:

The Honorable D. Michael Chappell
Administrative Law Judge
600 Pennsylvania Ave, N.W., Room H-110
Washington, DC 20580

s/ Jonathan Cohen
Jonathan Cohen
Federal Trade Commission
600 Pennsylvania Ave, NW, CC-9528
Washington, DC 20580
(202) 326-2551; jcohen2@ftc.gov

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES**

In the Matter of

**HEALTH RESEARCH LABORATORIES, LLC,
a limited liability company,**

**WHOLE BODY SUPPLEMENTS, LLC,
a limited liability company, and**

**KRAMER DUHON,
individually and as an officer of
HEALTH RESEARCH LABORATORIES, LLC
and WHOLE BODY SUPPLEMENTS, LLC.**

DOCKET NO. 9397

DECLARATION OF JONATHAN COHEN

I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify as follows:

1. I am a United States citizen and am over eighteen years of age. I am employed by the Federal Trade Commission (“FTC”) as an attorney in the Division of Enforcement, Bureau of Consumer Protection. I am acting as Complaint Counsel in the above-captioned matter.
2. During multiple teleconferences, Respondents’ counsel has repeatedly asserted that Olshan Frome Wolosky LLP (“Olshan”) directed them to engage particular consultants, and that Olshan and some of the consultants approved the advertisements at issue.
3. According to Respondents, they have refused to pay Olshan’s last invoice, demanded that Olshan put its liability carrier on notice, and will consider a malpractice claim after this matter concludes.

4. In a teleconference with Respondents' current counsel, Respondents' current counsel stated that Respondents engaged Yegorova at Olshan's suggestion on January 19, 2015. In a teleconference with Sheldon Lustigman, acting in his capacity as counsel to Inna Yegorova, Lustigman explained that Respondents engaged Yegorova directly.

5. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]

10. In response to a subpoena from Complaint Counsel, Dr. Cohen denied possessing documents reflecting his review of the supplements at issue.

11. Through their current counsel, Respondents have represented to Complaint Counsel that Olshan refuses to provide them with their entire file until Respondents pay Olshan's bill, which Respondents will not do because they contend Olshan breached its duties to Respondents through the allegedly erroneous advice Olshan gave.

12. Respondents have informed Complaint Counsel that seeking the information at issue from their former counsel is improper.

13. Respondents have informed Complaint Counsel that they will not comply with the April 6, 2021 order compelling production.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: April 13, 2021

/s/ Jonathan Cohen

Washington, D.C.

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF THE ADMINISTRATIVE LAW JUDGES**

In the Matter of

**HEALTH RESEARCH LABORATORIES, LLC,
a limited liability company,**

**WHOLE BODY SUPPLEMENTS, LLC,
a limited liability company, and**

**KRAMER DUHON,
individually and as an officer of HEALTH
RESEARCH LABORATORIES, LLC and
WHOLE BODY SUPPLEMENTS, LLC**

DOCKET NO. 9397

DECLARATION OF KRAMER DUHON

I, Kramer Duhon, hereby declare:

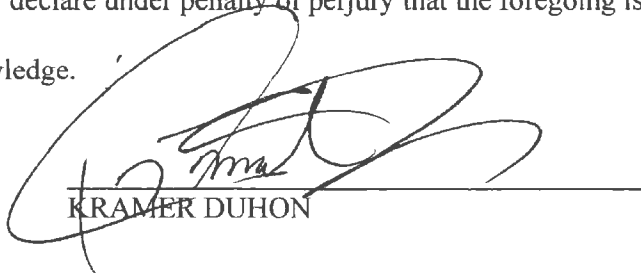
1. My name is Kramer Duhon. I am the CEO of Health Research Laboratories, LLC and Whole Body Supplements, LLC. I make this declaration based on personal knowledge of the facts set forth herein.

2. On or about January 7, 2015, I received a Civil Investigative Demand (“CID”) from the Federal Trade Commission (“FTC”) and immediately hired the law firm of Olshan Frome Wolosky LLP to represent the Respondents in connection with CID and all other legal issues related to the FTC. From January 7, 2015 until approximately November 13, 2019, the lawyers at Olshan represented me and provided legal advice regarding all issues and disputes with FTC. The Respondents have had no relationship with Olshan or its attorneys other than an attorney-client relationship. I, and the other Respondents, consider all of the



documents, files, and communications within Olshan's possession, custody or control to be confidential.

Pursuant to 28 U.S. C. § 1746, I declare under penalty of perjury that the foregoing is true and correct based on my personal knowledge.



KRAMER DUHON

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of

**HEALTH RESEARCH LABORATORIES, LLC,
a limited liability company,**

**WHOLE BODY SUPPLEMENTS, LLC,
a limited liability company, and**

**KRAMER DUHON,
individually and as an officer of
HEALTH RESEARCH LABORATORIES, LLC
and WHOLE BODY SUPPLEMENTS, LLC.**

DOCKET NO. 9397

DECLARATION OF GRANT WELBY

I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify as follows:

I am a United States citizen over the age of 18. I received a bachelor's degree from The Johns Hopkins University in 2018. I am employed by the Federal Trade Commission ("FTC") as an Honors Paralegal in the Bureau of Consumer Protection, where I was assigned to work on *In the Matter of Health Research Laboratories*, Docket No. 9397.

1. A true and correct copy of correspondence from Mary Engle to Andrew and Sheldon Lustigman, dated January 30, 2015, is **Attachment 1** hereto.

2. A true and correct copy of correspondence from Robert Frisby to Andrew Lustigman, dated December 19, 2018, is **Attachment 2** hereto.

■ [REDACTED]

[REDACTED]

4. A true and correct copy of *Natropathy: A Critical Appraisal*, by Kimball C. Atwood IV, MD is **Attachment 4** hereto. I retrieved this article from Medscape.com on March 1, 2021.

5. A true and correct copy of excerpts of the deposition of Ernst M. Kloetzili, taken in *FTC v. Braswell*, No. 3-cv-3700 (C.D. Cal.), is **Attachment 5** hereto.

■ [REDACTED]

[REDACTED]

7. A true and correct copy of Inna Yegorova's subpoena response is **Attachment 7** hereto.

■ [REDACTED]

[REDACTED]

9. A true and correct copy of an email from Kent Komae to Elizabeth Averill, dated January 12, 2021, is **Attachment 9** hereto.

10. I researched two institutions from which Inna Yegorova claims to hold doctorates: Clayton College of Natural Health ("Clayton") and Westbrook University ("Westbrook").

11. Information online, including on Wikipedia, discloses that Clayton was a distance learning school located in Alabama that ceased operations in 2010. I also reviewed public information that the Department of Education makes available, as well as public information that the Council for Higher Education Accreditation ("CHEA") makes available. Based on this research, Clayton never held any accreditation that the Department of Education or CHEA recognize.

12. Information online, including on Wikipedia, discloses that Westbrook is a distance learning school currently located in West Virginia. I also reviewed public information that the Department of Education makes available, as well as public information that the Council for Higher Education Accreditation (“CHEA”) makes available. Based on this research, Westbrook never held any accreditation that the Department of Education or CHEA recognize.

13. On February 25, 2021, I spoke with Dr. Lizabeth Gregg, who I understood to be the President of Westbrook University. Gregg informed me that Westbrook no longer accepts new students, and will entirely cease operations once its remaining students complete their coursework.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: April 13, 2021

/s/ Grant Welby

Washington, D.C.

Attachment 1



Division of Advertising Practices

United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

January 30, 2015

Via Email and Federal Express

Andrew B. Lustigman, Esq.
Sheldon S. Lustigman, Esq.
Olshan Frome Wolosky LLP
Park Avenue Tower
65 E. 55th Street
New York, NY 10022
ALustigman@olshanlaw.com
SLustigman@olshanlaw.com

Re: CIDs issued to Health Research Laboratories, LLC (Matter Number 142-3021) on December 31, 2014

Dear Misters Lustigman:

This letter is in response to your request to James Prunty, Carolyn Hann, and David Frankel ("FTC staff" or "staff") for an extension of the deadline for responding to the Civil Investigative Demand ("CID") served by the Federal Trade Commission on your client, Health Research Laboratories, LLC ("HRL"). Although the deadline for responding to the CID currently expires today, FTC staff advised me that you and they agreed to a rolling production schedule to accommodate your client's time constraints and recent inclement weather.

Pursuant to those discussions, I am writing to inform you of the following: First, my understanding is that for the purposes of HRL's responses to this CID, FTC staff and you have agreed to limit the scope of the defined term, Product(s), holding the remainder of this definition in abeyance until further notice. The revised definition of "Product(s)" shall be limited to the following products: BioHepatocyte, BioTherapex, BioZyme Liver Rejuvenation, Telomed, NeuroPlus, Skinny Green Coffee, and Rejuvalife Rx.

In addition, HRL agrees to provide exemplar direct mail pieces for the following products: Adult Stem Cell Booster 2.1, Adult Stem Cell Booster 2.0 (also known as ASCB 2.0), Biostem Blue, CTG 1.92%, Green Algae Supplement, Maximum T, T-Amp, and T-Plus Rejuvenation. Each such direct mail piece must be several pages long, with complete product descriptions and narratives. HRL also agrees to provide two product samples of Maximum T as well as two product samples each of BioHepatocyte, BioTherapex, BioZyme Liver Rejuvenation, Telomed, NeuroPlus, Skinny Green Coffee, and Rejuvalife Rx as part of its responsive to Document Specification 2.

Andrew B. Lustigman, Esq.
Sheldon S. Lustigman, Esq.
January 30, 2015
Page 2

Second, I am writing to inform you that the deadlines by which HRL must provide its responses are as follows:

Round 1: Friday, January 30, 2015

- Interrogatory Specifications 1-3.

Round 2: Friday, February 20, 2015

- Interrogatory Specifications 4-10, 12-17, 21-28, and 31; and
- Document Specifications 1, 2 (including Maximum T), 3-7, 8,¹ 9 (limited to any documents that provide a general description of the codes that appear on direct mail pieces, with the remainder held in abeyance), 13-14, 15 (including general training as well as any specific training relating to a Product), and 17 (any communications from consumers seeking refunds or chargebacks for any of the Product(s)).

Round 3: Monday, March 2, 2015

- Interrogatory Specifications 11, 18-20, and 29; and
- Document Specifications 10-12, 16 (all responsive recordings available by this date), and 17 (remainder of all responsive documents, including all documents relating to any communications with or about consumers seeking refunds or chargebacks for any of the Product(s)).

Round 4: Monday, March 16, 2015

- Interrogatory Specifications 30 and 32-34; and
- Document Specifications 16 (remainder of responsive recordings) and 18 (limited to the Applicable time period, with the remainder held in abeyance), 19 (limited to conduct other than tardiness and attendance, with the remainder held in abeyance), and 20.

¹ As you have discussed with FTC staff, I agree that the phrase, "or the Company," that appears in the first sence of Document Specification 8 should be omitted.

Andrew B. Lustigman, Esq.
Sheldon S. Lustigman, Esq.
January 30, 2015
Page 3

Other Issues

First, I understand from FTC staff that you have asserted that recordings responsive to Document Specification 16, which were created by a third-party vendor pursuant to a contract with HRL, may be beyond HRL's custody and control. Like staff, I respectfully disagree with this assertion. FTC staff is happy to discuss this issue with you further and to review any documents (*e.g.*, contracts between HRL and its vendor) relevant to this position.

Second, I understand that you have advised HRL to preserve all documents and other evidence in its possession and to cease all document destruction or erasure, as provided by Instruction II.E of the CID.

Finally, during this investigation, FTC staff reserves the right to request additional responses to any interrogatory or document specifications that have been fully or partly held in abeyance. You should provide any responsive search results within fourteen (14) days of receiving staff's request for additional searches.

If you have any questions or concerns about this production schedule, please contact Mr. Prunty at 202-326-2439 or Ms. Hann at 202-326-2745.

Very truly yours,



Mary K. Engle
Associate Director

cc: James A. Prunty
Carolyn L. Hann
David P. Frankel

(All via email only)

Attachment 2



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Bureau of Consumer Protection
Division of Enforcement

Robert M. Frisby
Attorney

Email: rfrisby@ftc.gov
Direct Dial: 202-326-2098

December 19, 2018

VIA ELECTRONIC MAIL

Andrew B. Lustigman, Esq.
Olshan Frome Wolosky LLP
1325 Avenue of the Americas
New York, NY 10019
ALustigman@olshanlaw.com

Re: *FTC and State of Maine v. Health Research Laboratories, LLC*, FTC No. X180007

Dear Mr. Lustigman:

We have completed our review of the documents you submitted in June 2018 in response to the FTC's May 21, 2018 compliance requests. Based on our review of the defendants' advertising, we have identified a number of representations raising concerns under the Order, including: (1) disease cure, mitigation, or treatment representations covered by section II.H; (2) other health benefit representations covered by section III; (3) representations regarding scientific testing covered by section IV; and (4) representations relating to the defendants' "free trial guarantee" covered by sections VIII and IX.A of the Order.

We need additional information to assess whether these representations violate the Order or warrant further investigation. Accordingly, pursuant to section XIX, please submit the following information and documents by January 16, 2019:

1. Total revenue received by defendants for each of the following products sold by Health Research Laboratories or Whole Body Supplements since the entry of the Order in January 2018: BioStem, Black Garlic Botanicals, BG-18, Ultimate Heart Formula, BladderEZE, Neupathic, BladderSecur, NeuroCare, Thyroid Essentials, Betarol, Maximum T, T-Plus, Regimen, The Ultimate Cardio Cleanse, and Clear Colon Defense;
2. The chargeback, return, and refund volume and rate for each product listed in item

one above, and the overall chargeback, return, and refund volume and rate, since entry of the Order in January 2018;

- 3.e Any complaint received by the defendants from a consumer, the Better Business Bureau, or any law enforcement agency referring or relating to the defendants’ “free trial guarantee,” any other refund offer, or any failure to provide a refund since entry of the Order in January 2018; and
- 4. For each advertising testimonial or other statement identified in the chart below, the evidence defendants possess and rely upon to substantiate that the statement is true. For consumer testimonials, please provide evidence that the statement is true and that consumers generally experience similar results using the product if such is the case. If defendants do not possess clinical testing of the product, or of an Essentially Equivalent Product, as that term is defined in the Order (as opposed to testing of individual ingredients), please so state.

Product	Advertising Statements
<p>BioStem</p>	<p>And scientific studies have shown that the premium quality superfood it contains, harvested from Klamath Lake in Oregon, possess [sic] properties specific to stem cells which allow it to:</p> <p>1.e Stimulate the release of stem cells from your own bone marrowe with an increase in production of 25% to 30% (that is approximately 3e million additional stem cells).e</p> <p>2.e Stimulate the shifting of your stem cells towards damagede tissue for faster and more active, “site-specific” rejuvenation.e</p>
<p>Black Garlic Botanicals</p> <p>and</p> <p>BG-18</p>	<p>“Black Garlic helps to repair age damaged skin. Uniquely colored due to its fermentation process, Black Garlic contains twice the antioxidants as regular garlic . . . and restores skin cells damaged by the aging process.” ~ Dr. Oz</p> <p>“My blood sugar numbers are now close to normal and I haven’t had a headache since I started using Black Garlic Botanicals” ~ Gus H.</p> <p>“I made the switch to Black Garlic Botanicals and within the span of 3 months my LDL levels have reduced from 300 to 150. This product works!” ~ Gerald W.</p> <p>“I now have my blood pressure under control with Black Garlic Botanicals. This is a quality product!” ~ Rolf M.</p> <p>SEE INSIDE to discover a natural nutrient that is up to 95% EFFECTIVE at maintaining clear arteries and reducing risk of a heart problem!</p>

	<p>Helps to mitigate out-of-control cell growth and naturally activates your body's ability to heal itself without damaging side effects.</p>
<p>Ultimate Heart Formula</p>	<p>Instead, right before you is a simple, safe, inexpensive, non-painful and preventative option that could help you say goodbye to your heart surgeon and avoid an angioplasty.</p> <p>Two studies reported in the medical journal, Pharmacotherapy, that 51% and 43% of people were able to get off blood-pressure and cardiovascular medication with the help of CoQ10 treatment. In another CoQ10 study, reported in the medical journal, Clinical Investigator, 100% of patients with serious heart problems experienced an improvement in their symptoms. And 80% experienced beneficial blood pressure levels. Furthermore, in yet another study involving 2,664 heart patients over a 3-month period, the results showed that 75% of people experienced fewer skipped heartbeats and 63% experienced a reduction in irregular heartbeats. And according to studies reported in the Cardiovascular Drugs Therapy medical journal, CoQ10 can improve the condition of 91% of patients who have suffered a disastrous interruption of blood-flow to the heart. In even MORE studies, heart patients taking CoQ10 were found to have less than one-third as much chest pain and 75% fewer heart rhythm problems than those not taking CoQ10. Best of all: There have been more than 1,000 published papers that PROVE CoQ10 is completely safe. Long term trials have even shown that supplementing with CoQ10 is absolutely safe and non-toxic even after 8-years of use.</p> <p>The Ultimate Heart Formula also contains a powerful, clot-busting agent! The Ultimate Heart Formula gives you the power of a Japanese soy plant called Natto, with a 1,000-year-old medicinal history! And recent scientific studies have shown it has the uncanny ability to liquefy blood-clots and help prevent them from occurring at all! . . . Like EDTA and CoQ10, the results from the clinical studies carried out on Natto have been remarkable! For example, researchers from JCR Pharmaceuticals, Oklahoma State University, and Miyazakie Medical College, gave people 200-grams of Natto before breakfast.e The result . . . Natto was able to reduce the time it took their bodies toe dissolve a dangerous blood-clot by 48% within just two hours of e treatment. Plus, their bodies retained this enhanced ability to dissolvee blood-clots for up to eight hours.e</p> <p>And that's not all . . . In another study, performed by Miyazakie Medical College, people were given Natto. Within just two hours,e their systolic blood pressure decreased, on average, from 173mmHg toe 155mmHg. And their diastolic blood pressure decreased frome</p>

	<p>101mmHg to 91mmHg. And according to Dr. Martin Milner, a researcher of cardiology and pulmonary medicine at the Center for Natural Medicine in Oregon . . . [,] “Natto represents the most exciting development in the prevention and treatment of cardiovascular related problems. We have finally found a potent natural agent that can help thin and dissolve clots effectively, without side-effects.”</p> <p>EDTA is up to 95% effective at maintaining clear arteries and helping to reduce the risk of a heart problem! It’s true, Ethylene Diamine Tetraacetic Acid or EDTA has shown to be 95% effective in helping maintain arteries in over 1,823 scientific studies. EDTA is a natural amino acid that eliminates dangerous blockages from your veins and arteries – blockages that prevent blood and oxygen from reaching your heart and brain helping to reduce your risk of a heart attack. In a study conducted by Dr. Norman Clarke M.D., a cardiologist and Chief of Research at the Providence Hospital Detroit, several hundred patients with chest pains and plaque-filled arteries were given EDTA. The results were absolutely amazing: 95% of them made a dramatic recovery and experienced remarkable improvements in their health. In another study, published in the Journal of Chronic Diseases, 100% of patients who used EDTA for 90-days saw a reduction in their blood-pressure levels. In addition, 70% experienced reductions in their cholesterol levels too.</p> <p>Furthermore, according to Dr. Michael Janson, who’s been treating heart patients with EDTA for many years, 90% of his patients report remarkable relief from chest discomfort as a result of EDTA treatment. And according to Dr. Gary Null, Ph.D., founder and director of the Nutritional Institute of America, “EDTA brought relief to more than 93% of patients suffering from heart disease and it can help avoid bypass surgery in 85% of cases. Thousands of stories from patients and physicians support its effectiveness and safety.”</p>
<p>BladderEZE</p>	<p>Clinical studies of isoflavones show up to 82% of participants suffering from urgent, frequent urination and leakage improved control of their bladders as quickly as a week.</p> <p>In an eight week clinical study, this new pumpkin seed extract worked far better at strengthening the bladder and urinary tract. As a result, it slashed frequent urination and leakage up to 57%.</p> <p>Soy isoflavones have been the subject of thousands of studies published in leading medical journals and books over the past several decades.</p> <p>It works like nothing we’ve ever seen before three clinical trials</p>

document success (the gold standard in clinical research.). Together, this dynamic duo rapidly reduced the number of frequent urinations and episodes of leakage. Just take a look at the cutting-edge research . . . In a clinical study, participants reported a quick and dramatic reduction in urinary frequency and leakage.

The improvement in urinary frequency, leakage and sleep statistically increased with the duration of the study, indicating a steady improvement when taken longer than six to eight weeks. Participants in a Clinical Study REDUCED Nightly Frequency and Leakage 79%! In one clinical study, participants experienced an average of 7.3 episodes of leakage at night. After just six weeks, the number dropped to 1.5 episodes – that’s an amazing reduction in leakage and frequency!

Vinpocetine is an all-natural extract from the periwinkle plant. Even a very small dose has been shown to naturally relax the smooth muscle of your bladder without the side effects of prescription drugs. In a small clinical trial in Germany [sic] patients who did not respond to pharmaceutical drugs had some astonishing results. An incredible 58% improved bladder function. These patients reported:

- Less urgency to go
- Less frequency going
- Overall less leakage.

Can BladderEZE help me with my symptoms of Urinary Incontinence? YES! BladderEZE gives you a proprietary blend of the best, scientifically documented natural bladder and pelvic muscle strengthening ingredients in every capsule. It has never been easier to regain bladder control and lessen frequency and leakage day or night while saving money.

Cut Your Risk of Bladder Leakage and Frequent Urination in Half

Research published in the National Health and Nutrition Examination Survey examined 1,961 women. They found those with vitamin D levels in the normal range experienced a 45% reduction in risk of urinary leakage. Another study in the Journal of Endocrinology and Metabolism found vitamin D works by strengthening the bladder’s all important detrusor muscle.

BladderEZE gives you natural bladder strengthening ingredients clinically researched to dramatically reduce a woman’s frequent urination and leakage day or night in as little as seven days.

Neupathic

Neupathic was formulated to support healthy nerve endings and help ease some of the following issues associated with nerve endings:

- Burning
- Tingling
- Itching
- Numbness
- Constant coldness
- Swelling and heaviness
- Cramps and restlessness

This “Perfect” Nerve Pain easing pill combines special nutrients to restore circulation and soothe nerve pain associated with diabetes!

Studies show that there IS a natural, effective treatment for diabetic nerve pain!

A “perfect” nerve pain supplement that was formulated from the ground up to improve your circulation and ease the numbness, tingling, itching, burning and swelling from excess fluid trapped in your legs.

If you have diabetic nerve pain, you could suffer with any or all of the symptoms below.

Shooting pain

Burning

Pins and needles

Electric shock-like pain

Extra sensitivity

Numbness

Throbbing

Tingling

Stinging

Stabbing

Radiating

Neupathic was specifically formulated with 6 distinct nutrients to help address ALL these issues and more.

If your own legs and feet are swollen, inflamed, heavy, tired, achy or numb regardless of anything else, your legs need some help from Neupathic.

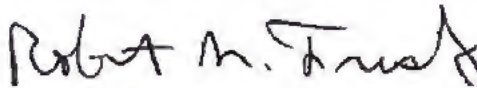
“Great reduction of pain. No more nerve pain in my feet. I also hardly notice any leg cramps. This product is great!” Ruth J.

	<p>“My circulation is now much better.” —Marion M.</p> <p>“No burning, stabbing pain. No more stiffness. More energy. Move better. Neupathic is fantastic. I love it! It should be available at the drug store.” Naomi R.</p> <p>“Neupathic is a great ‘miracle-like product’ which starts working the very first day you use it. Then it continues to control your pain every day. My feet have began [sic] to feel normal. Neupathic has improved my life. My nerve pain is gone and I will continue to take Neupathic until my numbness is gone too!” — Gloria R.</p> <p>“My feet no longer burn, especially after an hour or so of inactivity. I definitely feel more comfortable.” Margaret J.</p> <p>Already, thousands of people have tried Neupathic and LOVED the soothing results. They literally tell stories of amazing relief from their agonizing symptoms within just days of use.</p> <p>Neupathic is recognized as one of the more powerful natural nerve pain relief options available.</p>
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Finally, our review of advertising submitted to the FTC by consumers indicates that Whole Body Supplements markets BladderSecur by making bladder control and related health representations similar to those made for BladderEZE, and markets NeuroCare by making diabetic nerve pain and related health representations similar to those made for Neupathic. For these two products, please submit the evidence defendants possess and rely upon to substantiate that these representations are true. In addition, if defendants do not possess clinical testing of BladderSecur and NeuroCare, or of an Essentially Equivalent Product, as that term is defined in the Order (as opposed to testing of individual ingredients), please so state.

If you have additional questions, please contact me at (202) 326-2098 or at rfrisby@ftc.gov.

Sincerely,



Robert M. Frisby

CC: DEbrief@ftc.gov

Attachment 3

the 1990s, the number of people in the UK who are aged 65 and over has increased from 10.5 million to 13.5 million, and the number of people aged 75 and over has increased from 4.5 million to 6.5 million (Office for National Statistics 2000).

There is a growing awareness of the need to address the needs of older people in the UK. The Department of Health (2000) has published a strategy for older people, which sets out a vision for the future of health care for older people. The strategy is based on the following principles:

- Older people should be able to live independently and actively in their own homes for as long as possible.
- Older people should be able to access the services and support they need to live well.
- Older people should be able to participate in decisions about their care and services.
- Older people should be able to live in a safe and secure environment.

The strategy also sets out a number of key objectives for the future of health care for older people. These include:

- To reduce the number of older people who are admitted to hospital.
- To reduce the length of stay of older people in hospital.
- To reduce the number of older people who are admitted to care homes.
- To reduce the number of older people who are admitted to residential care.

The strategy also sets out a number of key actions for the future of health care for older people. These include:

- To improve the quality of care for older people in hospitals.
- To improve the quality of care for older people in care homes.
- To improve the quality of care for older people in residential care.
- To improve the quality of care for older people in the community.

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- To improve the quality of care for older people in the community.

Attachment 4

Naturopathy: A Critical Appraisal

Kimball C. Atwood IV, MD

Abstract and Introduction

Abstract

"Naturopathic medicine" is a recent manifestation of the field of naturopathy, a 19th-century health movement espousing "the healing power of nature." "Naturopathic physicians" now claim to be primary care physicians proficient in the practice of both "conventional" and "natural" medicine. Their training, however, amounts to a small fraction of that of medical doctors who practice primary care. An examination of their literature, moreover, reveals that it is replete with pseudoscientific, ineffective, unethical, and potentially dangerous practices. Despite this, naturopaths have achieved legal and political recognition, including licensure in 13 states and appointments to the US Medicare Coverage Advisory Committee. This dichotomy can be explained in part by erroneous representations of naturopathy offered by academic medical centers and popular medical Web sites.

Introduction

Two naturopaths were recently appointed to the US Medicare Coverage Advisory Committee (MCAC).^[1] This contradicts the conclusions of an inquiry made by the US Department of Health, Education, and Welfare (HEW; now the Department of Health and Human Services), the department that houses Medicare itself.

In 1968, naturopaths asked HEW to consider Medicare reimbursement for their practices. The department conducted an investigation and chose not to do so. Its report concluded:

Naturopathic theory and practice are not based on the body of basic knowledge related to health, disease, and health care that has been widely accepted by the scientific community. Moreover, irrespective of its theory, the scope and quality of naturopathic education do not prepare the practitioner to make an adequate diagnosis and provide appropriate treatment.

[2]

These conclusions are still valid. Thirty-five years later investigators from Simon Fraser University in British Columbia reported similar findings:

In our research for this chapter, we provided naturopaths and their professional associations ample opportunity to refute the conclusions of several major commissions of inquiry over the years that deemed their therapeutic rationale lacking in scientific credibility. None of our informants was able to convince us that the field had taken these earlier critiques to heart; in fact, precious few seemed to recognize that a problem still exists. [O]ur own bibliographic searches failed to discover any properly controlled clinical trials that supported claims of the profession, except in a few limited areas where naturopaths' advice concurs with that of orthodox medical science. Where naturopathy and biomedicine disagree, the evidence is uniformly to the detriment of the former.

We therefore conclude that clients drawn to naturopaths are either unaware of the well-established scientific deficiencies of naturopathic practice or choose willfully to disregard them on ideological grounds.^[3]

What follows is a summary of the current state of "naturopathic medicine." Much of it comes from the position papers and other articles on the Web site of the American Association of Naturopathic Physicians (AANP); from the *Textbook of Natural Medicine*, the only general textbook of the field, coedited and largely coauthored by one of the Medicare appointees^[4,5]; and from the most visible naturopathic school, Bastyr University in Kenmore, Washington, where the coeditor of the *Textbook* was founder and president and where the other new MCAC appointee is associate dean. Thus, it reflects the health beliefs of these 2 appointees and of the uppermost levels of "naturopathic medicine."

Brief History and Current Status

"Naturopathic physicians" are a recent manifestation of the field known as naturopathy, the origins of which were in the 19th-century German "natural living" movement. Early naturopaths objected to contemporary medical advances, such as the germ theory and vaccinations, but espoused the "water cure," fasting, herbs, homeopathy, colonic "detoxification," and other popular methods of the era.

The content of the field has changed little since then, but the trappings have become modern. A subset of naturopaths now seeks to distinguish itself from "traditional naturopaths": it professes to practice "a distinct form of primary health care," according to the official definition on the Web site of its national organization, the AANP.^[6] At the National College of Naturopathic Medicine in Portland, Oregon, "naturopathic physicians" are described as

...primary care physicians, most of whom are in general private practice [and] trained to be the doctor first seen by the patient for general healthcare, for advice on keeping healthy, and for the diagnosis and treatment of acute and chronic conditions.^[7]

"Naturopathic doctors" (NDs), as they also call themselves, state that they have received training appropriate to the practice of medicine, including a basic science curriculum equivalent to that taught in medical schools. This training occurs at 1 of 4 schools in the United States or 1 in Canada, each of which offers a 4-year, on-campus curriculum but no significant hospital or residency experience. Four of the schools are not attached to larger universities; the fifth, the University of Bridgeport College of Naturopathic Medicine in Connecticut, is owned by Reverend Sun Myung Moon's Unification Church.

These naturopaths are now licensed in 13 states (Alaska, Arizona, California, Connecticut, Hawaii, Kansas, Maine, Montana, New Hampshire, Oregon, Utah, Vermont, and Washington) and the District of Columbia. Their scope of practice is typically limited only by prohibitions against performing major surgery and prescribing controlled substances.^[8] In all of these states they are free to make broad claims of medical expertise. In Washington, an "every category of provider" law forces private insurers to reimburse naturopaths.^[9]

The Naturopathic Belief System

Naturopathic beliefs -- including those of "naturopathic physicians" -- are rooted in vitalism, the pre-20th-century assertion that biological processes do not conform to universal physical and chemical principles. Naturopaths describe a "healing power of nature," which is compromised by modern medicine.^[10] They state that they "treat the cause of a problem, rather than to merely eliminate or suppress the symptoms."^[6] They state that they treat "the whole person." They state that they can "boost the immune system" with herbs and homeopathic preparations. They profess knowledge about preventive medicine that is, implicitly, unknown to medical doctors, public health experts, nurses, nutritionists, and others. They profess special expertise in nutrition and in the use of "natural remedies" made from animal, vegetable, and mineral sources.

Naturopaths invoke a few simplistic theories to explain the causes of disease. These include the actions of ubiquitous "toxins" (including most pharmaceuticals); widespread food allergies; dietary sugar, fat, and gluten; inadequate vitamin and mineral intake; epidemic candidiasis; vertebral misalignments; intestinal "dysbiosis"; imbalances of Qi; and a few others. To diagnose these entities, naturopaths use an assortment of nonstandard methods, among which are iridology or iris diagnosis, which holds that the entire body is represented on the iris of the eye^[11]; applied kinesiology, by which an allergy to a food is detected by placing the food particle in one hand of a patient and observing a resulting weakness in the other; hair analysis for alleged toxins and vitamin and mineral deficiencies; electrodiagnosis, which can purportedly detect parasites and other problems by measuring the skin's resistance to a tiny electric current; "live cell analysis"; "pulse" and "tongue" diagnosis; and others.^[12,13]

Naturopathic Treatments

Naturopathic treatments include colonic irrigation (enemas) and fasting for "detoxification," hydrotherapy (wrapping part or all of the body in wet towels), homeopathy, acupuncture, chiropractic manipulation, aromatherapy, arduous dietary regimens, intravenous vitamin C, hydrogen peroxide and ozone, whole enzyme pills, herbs, desiccated animal organs, and other "natural remedies." Naturopaths sell these preparations to their clients at a profit, a practice that is both formally approved and joined by the AANP.^[14-16]

How does this translate into the practice of naturopathic medicine? The following recommendations and practices are representative:

- The repudiation of standard treatments of streptococcal pharyngitis,^[17] acute otitis media,^[18] and other childhood infectious diseases, offering instead homeopathy, hydrotherapy, and "natural antibiotics" (eg, herbs such as Goldenseal).

- FEDERAL TRADE COMMISSION | OFFICE OF THE SECRETARY | FILED 4/14/2021 | OSCAR NO. 601202 | PUBLIC
- Affiliation with the antivaccination movement.
 - The repudiation of standard treatments of asthma, offering instead, for example, a hydrogen peroxide bath to "bring extra oxygen to the entire surface of the skin, thus making the lungs somewhat less oxygen hungry" or "gems and minerals ... worn as jewelry, or placed around the home in special places."^[19] This quotation is from "Articles written by Naturopathic Physicians for the general public" (on the AANP Web site). The author is listed as a "senior editor of the *Journal of Naturopathic Medicine*, the official publication of the AANP."
 - Recommendations, by the Bastyr University AIDS Research Center, for treatment of HIV-positive patients with St. John's wort and garlic (both of which have been shown to reduce blood levels of highly active antiretroviral therapy agents), "acupuncture detoxification auricular program," whole-body hyperthermia, "adrenal glandular," homeopathy, "cranioelectrical stimulation," digestive enzymes, colloidal silver, and nearly 100 other dubious methods.^[20,21]
 - Warnings against proven medical and surgical treatments for hypertension, hyperlipidemia, and atherosclerosis, while instead recommending herbs and EDTA chelation.^[22]
 - The insertion of endonasal balloons, followed by their inflation in the nasopharynx, to "release tensions stored in the connective tissue and return the body to its original design," thus curing learning disorders and a host of other problems.^[23,24]
 - Treatment of the acute stroke patient for at least 20 minutes with an "ice-cold compress ... over the carotid arteries under the jaw bone on the neck" (which "may even abort the stroke") and subtle energy medicine.^[25] The author of these recommendations is listed as a "senior editor of the *Journal of Naturopathic Medicine*, the official publication of the American Association of Naturopathic Physicians."
 - The early detection of multiple sclerosis by "pulse" and "tongue" diagnosis, such as to effect a cure by hydrotherapy, homeopathy, acupuncture, diet, and other methods.^[26] The author of these claims is Chief Medical Officer of the Southwest College of Naturopathic Medicine.
 - The prevention and cure of breast cancer by an assortment of nonstandard tests and "supplements."^[27] The author of these claims "has lectured regularly at the Canadian College of Naturopathic Medicine on breast health and stress management."
 - The treatment of cancer of the prostate with "electrical current in the form of positive galvanism, applied transrectally."^[28] This recommendation is from "Articles written by Naturopathic Physicians for the general public" (on the AANP Web site). The author is Chief Medical Officer of the Southwest College of Naturopathic Medicine.
 - Ubiquitous "toxin" claims, including antifuoridation statements, warnings against most proven pharmaceuticals, and the assertion that "25% of Americans suffer from heavy metal toxicity."^[29]
 - "Natural childbirth care in an out-of-hospital setting" using a "naturopathic approach [that] strengthens healthy body functions so that complications associated with pregnancy may be prevented."^[7]
 - Nearly 100 nonstandard uses for vitamin C recommended by the *Textbook of Natural Medicine*.^[4]
 - The promotion and sale of "dietary supplements" for virtually all complaints.

Naturopaths have not subjected their basic tenets to critical scrutiny, apparently because they are already convinced that they are correct. For example, the AANP position paper on treatment of streptococcal pharyngitis, offering no supporting evidence, makes this claim: "naturopathic physicians ... have been successfully treating Strep pharyngitis with very low incidence of poststreptococcal sequelae, using various natural antibiotics, and natural immune enhancing therapies, for close to one hundred years ..."^[17]

A 1999 survey of the small number of NDS in Massachusetts, performed by 2 investigators from Children's Hospital in Boston, is consistent with these findings. They reported that only 20% of those surveyed would recommend that parents have their children vaccinated and that only 40% would refer a 2-week-old infant with a temperature of 101° F for definitive medical care. [30]

Implications for Medicare

In an interview for the *Seattle Times*, one of the new MCAC appointees offered examples of how he might affect the process of selecting therapies for Medicare coverage:

[The new appointee] said he plans to push for more emphasis on prevention and health promotion. He also wants well-proven and cost-effective alternative techniques to be covered by Medicare.

Examples could include natural ear-infection treatments for infants and acupuncture treatments for those suffering sports injuries or drug addiction, he said. [1]

Naturopathic literature suggests that by prevention and health promotion this Medicare adviser is referring to "detoxification," "cleansing programs" for "food allergies" and "candidiasis," enemas, "constitutional" homeopathic preparations, and so forth. "Natural ear-infection treatments for infants" are not only unproved but are implausible and dangerous. Acupuncture treatments for sports injuries are unlikely and unproven, and acupuncture for drug addiction has been convincingly disproved. [31]

Elsewhere, the same appointee recommends a flower pollen extract for benign prostatic hypertrophy, [32] an "intranasal douche with hydrastis tea" for bacterial sinusitis, [33] a "general bowel detoxification diet" for autism, [34] and oral bromelain (a protein extracted from pineapples) for the "lumpy skin around varicose veins." [35] For cervical dysplasia and pelvic inflammatory disease, he recommends "vaginal depletion packs," 1 by 3-inch cotton tampons containing a tar-like mixture of botanical oils, left in place for 24 hours at a time and repeated weekly. [36]

Formal criteria require that appointees to the MCAC be "from among authorities in clinical and administrative medicine, biologic and physical sciences, public health administration, health care data and information management and analysis, the economics of health care, medical ethics, and other related professions." [37] How were the 2 naturopaths selected? On February 18, 2003, I sent a letter to Thomas A. Scully, the Administrator of the Centers for Medicare & Medicaid Services, making points similar to those in this article and implicitly asking that question. There were 30 cosignatories.* Mr. Scully had not replied as of December.

*Lee S. Anderson, Marcia Angell, Seth Asser, Robert Baratz, R. Christopher Barden, Stephen Barrett, Heather Brock, Carl E. Bartecchi, Henry N. Claman, E. Patrick Curry, John E. Dodes, Bruce L. Flamm, Laura J. Fochtman, Timothy Gorski, Saul Green, Arthur P. Grollman, James J. Kenney, Jeffrey M. Lohr, Janice Lyons, Peter Madras, Frederick L. Merian, Steven Novella, Arnold Relman, John A. Robinson, Barbara Rockett, Francis X. Rockett, Linda Rosa, Wallace Sampson, Sally Satel, Gerald Weissmann

Dissent From the White House Commission on Complementary and Alternative Medicine Policy

Two dissenting members of the recently adjourned White House Commission on Complementary and Alternative Medicine Policy warned, in a letter to Department of Health and Human Services Secretary Tommy Thompson, of the problems introduced by official endorsements of naturopaths and other "complementary and alternative medicine" (CAM) practitioners:

Vulnerable Populations

Patients will often resort to "CAM" practices, modalities and practitioners upon the diagnosis of a debilitating, chronic or terminal condition. Recent Senate hearings have documented the *special vulnerability of the elderly* [emphasis added] on fixed-incomes to these phenomena.

[CAM practitioners] are not positioned for equivalency with conventional primary care providers. Efforts to equate their degree of training, or the scientific basis of their practice, with that of the designated primary care specialties puts the public at risk of receiving unvalidated and non-evidence based primary care.

... "CAM" "health promotion" and "prevention practices" also include preventing disease by "balancing qi," "eliminating parasites and toxins," "cleansing the liver" and/or by "cleansing the blood" via a multitude of supplements and questionable practices. Our uncritical acceptance of "CAM" wellness and health promotion can be interpreted as an endorsement of these claims. It is absolutely unclear what role, if any, "CAM" practices play in preventing disease and to what extent patients are burdened with useless treatments and products in their pursuit of "wellness."

In sum, general pronouncements about "CAM" neither serve the public interest nor protect the public health. It is essential to separate the effective from the ineffective, the safe from the unsafe and to contextualize these practices against conventional modalities *before* [emphasis added] any of them can be recommended for incorporation into the Nation's healthcare system. [38]

Even if Medicare itself successfully resists the efforts of its new advisers, their appointments are already being trumpeted to the public as evidence that the federal government considers naturopathic practices to be valid. [39,40] This will likely help naturopaths in their pursuit of universal state licensure and reimbursement by health insurers. Because licensed health care providers determine their own standards of care, [41] it would be detrimental to the public if naturopaths were successful in this pursuit. [42]

Comment

"Naturopathic medicine" is an eclectic assortment of pseudoscientific, fanciful, and unethical practices. Implausible naturopathic claims are still prevalent and are no more valid now than they were in 1968. The current wave of unexamined CAM fascination, however, appears to have helped naturopaths convince some that they have special abilities and that they are trained to be primary care physicians.

Most treatises on naturopathy that physicians and the public are likely to read are uncritical promotions that simply restate what naturopaths claim. Yet these views are found on the Web sites of academic medical centers and the large commercial sites for the general public. For several years, the Caregroup/Harvard Medical School Web site urged readers, without further comment, to "please consult your local telephone yellow pages" for "naturopathic physicians" and other CAM practitioners. [43] The Web site of the University of Washington School of Medicine portrays "naturopathic physicians" as well trained to practice "primary care integrative natural medicine," with a "scope of practice [that] includes all aspects of family and primary care, from pediatrics to geriatrics, and all natural medicine modalities." It further asserts that "naturopathic diagnosis and therapeutics are supported by scientific research drawn from peer-reviewed journals from many disciplines." [44] None of these statements can withstand rigorous scrutiny.

InteliHealth, a joint venture between Harvard Medical School and Aetna, promises to "[provide] credible information from the most trusted sources." [45] As recently as the spring of 2002 InteliHealth stated, "NDs are trained as family physicians"; they "treat the whole patient, not just the disease symptoms"; they "successfully combine so many therapies"; "Naturopathic doctors throughout the country are becoming increasingly recognized as primary care providers." The article suggested that if the reader were already consulting an ND, she might reasonably choose not to see an MD. [46] When InteliHealth replaced this article with a new one, it did so without explanation, failing to warn readers of the dangers of having trusted the previous information. The replacement article, moreover, approvingly describes naturopaths as "[concentrating] on principles of holistic health (pertaining to body, mind and soul), prevention and self-care." It does not address the serious shortcomings of the field. [47]

WebMD, the parent corporation of Medscape, offers this:

A naturopathic doctor often combines many different complementary therapies to enhance the body's natural vital force.

A licensed naturopathic physician (ND) attends a 4-year, graduate-level naturopathic medical school and is educated in the same basic sciences as a medical doctor (MD). [48]

Naturopathic medicine is used for health promotion, the prevention of disease, and treatment of illness. Most naturopaths can treat earaches, allergies, and other common medical problems. Naturopathic medicine tries to find the underlying cause of the person's condition rather than focusing solely on symptomatic treatment. [49]

The WebMD treatise also advises, "Naturopathy should not replace conventional methods of treatment for certain conditions," [49] but how is the patient to know? The assumption is that naturopaths will act responsibly, but they have neither the medical training nor the requisite scientific skepticism to do so. On the contrary, they portray themselves as primary care physicians. The unwary reader might conclude that naturopaths are trained to provide "conventional methods" when appropriate, but NDs have had only a small fraction of the training of primary care MDs. Instead they have been steeped in homeopathy and other highly implausible, ineffective practices. It is unlikely that readers of WebMD and the other sources mentioned here will appreciate this dichotomy.

The National Center for Complementary and Alternative Medicine (NCCAM) has had 3 naturopaths on its advisory council in the past 3 years. [50] It proposes to conduct research into CAM methods advocated by "licensed/certified CAM practitioners (Doctors of chiropractic, naturopathy, [etc.])." [51] The NCCAM advises citizens who consult CAM practitioners to ask about licensure or certification early in the process. [52]

Like the NCCAM, WebMD also admonishes readers to seek only *licensed* naturopaths: "without licensing standards, individuals with little or no formal education may proclaim themselves naturopathic physicians without medical school education or board testing." [48] The clear message is that such licensing implies competence. There is, however, no evidence that "educated"

naturopaths -- the most prominent of whom provided the clinical examples for this article -- are more competent than others.^[9] If anything, "traditional naturopaths" (ie, those who did not attend the "approved" schools) may be less of a threat to public health because they do not pretend to be primary care physicians.

Graduates of campus-based, 4-year naturopathic programs who have passed a standardized examination may demonstrate *consistency* from one practitioner to the next. But that says nothing about the *validity* of what they do -- which can be determined only by reference to the facts of nature and by rigorous testing of biologically plausible claims. At least one leading CAM researcher has acknowledged this fact:

Those who believe that regulation is a substitute for evidence will find that even the most meticulous regulation of nonsense must still result in nonsense.^[53]

Conclusion

This is the first article in a mainstream medical journal that critically summarizes the field of "naturopathic medicine." If physicians continue to consider naturopaths and other "alternative" practitioners as inconsequential -- or, if the only articles on CAM that most physicians read are uncritical -- pseudoscience will continue to make inroads into patient care and health policy. The information presented herein illustrates why official sanctioning of naturopaths as health care providers, including their appointments to the MCAC, should be considered unwise.

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Attachment 5

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IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

FEDERAL TRADE COMMISSION,)
Plaintiff,) Case No.
v.) CV03-3700-DT (PJWX)
BRASWELL, et al.,)
Defendants.)

VOLUME I

Monday, June 6, 2005
Hoebet & Boise, P.C.
1000 S.W. Broadway, Suite 1500
Portland, Oregon 97203

1 PROCEEDINGS (9:33 a.m.)

2 VIDEOGRAPHER: We are now on record. My
3 name is Gordy Foster. I work for Limelight Video
4 Productions at 2636 Northwest 26th Avenue in
5 Portland, Oregon. This deposition is being held on
6 June 6, 2005, in Portland, Oregon.

7 The case
8 caption is the Federal Trade Commission versus
9 A. Glenn Braswell, et al., pending in the
10 U.S. District Court for the Central District of
11 California, Case Number CV03-3700-DT, and in parens
12 PJWX. Deponent is Ernest M. Kloetzli -- Kloetzli?

13 THE WITNESS: Kloetzli.

14 VIDEOGRAPHER: Kloetzli. You told me and
15 I spaced it out.

16 And would the parties present please
17 identify themselves for the record?

18 THE WITNESS: Ernest M. Kloetzli. The
19 person who you're asking questions to.

20 MR. FRANKEL: Good morning, this is
21 David Frankel for the Plaintiff Federal Trade
22 Commission.

23 MS. LEE: I'm Christine Lee, also with
24 the Federal Trade Commission.

25 MS. NORTHRUP: Linda Northrup

1 Q. Did you ever pay a subscription to --

2 A. No, never did.

3 Q. Do you know anyone who paid for a
4 subscription to the Journal of Longevity?

5 A. No, I don't.

6 Q. You mentioned before the lunch break that
7 you were provided with studies anywhere between one
8 inch and sometimes two inches thick from the
9 companies as you were preparing advertisements; is
10 that correct?

11 A. Before -- before I started, yes. I mean,
12 before I started a project.

13 Q. First, who -- who gave you those
14 materials?

15 A. Many times it was -- it was Ron Tepper or
16 Audrey Beim, his administrative assistant. The
17 actual compilation of those packages is the
18 responsibility of Inna Yegorova, who's like their
19 director of like science. That was her thing. I
20 forget the name of her assistant, but they were the
21 ones who pulled together all the scientific stuff.

22 Q. How do you know that Inna Yegorova put
23 together the materials?

24 A. Do you mean, did -- I think a couple
25 times she handed it to me. Her title would indicate

1 that she was responsible for the compilation. Not
2 maybe -- not maybe for the physical collation,
3 but -- but certainly for the compilation.

4 Q. And do you recall any occasions where she
5 handed to you what those products were that you were
6 about to write ads for?

7 A. No. It could have been -- it could have
8 been anything. I don't remember specific stuff.

9 Q. Did you have any discussions with
10 Inna Yegorova about the materials that she gave to
11 you?

12 A. Sometimes I would. And she would maybe,
13 you know, write something down. If I had a -- a
14 hair-brained idea about something she would -- you
15 know, she would be the first person to put her thumb
16 down on it.

17 But, quite frankly, she's -- well,
18 she's -- it's a Russian name, and she has a very,
19 very, very, very heavy accent, and it's -- it's --
20 oral communication is very difficult with her.
21 True.

22 Q. Of the -- of the things that she wrote
23 and gave to you, do you still have copies of that?

24 A. No. No, I would have put that in the --
25 and returned that or either trashed that with the --

1 He walks -- he wears a white coat. He
2 walks around. And, I don't know, he's an expert.
3 I've never really had any professional dealings with
4 him. And I've sat in a room with him and he knows
5 me by face, and he's very polite and everything,
6 but...

7 Q. How is his role different from the role
8 of Inna Yegorova?

9 A. That's a good question. I think
10 that -- I think that he is more maybe -- his
11 background is more -- is more like in research.
12 Where Inna's background is more scientific. She
13 goes through -- through professional journals and --
14 and compiles -- you know, compiles studies on
15 individual ingredients and formulas. And keeps
16 records of those things so that when writers are
17 working on things, you know, that she can -- you
18 know, she can dish that out.

19 But that's a very good question. I think
20 there's a pretty subtle difference. Now that I
21 think of it, you know, who was that masked man? He
22 was a man in a white coat. He was -- with a
23 research Ph.D. from the University of Chicago.
24 Impresses me.

25 Q. Do you know what his subject -- the

1 subject of his Ph.D. is in?

2 A. No. It was in the -- I think it was in
3 the -- on the masthead of the -- of the Journal of
4 Longevity. In fact, he's written -- he's written
5 some articles in there. And it was -- and under his
6 byline was a short bio describing some of his stuff.
7 But I was -- I was very impressed with him.

8 Q. To your knowledge, has Mohammad Kahlid
9 ever reviewed ads that you have drafted?

10 A. I don't know that.

11 Q. And the same question with respect to the
12 Inna Yegorova?

13 A. I think that -- that -- that Inna has,
14 yes. Because I can remember definitely sometimes
15 when you're doing a project at the last minute or
16 there's a deadline the compression means that you're
17 able to see more clearly different people's roles.

18 And I remember there was a case where I
19 delivered something to Ron, and then he immediately
20 made a Xerox of it and got it over to Inna, and then
21 Inna had some concerns by -- by that afternoon.

22 That was a -- so I guess she does. I'd
23 just never seen -- seen her in the process
24 of approval until that point.

25 Q. Did Inna Yegorova convey her concerns

1 with something she wrote directly to you?

2 A. I think she -- she had a question of
3 something if something was -- was phrased, if that
4 was the best way to like phrase from a purely
5 scientific thing, from a purely scientific
6 viewpoint.

7 I think that -- that -- that she raised
8 some -- some issues. I was -- with -- with both Ron
9 and I, but I don't recall what those were. You have
10 different levels. You have the scientific approval,
11 you have a legal approval, you have a marketing
12 approval. And all of those address totally
13 different concerns.

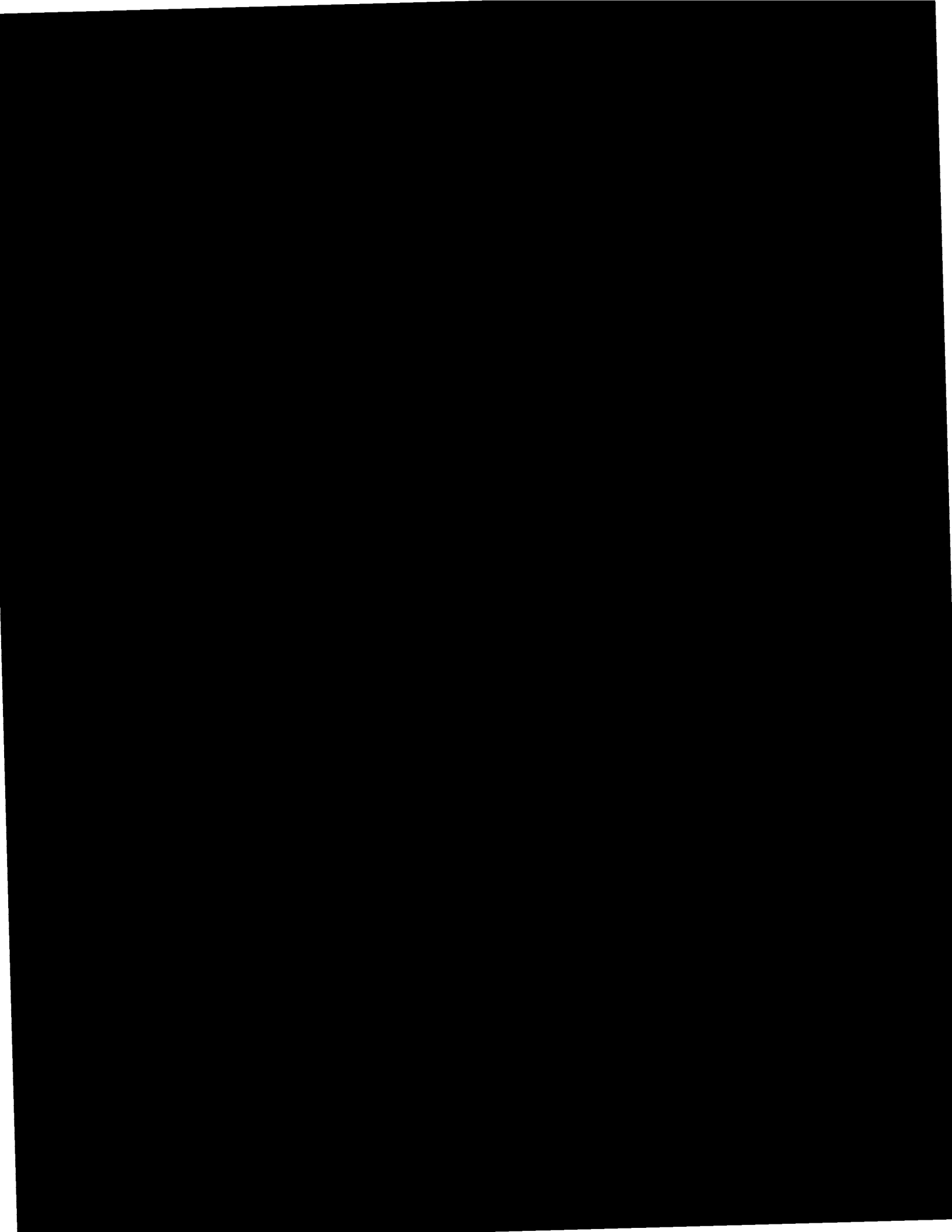
14 Q. Did she express her concerns directly to
15 you, or did she express her concerns to you through
16 someone else?

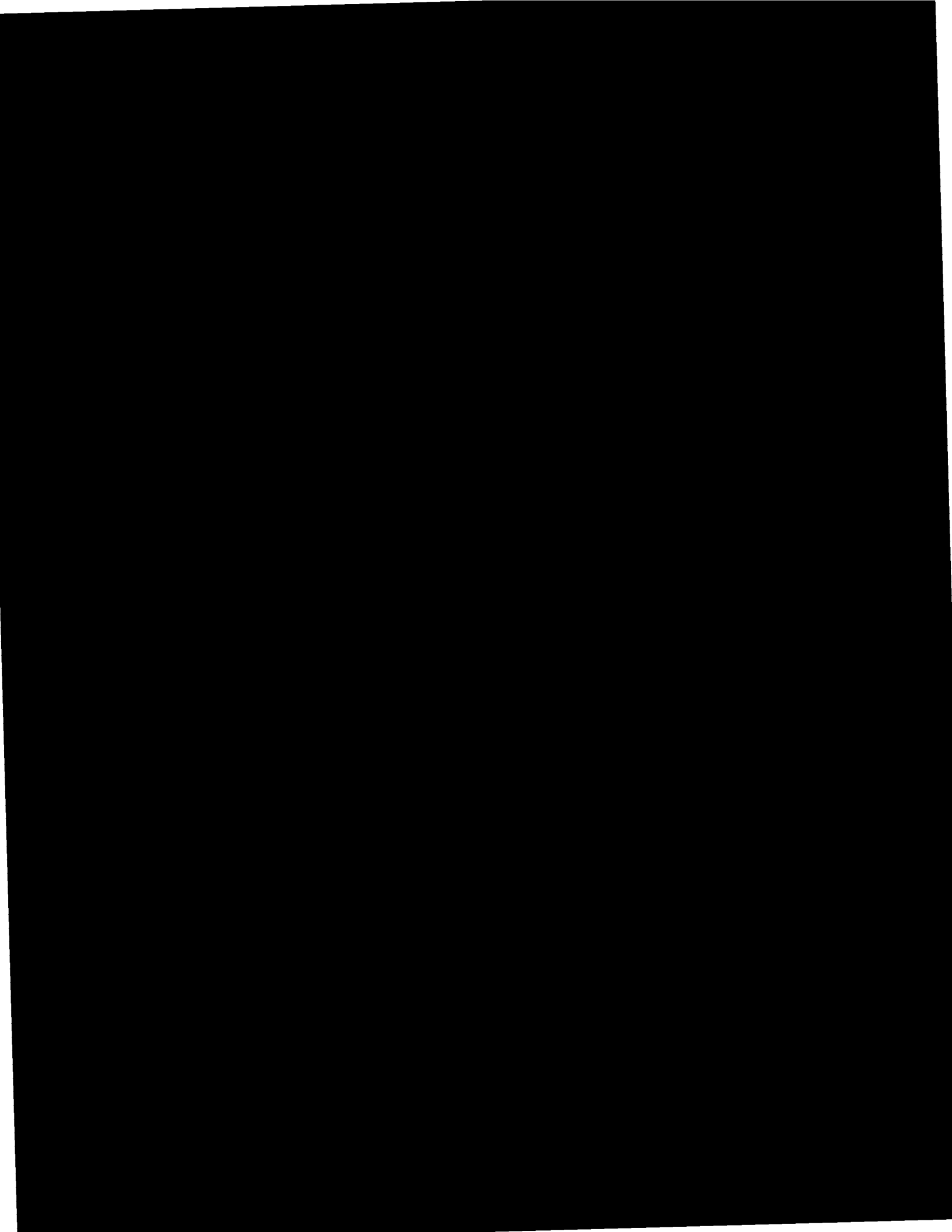
17 A. Well, I was sitting there, too. She
18 expressed those to like -- to like Ron, and to me
19 because I was sitting there in the office, too.

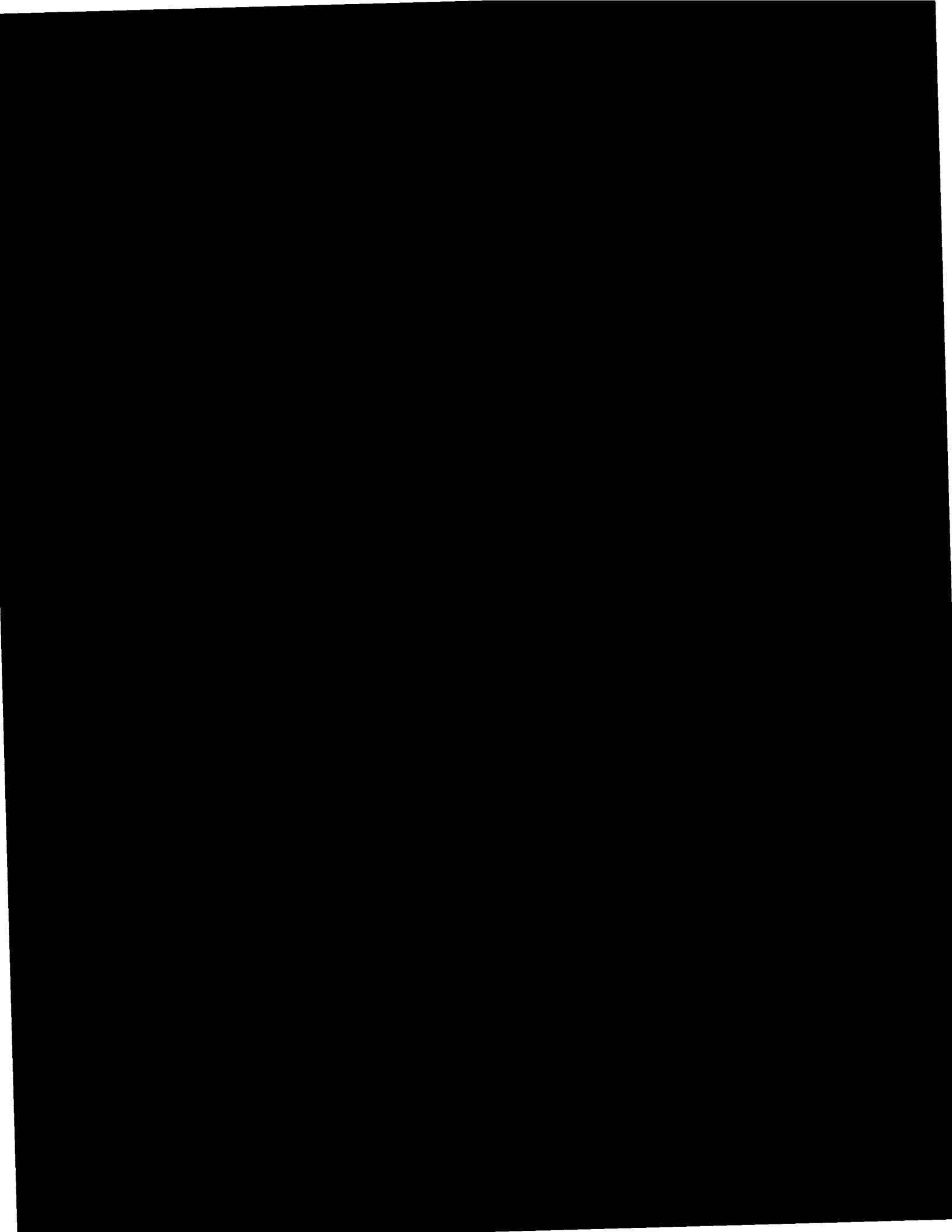
20 Q. So there was a meeting of the three of
21 you?

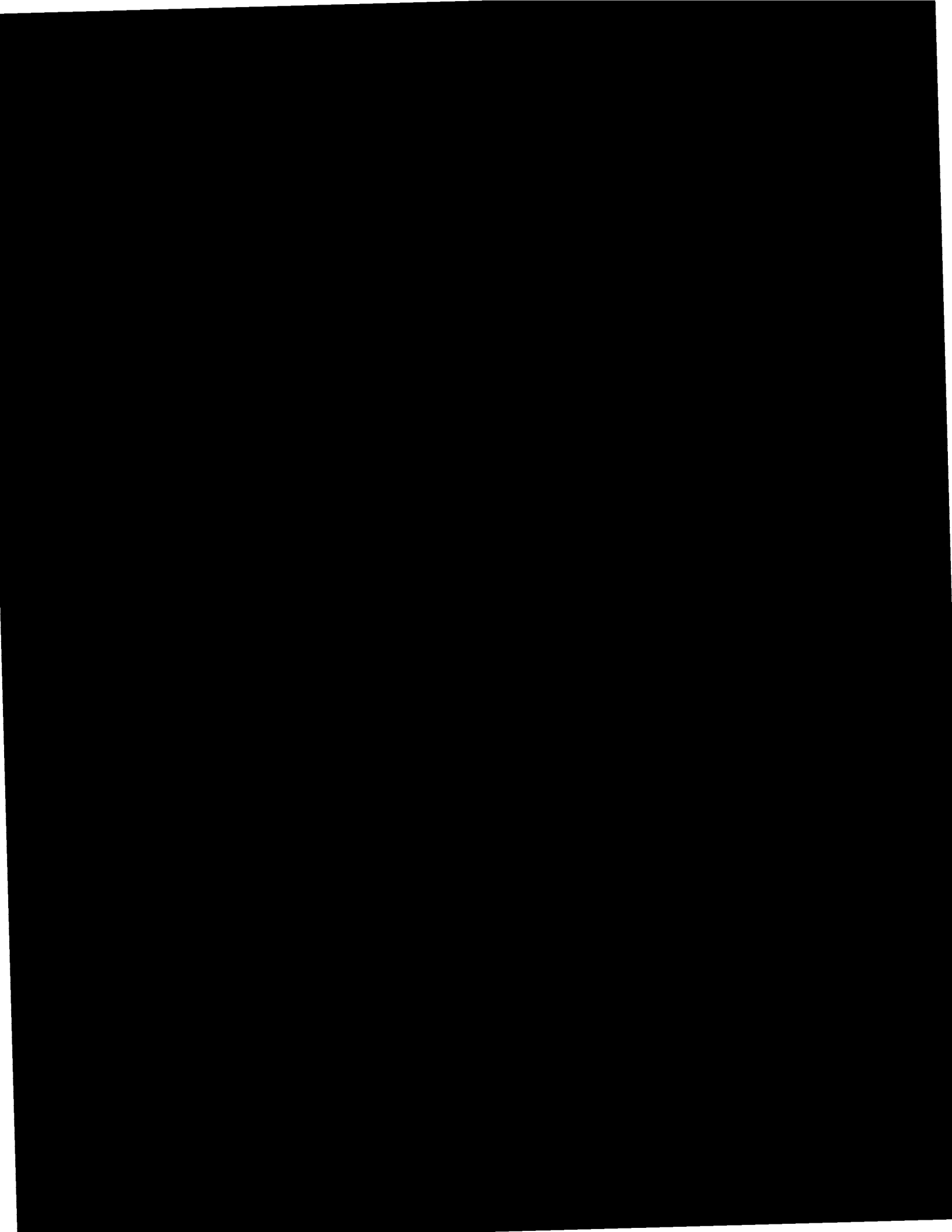
22 A. Yeah, it was one of those impromptu
23 things. And someone sticks their head in with --
24 with a draft, and in saying -- saying, well,
25 maybe -- I forget what her issue was, and I guess it

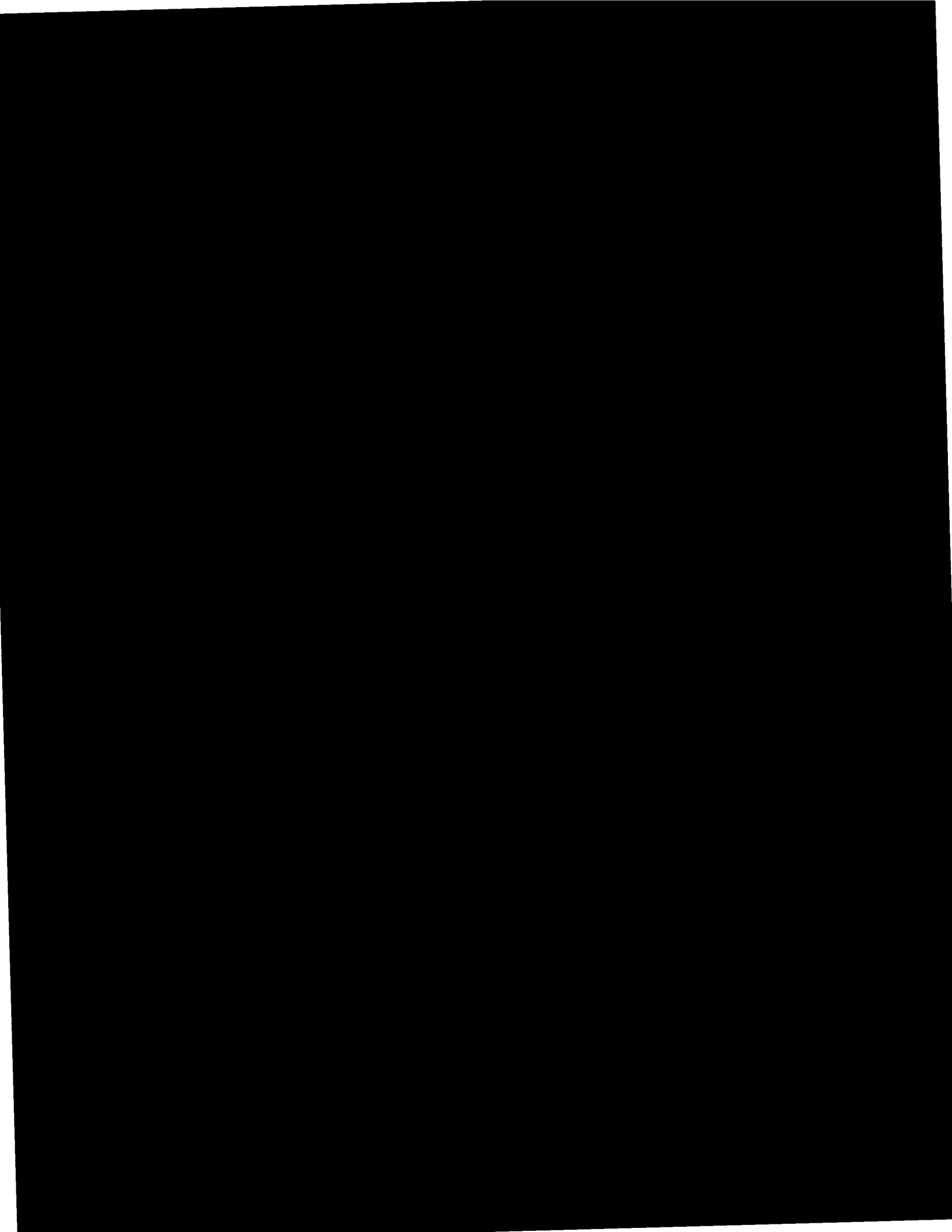
Attachment 6

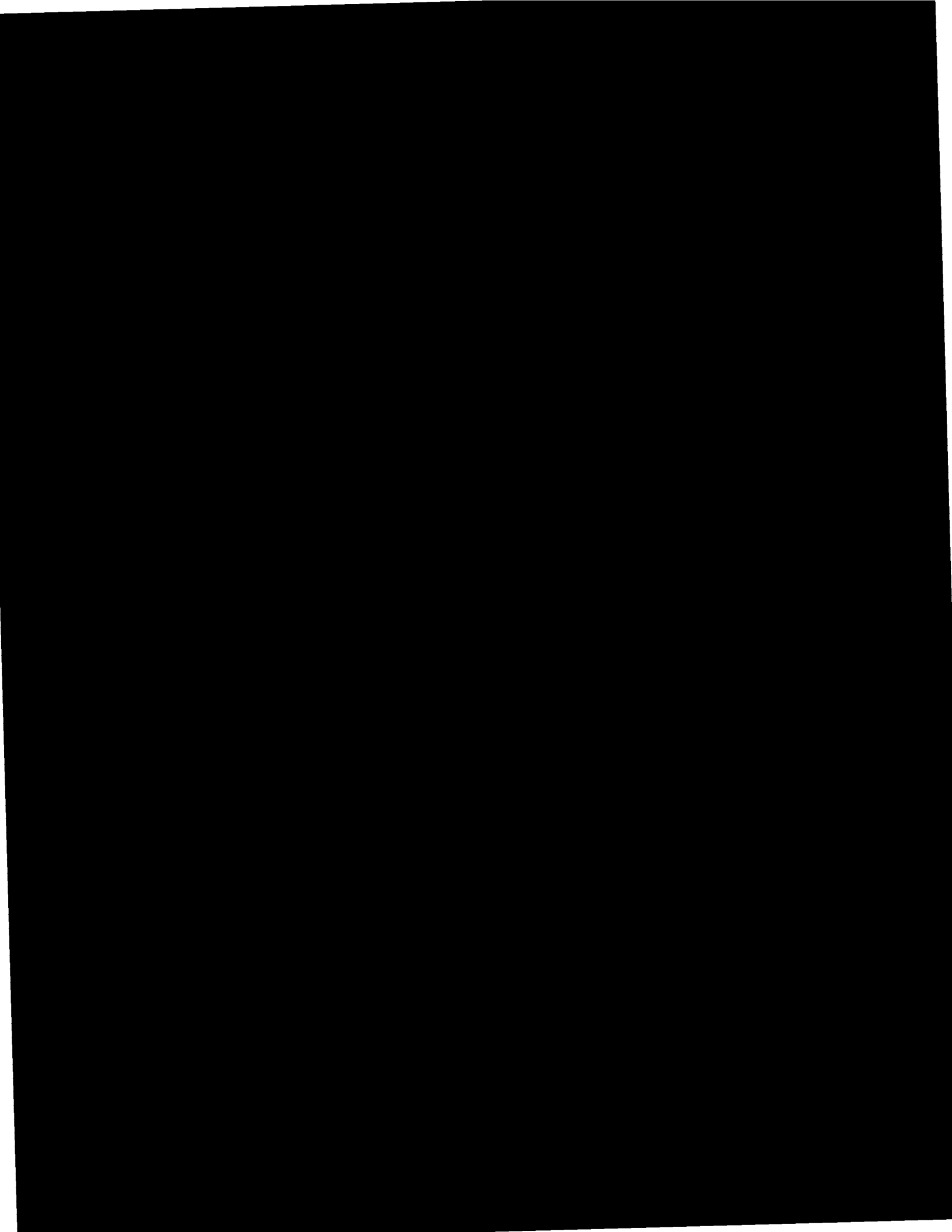


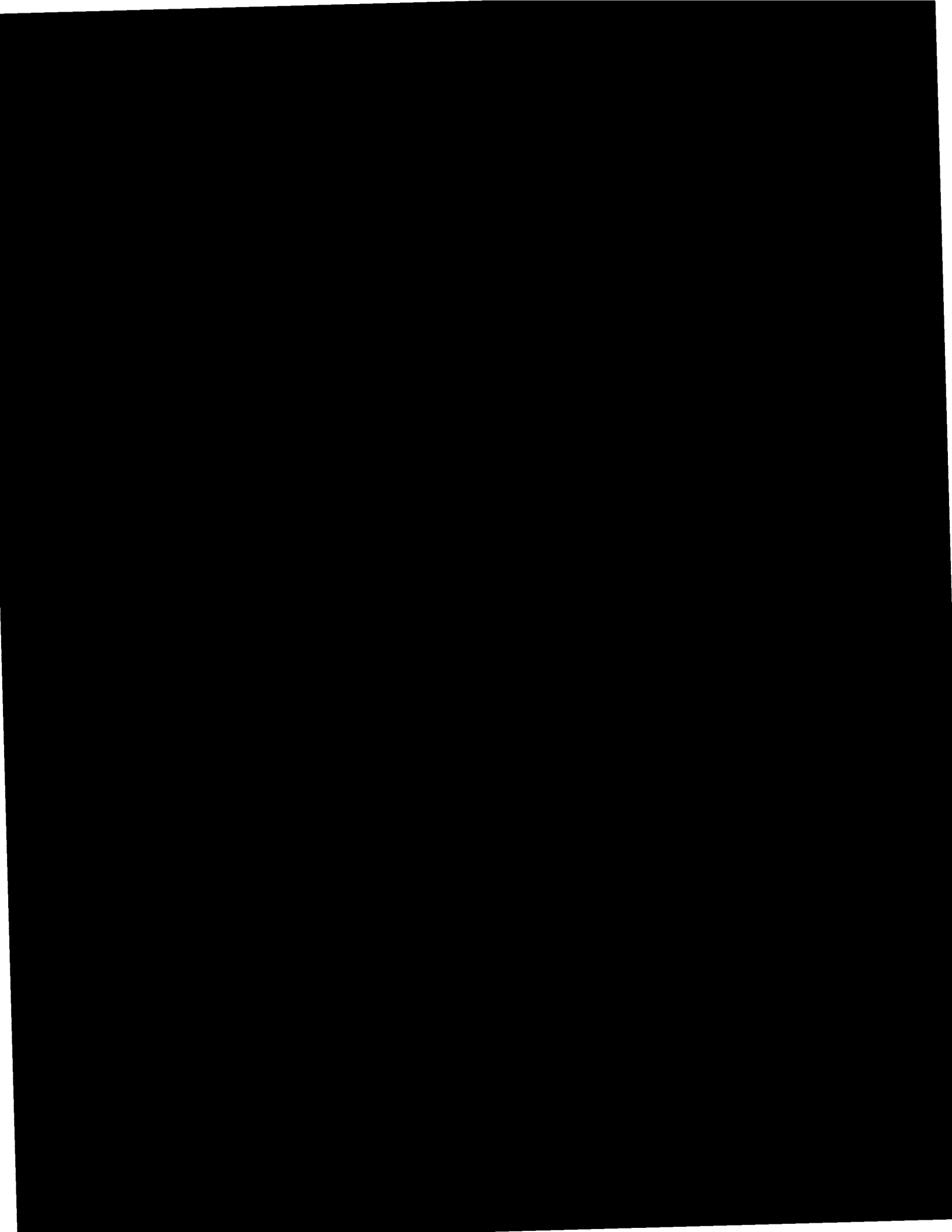


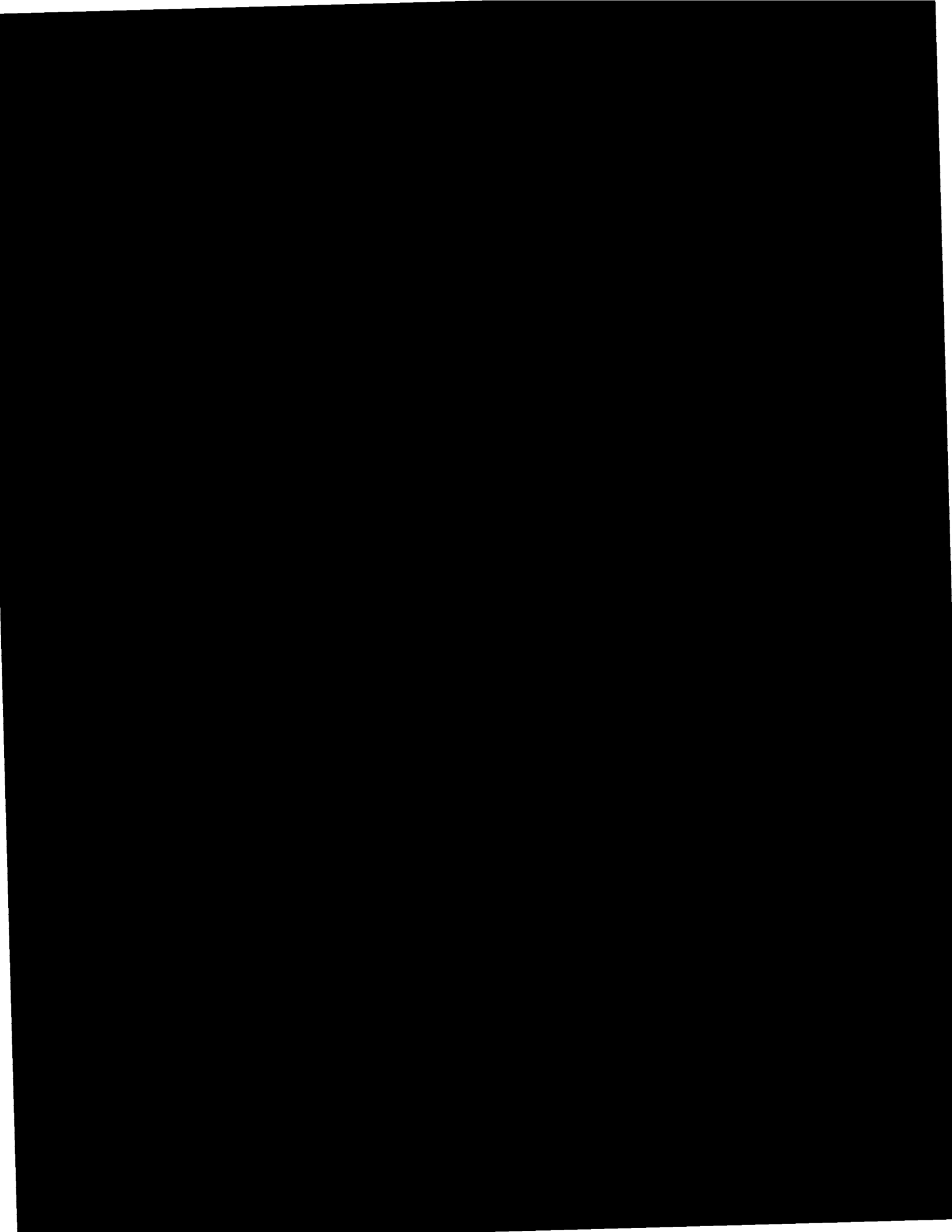


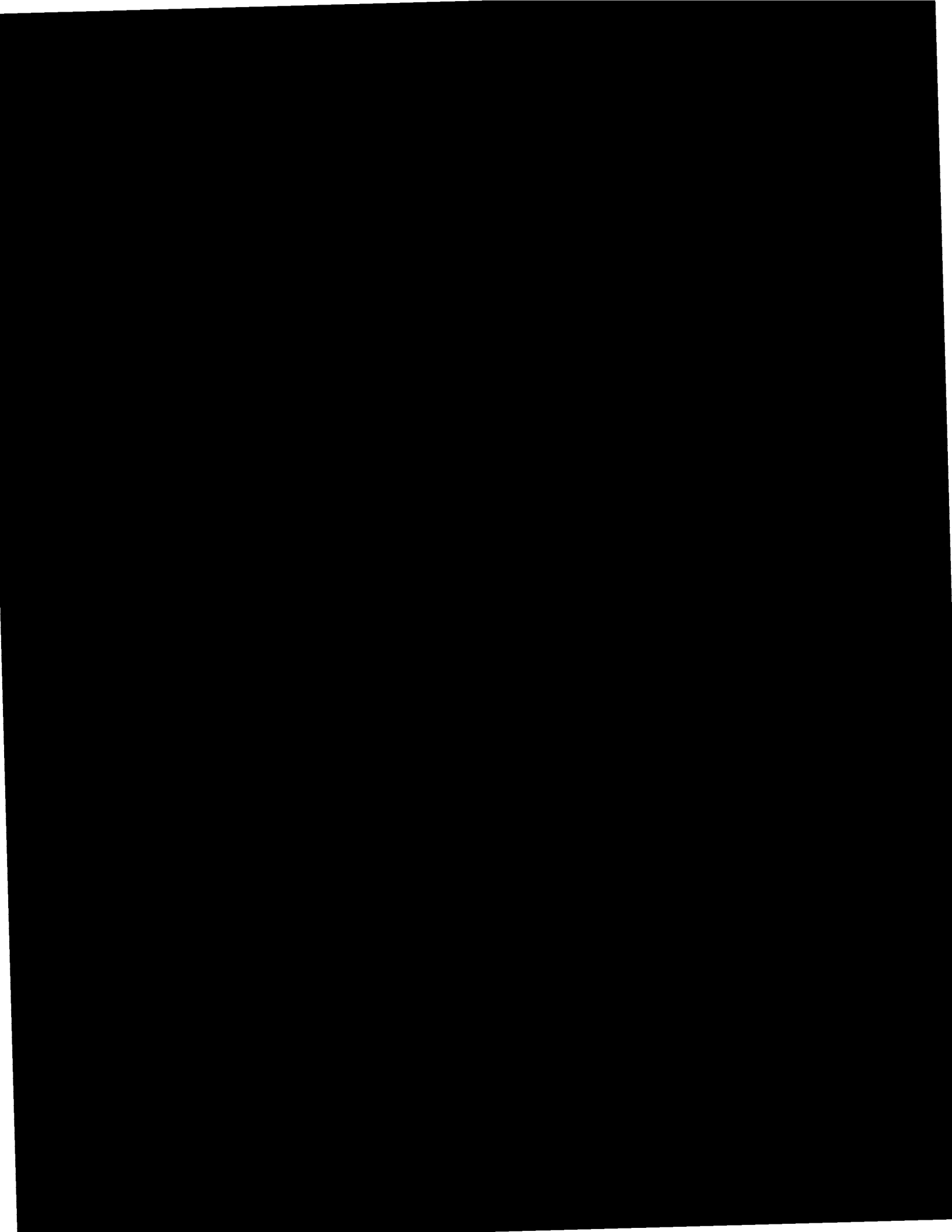












Attachment 7

**DECLARATION OF RECORDS CUSTODIAN
PURSUANT TO FED R. EVID. 803(6) AND 902 (11)**

I, Inna YEGOROVA, being of legal age, do hereby declare and depose as follows:

1. I am a custodian of records for Inna Yegorova ("Yegorova"). In that capacity, I am responsible for the compilation and maintenance of records pertaining to business Yegorova conducts. Due to my responsibilities, I have personal knowledge of the manner in which the subpoenaed party creates and maintains records of the business that it conducts.

2. On January 16, 2021, in response to a subpoena dated January 4, 2021 issued by the Federal Trade Commission, Yegorova transmitted to the Federal Trade Commission true and accurate copies of records maintained by the subpoenaed party consisting of 0 pages, and 0 files.

3. The documents produced are true and accurate copies of records maintained by the subpoenaed party in the regular course of business.

4. The records produced in response to the Federal Trade Commission's subpoena were made at or near the time of the occurrence of the matters and transactions set forth therein by, or from information transmitted by, a person with knowledge of those transactions.

4. Yegorova made the records produced to the Federal Trade Commission in response to the subpoena as part of regular practice in its regularly conducted business.

5. Yegorova kept the records produced to the Federal Trade Commission in response to the subpoena in the course of its regularly conducted business.

I declare under penalty of perjury that the foregoing is true and correct under 28 U.S.C. § 1746(2).

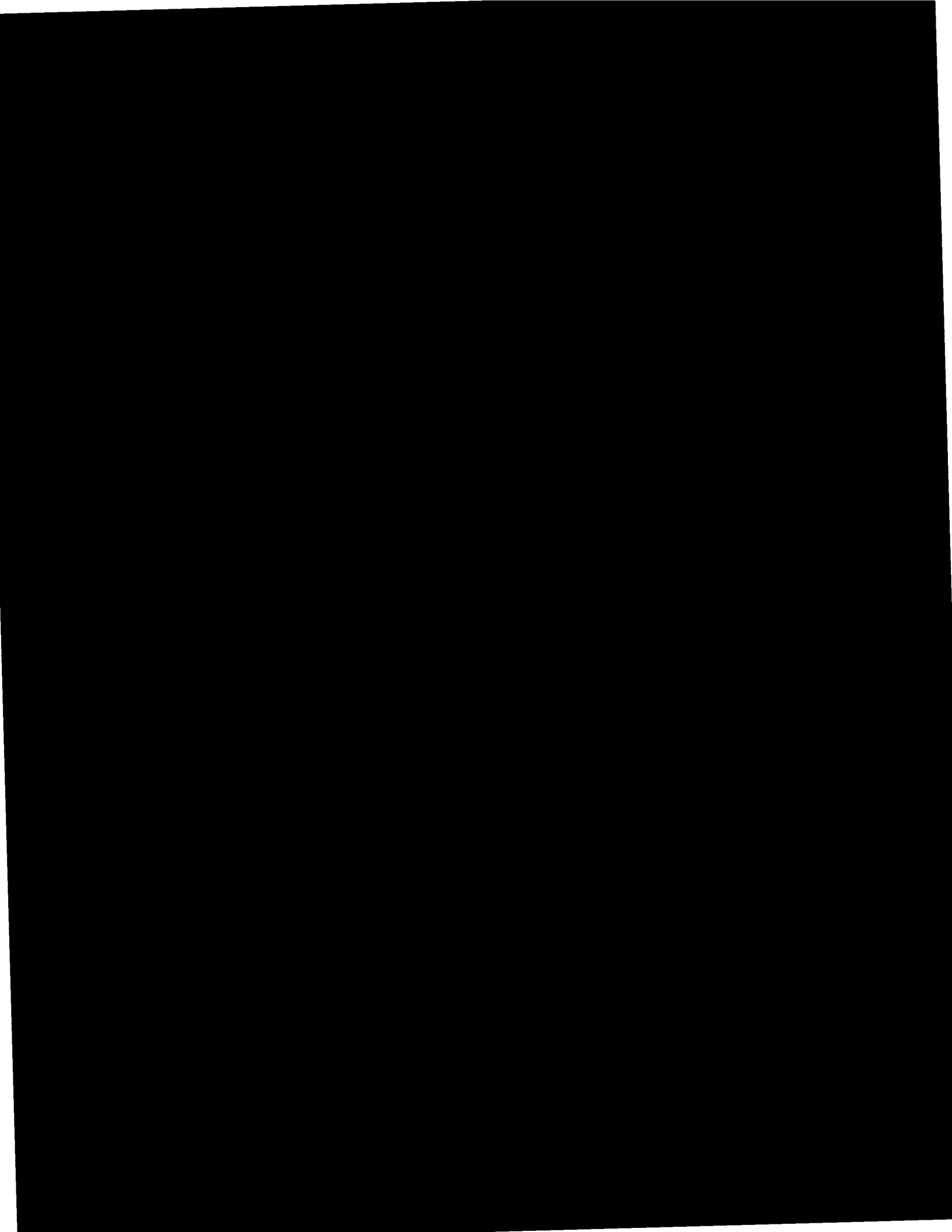
Executed on January 16, 2021, in Northridge, California.

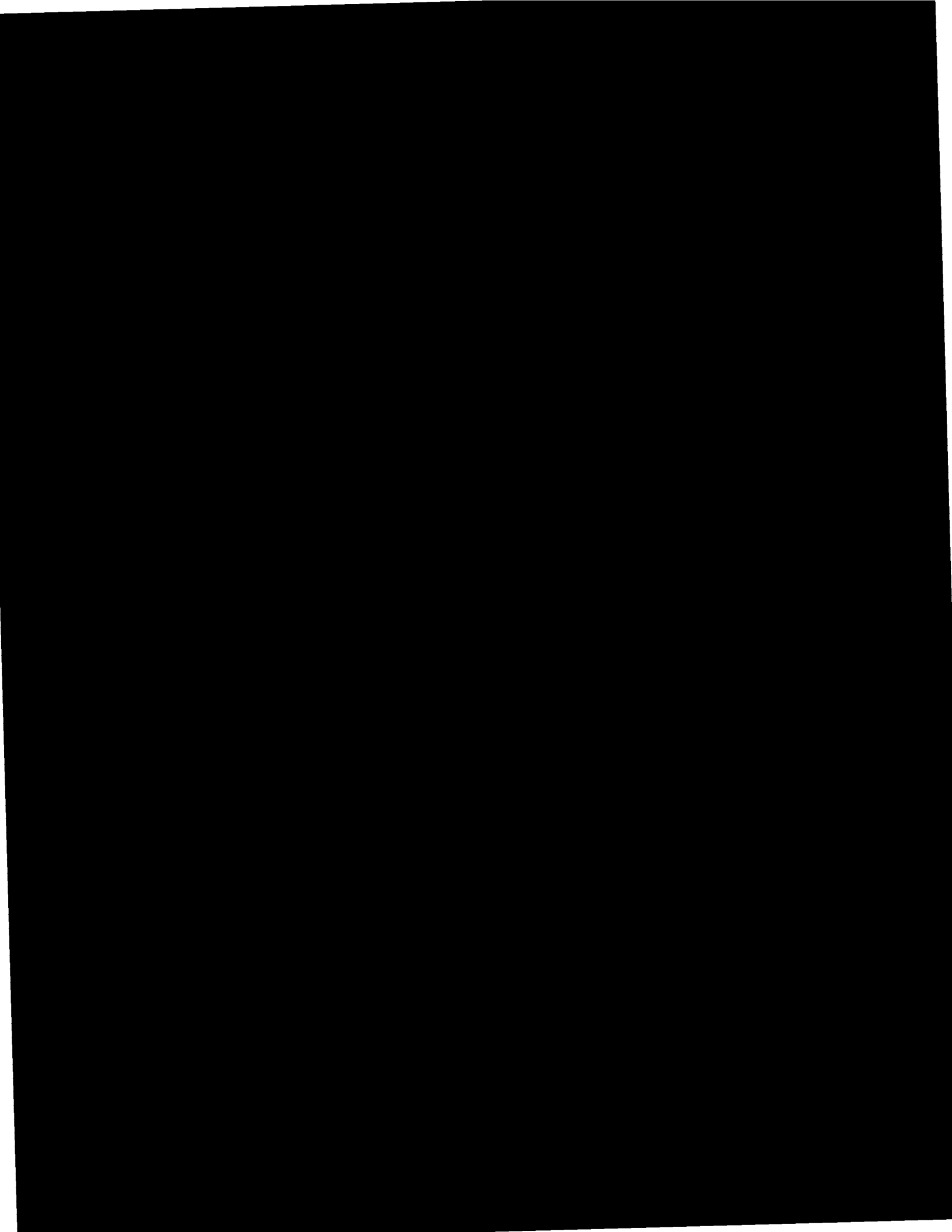
I Yegorova
Signature

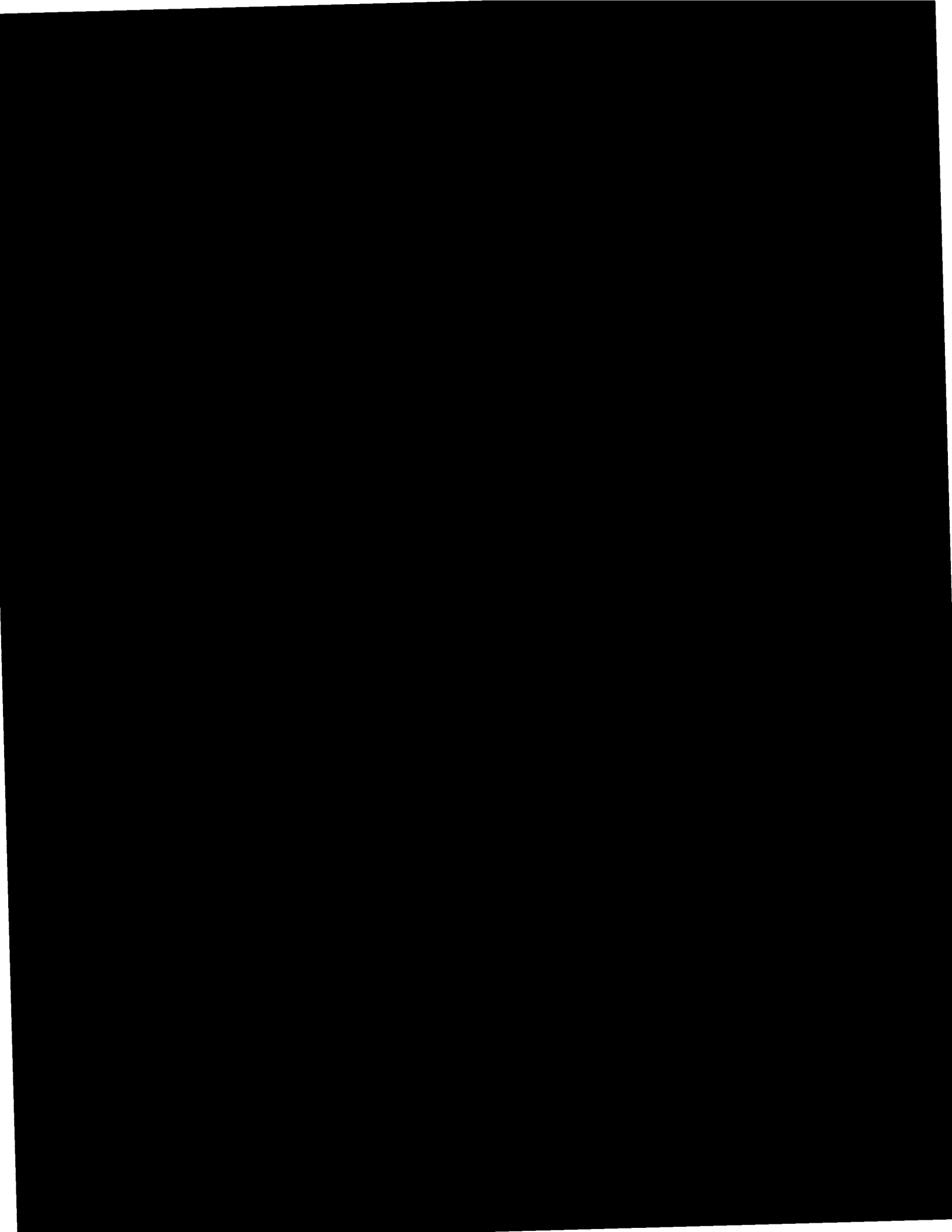
INNA YEGOROVA
Printed name

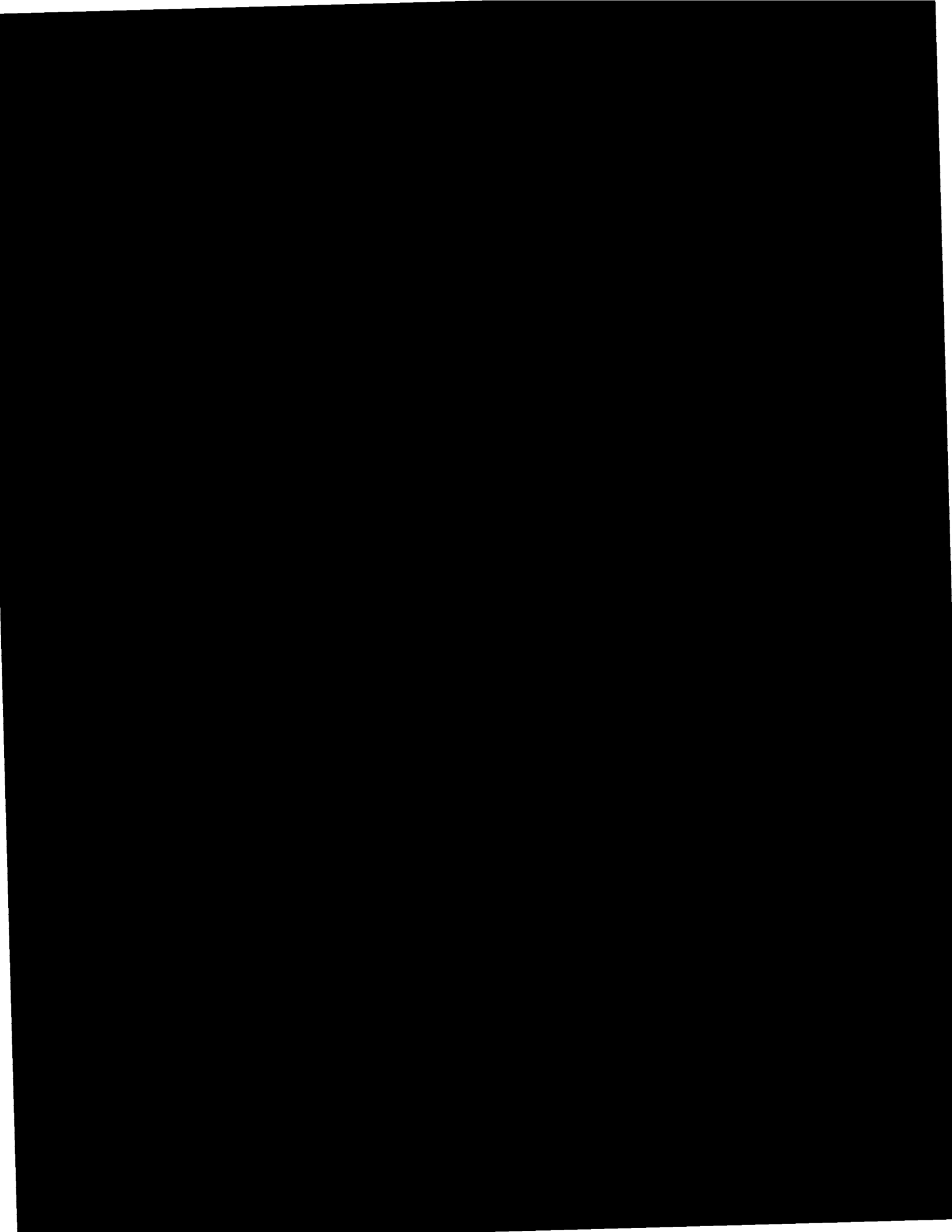
OWNER Inna Consulting
Title of records custodian

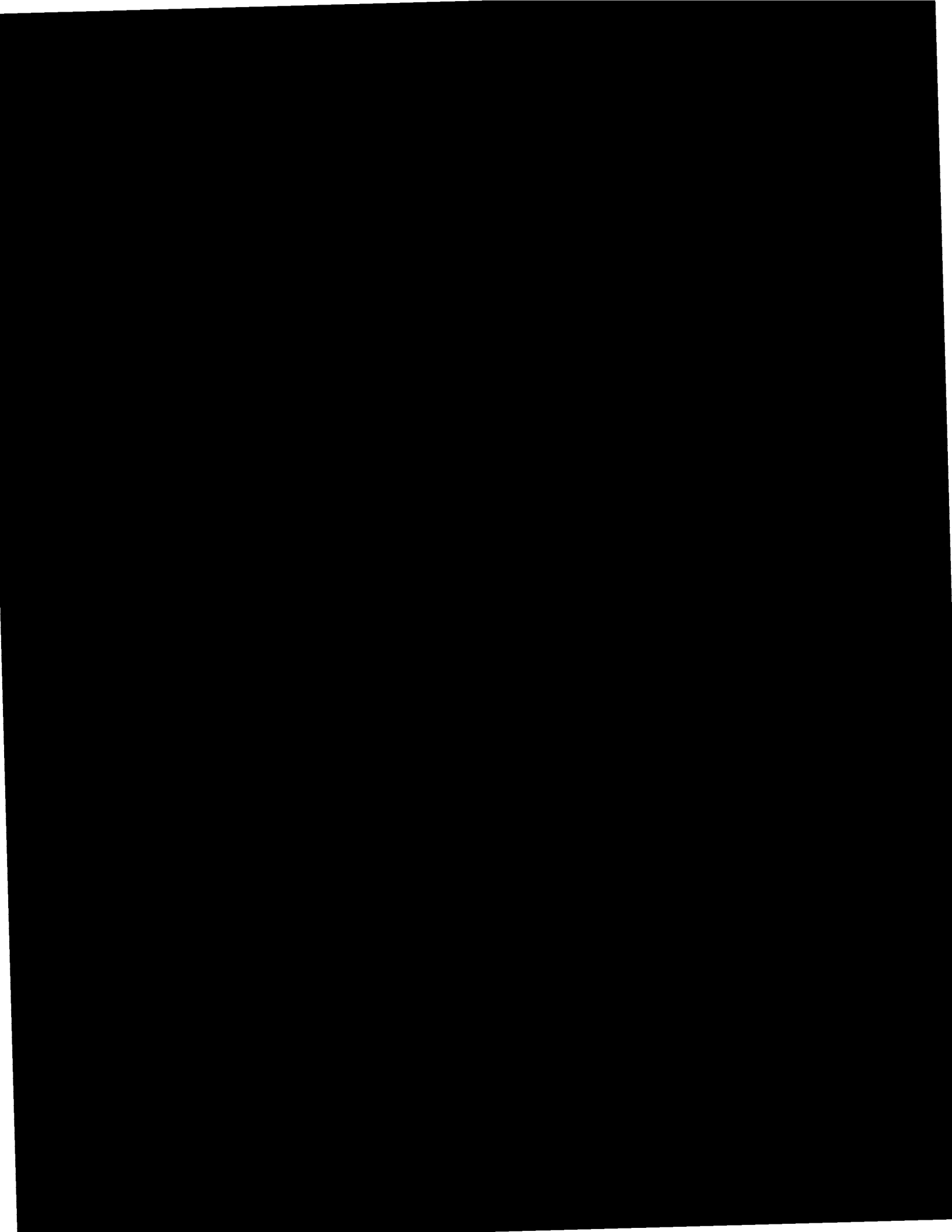
Attachment 8

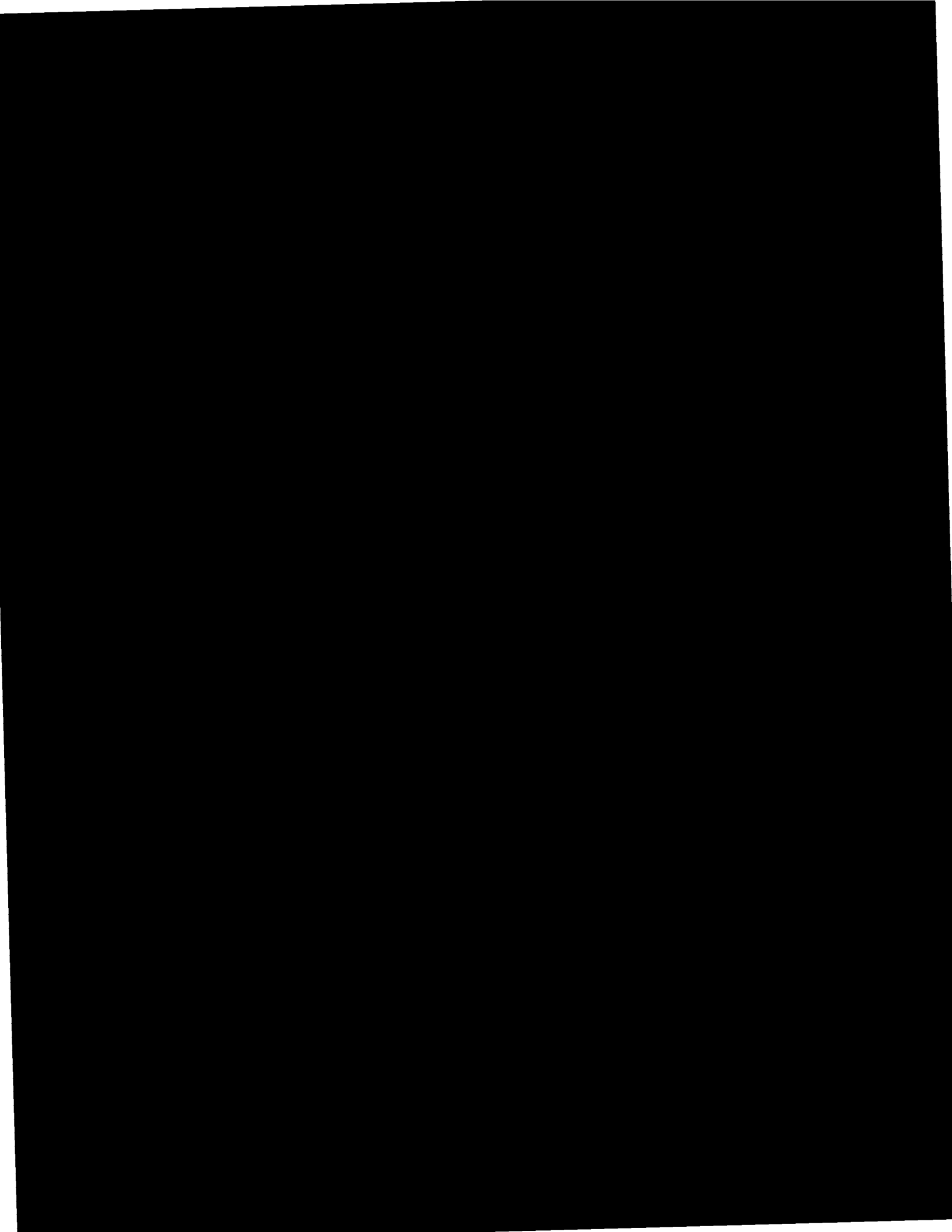












UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of

**HEALTH RESEARCH LABORATORIES, LLC,
a limited liability company,**

**WHOLE BODY SUPPLEMENTS, LLC,
a limited liability company,**

KRAMER DUHON,

**individually and as an officer of
HEALTH RESEARCH LABORATORIES, LLC**

and WHOLE BODY SUPPLEMENTS, LLC.

Docket No. 9397

**DECLARATION OF CELIA GARRETT
PURSUANT TO 28 U.S.C. § 1746**

I have personal knowledge of the facts set forth below and am competent to testify about them. If called as a witness, I could and would testify as follows:

I am a United States citizen over the age of 18. I received a bachelor's degree from Duke University in 2019. I am employed by the Federal Trade Commission ("FTC") as an Honors Paralegal in the Bureau of Consumer Protection. I have held this position since September of 2019. My business address is 600 Pennsylvania Avenue, N.W., Mail Drop 9528, Washington, DC 20580. On October 29, 2020, I was assigned to work on the case *In the Matter of Health Research Laboratories*, Docket No. 9397.

1. In February 2021, I was assigned to review mailer advertisements in this matter, Health Research Laboratories, as well as in two other FTC matters: A.S. Research, LLC and Mile High Madison Group, Inc. I selected advertising materials marketing products

connected to the companies named in the three identified matters.

2. In the Adobe Acrobat program, I identified certain PDF pages of the various mailers and then individually extracted each page to a new file. I converted these pages to image files that I then pasted into a PowerPoint file. I captioned each image with the name of the matter connected to the image and associated mailer. A true and accurate copy of this document is attached as **Attachment A**.

I state under penalty of perjury, that the foregoing is true and correct.

Executed on April 13, 2021, in Washington, DC

Celia Garrett

Attachment A

Health Research Labs


Encore Plus Solutions
(Nordic Clinical)

A.S. Research-Synovia

Ultimate Heart Formula Risk-Free Reply Form

YES! I want to do all I can to protect my heart and keep my arteries clear. I want to worry less and have more confidence in my heart health with this natural symptom-relieving heart health formula! I understand it is doctor-formulated and guaranteed to give my entire cardio system a fresh start. I understand I'm covered by your 60-day money back guarantee... Either the Ultimate Heart Formula works for me, or I can get a full and fast refund. Please send me the following supply:

- SUPER-INTENSIVE:** I get a 5 month supply, plus a 7 month bonus supply absolutely FREE! I pay only \$190.95 and get FREE SHIPPING!  **\$190.95** (one month only 60-quantity)
- MEGA-INTENSIVE:** I get a 3 month supply, plus a 3 month bonus supply absolutely FREE! I pay only \$120.95 and get FREE SHIPPING!  **\$120.95** (one month only 60-quantity)
- ULTRA-INTENSIVE:** I get a 2 month supply, plus a 1 month bonus supply absolutely FREE! I pay only \$70.95 and get FREE SHIPPING!  **\$70.95**
- INTENSIVE:** I get a 1 month supply for only \$30.95 + \$6.95 S&H!  **\$30.95** (one month only 60-quantity)

TOTAL PACKAGE: I get everything in the Mega-Intensive Package plus buy 3 months of Hydrflexin for only \$110.95 and get another 3 months FREE! All of this with FREE SHIPPING!  **\$220.95** (one month only 60-quantity)

RUSH PROCESSING: Add \$4.95 for the fastest way to receive your order.

ORDERED BY: (PLEASE PRINT)
 Name: _____
 Address: _____
 City: _____ State: _____ Zip: _____
 E-mail: _____

SELECT YOUR PREFERRED METHOD OF PAYMENT:
 I have enclosed my check or money order payable to "HRL" for the amount of: \$ _____

Please charge the full amount to my credit card:
    
 Credit Card Account Number: _____ Exp. Date (MO/YR): _____
 Signature: _____ Daytime Phone: _____

Our Iron-Clad Guarantee: Try Ultimate Heart Formula Risk-Free For 60 Days. If You Don't Feel 100% Better — YOU'LL GET YOUR MONEY BACK!
 YOU will be the only judge. You've read about the cardio-improving and heart-strengthening power of Ultimate Heart Formula. For up to 60 days, you can use it completely risk free in your own home and see your results. If you are not 100% satisfied, you can request a full refund. No questions asked. —Dr. Cohen

3 Ways to Place Your Order:
1. By Mail: Use the enclosed envelope or mail to:
 Health Research Labs,
 165 Pleasant Ave.,
 South Portland, ME 04106
2. By Phone: CALL TOLL-FREE
888-462-9386
3. Online:
www.HRLsupplements.com

Subtotal _____
 S&H _____
 *RUSH Processing +4.95
TOTAL _____

Health Research Labs,
 165 Pleasant Avenue,
 South Portland, ME 04106
 Please remove my name from future mailings. **15**
HRL005082

RSVP PAIN RELIEF CERTIFICATE

• Save 33% • Zero risk • Now yours without a prescription





Yes, Dr. Isler, I want the MRS1 of a whole new class of painkillers that work on a molecular level to ease, even end, my pain. Please send me Synovia as indicated below. I understand I risk absolutely nothing thanks to a LARGE PRINT, No-Risk, No-Questions-Asked, Money-Back Triple Guarantee.

- BEST DEAL:** Buy six at 33% savings and the lowest price per bottle! Please send me six bottles (a six-month supply) of Synovia for ~~\$659.95~~ **\$439.95**. This is a savings of 33% off the regular price. I also receive three FREE Gifts:
 FREE Special Report No. 1: The Old German Joint Pain Solution That Led to 6,000 Success Stories, a \$19.95 value, yours FREE!
 FREE Special Report No. 2: The 10 Best Flexibility and Mobility Exercises for Joint Pain, a \$19.95 value, yours FREE!
 FREE Special Report No. 3: 7 Little-Known Lifestyle Changes That Can Improve Arthritis Symptoms in 24-72 Hours, a \$19.95 value, yours FREE!
 FREE Shipping and Handling, at \$8.95 value
In all, my "Best Deal" order includes savings and FREE Gifts valued at \$169.80.

- GOOD DEAL:** Buy three at 17% savings! Please send me three bottles (a three-month supply) of Synovia for ~~\$179.95~~ **\$149.95**. This is a savings of 17% off the regular price. I also receive two FREE Gifts:
 FREE Special Report No. 1: The Old German Joint Pain Solution That Led to 6,000 Success Stories, a \$19.95 value, yours FREE!
 FREE Shipping and Handling, at \$8.95 value
In all, my "Best Deal" order includes savings and FREE Gifts valued at \$39.80.

- TRIAL OFFER:** Please send me one bottle (a one month supply) of Synovia for ~~\$29.95~~ **\$8.95** shipping & handling for a total of **\$89.90**.

Please indicate your method of payment:

Enclosed is a check or money order for \$ _____ payable to: AS Research, LLC
 Charge my:    
 Credit Card #: _____ Exp: _____ / _____
 Signature: _____ 3-or 4-Digit CVV Code: _____
 Phone: (_____) _____
Phone not used: I care we have a carbon stamp (see below)
 Yes, please order by mail that my order has shipped. Also, please let me know special savings certificates. I understand I can unsubscribe at any time and my address will never be rented or sold.
 Email address: _____

IMPORTANT: To mail to: write your name or address here. Please check the back cover for that information and cancel if necessary.
 MAIL this certificate to:
 AS Research, LLC 384 Green Leaf Drive, Grovespring, Georgia 30813... or for fastest service...
Call TOLL FREE 1-888-973-8076, 24/7.
 Thank you for your order! **31**

JOINT HEALTH NEWS / PAGE 18

Hydrflexin RISK-FREE ORDER CERTIFICATE

YES! I want to relieve my pain, stiffness, and inflammation with the Hydrflexin breakthrough that's already helped thousands of pain sufferers reclaim their lives! I understand that I must be thrilled with the results or I get a fast and full refund (less S&H). And I keep all of my free gifts no matter what!

You are covered by a 100% Money-Back Guarantee

- BEST DEAL—ULTIMATE PAIN RELIEF PACK!** Get discounts & gifts worth \$126.55! I want the six-month Ultimate Pain Relief Pack of Hydrflexin for only \$179.95. I get six bottles, two FREE health reports, FREE shipping, and a BONUS Sleep Guide for fast response!
- GOOD DEAL!** I want to try a three-month supply of Hydrflexin for only \$99.75 plus FREE shipping & handling. I receive three bottles, one FREE health report, and a BONUS Sleep Guide if I order within 10 days!
- SINGLE BOTTLE TRIAL OFFER** I want to try a one-month supply of Hydrflexin for \$39.95 plus \$6.95 for shipping & handling (\$46.90 total). I receive one FREE health report. Not eligible for the fast response bonus Sleep Like a Baby Health Guide.

OUT HERE


METHOD OF PAYMENT:
 Name: _____
 Address: _____
 City: _____ State: _____ Zip: _____
 My check is enclosed for U.S. \$ _____ (Payable to Research Labs)
 Please charge my:    
 Card No.: _____ CVV number: _____

IMPORTANT: **SEND THIS TO:** Mail to (fill in to receive special savings) (Optional, in case we have a question about your order)
 (Shipping code is located on the front page of this letter to the left of your mailing address.)
 Name: _____
 Address: _____
 City: _____ State: _____ Zip: _____
 Phone: (_____) _____
 Signature: _____
 Amount \$: _____

For fastest service, call Toll-Free 1-800-454-0180
 24 hours a day • 7 days a week
 You can also mail this order completed Order Certificate in the enclosed envelope to Research Labs, 4777 N. Ocean Drive #172, Ft. Lauderdale, FL 33309

Health Research Labs

Encore Plus Solutions
(Nordic Clinical)



Meet Dr. Richard Cohen, M.D.

Richard Cohen, M.D. is a nationally recognized medical expert. As a specialist in nutritional medicine, he brings over two decades of experience in treating age-related illness.

He completed his undergraduate degree at *Duke University* with honors. And received his medical degree from *Hahnemann Medical University* in Philadelphia. Dr. Cohen is a member of the *American College for the Advancement of Medicine*.

Dr. Cohen's expertise has earned him the attention of physicians and health professionals across the U.S. He has trained the American medical community on dietary issues for over 20 years. And recently, **he was recognized as a leading authority in using diet, nutritional supplements and lifestyle to enhance well-being.**

In recent years, he has helped develop a number of successful, innovative treatments to help his patients eliminate a variety of health problems.

If you ask me, that's no way to enjoy life. And your legs and feet are too important to your mobility and quality of life to ignore this problem!

What you really have is a severe circulation problem that is damaging nerves, and causing further complications...

People suffering with diabetes often have elevated blood sugar levels, and over time these elevated levels can cause permanent damage to the nerves in their feet and hands.



Not only that, this can lead to excess fluid in the legs, and swelling that puts further pressure

on your nerve endings and causes even MORE pain, and MORE problems.

This nerve damage causes a very distinct type of pain — diabetic nerve pain. Which is different from the pain you may experience from a headache, a sprained ankle, or arthritis.

Some people with diabetic nerve pain experience shooting, burning, pins and needles or itching, while others may have only mild symptoms. I have found that the type and intensity of the pain varies greatly from person to person.

Diabetic nerve pain is most commonly felt in the feet and hands, and although it can come and go, the damage that caused nerve pain is permanent.

So what can you do about it?

(continued)

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

Soothe Diabetic Nerve Pain and More! Call Now Toll Free 888-761-5495 • 3 HRL005038

of N-O is changing the way forward-thinking doctors evaluate good health!

We're focusing on the **ROOT** cause of poor health — **POOR** circulation!

And with discovering how N-O works — we now have the **BEST** tool to help you boost blood flow even better than ever!

But here's the problem — and it's a BIG one...

Let me ask you this...

When did you start noticing a decline in your health?

When did your energy level start to take a nosedive?

When did those concerns with cholesterol... blood pressure... memory decline... aching joints start to creep up on you?

Well, if you're like most folks — it probably started around your 40th birthday.

Well guess what?

That's around the **SAME** time your levels of N-O start to plummet! You think it's a coincidence?

Scientific studies say it's NO coincidence at all!

Take a look...

...Italian researchers discovered blood flow starts to decline by 10 percent for every decade — starting around the age of 30...

...so by the age of 60 — your blood flow is **52 percent weaker** than when you were in your 30s. And to add insult to injury...

...Japanese researchers reported that 70 to 80 year olds experienced a **75 percent loss** in endothelium-derived nitric oxide compared to young, healthy 20 year olds. Remember — your endothelium is where N-O is produced! So a decline in endothelial production equals a decline in N-O production!

When your cells are properly nourished, MAGICAL things happen to your body!

Oh — and by the way — all this research was based on healthy adults who didn't have existing problems with blood pressure... high cholesterol... or circulation-damaging blood sugar problems.

So imagine how low your blood flow may *really* be if you currently have some of these health problems!

Now — you see the big problem is that with every passing year... every passing decade — your levels of N-O are plummeting. So the question is: Can you get those levels back up to the healthy range?


The answer is a resounding **YES!** Because... *Continued on next page...*

Meet Dr. Allen Green

Allen Green, M.D. has over 20 years of experience in integrative healthcare settings. He is passionate and dedicated to advancing integrative medicine through education for healthcare professionals as well as the general public.

- ▶ Founder and Medical Director, Center for Optimum Health
- ▶ Past President, American College for Advancement in Medicine (ACAM)
- ▶ Currently on the Board of Directors and Education Committee, (ACAM)
- ▶ Former Assistant Clinical Professor (15 years), UC—Irvine, School of Medicine

- ▶ Past Chairman, Department of Family Practice, Orange Coast Memorial Medical Center in Fountain Valley, CA
- ▶ Past Chairman, Bioethics Committee, Orange Coast Memorial Medical Center in Fountain Valley, CA
- ▶ Post-graduate medical training in family medicine at Montgomery Family Practice Residency Program, Montgomery Hospital in Norristown, PA
- ▶ M.D., Temple University School of Medicine, Philadelphia, PA
- ▶ B.S. Molecular/Cellular Biology, Carnegie-Mellon University, Pittsburgh, PA



Call Toll-Free 1-800-750-0326 / 7

Health Research Labs

Encore Plus Solutions (Nordic Clinical)

LEADING DOCTORS REVEAL WHY THEY LOVE THE HEALING PROMISE OF GENEVIN



Neurologist
"For enhanced memory and brain response, I go with proven Genevin, every time."

Cardiologist
"I've seen Genevin boost cardiac stress test numbers by 325% or more in just 30 days."

Urologist
"Guys hate coming to my office. I rarely see them a second time if they use Genevin."

Dermatologist
"Looking for a way to make skin look and feel smoother and younger? It's right here."

Oncologist
"Oncology is serious for everyone involved. I feel hopeful thanks to Genevin!"

Rheumatologist
"Your body's joints can feel flexible and mobile again after just 30 days or Genevin."

Psychiatrist
"Now when my patients suffer from depression or anxiety, I point them to Genevin."

Gynecologist
"PMS and menopause have met their match. Let me introduce you to Genevin."

Ear, Nose & Throat
"Clear up chronic nasal congestion, tinnitus, bronchitis, you name it... with Genevin."

General Practitioner
"I praise Genevin as my go-to strategy for optimum health in every way."

Pulmonary Physician (Lungs)
"I've seen serious improvements in those suffering from asthma. Give Genevin a try."

Pathologist (Tissues)
"Want to live a disease-free life? Genevin is the key that opens that amazing door..."

Nephrologist (Kidneys)
"It's time to say goodbye to all kinds of kidney disorders, thanks to Genevin."

Gastroenterologist
"Tired of acid reflux, IBS and other digestive problems? Go with Genevin. Now."

Allergist
"I can't remember anything to overcome serious allergies as quickly as Genevin."

Ophthalmologist
"For sharper, youthful vision, your choice is clear: Genevin."

Podiatrist
"This year, Genevin has proven its worth with foot problems, over and over and over again."

Obstetrician
"Genevin helps you focus on what matters... welcoming that amazing new life."

Go ahead. Try It Yourself. When you take a bottle of Genevin to any doctor or medical professional, you'll hear amazing things about this breakthrough anti-aging strategy.

CALL 1-888-773-8908 TO SAVE NOW!

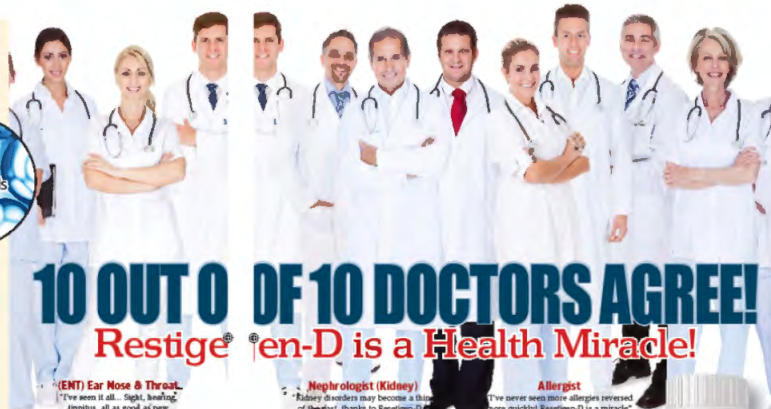
Every Organ in Your Body Gets a New Start!



When you are born - your body is "Starting Point Perfect"... the 50 Trillion Cells in your body are unused, undamaged, strong, young and fresh. The ability to grow bigger, stronger, faster is automatically built into your cellular makeup. But as we age - the cells in our body begin to degrade, begin to lose the ability to grow, begin to wear out... and at some point our cells become so damaged that our bodies are taken over by a spiderweb of disease or run flat by old age - and we die. Of course aging is inevitable - but feeling young, looking young - being strong, and living a superb quality of life CAN be achieved - through cellular regeneration. With Resegen-D you can actually reset your organs, cells and body to "Starting Point Perfect"... arresting and REVERSING damage done to your body by time...



Call 1-800-753-0492
Now For Your 30 Day
RISK FREE TRIAL



10 OUT OF 10 DOCTORS AGREE!
Resegen-D is a Health Miracle!

(ENT) Ear Nose & Throat
"I've seen it all... Slight, hoarse, chronic, all as good as gone - with 30 days of Resegen-D!"

Gastroenterologist
"If you want to fix Acid Reflux or IBS for good... try Resegen-D. IT WORKS!"

General Practitioner
"Nothing is better for post-baby recovery and a post-baby body - than Resegen-D."

Gynecologist
"The total elimination of TMS Symptoms is now possible with Resegen-D."

Neurologist
"Resegen-D is PROVEN to enhance memory function and response time. Truly Amazing."

Endocrinologist
"Last... get Resegen-D and you will not have to see me... ever. It is an all body WONDER."

Nephrologist (Kidney)
"Kidney disorders may become a thing of the past... thanks to Resegen-D!"

Pathologist (Tissues)
"I think Resegen-D is the gateway to living a disease free life. Thank God."

Pulmonary Physician (Lung)
"The results of Resegen-D for asthma sufferers is nothing short of a miracle."

Ophthalmologist
"Resegen-D is the best supplement that actually improves eye disorders."

Oncologist
"Oncology is a very serious business. Resegen-D actually gives me real hope!"

Podiatrist
"I've solved more problems with Resegen-D in the last year than you can imagine."

Allergist
"I've never seen more allergies reversed more quickly! Resegen-D is a miracle!"

Cardiologist
"Resegen-D is amazing. I've seen stress test numbers improve 325% in 30 days."

Dermatologist
"If you want perfect skin - Resegen-D is the answer... the SAFE answer."

Rheumatologist
"30 days of Resegen-D is like having all the joints in your body lubricated!"

Urologist
"No one wants to see me - with Resegen-D, they usually don't have to a second time."

Psychiatrist
"Resegen-D is now my first choice in treating depression and anxiety. Good stuff."



Resegen-D - Rebuild Your Body Cell by Cell

30-Day RISK FREE TRIAL - Call 1-800-753-0492 Now

Health Research Labs

Encore Plus Solutions (Nordic Clinical)

A.S. Research-Synovia

FTC0013

Doctors' Opinion...

Question:
What is the single, greatest health benefit of Black Garlic?

Answer:
In my experienced medical opinion, Black Garlic's most important benefit is its all natural help for heart issues and diabetes. From potential life extension to antioxidant help to disease protection, no doubt, Black Garlic can do a lot to help you. But what I see in so many people is poor heart health and serious blood sugar issues. And I believe that is where it greatest benefit lies.

And if you have BOTH, that is a dangerous combination...

- 2 out of 3 people with diabetes die of heart disease or stroke.
- 47% of Americans are unaware that diabetes can lead to heart disease.
- 58% don't know that it can affect their sex life.
- 28% don't believe diabetes is a serious disease.
- Having high amounts of sugar in the bloodstream develops into fat that clogs, narrows, and inflames the blood vessels, causing additional wear and tear.

I'm confident BG18 can help improve both of these dangerous health issues and get you on firmer footing. And no other natural healer can help protect you from both like Black Garlic can. Call now for BG18 and see for yourself.

purchase price within 60 days. No questions asked.
I look forward to hearing from you!

Sincerely,
Richard Cohen M.D.
Richard Cohen, M.D.
Whole Body Supplements
Medical Director

P.S. Amazing BG18, packed with 1200 mg of pure Black Garlic gives you the power of a variety of needed good-health nutrients all in two capsules!

Most notably, it can help your entire cardio system run smoothly. Reply now if you want to enjoy the longer life

FREE SHIPPING

Call now 1-888-200-1834 for BG18 and see how it can help YOU.

Doctors Agree... Will Restore Your Memory Else You've Seen!

The Doctor Will Take Your Questions Now...

QUESTION:
What Is Resetigen-D exactly?

ANSWER:
Resetigen-D is an all natural supplement made up of 31 pure ingredients. It is specially formulated (for lack of a better term) to target and restore your body on a cellular level. Resetting your system to how it was meant to operate. It is really a "head to toe" restoration pill - that works.

QUESTION:
What does Resetigen-D "fix"?

ANSWER:
As incredible as it seems - everything. Resetigen-D targets and repairs all the cells in your body - and since you are made up of nothing but cells - everything is rejuvenated - on the inside and on the outside.

QUESTION:
At what age should I start taking Resetigen-D?

ANSWER:
Start now - regardless of your age. If you are 18 or 108 years old - Resetigen-D will help you reset your body to "starting point perfect"

QUESTION:
Where is Resetigen-D made?

ANSWER:
Right here in the USA - under VERY controlled conditions... so every capsule is PURE and SAFE.

QUESTION:
Is Resetigen-D Safe to use?

ANSWER:
Absolutely yes! Resetigen-D is 100% safe - because it is made from all natural ingredients already found in our bodies.

QUESTION:
How long does it take to work?

ANSWER:
It works fast. All 50 trillion cells in your body will be "washed" in less than 30 days.

97.4% Increase In Brain Function... Memory... Response Times

Studies at The University of Moscow have shown that Resetigen-D's 31 powerful ingredients caused memory function, brain function, and mental response times to increase by an astonishing 97.4% in just 28 days. The ability to retain facts, the ability to solve complex math problems, the ability to learn a language, and the ability to play an instrument were PROVEN to be EASY with a 28 day course of Resetigen-D.

90-Day RISK FREE TRIAL - Call 1-800-753-0492 Now

Jack Isler, M.D.
AS Research LLC
384 Green Leaf Drive,
Grovetown, GA 30813

SAVINGS CODE: CUSTOMER PRIORITY CODE:

PRESTIGE STANDARD
US POSTAGE
PAID
PERMIT NO. 102
TOWN ST 12465

M.D. APPROVED! • PATENTED! • SAFE AND NATURAL!

Medical Doctor looking for 1,000 people who crave pain relief without injections, medications or side effects.

For you, relief like this is now possible with the **FIRST** in a whole new class of painkillers **clinically proven to reduce your pain by 95%**, page 4.

OPEN for remarkable results like...

- » Lawrence no longer needs his electric cart to shop, 6
- » Bone-on-bone pain, gone, for William, 12
- » Gerald's 24-hour hip pain, vanished, 3
- » No more painful injections for Lisa, 7
- » Better knees, no doctors, no shots for George, 10

» Joe's knee feels so good, he's postponed surgery, 12

» Barbara's back was killing her for two years, but not anymore, page 12

See what kind of pain relief miracle it can do for you...

Health Research Labs

Encore Plus Solutions
(Nordic Clinical)

A.S. Research-Synovia

Cutting-Edge Natural Medicine

**"If you're looking for a stronger heart and complete health overhaul...
Black Garlic is one of the few "Full Body Healers" on earth I trust 100%."**

Black Garlic is a proven miracle for... Cholesterol... Hypertension... Diabetes... Your Heart... Your Brain... Hypoglycemia... Weight Control and more.

Dear friend
What I'm about to tell you is really pretty amazing.
You see, there's a place in Japan, called the Aomori prefecture, which is the garlic capital of Japan...
This ONE district produces nearly 80% of the total garlic crop in Japan...
But what it's really famous for around the world is its fermented, healing Black Garlic! A proven superfood that has helped its citizens for thousands of years to live longer and healthier than you or I can expect to.
In fact, this Japanese city could be considered a miraculous "Blue Zone," much like the nearby Okinawa. This is defined by National Geographic Magazine as a place where people eat a unique diet that gives them extraordinary health benefits.

Black Garlic as a healing and longevity agent first gained a modern following and global popularity after Hiroaki University professor, Enki Sasaki, showed that Black Garlic reduced cell size of certain serious diseases.
He knew he was on to something important when he conducted the same research using white garlic, but did not yield the same healthier results.
And while his clinical research confirmed that black garlic absolutely has unique healing properties...
This was NOT news to the Japanese people who have been using it for thousands of years to live longer and healthier!
So while you may occasionally see garlic used as an ingredient in a natural



SPECIAL REPORT ON PAIN RELIEF SUMMER 2017 • COMPLIMENTARY ISSUE

Based on a discovery from the Kaplan Medical Center in Rehovot, Israel...

The Israeli secret for miraculous pain relief

Relief starting in as little as 5 days!

A mysterious desert mineral can help you feel decades younger, by restoring mobility and flexibility

"Only 1% of Israelis get arthritis—while 20% of Americans suffer from it."

A mysterious mineral found 6,700 miles away in the middle east could spark a multi-million-dollar joint health revolution.
Only Neurocet contains this clinically tested, joint-nourishing miracle for improving discomfort, stiffness, flexibility and mobility. This extraordinary story starts on page 2...

Fast acting joint and muscle comfort for:

- Back pain • Sprains • Joint pains • Stiff neck
- Muscle aches • Foot pain • And more

▲ Israeli General Ariel Sharon led his forces to victory. Is this mineral the secret to their success?

Your satisfaction is **100% GUARANTEED**—or it's FREE!

NC000085

Jack Isler, MD, pioneer in natural medicine and author of 21 Broken Bones: A Guide to Understanding and Controlling Your Pain

"I know real pain since I've broken 21 bones."

"I've seen and tried almost every kind of painkiller. Synovia is the best!"





Dear Pain-Magued Friend,
Before I went to medical school to become an anesthesiology critical care physician, I beat up my body quite a bit.
Over an 11 year span in my younger days, I broke 21 bones.
This was a result of martial arts tournaments (yes, I broke wood planks and bricks with my hands)... being tossed like a rag doll as a rodeo clown... feeding off bulls as a bullfighter... and a serious accident as a construction worker.
Breaking those bones, of course, was very painful. And those broken bones led me on a search for pain relief that lasted decades.
I've tried just about every pain relief "solution" available. From shots to acupuncture. From prescription medications to yoga. Some gave me temporary relief, others failed miserably.
But it wasn't until I realized I had to take the

I broke a number of bones working in a rodeo being a younger clown.

I know pain. And I know relief. Synovia will give you the kind of relief you want—or it's FREE! Order today.

Jack Isler MD
Jack Isler, M.D.

For fastest ordering, call TOLL FREE 1-888-973-8078

Health Research Labs

Encore Plus Solutions
(Nordic Clinical)

The Japanese Smoke & Have High Blood Pressure — Yet, Low Cholesterol!

Japanese have lowest incidence of heart attacks in the world. Why?

What are your treatment options for heart disease?

SENSIBLE DIET

Being overweight is just 1 factor that puts you at risk for heart disease. Losing weight doesn't guarantee lowering cholesterol, blood pressure, or triglycerides (a type of fat in your blood).

• **Ornish Diet:** Very little wiggle room for food choices, only 10% of calories can come from fat, & can be pricey for produce, whole grains, and fish.

• **Mediterranean Diet:** Not a structured diet, so it's up to you to figure out on your own how many calories you need to eat to lose or maintain weight & how active you'll be.

• **Vegan Diet:** No animal products allowed, even dairy and eggs. Takes work to ensure you get sufficient amounts of key nutrients. Limited options for eating out, may require a lot of time to prep for meals.

PHYSICAL ACTIVITY

Recommended exercise at least 30 minutes a day, 5 days a week in order to improve heart health.

GENETICS

Many heart conditions are passed on from generation to generation. While you can't change your genes, you can learn your family history and prepare your body and your mind for any potential upcoming challenges with natural preventative solutions.

STATINS

Medications with possible side effects: muscle pain, liver damage, kidney failure, even death.

The Miraculous Solution in Japan: **Black Garlic**

The Aomori prefecture is the garlic capital of Japan, producing as much as 30% of the total garlic in the nation. What it's really famous for is the fermented Black Garlic.

Popular in Asian cuisine, Black Garlic is fermented under highly controlled conditions for 3-4 weeks, which is what gives it its black color. While many are hesitant to try it because of its color, it is actually easy to digest and odorless, can be enjoyed as a preserved fruit, used as a spice or condiment, and the garlic skin can be used to brew tea.

A Natural Supplement Improving Lives
Black Garlic gained popularity after Hiroaki University professor, Jinji Suzuki, showed that Black Garlic had a beneficial effect on harmful cells in the body — the same research was conducted using white garlic and did not yield the same results.



Black Garlic is studied for:

- ✓ Increasing energy
- ✓ Strengthening the immune system
- ✓ Promote anti-aging effects
- ✓ Enhancing recovery from fatigue
- ✓ And, improving restfulness



Black Garlic is the... "perfect human health food."
Black Garlic antioxidant capacity is the best in more than 300 kinds of food!

Black Garlic must be fermented in precise conditions for over 60 days with increasing efficiency the longer it ferments. It contains 16 kinds of amino acids needed by the human body.

Healthy Arteries

Hard build-up in arteries can lead to unhealthy heart conditions. Black Garlic helps keep blood vessels barrier free to create smooth flow, which could address symptoms of fatigue. It may also inhibit calcium binding, which is responsible for arterial plaque formation.

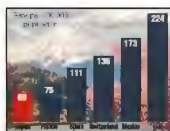
Prevent Health Crises Before They Take Hold

Black Garlic is being tested in both population studies and clinical trials to see how effective it is at preventing and treating the root cause of many key health issues.

Want Healthy Blood Pressure & Cholesterol?
Black Garlic helps maintain healthy blood pressure, cholesterol and triglyceride levels.

Overweight? Belly Fat Creates New Risk Factors

Some fat is a normal function of the human body and helps to regulate blood sugar. But belly fat in particular loses sensitivity to insulin, and can often trigger the body's natural function of pumping insulin. This can cause metabolic syndrome, which may further develop into high blood pressure, excess bad cholesterol, and even type 2 diabetes.



Lowest Heart Disease in Japan



Fermentation Process of Garlic



BLACK GARLIC A BREAKTHROUGH FOR:

- ✓ Cholesterol
- ✓ Blood Sugar
- ✓ Blood Pressure
- ✓ The Heart
- ✓ The Brain

NEUROCET BREAKTHROUGH INGREDIENT #1:

The miraculous joint-protecting power of boron

Is this the secret that has made the Israeli Forces invincible?

The Israeli Defense Forces rank among the strongest and most highly-trained armed forces in the world. The people are known for being fit, strong, and *incredibly* resilient. They have one of the longest and healthiest lifespans on earth — an extraordinary 80.2 years.

"May you live to 120 years old," an Israeli blessing says it all

The fascination with a long and healthy life is reflected in their history where it is reported in their scripture that Moses lived to 120 and Abraham to an extraordinary 175, astronomical by today's standards. That long-life goal is rapidly becoming a reality for the average Israeli.

For over 2,100 years, their military power has been acknowledged worldwide

In modern times the state of Israel has produced extraordinary warriors like Moshe Dayan, Ariel Sharon and Yitzhak Rabin



This rare desert mineral helps relieve your worst joint pain

who have faced overwhelming challenges and won.

Yet throughout their early history, these remarkable people have distinguished themselves as skilled soldiers with unmatched physical capabilities.

Over 2,000 years ago Judah The Hammer revolted against the powerful, well-armed Seleucid rulers of Judea and emerged victorious. 2,100 years ago, Shimon Kokhba organized a small, disciplined warrior group that defeated an entire

Israel's 2,100-year history of military victories
The most courageous and physically fit warriors in history

In Ngawha, New Zealand, they call this the "Curative Pool" for arthritis

SHMUEL ADIYA
As a 19th member of the 6th century, Shmuel Adiya's people were attacked by the most powerful and largest nation in South Arabia. Adiya's resistance was so fierce, the enemy withdrew.

ELIJZER BEN YAIR
2,192 men ago, Elijzer Ben Yair fought against 9,500 Roman soldiers who attacked Masada. His mountain-top fortress. With only 907 warriors, he held them off for two years, even amazing Roman generals.

These spa pools contain a staggering 300 parts per million of boron
New Zealand residents also have an astonishingly low rate of muscular skeletal disease. In Ngawha, New Zealand there are spa pools which are well known as "curative pools" for arthritis.

You're 100% Satisfied — Or It's FREE!

Clinically-tested ingredients for reducing joint pain, stiffness and improving mobility

- ✓ Fast-acting ✓ Long lasting
- ✓ Deep penetrating

Get up to 2 FREE BOTTLES by calling 1-800-633-4854 or returning the order form on page Z7.

NOT SOLD IN ANY STORE NO PRESCRIPTION IS NEEDED.

Neurocet

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

TO ORDER CALL TOLL-FREE 1-800-633-4854 7

Health Research Labs

Encore Plus Solutions
(Nordic Clinical)

A.S. Research-Synovia

On the other hand, heart/cardio medications are notorious for their ugly side effects, because those chemicals just aren't good for your body.

**Naturally protect and strengthen your heart and arteries...
Reply now 100% risk free for all-natural Ultimate Heart Formula!**

If you knew how truly debilitating a heart attack or stroke would be for you, taking away your ability to walk, talk, eat by yourself, or even move... You would take this matter very seriously.

It would make your decision to reply now for our **Ultimate Heart Formula** a no-brainer. It is simply among the most potent, natural heart formulas on the market today! As a medical doctor, I'm 100% confident it can support your heart and artery health to help lower your cardio health risk. So you don't have to worry about the damage it will do to your body.

Don't wait... Reply now to join our thousands of satisfied users and get special, first-time-buyer-only low pricing. You can also get a greatly discounted price on the perfect companion product, and FREE Shipping!

Don't roll the dice on your good health or your life! Take this easy step now to keep your heart strong and your arteries clear.

Reply now for the Ultimate Heart Formula... America's #1 natural treatment to help maintain cardio health... doctor-recommended and formulated... and already used by thousands of people just like you! Call now!

With daily use, it can rejuvenate your heart and arteries with needed nutrients to give you many years of trouble-free support!

Your reply is 100% risk free... If you're not 100% satisfied with your improvement after using **Ultimate Heart Formula**, simply send it back for a full refund of your purchase



Vou can enjoy a healthy trouble-free heart and arteries, naturally, with an effective formula used by thousands of people across America! **Reply now for the Ultimate Heart Formula.**

price within 60 days. No questions asked.

I look forward to hearing from you!

Sincerely,

Richard Cohen

Richard Cohen, M.D.
Health Research Labs, Scientific Advisor

P.S. Our Ultimate Heart Formula can help keep your heart strong and arteries clear, so you can feel great and worry less! Respond now if you want your healthiest heart possible! You'll get completely natural, real support for complete heart protection. All natural **Ultimate Heart Formula** is 100% effective and safe to use every day! Remember, thousands of people have already used it to help keep troubling heart-related problems out of their life! **Call now risk free 888-462-9386.**

P.P.S. Sign up for our FREE weekly email newsletter! It's called *Dr. Cohen's Healthy News Now...* and it discusses many different health issues. Our customers love it! Just give us your email address when you place your order.

UCLA School of Medicine
"Early clinical studies show if you boost nitric oxide formation in the brain, you can support memory and learning."

—Dr. Louis Ignarro, Ph.D. Nobel Prize in Medicine and Professor of Pharmacology at the UCLA School of Medicine

When you start misplacing your keys... forgetting faces and names... or having those "senior moments" — are you secretly wondering...

Am I losing it?"

Most folks over 40 assume mental decline is just a natural part of aging — and so they just put up with the forgetfulness... mental fog... and brain drain.

But research conducted by Nobel Prize winner Dr. Louis Ignarro reveals mental decline may just be your brain's cry for more N-O!

Without adequate levels of N-O — blood flow to your brain can plummet — and that can cause similar symptoms as age-related mental decline. So if you're experiencing...

- Forgetfulness
- Mental fatigue
- Difficulty concentrating
- Poor recognition of faces and numbers
- Blue moods



...then I encourage you to try N-O Sanguinol and see the difference healthy blood circulation can have on your brain! And the good thing is...

...you don't have to wait long to see if N-O Sanguinol is working for you. Most folks experience a noticeable improvement — starting with the very first dose!

Now that N-O Sanguinol is available to consumers — you have a scientifically studied formula to unleash the power of N-O for healthy circulation... higher energy levels... sharper thinking... deeper breathing... and a healthier and longer life!

Here's to science-based healing miracles,

Dr. Allen Green, M.D.
Dr. Allen Green

P.S. I forgot to mention one important thing: When you respond within 7 days — I've got a special gift to send you.

I realize this may be the first time you've really thought about nitric oxide as a part of your wellness program.

And the truth is: What I've mentioned about N-O just scratches the surface. That's why I've created a special report that's easy-to-understand and tells you more about the many health benefits of N-O.

It's called *"Say YES to N-O for Optimal Good Health!"* In this report you'll uncover:

- Little-known — and tasty — N-O Boosters! YES you can EAT your way to healthier N-O levels!

- Taking pain pills? Find out how to use N-O for optimum results!

- Turn DOWN sauna heat — and REV UP N-O production! For even better results — follow the "15-30" protocol in your report!

- Secret cause of sleep-deprivation! Could this be why you're tossing and turning all night?

- The BEST birthday gift for friends turning 40!

- And much more!



Call Toll-Free 1-800-750-0326 / 27

pain by 95%...restore your joints' natural lubricating fluid...and squelch pain-causing free radicals. *Synovia* works for you, or your money back!

- **Money Back Guarantee No. 3:** *Synovia* will give you relief for your knees, hips, back, neck, hands, fingers, legs and joints **without** injections, medications or side effects. *Synovia* works for you, or your money back!

In fact, try out *Synovia* for a full 60 days. If during that time or at the end of that time, you're not thrilled by the relief you get with *Synovia*, just return the bottles—opened or not—for a **FULL, 100% REFUND** of every penny you paid. No questions asked. Plus, your **FREE Gifts** are yours to keep.

So don't suffer one more second. Order Synovia today!

Why does *Synovia* work when so many pain relieving "solutions" only work on a temporary basis or don't work at all?

As you've read, *Synovia* works differently, as the FIRST of a whole new class of painkillers called MPRs (for Molecular Pain Relievers).

Synovia is the only pain-relieving formula I've found with nutrients clinically proven or shown to...

- >> Reduce pain by 95%
- >> Reduce pain-causing acidity by 57%
- >> Deliver "relief molecules" deep within your joints
- >> Restore your body's natural lubricating fluids
- >> Restore and repair damaged joint cartilage
- >> Defuse pain-causing free radicals better than any other antioxidants
- >> Relieve pain in your knees, hips, shoulders, back, neck and joints

Even better, as I noted, you can now try *Synovia* at 33% savings and without risking one cent.

Ordering is easy. For fastest service, call TOLL FREE 1-888-973-8076 anytime 24 hours a day, 7 days a week. Or return the RSVP Pain Relief Certificate in the postage-paid envelope to:

No "Black Box" warning needed! Get safe, natural pain relief.

One thing people taking *Synovia* really appreciate is it brings them blessed relief safely, gently and naturally—with zero worry about side effects.

Not so with conventional painkillers that are required to have a "Black Box" warning label on their boxes notifying users of potential side effects like bleeding or perforation of the stomach...extreme fatigue...dizziness...or constipation.

More serious side effects of conventional painkillers include difficulty breathing...rapid weight gain...muscle cramps...decreased hearing...or abdominal cramping.

Now, take *Synovia* with peace of mind you can get safe, safe pain relief!

AS Research, LLC, 394 Green Leaf Dr., Grovetown, Georgia 30813.

If you want to relieve, even end, your pain starting today, order *Synovia* now. Remember, *Synovia* works for you—or it's FREE!

Yours for better health, the natural way,

Jack Isler, M.D.
Jack Isler, M.D.

P.S. Don't forget. Your "Best Deal" of *Synovia* includes savings of 33%...three FREE Special Reports...and FREE shipping—a total of \$188.80 in savings and FREE Gifts.

P.P.S. And you won't risk one cent thanks to A LARGE PRINT, No-Risk, No-Questions-Asked Money Back Triple Guarantee. So order today!

Safe, powerful pain relief without injections, medications or side effects! Works for you, or it's FREE. Satisfaction guaranteed!



Help Keep Your Arteries Clear and Enjoy More Peace of Mind! Call Toll-Free 888-462-9386 • 13 HRL005080

For fastest ordering, call TOLL FREE 1-888-973-8076

Health Research Labs

Encore Plus Solutions
(Nordic Clinical)

A.S. Research-Synovia

Love Your Entire Life...

Qualities of Black Garlic

- ✓ Antioxidants
- ✓ Helps Maintain Healthy Blood Pressure
- ✓ Heart Protection
- ✓ Supports Healthy & Balanced Cholesterol
- ✓ Anti-Bacterial
- ✓ Circulation Support
- ✓ Strong Immunity



"Black Garlic Botanicals relieved the pain in my legs and feet. My circulation is better than it has been in a long time. This product is amazing and I can't live without it." -- John I.*



"Black Garlic helps me sleep better at night — I can't believe how rested I feel in the mornings now!" -- Michelle M.*



You can improve your life now, too! Try it free risk-free today — only pay if you see results.

Finally Get the Rest You Deserve

More Black Garlic Benefits

Just 2 capsules a Day!

HEALTHY WEIGHT MANAGEMENT

"A thicker waistline increases heart attack risk," says Nica Goldberg, MD. Stomach fat is linked to high blood sugar, increased blood pressure, and raised levels of triglycerides, all of which are major risk factors for heart disease. Belly fat is also called visceral fat, which is closer to internal organs, and can be related to hormones — that's why many women start seeing their tummies thicken during menopause.

Black Garlic is an excellent addition to a healthy diet and exercise for overall health. Sustainable weight management is the most sensible and practical option for anyone concerned about heart health.

IMMUNITY BOOSTER

Black Garlic addresses inflammation, boosts immune function, and is toxic to invading bodies. The allicin in garlic, a sulfur-rich compound, is a powerful weapon against harmful conditions and promotes overall health. Black Garlic contains twice the antioxidant punch of fresh garlic, because of the fermentation process. This makes it an ideal health booster for every season.

AGE DEFYING

Black Garlic is a great energizer and helps prolong a healthy lifestyle! It also helps repair damaged skin with double the amount of antioxidants than regular garlic. Like rust attacking metal, free radicals eat away at cells and destroy them, causing the aging effect. Black Garlic positively impacts cellular immunity, causing a rejuvenated appearance.

DETOX

Black Garlic acts as a blood purifier and cleanses the body in general. It has antibacterial, anti-fungal properties that create a hostile environment for Candida albicans and can decrease bacteria linked to stomach ulcers. Your gut is also known as your second brain, because the health of your gastrointestinal system is extremely important to your overall wellbeing. Black Garlic supports cell regeneration and alkalizes your body to form a habitat resistant to takeover. It also features abundantly rich oxygen for healthy cell activity, so you can discover even more wonderful overall health with just 2 capsules per day!

EASILY DURING THE DAY — AND GETTING RESTFUL SLEEP AT NIGHT...

winning discovery
your legs, feet, and
—with one dose!

Japanese researchers report up to an 85% decline in N-O by the time you reach your 70s

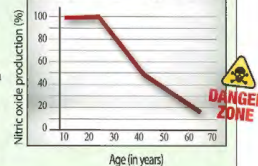
Nitric oxide is a gas that is produced in every tissue and organ of your body, from your muscles to your brain. This chemical tells arteries to "relax" which allows more oxygen into tissues by increasing blood flow.

Unfortunately, most adults over 40 don't produce enough. In fact, by the time you reach your 70s and 80s, you're producing up

to a staggering 85% less — making you very susceptible for high blood pressure, cardiovascular disease and stroke.

One of the best things you can do for your vascular system and health is to ensure optimal levels of nitric oxide. And now you can address N-O deficiencies with a single, money-saving dose of an astounding new breakthrough.

NITRIC OXIDE LEVELS DECLINE WITH AGE



your blood vessels — called your endothelium. And as it turns out...

...it's N-O that sends the signal for your arteries to OPEN and RELAX!

Discovering that N-O is the key to opening blood vessels is nothing short of a breakthrough. Here's why...

...One of the first things we learn in medical school is the critical importance of BLOOD FLOW. If your blood is sluggish and trickling — then your body won't work properly. Why?

Because nutrient-rich, oxygenated blood can't get to your organs — so they start to wither away. Yes, starve!

That means...

- **FEELING NUMB!** Legs... arms... and other parts lose sensation several times throughout the day — and night!
- **COLD HANDS AND FEET!** Without healthy blood flow to your extremities — temperature regulation is downright difficult!
- **PAINFUL SWELLING!** Legs, feet, and ankles become swollen and puffy due to the build up of excess fluid in the tissues.
- **VARICOSE VEINS!** Valves pumping blood are not working properly, resulting in burning, cramping and throbbing in your legs.
- **JOINTS HURT!** Lack of oxygenated blood means LITTLE nutri-

ents are getting to those joints!

● And so much more!

Now that scientists uncovered the power of N-O to open blood vessels and deliver critical nutrients and oxygen to your entire circulatory system

Continued on next page...

The all-natural breakthrough for limb problems caused by poor blood flow:

- ✓ Throbbing legs
- ✓ Cold hands and feet
- ✓ Numbness and tingling



Significant delivers powerful deep within your joints.

The molecule is **hyaluronic acid**, the main component of your synovial fluid.

Hyaluronic acid is an amazing water-attracting molecule able to hold up to 50 times its weight in water. This makes it ideal for lubricating your joints.

Yet as you age, levels of hyaluronic acid in your body and your joints decrease, which leads to sagging skin and painful joints.

This is why, since the early 1990s, hyaluronic acid has been injected into joints to deliver "relief molecules" and boost synovial fluid.

But these shots are painful and expensive... only work on the joint treated...and only give temporary relief.

That's why I'm excited to tell you about oral hyaluronic acid in a pill...

(Continued on next page...)

Oral hyaluronic acid beats popular pain relief solution

In a clinical study, 70 patients with severe knee pain took oral hyaluronic acid or popular pain medication to see which one was better at reducing pain and swelling.

After just 30 days, more than 8 out of 10 people taking oral hyaluronic acid had NO swelling. However, only 2 out of 10 people taking the pain medication experienced reduced swelling.

And for severe swelling, ZERO cases were found in the hyaluronic acid group, meaning it was 100% effective at quelling severe swelling.

Compare that to 9 out of 10 people taking the pain medication who still had severe swelling.⁽²⁾

(2) Miller, L. et al. Clin Nutr Suppl 2009

According to Nutrition Journal...

"Oral hyaluronic acid relieves knee pain," and more than a dozen clinical studies prove it!

Clinical studies conducted between 2008 and 2015 prove the pain relieving power of oral hyaluronic acid.

In a review of 13 studies, with subjects taking 80 to 630 mg a day of hyaluronic acid, results included...



- ✓ Significant improvement in knee pain and discomfort
- ✓ Significant improvement in stiffness
- ✓ Significant improvement in joint pain, muscle function and strength

The conclusion by researchers? Oral hyaluronic acid is "safe and effective for relieving knee pain."⁽³⁾

(3) Di, M. et al. Nutrition Journal, 2016

For fastest ordering, call TOLL FREE 1-888-973-8076

Call Toll-Free 1-800-750-0326 / 3

Health Research Labs

Encore Plus Solutions
(Nordic Clinical)

A.S. Research-Synovia

BUT... I call Neupathic the "perfect" solution because it was formulated based on the latest medical research, and recent science has now shown these 6 ingredients get the job done better, and work better together.

The fact is, you need powerful nerve treatment at the cellular level to help you. And you will NOT find any other formulas, with this proven nutrient lineup, or at this precise, high dosage. Which leaves all other products lacking for effective relief.

Already, thousands of people have tried Neupathic and LOVED the soothing results. They literally tell stories of amazing relief from their agonizing symptoms within just days of use.

Don't wait any longer... Stay a step ahead of tingling, burning, numbness and more!

The reason why Neupathic is the best choice today for long-lasting nerve relief is because it

contains the 6 KNOWN nerve pain, and lower leg health helping nutrients.

You'll help quiet those agitated nerves, and help restore comfort, health and mobility to your legs, hands and feet!

YOU are a perfect candidate for Neupathic if:

■ You find it difficult to walk because you can't feel the ground under your feet.

■ You can't stop the itching, burning, stabbing, pins and needles or tingling in your legs and feet.

■ Your hands, feet and legs are always cold.

■ You don't get a restful night's sleep because of pain and discomfort.

■ It's hard to keep your balance on unsteady legs and feet.

■ It's hard to walk, move, exercise, bend, or enjoy your favorite activities.

■ You feel trapped and immobile because of your unhealthy legs and feet.

■ Your condition is worsening... as your pain gets worse and your legs become more swollen and heavy and tired.

If this describes your life today, I urge you to try the soothing relief that comes from Neupathic!

Neupathic will go to work fast to settle your pain, ease your burning and tingling and numbness, and restore health and mobility to your legs.



More Comments from Happy Neupathic Customers...



"I used to feel like someone was putting a needle in my toes. I no longer feel that and I am quite happy!"

—Willard C.



"Neupathic has helped to relieve the neuropathy in my feet."

—Henry F.

Results may vary. These are real users with real results.

Proof... Proof... and more scientific PROOF! N-O Sanguenol not only WORKS —it WORKS FAST!

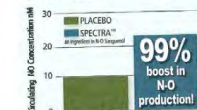
Laboratory tests — as well as human trials — show the ingredients in N-O Sanguenol deliver antioxidant protection from all 5 types of free radicals — starting in as little as two hours!

Please know this: In the scientific field — this level of antioxidant protection — from all 5 types of free radicals — is **nothing short of AMAZING! Here's the proof:**

One study reported Spectra in N-O Sanguenol significantly reduced:

- **Superoxide** free radicals — which attack your arteries and damage DNA!
- **Hydroxyl** — the free radicals that damage cellular membrane.
- **Peroxynitrate** — which break

Double Your N-O!



N-O Sanguenol can double your nitric oxide levels, allowing your blood to flow like a fast-moving river!



down collagen in the skin and single oxygen free radicals that wreak havoc with cholesterol — also dropped within hours!

And take a look at this:

- ✓ All 5 types of free radicals found in the mitochondria — which is your cell's nucleus — were reduced by 42% — within 2 hours!
- ✓ Cellular inflammation caused by ALL 5 free radical types — dropped as much as 35%!
- ✓ INCREASED cell's ability to

consume healthy oxygen levels by a whopping 141% — within 1 hour!

But here's even MORE good news...

Spectra™ actually BOOSTS N-O levels by up to 99%! (Yes — nearly DOUBLED!)

I'll be the first to admit that I wanted Spectra™ in my N-O Sanguenol formula because of the antioxidant PUNCH it delivers to free radicals. In my scientific opinion — NOTHING

Most pain relievers give you temporary relief... simply mask pain...or trick your brain into thinking you have less pain. But they don't get to the root cause of your pain. And they can be costly...painful (think needles)...or have dangerous side effects that can rip up your stomach or wreck your joints.

That's not acceptable for my patients, my family or me.

So we've turned to Molecular Pain Relievers that work at the molecular level, deep within your joint cartilage and tissues.

As you'll see, MPRs restore your body's natural joint lubricating fluids and cartilage and relieve pain in a way that's far superior to anything I've found in natural or conventional medicine.

And which MPR is delivering the best relief?

It's the FIRST of this new class of painkillers... a pill called Synovia that's been a "life-restorer" for people all across America

Just imagine getting relief like this...



✓ **No more hip pain!**

At age 79, Gerald P. of Utah began to have pain in both of his hips 24 hours a day. After taking Synovia for one week, he felt an almost 50% reduction in pain. After one bottle, his pain was gone!

✓ **No more injections!** George S. of Pennsylvania needed to see his doctor for knee injections. Now he gratefully writes, "I have noticed an improvement in my knee joints after using Synovia for only one month. My right knee is feeling much better without needing shots."



✓ **No more knee or finger pain!** Betty L. of South Carolina had a swollen, cranky knee and fingers that crossed. After taking Synovia, she gratefully reports, "I can walk better, and my fingers feel so much better I'm playing the piano again."



How are results like these possible when other pain relief solutions have failed?

It's because Synovia attacks pain in a new and different way—to give you the kind of relief most people only dream of.

As you'll see, its exclusive, superior ingredients include...

- **A unique, patented, broad-spectrum Collagen—the only collagen clinically proven to reduce your pain by 95%, page 4**
- **A special natural lubricant that delivers "relief molecules" deep within your joints, yet without needles or injections, page 8**
- **And a marine marvel proven to be 800 times more potent than CoQ10 at quelling pain causing free radicals, page 14**

...all yours in a one-a-day Synovia pill and now available to you without a prescription.

What kind of pain relief miracle can Synovia do for you? Just turn the page...

Health Research Labs

Encore Plus Solutions
(Nordic Clinical)

A.S. Research-Synovia

We have been flooded with testimonials for our Ultimate Heart Formula!

"My blood pressure is normal.. Tastes good. I also have more energy and a more stable pulse.."
—John A. Jones

"Excellent Results. No Pain! Easy to Take!
Thank you for the **Ultimate Heart Formula.** It gives me more energy. It's easy to take, has no unwanted side effects. **It makes life easier with no pain in my heart. I highly recommend the Ultimate Heart Formula to anyone who has heart problems."**
—Dawn Simoneau

"I have no heart problems since starting Ultimate Heart Formula many years ago. Thank God for the ad I read years ago. I am now 81 and going strong. Sorry I'm bragging now."
—Woki Miles

"Most products that we send for through the mail do not do what is claimed. I had PVC's which I hated so much. **After using the Ultimate Heart Formula I feel great and am so happy."**
—Darlene H. Juhl

"I had occasional rapid heart beats and irregular heart beats. After taking Ultimate Heart Formula I feel great and have felt great since. I have been taking this product almost 12 months. It's easy to take and quick to work. Convenience, Taste, Results."
—Fred Memmer

Call Toll-Free 888-462-9386 for Ultimate Heart Formula Instant absorption drops!



"Met my expectations. I like that it is taken orally. I have been free from chest pains since the start. It gives me confidence when I go to bed at night that I will awake to see another day. I am 85 and was diagnosed with mitral valve prolapse many years ago."
—Diana Lessard

"Peace of mind. I no longer have to worry about heart problems. My father did chelation for the heart."
—Christine Robbins

"I feel more positive and more active. My arteries and veins are clear. I feel 50 years old."
—Joan E. Johnson



These are real results from real users of the Ultimate Heart Formula. Individual results may vary. We guarantee you will love this product or your money back.

Help Keep Your Arteries Clear and Enjoy More Peace of Mind! Call Toll-Free 888-462-9386 • 7 HRL005074

PAGE 10 / JOINT HEALTH NEWS

Real people have beaten pain and gotten their lives back with *Hydraxflexin!*

No more shoulder pain...

"I had pain building up in my shoulder and arm for a number of years before starting a joint supplement regime. I'm very pleased with *Hydraxflexin*; my shoulder has not bothered me at all since I began taking it about 12 months ago."
—Paula, Asheville, NC



From despair to hope...

"My hands were very stiff and painful. I've also got arthritis in my feet. I am very sensitive to medications and cannot take NSAIDs because I react to them with even more pain! *Hydraxflexin* has made the difference between hopefulness and despair. It's actually made my life bearable by decreasing my pain and increasing my function."
—Julie M., Iowa City, IA



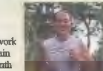
Feels better than she did when she was 30...

"I am 78 and still working full-time. I feel better now than when I was 30! It wasn't so long ago that I could hardly walk because of the pain in my left knee. I've tried other joint products, but only *Hydraxflexin* takes away my pain and the stiffness. I run out regularly and thought maybe I don't need it anymore. Sure enough, the stiffness came back! Now I wouldn't be without it."
—Ruth A., Shipperville, PA



80% healed from knee pain...

"I am a blasting contractor and work on steep slopes. This puts added strain on the ligaments. There was a 3 month period of time when I could not work due to knee pain. I noticed relief within a week of taking *Hydraxflexin* that I had less pain. I believe that between a manual treatment and *Hydraxflexin*, I am healing much faster than if I had kept off my feet. I am now about 80% healed."
—Arthur W., Exandria, CA



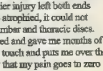
No more morning stiffness—knee pain gone...

"*Hydraxflexin* means I no longer wake up stiff or with pain in my knee. I'm 70 and still working 12 hour days. Man made pharmaceuticals, God made alternatives. I choose: "God made", thank you for giving him a hand. Like the way it helps to repair my knee by increasing the synovial fluid as well as the pain relief. I've been taking *Hydraxflexin* for nearly two years."
—Lolita R., Peter Heights, IL



Zero pain—sleeps like a baby...

"In my 60's I discovered an earlier injury left both ends of a shoulder retractor cuff muscle so atrophied, it could not be repaired. I also have damaged lumbar and thoracic discs. NSAIDs caused my stomach to bleed and gave me months of agony. *Hydraxflexin* is the crowning touch and puts me over the top. It's only when I take two a day that my pain goes to zero and I get to sleep well."
—Yvon B., Pueblo, CO



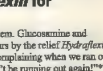
Severe burning, stiffness, and pain in elbow resolved...

"About a year ago, I severely strained the tendon and ligaments in my elbow. It has caused moderate to severe pain and stiffness, as well as a severe burning sensation. There has been moderate inflammation in my elbow ever since! A friend of mine... introduced me to a product called *Hydraxflexin* that he said would probably work much more effectively without the side effects... During the time I have been taking *Hydraxflexin*, I noticed that the level of pain AND the burning sensation in my elbow were diminished to a greater degree than when I was taking Motrin and Aleve!" I am very thankful!"
—David B., Germantown, MD



Swears by *Hydraxflexin* for knee pain...

"My husband had a knee problem. Glucosamine and Chondroitin did not help. He swears by the relief *Hydraxflexin* has provided him. He was soon complaining when we ran out for a few days recently... we weren't running out again!"
—Louise S., Hillsdale, NJ



Reduced pain, stiffness, and swelling by 85%...

"I often wake up with back ache, stiff neck and fingers and I've had surgery on my shoulder. I used to take pharmaceutical drugs but discontinued the use due to side effects and got worried when Vioxx was withdrawn from the market. *Hydraxflexin* reduces my pain, stiffness, and the swelling in my fingers by about 85%. It also appears to be helping my skin."
—Helen R., Lincoln, NJ



**A randomized, double-blind, placebo-controlled study.

These accounts have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

Remarkable case studies with *Synovia*

No more bone-on-bone pain, no more injections for William!



For years, William B. of Tennessee, age 87, suffered from bone-on-bone ankle problems. The pain was so bad, he had to get injections every two months.

But since taking *Synovia*, relief has been, in his words, "Absolutely wonderful! The pain and swelling had disappeared with no side effects. Thank you—I am back living normal again!"



Barbara's loving the relief for her back and knees!

Barbara B. of Salt Lake City knows what it's like to have a bad back. After all, her back was "killing" her for two years.

She took shots and tried everything doctors recommend to no avail.

But now she happily reports, "I've been taking *Synovia* for one and half months, and it's amazing. Now, I wake up every morning without a back ache."

"I've also had my knees replaced and have no problems with my knees. I'd recommend *Synovia* to anybody in pain—back pain, shoulder pain, any pain. I just re-ordered two bottles. Thank you very much."



From cortisone shots to almost zero pain!

Severe shoulder pain made life difficult for 61-year-old Pam S. of Ohio. She had three cortisone shots but only got temporary relief.

The pain got so bad, she could not lift her right arm above her head...sleep on her right side...or even lift up her grandchildren.

So she tried *Synovia*. After taking the first bottle, she reports, "What a difference *Synovia* has made in my life. My pain has improved to the point I hardly notice that I have it."

The product is awesome. I can lift my arm sleep on my side and lift my grandkids. Thank you *Synovia* for giving my life back!"



Knee replacement surgery postponed!

Joe D. of Pennsylvania, age 56, suffered from terrible pain in his right knee for the past 2-3 years.

The pain got so bad, he had seriously considered knee replacement surgery. He tried injections (which provided temporary relief), as well as therapy—with little or no benefit.

Then he tried *Synovia*. He writes, "To my pleasant surprise, *Synovia* has helped me noticeably. There are now days I don't even know I have knee pain. I'm thankful that the pain is so much less, surgery is not even a consideration."

Individual results may vary.