

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

CASE NO.

FILED
2005 MAY 17 PM 2:09
CLERK, US DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY _____
DEPUTY

FEDERAL TRADE COMMISSION,)
)
)
Plaintiff,)
)
)
v.)
)
DIRECT-PROM, INC., and)
RAMIRO MAILLAND,)
)
)
Defendants.)

EPO5CA0186

COMPLAINT FOR PERMANENT INJUNCTION
AND OTHER EQUITABLE RELIEF

Plaintiff, the Federal Trade Commission ("FTC" or "Commission"), through its undersigned attorneys, alleges as follows:

1. Plaintiff brings this action under Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), to secure a permanent injunction, rescission of contracts and restitution, disgorgement of ill-gotten gains, and other equitable relief against defendants for engaging in deceptive acts or practices and disseminating false advertisements in connection with the advertising and sale of ReduCarb, a purported weight loss product, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over this matter pursuant to 15 U.S.C. §§ 45(a), 52, and 53(b), and 28 U.S.C. §§ 1331, 1337(a), and 1345.
3. Venue in the United States District Court for the Western District of Texas is proper under 15 U.S.C. §53(b) and 28 U.S.C. §§ 1391(b) and (c).

THE PARTIES

4. Plaintiff, the Federal Trade Commission, is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The Commission enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The Commission also enforces Section 12 of the FTC Act, 15 U.S.C. § 52, which prohibits false advertisements for food, drugs, devices, services, or cosmetics in or affecting commerce. The Commission may initiate federal district court proceedings, through its attorneys, to enjoin violations of the FTC Act and to secure such other equitable relief, including rescission of contracts and restitution, and disgorgement of ill-gotten gains, as may be appropriate in each case. 15 U.S.C. § 53(b).
5. Defendant Direct-Prom, Inc. ("Direct-Prom") is a Texas corporation with its principal office or place of business at 3105 N. Yarbrough, Suite C, El Paso, Texas 79925. At all times relevant to this complaint, acting individually or in concert with others, Direct-Prom has marketed and sold ReduCarb to consumers. Direct-Prom transacts or has transacted business in this district.
6. Defendant Ramiro Mailland ("Mailland") is the President, C.E.O., and sole owner of Direct-Prom. At all times relevant to this complaint, acting individually or in concert

with others, he has formulated, directed, controlled, had the authority to control, and/or participated in the acts and practices of Direct-Prom, including the acts or practices set forth in this complaint. His principal office or place of business is the same as that of Direct-Prom. Mailland transacts or has transacted business in this district.

COMMERCE

7. The acts and practices of defendants alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

DEFENDANTS' COURSE OF CONDUCT

8. Since about March 2003, defendants have advertised, offered for sale, sold, and distributed ReduCarb, a dietary supplement, to consumers nationwide. Defendants have advertised and marketed ReduCarb, which contains vitamin C, chromium, chitosan, kidney bean extract, and vanadium, as a purported weight loss product. Defendants have offered and sold a one-month supply of ReduCarb for \$59.95, plus shipping and handling.
9. Defendants have advertised ReduCarb throughout the United States through direct-response, Spanish-language, 60-second commercials that appeared on Spanish-language television stations, such as KWHY Los Angeles (Telemundo) and KAZA Los Angeles (Azteca America). Defendants have also advertised ReduCarb throughout the United States through direct-response, Spanish-language radio commercials broadcast on Spanish-language radio stations, such as KBUE FM and KWKW AM in Los Angeles. Consumers have been able to purchase the product by calling a toll-free telephone number broadcast in the commercials.

ReduCarb Advertising

10. Defendants have disseminated, or caused to be disseminated, advertisements for ReduCarb, including, but not necessarily limited to, 60-second television commercials and radio ads. The scripts for the television and radio ads were identical. See Exhibit A (videotape with three versions of the commercials); Exhibit B (videotape transcript with three versions of the commercials, translated from the original Spanish to English); and Exhibit C (radio and television scripts for the three versions of the commercials, translated from the original Spanish to English). These advertisements contain the following statements, among others:
- a. This is Omar Fierro speaking, and it is a pleasure for me to tell you how I lost sixteen kilos, thirty-four pounds, easily, with a sensational product called ReduCarb. ReduCarb is just a pill that you take twenty minutes before meals and ReduCarb works while you eat. . . With ReduCarb you can eat whatever you want and this will work in your favor. You can lose weight sensationally.
-Exhibits A and B (videotape and transcript version 1); see also Exhibit C (radio and television script version 1).
 - b. . . . I have already lost sixteen kilos, that is thirty-four pounds, easily, and I feel sensational. Because I found a product called ReduCarb that is completely natural. It contains a lot of Vitamin C, it contains protein, and it contains chitosan, which helps to eliminate carbohydrates. What are carbohydrates? Those little delicious tacos that we love so much, those desserts that we love to eat . . . we can still eat them but, this ReduCarb is going to help us to envelop them and quickly eliminate them from the body so that they do not become converted into fat and those horrible ["love handles"] that we don't like to have on us.
-Exhibits A and B (videotape and transcript version 2); see also Exhibit C (radio and television script version 2).
 - c. How are you, friends? This is Omar Fierro speaking, and I want to tell you how to lose weight. I have already done it. I lost sixteen kilos in two months. Thirty-four pounds in two months and it was very easy. I tried to follow, well, a dreary diet, drink a lot of water and do a little bit of exercise, but I found a sensational product called ReduCarb. ReduCarb is going to help you lose weight while you

eat. You don't have to put on those cumbersome girdles that are so heavy to wear all day long, nor do you have to wear those plastic sweating suits, and you don't have to put on creams or anything like that. ReduCarb is a very easy product to use. All you have to do is take a little pill twenty minutes before meals and you will lose weight while you eat. . . .

-Exhibits A and B (videotape and transcript version 3); see also Exhibit C (radio and television script version 3).

DEFENDANTS' VIOLATIONS OF THE FTC ACT

11. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits unfair or deceptive acts or practices in or affecting commerce. Section 12(a) of the FTC Act, 15 U.S.C. § 52(a), prohibits the dissemination of any false advertisement in or affecting commerce for the purpose of inducing, or which is likely to induce, the purchase of food, drugs, devices, services, or cosmetics. For purposes of Section 12 of the FTC Act, 15 U.S.C. § 52, ReduCarb is a "food" or "drug" as defined in Section 15 of the FTC Act, 15 U.S.C. § 55. As set forth below, defendants have engaged in such unlawful practices in connection with the marketing and sale of ReduCarb.

COUNT I

ReduCarb: False Claims

12. Through the means described in Paragraph 10 above, defendants have represented, expressly or by implication, that:
- a. ReduCarb causes substantial weight loss in a short period of time, for example, 34 pounds in two months; and
 - b. ReduCarb causes substantial weight loss without the need to reduce caloric intake.
13. In truth and in fact:
- a. ReduCarb does not cause substantial weight loss in a short period of time; and

- b. ReduCarb does not cause substantial weight loss without the need to reduce caloric intake.

Therefore, defendants' representations set forth in Paragraph 12 above are false and misleading and constitute deceptive acts or practices, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

COUNT II

ReduCarb: Unsubstantiated Claim

14. Through the means described in Paragraph 10 above, defendants have represented, expressly or by implication, that:
 - a. ReduCarb causes weight loss; and
 - b. ReduCarb causes substantial weight loss by blocking or removing carbohydrates.
15. Defendants did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 14 above at the time the representations were made. Therefore, the making of the representations set forth in Paragraph 14 constitutes a deceptive act or practice, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

CONSUMER INJURY

16. Consumers throughout the United States have suffered and continue to suffer substantial injury as a result of defendants' unlawful acts or practices. In addition, defendants have been unjustly enriched as a result of their unlawful acts and practices. Absent injunctive

relief by this Court, defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

THIS COURT'S POWER TO GRANT RELIEF

17. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt and redress violations of the FTC Act. The Court, in the exercise of its equitable jurisdiction, may award other ancillary relief, including but not limited to rescission of contracts and restitution, and the disgorgement of ill-gotten gains, to prevent and remedy injury caused by defendants' law violations.

PRAYER FOR RELIEF

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

(1) Permanently enjoin defendants from violating Sections 5(a) and 12 of the FTC Act, as alleged herein, including committing such violations in connection with the advertising, offering for sale, sale, or distribution of food, drugs, dietary supplements, devices, cosmetics, or other products, services, or programs;

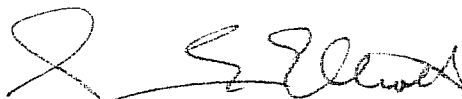
(2) Award such equitable relief as the Court finds necessary to redress injury to consumers resulting from defendants' violations of the FTC Act, including, but not limited to, rescission of contracts and restitution, and the disgorgement of ill-gotten gains; and

(3) Award Plaintiff such other equitable relief as the Court may determine to be just and proper.

Dated: May 16, 2005

Respectfully submitted,

WILLIAM BLUMENTAL
General Counsel



JAMES E. ELLIOTT (Texas Bar #: 06557100)
Federal Trade Commission - Southwest Region
1999 Bryan Street, Suite 2150
Dallas, TX 75201
(214) 979-9373 (tel.)
(214) 953-3079 (facsimile)

LAURA KOSS
EDWIN RODRIGUEZ
Division of Enforcement
Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580
(202) 326-2890 (tel. - Ms. Koss)
(202) 326-3147 (tel. - Mr. Rodriguez)
(202) 326-2559 (facsimile)

Attorneys for Plaintiff

Exhibit A

See accompanying videotape labeled Exhibit A,
"Direct Prom, Inc., ReduCarb TV Spots with Omar Fierro"

Exhibit B

CERTIFIED TRANSLATION
The Language Doctors, Inc.

Federal Trade Commission
Bureau of Consumer Protection

Videocassette
Code:
RCOF-01-ReduCarb1

LABEL:
ReduCarb TV Spots with Omar Fierro
RCOF-01-ReduCarb 1

REFERENCIA / LEGEND
OMAR FIERRO: OF
DESCRIPCIÓN DE LAS IMÁGENES/IMAGE DESCRIPTION: DI

- DI *Omar Fierro en cámara.*
Texto en el margen inferior por unos segundos:
ESTE PRODUCTO NO HA SIDO EVALUADO POR EL FDA. ESTE PRODUCTO NO TIENE LA INTENCION DE DIAGNOSTICAR, TRATAR, CURAR O PREVENIR CUALQUIER ENFERMEDAD. RESULTADOS PUEDEN VARIAR.
- 001 OF *¿Qué tal amigos? Les habla Omar Fierro y es un placer para mí poderles comunicar cómo bajé yo dieciséis kilos de peso, treinta y cuatro libras, fácilmente con un producto sensacional que se llama ReduCarb.*
- DI *Omar Fierro en una ventana de video cogiendo al vuelo una botella de ReduCarb, y con una imagen de video lavada detrás:*
Mujer joven tomándose una pastilla.
- 002 OF *ReduCarb son unas pastillas que usted solamente se tiene que tomar veinte minutos antes de cada comida, y mientras usted come ReduCarb trabaja.*
- DI *Montaje de imágenes de video lavadas en ventanas cuadradas:*
Mujer joven poniéndose una faja, seguida por mujer joven poniéndose un traje de plástico, seguida por una mujer joven poniéndose cremas, y seguida por una mujer joven preparando una ensalada.
- 003 OF *No se tiene que andar poniendo esas molestísimas fajas que las tiene que traer todo el día puestas, ni ponerse los trajes para sudar, ni embarrarse de crema y celofán. Tampoco tiene que matarse de hambre comiendo puras ensaladas.*
- DI *Omar Fierro en una ventana de video con una botella de ReduCarb, y con un montaje de imágenes de video lavadas detrás:*
Mujer joven y esbelta mirándose al espejo,
- Omar Fierro on camera.*
Text on the lower margin of the screen for a few seconds:
THIS PRODUCT HAS NOT BEEN EVALUATED BY THE FDA THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OR PREVENT ANY ILLNESS. RESULTS MAY VARY.
- Telephone number on the lower margin of the screen:*
ReduCarb 1-800-718-2220
- How are you, friends? This is Omar Fierro speaking, and it is a pleasure for me to tell you how I lost sixteen kilos, thirty-four pounds, easily, with a sensational product called ReduCarb.*
- Omar Fierro in a video window catching a bottle of ReduCarb and with a washed-out video image behind him:*
Woman swallowing a pill.
- Telephone number on the lower margin of the screen:*
ReduCarb 1-800-718-2220
- ReduCarb is just a pill that you take twenty minutes before meals and ReduCarb works while you eat.*
- Montage of washed-out video images in square windows:*
Woman putting on a girdle, followed by young woman putting on a plastic suit, followed by a young woman putting on creams, and followed by a young woman preparing a salad.
- Telephone number on the lower margin of the screen:*
ReduCarb 1-800-718-2220
- You don't have to put on those cumbersome girdles that have to be left on all day long, nor do you have to wear those plastic sweating suits, and you don't have to put on creams. You also don't need to die of starvation eating nothing but salads.*
- Omar Fierro in a video window with a bottle of ReduCarb and a video montage of washed-out images behind him:*
Young, thin woman looking at herself in the

seguida por tomas de cerca de su cuerpo, y seguida por toma de de una mujer joven andando sonriente

mirror, followed by close-ups of her body, and followed by footage of a young woman walking and smiling.

Número de teléfono en el margen inferior de la imagen:

ReduCarb 1-800-718-2220

Telephone number on the lower margin of the screen:

ReduCarb 1-800-718-2220

004 OF Con ReduCarb usted puede comer lo que usted quiera y esto va a trabajar a favor suyo. Puede bajar de peso sensacionalmente. Yo, Omar Fierro, se lo recomiendo. Llamen al 1-800-718-2220, 1-800-718-2220.

With ReduCarb you can eat whatever you want and this will work in your favor. You can lose weight sensationally. I, Omar Fierro, recommend it. Call 1-800-718-2220, 1-800-718-2220.

DI *Imagen lavada de la mujer joven andando sonriente con imagen de tres botellas de ReduCarb en el margen derecho.*

Washed out image of the young woman walking and smiling and three bottles of ReduCarb on the lower right margin.

Número de teléfono en el margen inferior de la imagen:

ReduCarb 1-800-718-2220

Telephone number on the lower margin of the screen:

ReduCarb 1-800-718-2220

005 OF ReduCarb, 1-800-718-2220. Este tiene mi cara. Que no lo engañen. Baje de peso... ¡hoy!
//FIN DE LA CINTA DE VÍDEO //

ReduCarb, 1-800-718-2220. This one has my face on it. Don't be fooled. Lose weight...today!
//END OF RECORDING//

**Federal Trade Commission
Bureau of Consumer Protection**

**Videocassette
Code:
RCOF-02-ReduCarb2**

**LABEL:
ReduCarb TV Spots with Omar Fierro
RCOF-02-ReduCarb 2**

**REFERENCIA / LEGEND
OMAR FIERRO: OF
*DESCRIPCIÓN DE LAS IMÁGENES/IMAGE DESCRIPTION: DI***

- DI *Omar Fierro en cámara con una botella de ReduCarb y texto en el margen inferior por unos segundos:*
ESTE PRODUCTO NO HA SIDO EVALUADO POR EL FDA. ESTE PRODUCTO NO TIENE LA INTENCION DE DIAGNOSTICAR, TRATAR, CURAR O PREVENIR CUALQUIER ENFERMEDAD. RESULTADOS PUEDEN VARIAR.
- 001 OF *Hola, amigos, les habla Omar Fierro. Yo quiero compartir con ustedes cómo bajé yo de peso. Ya llevo dieciséis kilos, o sea treinta y cuatro libras, y me siento sensacional.*
- DI *Omar Fierro en una ventana de video con una botella de ReduCarb, sobre fondo blanco e imagen de tres botellas de ReduCarb en el margen izquierdo de la imagen, seguidas por texto:*
Producto Natural
- Vitamina C
- Proteína
- Chitosan
- 002 OF *Porque encontré un producto que se llama ReduCarb, que es completamente natural. Contiene muchísima vitamina C, contiene proteína, y contiene chitosan que ayuda a eliminar los carbohidratos.*
- DI *Omar Fierro en una ventana de video con una botella de ReduCarb y montaje de varias imágenes lavadas de Omar Fierro, más grueso y comiendo en el margen izquierdo, con texto en negro debajo:*
Omar Antes de ReduCarb.
- 003 OF *¿Qué son los carbohidratos? Esos taquitos tan sabrosos que nos encantan, los postres que nos fascina comerlos... los vamos a poder seguir comiendo pero, este ReduCarb nos va a ayudar a envolverlos y a sacarlos del cuerpo rápidamente para que no se*
- Omar Fierro on camera with a bottle of ReduCarb and text on the lower margin of the screen for a few seconds:*
THIS PRODUCT HAS NOT BEEN EVALUATED BY THE FDA. THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OR PREVENT ANY ILLNESS. RESULTS MAY VARY.
- Hello, friends, this is Omar Fierro speaking. I want to tell you how I lost weight. I have already lost sixteen kilos, that is thirty-four pounds, easily, and I feel sensational.*
- Omar Fierro in a video window with a bottle of ReduCarb over a white slate and with three bottles of ReduCarb on the left margin, followed by text:*
Natural Product
- Vitamin C
- Protein
- Chitosan
- Telephone number on the lower margin of the screen:*
ReduCarb 1-800-718-2220
- Because I found a product called ReduCarb that is completely natural. It contains a lot of Vitamin C, it contains protein, and it contains chitosan, which helps to eliminate carbohydrates.*
- Omar Fierro in a video window with a bottle of ReduCarb and montage of various washed-out images of Omar Fierro, visibly heavier and eating, on the left margin, with black text below :*
Omar Before ReduCarb.
- Telephone number on the lower margin of the screen:*
ReduCarb 1-800-718-2220
- What are carbohydrates? Those little delicious tacos that we love so much, those desserts that we love to eat ... we can still eat them but, this ReduCarb is going to help us to envelop them and quickly eliminate them from the body so that they do not become*

- conviertan en grasa y en esas horribles (inaudible) que no nos gusta tener.
- DI *Omar Fierro en una ventana de video con una botella de ReduCarb, y con un montaje de imágenes de video lavadas detrás: Mujer joven tomándose una pastilla, seguida por mujer joven y esbelta mirándose al espejo, y seguida por tomas de cerca de su cuerpo.*
- converted into fat and those horrible (inaudible) that we don't like to have on us. *Omar Fierro in a video window with a bottle of ReduCarb and a video montage of washed-out images behind him: Young woman swallowing a pill, followed by a young, thin woman looking at herself in the mirror, and followed by close-ups of her body.*
- Número de teléfono en el margen inferior de la imagen:
ReduCarb 1-800-718-2220
- Telephone number on the lower margin of the screen:
ReduCarb 1-800-718-2220
- 004 OF ¿Quiere usted lucir un cuerpo sensacional para este verano y poderse poner su bikini que tanto le gusta? Yo le recomiendo ReduCarb. Lo puede conseguir en el 1-800-718-2220.
- DI *Imagen lavada de una mujer joven andando sonriente con imagen de tres botellas de ReduCarb en el margen derecho.*
- Washed out image of the young woman walking and smiling and three bottles of ReduCarb on the lower right margin.
- Número de teléfono en el margen inferior de la imagen:
ReduCarb 1-800-718-2220
- Telephone number on the lower margin of the screen:
ReduCarb 1-800-718-2220
- 005 OF 1-800-718-2220. ReduCarb es un producto completamente natural. Yo, su amigo Omar Fierro, se lo recomienda. Utilícelo y va a bajar de peso.
//FIN DE LA CINTA DE VIDEO //
- 1-800-718-2220. ReduCarb is a completely natural product. I, your friend Omar Fierro, recommend it. Use it and you will lose weight.
//END OF RECORDING//

**Federal Trade Commission
Bureau of Consumer Protection**

**Videocassette
Code:
RCOF-03-ReduCarb 3**

**LABEL:
ReduCarb TV Spots with Omar Fierro
RCOF-03-ReduCarb 3**

**REFERENCIA / LEGEND
OMAR FIERRO: OF
DESCRIPCIÓN DE LAS IMÁGENES/IMAGE DESCRIPTION: DI**

DI *Omar Fierro en cámara con texto en el margen inferior por unos segundos:*
ESTE PRODUCTO NO HA SIDO EVALUADO POR EL FDA. ESTE PRODUCTO NO TIENE LA INTENCION DE DIAGNOSTICAR, TRATAR, CURAR O PREVENIR CUALQUIER ENFERMEDAD. RESULTADOS PUEDEN VARIAR.

Omar Fierro on camera with text on the lower margin of the screen for a few seconds:
THIS PRODUCT HAS NOT BEEN EVALUATED BY THE FDA. THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OR PREVENT ANY ILLNESS. RESULTS MAY VARY.

Número de teléfono en el margen inferior de la imagen:

ReduCarb 1-800-718-2220

Telephone number on the lower margin of the screen:

ReduCarb 1-800-718-2220

001 OF ¿Qué tal amigos? Les habla Omar Fierro y quiero recomendarles cómo bajar de peso. Yo ya lo hice. Bajé dieciséis kilos en solamente dos meses. Treinta y cuatro libras en dos meses y fue muy sencillo. Traté de llevar una dieta, pues, mal ansiada, tomar mucha agua y hacer un poquitito de ejercicio, pero encontré un producto sensacional que se llama ReduCarb.

How are you, friends? This is Omar Fierro speaking, and I want to tell you how to lose weight. I have already done it. I lost sixteen kilos in only two months. Thirty-four pounds in two months and it was very easy. I tried to follow, well, a dreary diet, drink a lot of water and do a little bit of exercise, but I found a sensational product called ReduCarb.

DI *Omar Fierro en cámara con una botella de ReduCarb en la mano, tres botellas de ReduCarb en el margen inferior derecho y número de teléfono en el margen inferior de la imagen:*

ReduCarb 1-800-718-2220

Omar Fierro on camera with a bottle of ReduCarb in his hand and with three bottles of ReduCarb on the lower, right margin of the screen and telephone number on the lower margin of the screen:

ReduCarb 1-800-718-2220

002 OF ReduCarb le va a ayudar a bajar de peso mientras usted está comiendo. No se tiene que poner esas molestísimas fajas que tanto pesa traerlas todo el día puestas, ni ponerse los trajes esos de plástico para sudar, ni embarrarse de cremas ni mucho menos. ReduCarb es un producto muy sencillo de utilizar. Solamente se toma una pastillita veinte minutos antes de cada comida, y mientras usted come va a bajar de peso porque ReduCarb le va a quitar los carbohidratos del cuerpo. Esos pastelitos, esos taquitos que tanto nos gusta comer, nos los vamos a poder comer y poco a poco los vamos a ir eliminando del cuerpo. ReduCarb, 1-800-718-2220. Este tiene mi cara. Que no lo engañen.

//FIN DE LA CINTA DE VÍDEO //

ReduCarb is going to help you lose weight while you eat. You don't have to put on those cumbersome girdles that are so heavy to wear all day long, nor do you have to wear those plastic sweating suits, and you don't have to put on creams or anything like that. ReduCarb is a very easy product to use. All you have to do is take a little pill twenty minutes before meals and you will lose weight while you eat, because ReduCarb is going to eliminate the carbohydrates from your body. Those little pastries, those little tacos that we love to eat, we will still be able to eat them and, little by little, we will eliminate them from our body. ReduCarb, 1-800-718-2220. This one has my face on it. Don't be fooled.

//END OF RECORDING//

Exhibit C

**Commercial Transcript Reducarb
(First Part)**

Que tal amigos les habla Omar Fierro es un placer comunicarles como baje yo 16kl de peso 34lb facilmente con un producto sensacional que se llama Reducarb.

Reducarb, son las pastillas que usted solamente se tiene que tomar 20 minutos, antes de cada comida y mientras usted come Reducarb trabaja.

No se tiene que ponerse esas molesticimas fajas que las tiene que traer todo el dia, ni esos trajes para sudar, ni enbarrarse de crema ni selofan, ni matandose de hambre comiendo puras ensaladas.

Con Reducarb usted puede comer lo que usted quiera y esta va trabajar en favor suyo puede bajar de peso sensacional mente.

Yo Omar Fierro se lo Recomienda. Llame al 1-800-718-2220, 1-800-718-2220, Reducarb 1-800-718-2220.

Este es el Original, que no lo engañen .

Baje de Peso.

**Commercial Transcript ReduCarb
(First Part)**

How are you, friends? This is Omar Fierro speaking, and it is a pleasure for me to tell you how I lost 16 kilos, 34 lbs., easily, with a sensational product called ReduCarb.

ReduCarb, the pills that you just have to take 20 minutes before meals and ReduCarb works while you eat.

You don't have to put on those cumbersome girdles that have to be left on all day long, nor do you have to wear those plastic sweating suits, nor do you have to put on creams and cellophane, nor do you have to die of starvation eating nothing but salads.

With ReduCarb you can eat whatever you want and this will work in your favor. You can lose weight sensationally.

I, Omar Fierro, Recommend it. Call 1-800-718-2220, 1-800-718-2220. ReduCarb, 1-800-718-2220.

This one is the Original, don't be fooled.

Lose Weight.

CERTIFIED TRANSLATION
The Language Doctors, Inc.

**Commercial Transcript Reducarb
(Second Part)**

Hola amigos les habla Omar Fierro, yo quiero comparti con ustedes como baje de peso ya llevo 16kl osea 34lb y me siento sensacional.

Porque encuentre un producto que se llama Reducarb que es total mente natural, contiene muchisima vitamina C, contiene Proteina, y contiene Chitosan que ayuda a eliminar los carbohidratos, que son los carbohidratos? Esos taquitos tan sabrosos que nos encantan, esos postres que tanto nos facina comernos, los vamos a poder seguir comiendo, pero este Reducarb nos va ayudar envolverlos y sacarlos del cuerpo rapidamente para que no se combierta en grasa y en esas horribles llantitas que no nos gustan tener.

Quiere usted lucir ese cuerpo sensacional para este verano y ponerse ese bikini que tanto le gusta?

Yo le recomiendo Reducarb.

Lo puede conseguir en el 1-800-718-2220, 1-800-718-2220.

Reducarb es un producto completamente natural.

Yo su amigo Omar Fierro se lo recomienda.

Utilicelo y va bajar de peso.

**Commercial Transcript ReduCarb
(Second Part)**

Hello, friends, this is Omar Fierro speaking; I want to tell you how I lost weight I have already lost 16 kilos that is 34 pounds and I feel sensational.

Because I found a product called ReduCarb that is completely natural, contains a lot of Vitamin C, contains protein, and contains Chitosan which helps to eliminate carbohydrates, what are carbohydrates? Those little delicious tacos that we love so much, those desserts that we love to eat, we can still eat them but, this ReduCarb is going to help us to envelop them and quickly eliminate them from the body so that they do not become converted into fat and those horrible "love handles" that we don't like to have on us.

Do you want to have a sensational body this summer and to wear that bikini you like so much?

I recommend ReduCarb.

You can get it by calling 1-800-718-2220, 1-800-718-2220.

ReduCarb is a completely natural product.

I, your friend Omar Fierro, recommend it.

Use it and you will lose weight.

CERTIFIED TRANSLATION
The Language Doctors, Inc.

**Commercial Transcript Reducarb
(Third Part)**

Quetal amigos les habla Omar Fierro quiero recomendarles como bajar de peso, yo ya lo hise baje 16kl en dos meses 34lb en dos meses y fue muy sencillo.

Trate de llevar una dieta balanceada y tomar mucha agua y un poquito de ejercicio, pero encuentre un producto sensacional que se llama Reducarb.

Reducarb le va ayudar a bajar de peso mientras usted esta comiendo, no se tiene que poner esas molesticisimas fajas que tanto pesan traerlas todo el dia puestas ni ponerse ese traje de plastico para sudar, ni embarrarse de cremas ni mucho menos.

Reducarb es un producto muy sencillo de utilizar, solamente te tomas una pastillita 20minutos antes de cada comida y mientras usted come va bajar de peso, porque Reducarb le va quitar los carbohidratos, esos pastelitos esos taquitos que tanto nos gustan comer, nos lo vamos a comer y poco a poco los vamos a ir eliminando del cuerpo.

Reducarb 1-800-718-2220.

Este tiene mi cara, que no lo engañen.

**Commercial Transcript Reducarb
(Third Part)**

How are you, friends? This is Omar Fierro speaking [sic.] want to tell you how to lose weight, I have already done it I lost 16 kilos in two months 34 pounds in two months and it was very easy.

I tried to follow a balanced diet and to drink a lot of water and do a little bit of exercise, but I found a sensational product called ReduCarb.

ReduCarb is going to help you lose weight while you eat, you don't have to put on those cumbersome girdles that are so heavy to wear all day long nor do you have to wear those plastic sweating suits, and you don't have to put on creams or anything like that.

ReduCarb is a very easy product to use, all you do is take a little pill 20 minutes before meals and you will lose weight while you eat, because ReduCarb is going to eliminate the carbohydrates from your body, those little pastries those little tacos that we love to eat, we will still be able to eat them and little by little we will eliminate them from our body.

ReduCarb, 1-800-718-2220.

This one has my face on it, don't be fooled.

CERTIFIED TRANSLATION
The Language Doctors, Inc.