UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman

Pamela Jones Harbour

Jon Leibowitz J. Thomas Rosch

In the Matter of)	
ALEXANDER HECKMAN,)	
individually and doing business)	
as Omega Supply, and)	DOCKET NO. 9332
)	
ERICK DEL RIO,)	
individually.)	
)	

COMPLAINT

The Federal Trade Commission, having reason to believe that Alexander Heckman, individually and doing business as Omega Supply, and Eric Del Rio, individually (collectively, "respondents"), have violated the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

- 1. Respondent Alexander Heckman ("Heckman") owns and does business as Omega Supply. His registered place of business is 3615 Jemez Drive, San Diego, California, 92117-3709. At all times relevant to this Complaint, acting alone or in concert with others, Heckman has formulated, directed, controlled, or participated in the various acts and practices set forth herein.
- 2. Respondent Erick del Rio, a/k/a Erick Delrio, a/k/a Erick del Reyes, a/k/a Erick Delreyes ("del Rio") is an individual who, at all times relevant to this Complaint, acting alone or in concert with others, has formulated, directed, controlled, or participated in the various acts and practices set forth herein. His principal place of business is the same as that of Heckman.
- 3. Respondents have advertised, promoted, offered for sale, sold, and distributed products to the public, including Amigdalina B-17, Hydrazine Sulphate, and Cloracesium (collectively, the "Omega Supply Products"). The Omega Supply Products are "foods" or "drugs" within the meaning of Sections 12 and 15 of the Federal Trade Commission Act.

4. The acts and practices of respondents, as alleged herein, have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.

AMIGDALINA B17

- 5. Respondents created, prepared, disseminated, or caused to be disseminated advertisements for Amigdalina B17 through an Internet website, www.laetrilesupply.com, including but not limited to the attached Exhibit A. The advertisements contain the following statements, among others:
 - a. In spite of the great advances in the diagnosis and treatment of malignant tumors, cancer continues to be one of the principal causes of death. . . .
 - b. There are several types of tumors for which there is no effective treatment yet known. All this justifies, and even makes imperative the search for new substances with antitumoral effect and ideally, with little or no toxicity in therapeutic dosages.
 - c. In the last 10 years several vegetable and hormonal substances have been discovered with such characteristics and, therefore, many patients who formerly could not be benefited [sic] or alleviated medicinally may now be exposed to useful. [sic] antineoplastic treatments, [sic] This [sic] treatments are based on the anti-tumoral action of a vegetable agent that was known empirically for many years, but in the last 20 years has been scientifically proven, primarily through clinical studies. This antitumoral agent is VITAMIN B17 commonly known as VITAMIN B17 and/or Laetrile

[Exhibit A, Page 1.]

d. Clinical experience with the use of Vitamin B17

Like many other substances VITAMIN B17 was initially employed empirically on patients with malignant tumors. . . .

All agree that it is a characteristically harmless substance when administered intravenously under medical supervision and that orally, therapeutic dosages can be tolerated. On the other hand, they all report definite palliative and antitumoral effect even on patients with cancer in terminal stages. Phase I studies were designated to determine the minimum toxic dosage in humans. Some 420 patients with cancer in advanced stages and 90 healthy volunteers were exposed to VITAMIN B17 in intravenous dosages of up to 21g or 2 g orally, per day, tolerated perfectly without evidence of toxicity, acute or chronic (six month study). The palliative effect was apparent in those patients who were not able to tolerate any kind of conventional treatment.

The Phase II studies were designed to demonstrate the antitumoral effect of VITAMIN B17. The files of 1200 patients with advanced malignant neoplasms exposed to VITAMIN B17 in varying dosages were reviewed. Intravenously and orally, VITAMIN B17 demonstrated [sic] to have antitumor effect. Complete remissions, partial remissions and prolonged stabilization (objective responses) were seen in almost 33% of the patients, who were no longer candidates for conventional treatment in more than 70% of the cases.

[Exhibit A, Pages 2-3 (bold text in original).]

e. Studies made by Dr. Harold Manner and latter [sic] by the McNaughton Foundation, [sic] concluded that 100 mg to 250 mg per day will be the ordinarily recommended amount for complete assurance of an actively supported natural immunity from the deadly symptoms of cancer. Therapeutic efficacy of VITAMIN B17 is considered by many authorities to be highest when the natural metabolic pathway of oral ingestion is followed. Tablets are therefore, [sic] the delivery system recommended by the majority of physicians. Fortunately for this purpose Cyto Pharma de Mexico S.A. offers VITAMIN B17 in 100 mg Tablets, [sic] naturally obtained from apricot seeds, meeting the physiological and chemical properties of the VITAMIN B17 listed on the Merck Index.

Conclusion

With all that which [sic] has been previously exposed, we can conclude that VITAMIN B17 has an antitumoral effect, even in those patients in a poor condition and/or with extensively disseminated disease. VITAMIN B17 as an antineoplastic agent is no longer a dream to be proven, but rather a demonstrated reality with scientific evidence confirmed each time that it is prescribed under medical vigilance. VITAMIN B17 appears to be not only a possibility for the cure of cancer but also and most importantly opens a new dimension for its prevention.

[Exhibit A, Pages 3-4 (bold text in original).]

- 6. Through the means described in Paragraph 5, including the statements and depictions contained in the advertisements attached as Exhibit A, among others, respondents have represented, expressly or by implication, that reliable scientific evidence demonstrates that Amigdalina B17 is effective in the prevention, treatment, and cure of cancer.
- 7. In truth and in fact, reliable scientific evidence does not demonstrate that Amigdalina B17 is effective in the prevention, treatment, and cure of cancer. Therefore, the representation set forth in Paragraph 6 is false and misleading.

- 8. Through the means described in Paragraph 5, including the statements and depictions contained in the advertisements attached as Exhibit A, among others, respondents have represented, expressly or by implication, that:
 - a. Amigdalina B-17 is effective in the treatment and cure of cancer, even in advanced stages;
 - b. Amigdalina B-17 is effective in the prevention of cancer; and
 - c. Amigdalina B-17 is safe and has no toxicity.
- 9. Through the means described in Paragraph 5, including the statements and depictions contained in the advertisements attached as Exhibit A, among others, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representations set forth in Paragraph 8, at the time the representations were made.
- 10. In truth and in fact, respondents did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 8, at the time the representations were made. Therefore, the representation set forth in Paragraph 9 was, and is, false or misleading.

HYDRAZINE SULFATE

11. Respondents created, prepared, disseminated, or caused to be disseminated advertisements for Hydrazine Sulfate through an Internet website, www.laetrilesupply.com, including, but not limited to, the attached Exhibit B. The advertisements contain the following statements, among others:

Hydrazine sulphate is a chemical that works against cancer by blocking a liver enzyme in the body. In blocking the enzyme, the tumor is deprived of the energy it needs to grow. It is not claimed to be a cure, but ther esult [sic] is the tumor shrinks. . . .

Hydrazine sulphate is an anti-cachexia drug which acts to reverse the metabolic processes of debilitation and weight loss in cancer and secondarily acts to stabilize or regress tumors. . . .

There is an abundance of published, positive, peer reviewed studies on hydrazine sulphate in the medical literature. . . . These data emanate from major cancer centers both from the United States (randomized, double-blind, placebo-controlled studies and single-arm studies) and Russia (large-scale, multicentric Phase II-equivalent studies). These data indicate the therapeutic action of hydrazine sulphate to extend to all types of tumors.

Hydrazine sulphate has been demonstrated to produce only a few and transient side effects. There have been no instances of bone-marrow, heart, lung, kidney or immune system toxicity, or death, reported. Hydrazine sulphate has never been demonstrated to be carcinogenic in humans.

[Exhibit B, Page 1.]

- 12. Through the means described in Paragraph 11, including the statements and depictions contained in the advertisements attached as Exhibit B, among others, respondents have represented, expressly or by implication, that reliable scientific studies prove that Hydrazine Sulphate is effective in the treatment of cancer.
- 13. In truth and in fact, reliable scientific studies do not prove that Hydrazine Sulphate is effective in the treatment of cancer. Therefore, the representation set forth in Paragraph 12 is false and misleading.
- 14. Through the means described in Paragraph 11, including the statements and depictions contained in the advertisements attached as Exhibit B, among others, respondents have represented, expressly or by implication, that:
 - a. Hydrazine Sulphate is effective in the treatment of cancer;
 - b. Hydrazine Sulphate shrinks the size of cancerous tumors; and
 - c. Hydrazine Sulphate is safe and has no significant side effects.
- 15. Through the means described in Paragraph 11, including the statements and depictions contained in the advertisements attached as Exhibit B, among others, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representations set forth in Paragraph 14, at the time the representations were made.
- 16. In truth and in fact, respondents did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 14, at the time the representations were made. Therefore, the representation set forth in Paragraph 15 was, and is, false or misleading.

CLORACESIUM

17. Respondents created, prepared, disseminated, or caused to be disseminated advertisements for Cloracesium through an Internet website, www.laetrilesupply.com, including but not limited to the attached Exhibit C. The advertisements contain the following statements, among others:

a. Cloracesium (Cesium Chloride)

The high pH therapy for cancer tests on mice and humans

[Depiction of pill bottle labeled Cloracesium]

* * *

The High pH Therapy.

The ready uptake of cesium and rubidium by the cancer cells lead [sic] the writer to the high pH therapy. This consists of feeding the patient close to 6 g. of CsCI or RbCI per day in conjunction with the administration of ascorbic and retionic acids, vitamins C and A, which being weak acids, upon absorption by the tumor cells will enhance the negative potential gradient across the membrane, and also zinc and selenium salts which, when absorbed on the membrane surface, will act as broad and moderately strong electron donors. Both types of compounds have been shown in mice to drastically enhance the pickup for cesium and rubidium ions.

The toxic dose of CsCL is 135 g. The administration of 6 g. per day therefore has no toxic effects. It is sufficient however to give rise to the pH in the cancer cells, bringing them up in a few days to the 8 or above where the life of the cell is short. In addition, the presence of Cs and Rb salts in the body fluids neutralizes the acid toxin leaking out of the tumor mass and renders them nontoxic.

[Exhibit C, Pages 1, 5 (bold text in original).]

b. Tests on Man:

Many tests on humans have been carried out by H. Nieper in Hannover, Germany and by H. Sartori in Washington, DC as well as by a number of other physicians. On the whole, the results have been very satisfactory. It has been observed that all pains associated with cancer disappear within 12 to 24 hr. except ina [sic] very few cases where there was a morphine withdrawal problem that required a few more hours. . . .

In addition to the loss of pains, the physical results are a rapid shrinkage of the tumor masses. The material comprising the tumors is secreted as uric acid in the urine; the uric acid content of the urine increases many fold. About 50% of the patients were pronounced terminal, and were not able to work. Of these, a majority have gone back to work.

[Exhibit C, Page 6 (bold text in original).]

c. Only one case history will be presented here. A woman with 2 hard tumor masses 8 to 10 cm in diameter, one on her thyroid and one on her chest, was given 3 to 6 months to live. She had been subjected to chemotherapy, but was discontinued because it weakened her. She was taking laetrile on her own. She was given a 50 g bottle of CsCI and was told to take 4 g per day. She reported her case a year later. Being very frightened she took the entire 50 g. in one week. At the end of that time the tumor masses were very soft, so he [sic] obtained another 50g of CsCL and took it in another week. By the end of that time she could not find the tumors, and two years later there was no sign of their return.

[Exhibit C, Pages 6-7.]

d. Low Incidence Cancer Areas

There are a number of areas where the incidences of cancer are very low. . . . The food intake has been studied by the author as far as possible from the high pH point of view. The results found will be discussed for a number of low incidence areas.

The Hopi Indians of Arizona

The incidence of cancer among the Hopi indian [sic] is 1 in 1000 as compared to 1 In [sic] 4 for the USA as a whole. Fortunately their food has been analyzed from the stand point of nutritional values [17] [sic]. In this study it was shown that the Hopi food runs higher in all the essential minerals than conventional foods. It is very high in potassium and exceptionally high in rubidisium [sic]. Since the soil is volcanic it must also be very rich in cesium. . . . The results indicate clearly that the Hopi food meets the requirements for the High pH therapy.

The Pueblo Indians of Arizona

Some 20 years ago the incidence of cancer among Pueblo Indians was the same as that for the Hopi Indians, since their food was essentially the same, [sic] But unlike the Hopi, these Indians have accrued certain items from outside their environment, hence supermarkets were installed in the area. Today the incidence of cancer among the Pueblos is 1 in 4, the same as the U.S. it [sic] is reported that there is a regular epidemic of cancer among them. It must be emphasized here that the high incidence of cancer is not due to what is in the supermarket foods, but rather to what is not in it. It is essentially lacking rubidium and cesium and low in potassium. . . .

Central and South America

The Indians who live in Central America and on the highland of Peru and Equator [sic] have very low incidences of cancer. The soil in these areas is volcanic. Fruit from the

areas has been obtained and analyzed for bubidium [sic] and cesium and found to run very high in both elements. Cases have been reliably reported where people with advance unoperable [sic] cancer have gone to live with these Indians, and found that all tumor masses disappear within a very few months.

In conclusion, the High pH therapy, as has been pointed out, was arrived at from physical experiments carried out on cancer and normal cells. It has been tested and found effective on cancers in both mice and humans, [sic] There can be no question that Cs and Rb salts, when present in the adjacent fluids the pH of cancer cells, [sic] will rise to the point where the life of the cell is short, and that they will also neutralize the acid toxins formed in the tumor mass and render them nontoxic.

[Exhibit C, Pages 7-8 (bold text in original).]

- 18. Through the means described in Paragraph 17, including the statements and depictions contained in the advertisements attached as Exhibit C, among others, respondents have represented, expressly or by implication, that reliable scientific evidence proves that Cloracesium is effective in the treatment and cure of cancer.
- 19. In truth and in fact, reliable scientific evidence does not prove that Cloracesium is effective in the treatment and cure of cancer. Therefore, the representation set forth in Paragraph 18 is false and misleading.
- 20. Through the means described in Paragraph 17, including the statements and depictions contained in the advertisements attached as Exhibit C, among others, respondents have represented, expressly or by implication, that:
 - a. Cloracesium prevents or lowers the risk of cancer;
 - b. Cloracesium is effective in the treatment and cure of cancer, even in advanced and inoperable stages; and
 - c. Cloracesium shrinks cancerous tumors.
- 21. Through the means described in Paragraph 17, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representations set forth in Paragraph 20, at the time the representations were made.
- 22. In truth and in fact, respondents did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 20, at the time the representations were made. Therefore, the representation set forth in Paragraph 21 was, and is, false or misleading.
- 23. The acts and practices of respondents as alleged in this complaint constitute unfair or deceptive acts or practices, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the Federal Trade Commission Act.

NOTICE

Proceedings on the charges asserted against the respondents named in this complaint will be held before an Administrative Law Judge (ALJ) of the Federal Trade Commission, under Part 3 of the Commission's Rules of Practice, 16 C.F.R. Part 3. A copy of Part 3 of the Rules is enclosed with this complaint.

You are notified that the opportunity is afforded you to file with the Commission an answer to this complaint on or before the twentieth (20th) day after service of it upon you. An answer in which the allegations of the complaint are contested shall contain a concise statement of the facts constituting each ground of defense; and specific admission, denial, or explanation of each fact alleged in the complaint or, if you are without knowledge thereof, a statement to that effect. Allegations of the complaint not thus answered shall be deemed to have been admitted.

If you elect not to contest the allegations of fact set forth in the complaint, the answer shall consist of a statement that you admit all of the material allegations to be true. Such an answer shall constitute a waiver of hearings as to the facts alleged in the complaint, and together with the complaint will provide a record basis on which the ALJ shall file an initial decision containing appropriate findings and conclusions and an appropriate order disposing of the proceeding. In such answer you may, however, reserve the right to submit proposed findings and conclusions and the right to appeal the initial decision to the Commission under Section 3.52 of the Commission's Rules of Practice for Adjudicative Proceedings.

Failure to answer within the time above provided shall be deemed to constitute a waiver of your right to appear and contest the allegations of the complaint and shall authorize the ALJ, without further notice to you, to find the facts to be as alleged in the complaint and to enter an initial decision containing such findings, appropriate conclusions and order.

The ALJ will schedule an initial prehearing scheduling conference to be held not later than 7 days after the last answer is filed by any party named as a respondent in the complaint. Unless otherwise directed by the ALJ, the scheduling conference and further proceedings will take place at the Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580. Rule 3.21(a) requires a meeting of the parties' counsel as early as practicable before the prehearing scheduling conference, and Rule 3.31(b) obligates counsel for each party, within 5 days of receiving a respondent's answer, to make certain initial disclosures without awaiting a formal discovery request.

Notice is hereby given to each of the respondents named in this complaint that a hearing before the ALJ on the charges set forth in this complaint will begin on December 16, 2008, at 10 a.m., or such other date and time as determined by the ALJ, in Room 532, Federal Trade Commission Building, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580. At the

hearing, you will have the right under the Federal Trade Commission Act to appear and show cause why an order should not be entered requiring you to cease and desist from the violations of law charged in this complaint.

The following is the form of order which the Commission has reason to believe should issue if the facts are found to be as alleged in the complaint. If, however, the Commission should conclude from record facts developed in any adjudicative proceedings in this matter that the proposed order provisions might be inadequate to fully protect the consuming public, the Commission may order such other relief as it finds necessary or appropriate.

Moreover, the Commission has reason to believe that, if the facts are found as alleged in the complaint, it may be necessary and appropriate for the Commission to seek relief to redress injury to consumers, or other persons, partnerships or corporations, in the form of restitution for past, present, and future consumers and such other types of relief as are set forth in Section 19(b) of the Federal Trade Commission Act. The Commission will determine whether to apply to a court for such relief on the basis of the adjudicative proceedings in this matter and such other factors as are relevant to consider the necessity and appropriateness of such action.

ORDER

For purposes of this Order, the following definitions shall apply:

- 1. "Commerce" shall mean "commerce" as defined in Section 4 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 44.
- 2. "Competent and reliable scientific evidence" shall mean tests, analyses, research, studies, or other evidence based on the expertise of professionals in the relevant area, that has been conducted and evaluated in an objective manner by persons qualified to do so, using procedures generally accepted in the profession to yield accurate and reliable results.
- 3. "Covered Product or Service" shall mean any dietary supplement, food, drug, or other health-related product, including, but not limited to, Amigdalina B-17, Hydrazine Sulphate, and Cloracesium, or any health-related service or program.
- 4. "Food" and "drug" shall mean "food" and "drug" as defined in Section 15 of the FTC Act, 15 U.S.C. § 55.
- 5. "Endorsement" shall mean as defined in 16 C.F.R. § 255.0(b).

- 6. Unless otherwise specified, "respondents" shall mean:
 - a. Alexander Heckman, individually and doing business as Omega Supply; and
 - b. Erick del Rio, a/k/a Erick Delrio, a/k/a Erick del Reyes, a/k/a Erick Delreyes, individually;

and each of the above's agents, representatives, and employees.

I.

IT IS HEREBY ORDERED that respondents, directly or through any corporation, partnership, subsidiary, division, trade name, or other device, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of Amigdalina B-17, Hydrazine Sulfate, Cloracesium, or any substantially similar product or any other Covered Product or Service, in or affecting commerce, shall not represent, in any manner, directly or by implication, including through the use of a product name, endorsement, depiction, or illustration, that:

- A. Such product is effective in the treatment or cure of cancer;
- B. Such product prevents or lowers the risk of cancer;
- C. Such product shrinks the size of cancerous tumors; or
- D. Such product is safe and has no toxicity or side effects,

unless such representation is true, non-misleading, and, at the time the representation is made, respondents possess and rely upon competent and reliable scientific evidence that substantiates the representation.

II.

IT IS FURTHER ORDERED that respondents, directly or through any corporation, partnership, subsidiary, division, trade name, or other device, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of any Covered Product or Service, in or affecting commerce, shall not make any representation, in any manner, directly or by implication, including through the use of a product name, endorsement, depiction, or illustration, about the efficacy, performance, or health-related benefits of any Covered Product or Service unless the representation is true, non-misleading, and, at the time it is made, respondents possess and rely upon competent and reliable scientific evidence that substantiates the representation.

IT IS FURTHER ORDERED that respondents, directly or through any corporation, partnership, subsidiary, division, trade name, or other device, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of any Covered Product or Service, in or affecting commerce, shall not misrepresent, in any manner, expressly or by implication, including through the use of any product name or endorsement, the existence, contents, validity, results, conclusions, or interpretations of any test, study, or research.

IV.

IT IS FURTHER ORDERED that:

- A. Nothing in this order shall prohibit respondents from making any representation for any drug that is permitted in labeling for such drug under any tentative or final standard promulgated by the Food and Drug Administration, or under any new drug application approved by the Food and Drug Administration; and
- B. Nothing in this order shall prohibit respondents from making any representation for any product that is specifically permitted in labeling for such product by regulations promulgated by the Food and Drug Administration pursuant to the Nutrition Labeling and Education Act of 1990.

V.

IT IS FURTHER ORDERED that:

- A. Respondents shall, within seven (7) days after the date of service of this order, deliver to the Commission a list, in the form of a sworn affidavit, of all consumers who purchased Amigdalina B-17, Hydrazine Sulfate, or Cloracesium, on or after June 15, 2002 through the date of service of this order. Such list shall include each consumer's name and address, the product(s) purchased, and, if available, the consumer's telephone number and email address;
- B. Within forty-five (45) days after the date of service of this order, respondents shall send by first class mail, postage prepaid, an exact copy of the notice attached as Attachment A to all persons identified in Part V.A. The face of the envelope containing the notice shall be an exact copy of Attachment B. The mailing shall not include any other documents; and
- C. Except as provided in this order, respondents, and their officers, agents, servants, employees, attorneys, and representatives shall not sell, rent, lease, transfer, or otherwise disclose the name, address, telephone number, credit card number, bank account number, e-mail address, or other identifying information of any person who paid any money to any respondent, at any

time prior to issuance of this order, in connection with the purchase of Amigdalina B-17, Hydrazine Sulfate, or Cloracesium. *Provided, however,* that respondents may disclose such identifying information to the FTC pursuant to Part V.A above, or any law enforcement agency, or as required by any law, regulation, or court order.

VI.

IT IS FURTHER ORDERED that for a period of five (5) years after the last date of dissemination of any representation covered by this order, respondents shall maintain and upon request make available to the Federal Trade Commission for inspection and copying:

- A. All advertisements and promotional materials containing the representation;
- B. All materials that were relied upon in disseminating the representation; and
- C. All tests, reports, studies, demonstrations, or other evidence in their possession or control that contradict, qualify, or call into question such representation, or the basis relied upon for the representation, including complaints and other communications with consumers or with governmental or consumer protection organizations.

VII.

IT IS FURTHER ORDERED that respondents shall deliver a copy of this order to all current and future principals, officers, directors, and managers, and to all current and future employees, agents, and representatives having responsibilities with respect to the subject matter of this order, and shall secure from each such person a signed and dated statement acknowledging receipt of the order. Respondents shall deliver this order to current personnel within thirty (30) days after the date of service of this order, and to future personnel within thirty (30) days after the person assumes such position or responsibilities.

VIII.

IT IS FURTHER ORDERED that respondents, for a period of ten (10) years after the date of issuance of this order, shall notify the Commission of the discontinuance of their individual current business or employment, or of their individual affiliation with any new business or employment. The notice shall include the respondent's new business address and telephone number and a description of the nature of the business or employment and their duties and responsibilities. All notices required by this Paragraph shall be sent by certified mail to the Associate Director, Division of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C., 20580.

IT IS FURTHER ORDERED that respondents shall, within sixty (60) days after the date of service of this order, and at such other times as the Federal Trade Commission may require, file with the Commission a report, in writing, setting forth in detail the manner and form in which they have complied with this order.

X.

This order will terminate twenty (20) years from the date of its issuance, or twenty (20) years from the most recent date that the United States or the Federal Trade Commission files a complaint (with or without an accompanying consent decree) in federal court alleging any violation of the order, whichever comes later; *provided, however*, that the filing of such a complaint will not affect the duration of:

- A. Any Paragraph in this order that terminates in less than twenty (20) years;
- B. This order's application to any respondent that is not named as a defendant in such complaint; and
- C. This order if such complaint is filed after the order has terminated pursuant to this Paragraph.

Provided further, that if such complaint is dismissed or a federal court rules that the respondents did not violate any provision of this order, and the dismissal is either not appealed or upheld on appeal, then the order will terminate according to this Paragraph as through the complaint was never filed, except that the order will not terminate between the date such complaint is filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

THEREFORE, the Federal Trade Commission this sixteenth day of September, 2008, has issued this complaint against respondents.

By the Commission.

Donald S. Clark Secretary

ATTACHMENT A LETTER TO BE SENT BY FIRST CLASS MAIL

[To be printed on letterhead of Omega Supply/www.laetrilesupply.com]

[Date]

To Whom It May Concern:

Our records show that you bought Amigdalina B-17, Hydrazine Sulphate, or Cloracesium from our website www.laetrilesupply.com. We are writing to tell you that the Federal Trade Commission ("FTC") has found that our advertising claims for these products were false or unsubstantiated, and has issued an Order prohibiting us from making those claims in the future. The Order entered against us also requires that we send you the following information about the scientific evidence on these products.

Very little scientific research has been done concerning Amigdalina B-17, Hydrazine Sulphate, and Cloracesium as a treatment or cure for cancer in humans. The scientific studies that have been done do not demonstrate that Amigdalina B-17, Hydrazine Sulphate, or Cloracesium, or the ingredients in these products, are effective when used as treatments for cancer.

It is very important that you talk to your doctor or health care provider before using *any* alternative or herbal product, including Amigdalina B-17, Hydrazine Sulphate, and Cloracesium. Speaking with your doctor is important to make sure that all aspects of your medical treatment work together. Things that seem safe, such as certain foods, herbs, or pills, may interfere or affect your cancer or other medical treatment, or other medicines you might be taking. Some herbs or other complementary or alternative treatments may keep your medicines from doing what they are supposed to do, or could be harmful when taken with other medicines or in high doses. It also is very important that you talk to your doctor or health care provider before you decide to take any alternative or herbal product, including Amigdalina B-17, Hydrazine Sulphate, or Cloracesium, instead of taking conventional cancer treatments that have been scientifically proven to be safe and effective in humans.

If you would like further information about complementary and alternative treatments for cancer, the following Internet web sites may be helpful:

- 1. The National Cancer Institute: www.cancer.gov/cancertopics/pdq; or
- 2. The National Center for Complementary and Alternative Medicines: www.nccam.nih.gov

You also can contact the National C	Cancer Institute's Cancer	Information S	Service at
1-800-4-CANCER or 1-800-422-6237			

Sincerely,

Alexander Heckman Omega Supply/www.laetrilesupply.com

ATTACHMENT B

Alexander Heckman Omega Supply/www.laetrilesupply.com 3615 Jemez Drive San Diego, California 92117-3709

[name and address of purchaser]

GOVERNMENT ORDERED NOTICE