	Case 3:08-cv-01718-VRW Document	1 Filed 03/31/2008 Page 1 of 19
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8 9	Attorneys for Plaintiff Federal Trade Commission	
10	UNITED STATES D	ISTRICT COURT
11	NORTHERN DISTRIC SAN FRANCIS	CT OF CALIFORNIA
12		
13	FEDERAL TRADE COMMISSION,	
14	Plaintiff,	
15	V.	
16	NEXTCLICK MEDIA, LLC, a Delaware limited liability company,	4:08-cv-01718 VRW
17	dba StopSmoking180.com, StopSmokingResolution.com,	COMPLAINT FOR INJUNCTIVE
18	StopSmokingResolution.com, BeautifulSkin.com, and OnLineDirectProducts;	AND OTHER EQUITABLE RELIEF
19	NEXT INTERNET, LLC, a Delaware	
20	limited liability company;	
21	KENNETH CHAN, individually and as an officer of NEXTCLICK MEDIA, LLC, and NEXT INTERNET, LLC; and	
22		
23	ALBERT CHEN, individually and as an officer of NEXTCLICK MEDIA, LLC,	
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25	Defendants.	
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27	Plaintiff, the Federal Trade Commissio	on ("FTC" or "Commission"), for its
28	Complaint alleges as follows:	

Complaint

1 1. The FTC brings this action under Section 13(b) of the Federal Trade 2 Commission Act ("FTC Act"), 15 U.S.C. § 53(b), and Section 917(c) of the Electronic 3 Fund Transfer Act ("EFTA"), 15 U.S.C. § 16930(c), to secure preliminary and permanent 4 injunctive relief, rescission of contracts and restitution, disgorgement of ill-gotten gains, 5 and other equitable relief against Defendants for engaging in deceptive acts or practices in connection with the sale of smoking-cessation and skin-treatment products in violation 6 of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52; Section 907(a) of the 7 EFTA, 15 U.S.C. § 1693e(a); and Section 205.10(b) of Regulation E, 12 C.F.R. 8 § 205.10(b). 9

JURISDICTION AND VENUE

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

3. **Venue.** Venue in the United States District Court for the Northern District of California is proper under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b), (c), and (d).

4. Intradistrict Assignment. Because the Defendants have or have had two offices in the City and County of San Francisco in which they transact or have transacted business, *see infra* $\P\P$ 6-9, assignment is appropriate in the San Francisco Division.

PLAINTIFF

5. 19 Plaintiff FTC is an independent agency of the United States Government 20 created by statute. 15 U.S.C. §§ 41-58, as amended. The Commission is charged with, 21 inter alia, enforcement of 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 22 23 Commission is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act, and to secure such equitable relief, 24 25 including restitution for injured consumers, as may be appropriate in each case. 15 U.S.C. § 53(b). 26

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6. Defendant NextClick Media, LLC ("NextClick"), is a Delaware limited

DEFENDANTS

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liability company that has or has had business offices located at 667 Folsom Street, San Francisco, CA, 94107; 880 Harrison Street, San Francisco, CA, 94107; and 2525 Charleston Road, Suite 101, Mountain View, CA 94043. NextClick does business under a number of names including StopSmoking180.com, StopSmokingResolution.com, BeautifulSkin.com, and OnLineDirectProducts. NextClick transacts or has transacted business in the Northern District of California.

7. Defendant Next Internet, LLC ("Next Internet"), is a Delaware limited liability company that has or has had business offices located at 667 Folsom Street, San 8 Francisco, CA 94107; 880 Harrison Street, San Francisco, CA, 94107; and 2525 Charleston Road, Suite 101, Mountain View, CA 94043. It is the parent of NextClick. Next Internet transacts or has transacted business in the Northern District of California.

8. 12 Defendant Kenneth Chan is or at times material to this Complaint has been an owner, officer, or director of NextClick and Next Internet. At times material to this 13 14 Complaint, acting alone or in concert with others, Kenneth Chan formulated, directed, 15 controlled, or participated in the acts and practices of NextClick and Next Internet, including the acts and practices set forth in this Complaint. Kenneth Chan resides in and 16 transacts or has transacted business in the Northern District of California. 17

9. Defendant Albert Chen is or at times material to this Complaint has been an owner, officer, or director of NextClick. At times material to this Complaint, acting alone or in concert with others, Albert Chen formulated, directed, controlled, or participated in the acts and practices of NextClick, including the acts and practices set forth in this Complaint. Albert Chen resides in and transacts or has transacted business in the Northern District of California.

<u>COMMERCE</u>

25 10. At all times relevant to this Complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as "commerce" is defined in Section 26 27 4 of the FTC Act, 15 U.S.C. § 44.

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DEFENDANTS' BUSINESS PRACTICES Defendants' Free Trial Programs

11. Since at least 2006, and continuing thereafter, Defendants have operated several websites advertising for sale over the Internet "free trials" of various products. These websites include, but are not limited to, the websites www.StopSmoking180.com, www.StopSmokingResolution.com and www.BeautifulSkin.com, pages of which are attached as Exhibits A and C - K. Defendants' StopSmoking180.com website offers a stop-smoking product, in the form of an herbal patch, that Defendants advertise as helping consumers to stop smoking. Defendants' StopSmokingResolution.com website similarly offers an herbal patch that is advertised to help consumers stop smoking. Defendants' BeautifulSkin.com website offers a package of three different skin care products advertised to treat acne.

12. Defendants send out thousands of bulk emails to consumers advertising
these products, including, but not limited to, the attached Exhibit B. A consumer
receiving such an email is directed to one of Defendants' websites. Sometimes
consumers are directed to these websites from other websites, such as
www.TreasureTrooper.com, that offer free gift cards and other incentives to consumers
who will try a new product – such as Defendants' products – on a free trial basis.

Defendants usually provide their products on a monthly subscription basis,
 but claim that consumers may try the product free. This is the focus of Defendants'
 websites. For example, the first page of the www.StopSmoking180.com website repeats
 the word "free" in large colored print four times:

23 "TRY IT FREE*!" [Asterisk references no other text]
24 "Free 10-Day Trial plus shipping and handling"
25 "YES! RUSH ME MY FREE TRIAL"
26 "FREE 10-Day Supply plus shipping and handling" (Exhibit A)
27 A typical bulk email for the StopSmoking180 program states in large type:
28 "Free 10 DAY SUPPLY"

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"CLICK HERE TO TRY IT FREE!" (Exhibit B) 1 2 Similarly, the first page of the www.BeautifulSkin.com website repeats the word "free" 3 four times, again in large colored print: 4 "FREE TRIAL CLICK NOW" "FREE TRIAL!" 5 "TRY IT FREE" 6 "Get FREE Trial Now!" (Exhibit C) 7 The StopSmokingResolution.com website tells consumers that the stop smoking patch is 8 a "FREE TRIAL" and a "NO-COST 10-Day Supply of ZeroNicotine, you pay only 9 10 shipping and handling!" (Exhibit D) 14. Defendants make an initial shipment of a month's supply of product to the 11 12 consumer, which includes the trial product. Although Defendants claim that the trial of 13 the product is free or that there is no cost to try the product (other than a small shipping 14 and handling charge), consumers who elect to keep the product (including the trial 15 product) are charged the same price that is charged for a month's supply. This charge typically is \$99.95 for the smoking-cessation products and \$69.95 for the skin-care 16 17 products. Similarly, although Defendants claim that consumers will receive a full refund 18 upon returning unused product from the initial shipment (Exhibit J), consumers who elect 19 to return unused product (which they must do in order to avoid further charges) must pay 20 the postage for returning the product and are assessed a \$7.95 restocking fee as well.

15. Nowhere in proximity to Defendants' promotional statements concerning the free trial offer is there a disclosure about the restocking fee Defendants charge.

16. In addition, nowhere in proximity to Defendants' promotional statements
concerning the free trial offer is there a disclosure that consumers seeking to avoid
further charges must themselves pay to ship the remaining 20 days' worth of product
back to Defendants.

27 17. Further, nowhere in proximity to Defendants' promotional statements
28 concerning the free trial offer do Defendants disclose that by requesting the supposedly

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free trial product, consumers will become enrolled in a program whereby they will incur a continuing month-to-month obligation to pay for monthly supplies of the product.

3 18. In fact, in numerous instances, Defendants' websites indicate that 4 consumers have no obligations after the trial period ends unless they affirmatively decide 5 to continue with the program, when in fact Defendants continue to bill consumers' credit 6 card or debit card accounts unless consumers affirmatively opt out of the program. 7 StopSmoking180.com's website emphasizes: "Your cost: Only \$3.95," which is the shipping and handling fee. (Exhibit A) After a consumer supplies information indicating 8 9 interest in the stop-smoking patch on StopSmoking180.com, a second page opens up 10 informing consumers that they will "Simply pay low shipping and handling." (Exhibit E) After the consumer provides additional shipping information, a third page pops up asking 11 12 for "billing information." (Exhibit F) This page requires consumers to provide their credit or debit card account information. It has a paragraph at the top asking, "Why do 13 [Defendants] need my credit card information?" It then responds: "Your 10 day trial is 14 15 absolutely free! Charges will only be made to your credit card if you find that StopSmoking180 is the product for you and you choose to continue with the stop 16 17 smoking 180 program for a discounted membership price." (Emphasis added.) (Exhibit 18 F)

19 19. Defendants do not ask for the consumer's consent for enrollment in a
 20 continuity program or authorization to charge the additional shipments to the debit or
 21 credit card account that the consumer provided to pay the shipping and handling charges
 22 for the trial product.

23 20. Defendants do not obtain written authorization from consumers who order
24 the trial product and pay by debit card for Defendants to make recurring transfers from
25 the consumers' accounts.

26 21. Rather, unless the consumer cancels, Defendants charge for the initial
27 shipment using the credit or debit card account number the consumer provided ostensibly
28 for the shipping and handling fee. Similarly, unless the consumer cancels, Defendants

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charge that same credit card or debit card account number for future monthly shipments as they are made under the program.

22. Many consumers, once they receive more than a 10-day supply of product or a confirming email or are charged more than the shipping and handling fee, come to realize that they have been enrolled in a continuity program.

23. 6 Defendants represent, expressly or by implication, that canceling the continuity program before or after the expiration of the free trial period will be easy for 7 consumers to accomplish. The "Terms and Conditions" page on the 8 9 StopSmoking180.com website states three times, with minor word variations, that 10 consumers "can also cancel anytime, risk free in order to not incur any charges on future orders." (Exhibit G) The BeautifulSkin.com website similarly promises that "We 11 12 believe in complete customer satisfaction. This is reflected in our 30-days satisfaction 13 guaranteed return policy." (Exhibit H)

24. 14 In fact, Defendants make cancelling so difficult that consumers who follow 15 the instructions on the website are unable to cancel.

25. Defendants' cancellation policy requires that the consumer return some of 16 the product sent. In the case of StopSmoking180 and StopSmokingResolution, the free trial usually comes with a 20-day supply of the product, which consumers must return in order to avoid further charges. In the case of BeautifulSkin, consumers are automatically sent a 30-day supply of the products and must return any unused product. Defendants will accept returns of the smoking-cessation and skin-care products only if the consumer first has obtained an "RMA" [return merchandise authorization] number. In order to obtain such a number, the consumer must contact Defendants by telephone, by logging onto the "Members" section of Defendants' website, or by sending an email to Defendants' customer service department.

26 26. In numerous instances, however, the username and/or password consumers 27 receive to log on do not work on Defendants' website, and, when consumers contact 28 Defendants by email to request a correct username and/or password enabling them to log

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on, Defendants do not provide one.

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27. Similarly, many consumers who attempt to cancel by sending an email to Defendants never receive the requisite RMA number.

28. Many consumers who attempt to call the customer service number which Defendants post on their websites are not able to speak with a representative and are not able to leave a message. Even consumers who are able to leave messages generally do not receive the requisite RMA number.

29. Due to the cancellation roadblocks Defendants have erected, many consumers are unable to cancel within the specified period and incur unauthorized charges for the initial shipment of up to \$99.95 a month.

30. Defendants also represent, expressly or by implication, that consumers who
elect to continue with the subscription program can easily cancel their membership and
not incur further charges. For example, the "Terms and Conditions" on the
StopSmoking180.com website states, under the bold heading "Return Policy – Our
Money Back Guarantee," that "you may discontinue your 'Commit to Quit VIP'
Membership enrollment at anytime by visiting <u>MEMBERS</u> and click on the Cancel
Subscription Link." (Exhibit G)

31. In fact, Defendants make cancelling the subscription program so difficult that consumers who follow the instructions on the website are unable to cancel before incurring charges for more months than they desired. Those instructions can typically be accessed on the website by clicking on the "Member" or "Contact Us" banner on the first page of the website, as is the case on StopSmoking180.com. Consumers who follow these instructions then run into the same roadblocks, described in ¶¶ 26-28 above, as consumers seeking to cancel before the end of the trial period.

Defendants' Stop Smoking Program Claims

32. Since at least 2006, Defendants have, through their
www.StopSmoking180.com website and numerous emails sent out to consumers,
advertised for sale over the Internet a stop-smoking patch called "Nicocure" and

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"StopSmoking 180®." Defendants advertise Nicocure's primary ingredient as Lobelia inflata. Defendants assert that Nicocure and StopSmoking 180® is the "world's most effective quit smoking program." In particular, Defendants describe Nicocure and StopSmoking 180® as "[E]ffective with over 97% of those who try it." Defendants then ask consumers to "Compare that [97% rate] with the meager 20% of nicotine-based products." (Exhibit A)

Similarly on the website's page entitled "The 180 Plan," Defendants state that:

"It's hard to find a smoking cessation program that's truly effective. Most remedies on the market do little more than slightly reduce your cravings for a short time. That's definitely not enough to make you quit!

. . . .

"Our natural Nicocure patches are the safest and most effective products on the market, enjoying a 97 percent success rate! Compare that to the 20 percent success rate of most smoking cessation products." (Exhibit I) Similarly, on the StopSmoking180.com page entitled "Frequently Asked Questions," Defendants state:

"How does Nicocure work to help me Quit Smoking? The Nicocure formula is primarily based around our proprietary herbal blend. It is safe and non-addictive, and it can provide your 'nicotine receptor cells' with the same sensation provided by nicotine. The difference is that you won't crave the sensation anymore after finishing the Nicocure formula. Remember, patches and gums simply feed you more nicotine. That's NOT the way to break an addictive habit." (Exhibit J)

33. Since at least 2006, Defendants have, through their
www.StopSmokingResolution.com website and numerous emails sent out to consumers,
advertised for sale over the Internet a stop-smoking patch called "ZeroNicotine."
Defendants advertise ZeroNicotine's ingredients as gotu kola, hops, skullcap, oat,
peppermint, ginger root, gentian, myrrh, safflower, eucalyptus, slippery elm, licorice

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root, alfalfa, passion flower, sarsaparilla, bayberry, and echinacea powder. (Exhibit K)

34. On the first page of Defendants' StopSmokingResolution.com website Defendants state, "With its unique blend of ingredients, The Stop Smoking Resolution offers you the best possible chance to finally kick the habit for good!" (Exhibit D)

35. Defendants also assert that each patch of ZeroNicotine "contains a dose of the most effective herbal ingredients, formulated to alleviate the symptoms of nicotine withdrawal while cleansing the system of all smoking-related toxins. To break free from smoking, you need to break free from nicotine. Unlike other stop smoking patches, The Stop Smoking Resolution's all-natural formula eliminates, rather than replenishes, the level of nicotine in your body, helping you break the habit." (Exhibit D)

THE FTC ACT

36. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), provides that "unfair or deceptive acts or practices in or affecting commerce, are hereby declared unlawful."

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

38. An unfair act or practice is one that causes or is likely to cause substantial injury to consumers that is not reasonably avoidable by consumers themselves and that is not outweighed by countervailing benefits either to consumers or competition. 15 U.S.C. § 45(n).

39. 20 Section 12(a) of the FTC Act, 15 U.S.C. § 52(a), prohibits the 21 dissemination of any false advertisement in or affecting commerce for the purpose of 22 inducing, or which is likely to induce, the purchase of food, drugs, devices, services, or 23 cosmetics. For the purposes of Section 12 of the FTC Act, 15 U.S.C. § 52, Nicocure, StopSmoking180[®], and ZeroNicotine are "drugs" pursuant to Section 15(d) of the FTC 24 25 Act, 15 U.S.C. § 55(d).

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THE ELECTRONIC FUND TRANSFER ACT AND REGULATION E

40. 27 Section 907(a) of the EFTA, 15 U.S.C. § 1693e(a), provides that a 28 "preauthorized electronic fund transfer from a consumer's account may be authorized by Page 10 Complaint

the consumer only in writing, and a copy of such authorization shall be provided to the
 consumer when made."

3 41. Section 205.10(b) of Regulation E, 12 C.F.R. § 205.10(b), provides that "[p]reauthorized electronic fund transfers from a consumer's account may be authorized 4 only by a writing signed or similarly authenticated by the consumer. The person that 5 obtains the authorization shall provide a copy to the consumer." 6 **FTC ACT VIOLATIONS** 7 COUNT I 8 9 **Misrepresentation of Material Facts** 42. In numerous instances, in the course of advertising their smoking-cessation 10 and skin-care products, Defendants have represented, expressly or by implication, that: 11 12 there is no cost for a trial of Defendants' products other than a a. shipping and handling fee; and 13 14 b. consumers in the continuity program will be able to cancel at any 15 time and/or cancel easily so as not to incur further monthly charges. 43. In truth and in fact: 16 17 there is a cost for a trial of Defendants' products other than a a. shipping and handling fee; and 18 19 b. consumers in the continuity program are not able to cancel at any time and/or cancel easily so as not to incur further monthly charges. 2021 44 Therefore, Defendants' representations set forth in Paragraph 42 are false and misleading, and constitute deceptive acts or practices in violation of Section 5(a) of 22 the FTC Act, 15 U.S.C. § 45(a). 23 24 <u>COUNT II</u> 25 **Failure to Disclose Material Facts** 45. In numerous instances, in the course of advertising their smoking-cessation 26 27 and skin-care products, Defendants have represented, expressly or by implication, that 28 consumers will have a specified trial period in which to review Defendants' programs

without incurring any charges other than shipping and handling. 1 46. Defendants fail to disclose, or to disclose adequately, the material terms 2 3 and conditions of the offer, including, but not limited to the fact that: 4 the consumer's account will be charged for a one-month supply of a. product unless the consumer takes affirmative action during the trial period to 5 avoid the charge; 6 b. consumers who cancel during the trial period will have to pay to 7 ship unused product back to Defendants; 8 9 c. consumers who cancel and return unused product during the trial period will be billed a restocking fee; and 10 d. consumers who do not cancel and return unused product during the 11 12 trial period will be charged for future shipments of product. 47. In light of the representation set forth in Paragraph 45, the failure of 13 14 Defendants to disclose, or to disclose adequately, this material information is a deceptive 15 act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a). **COUNT III** 16 **Unauthorized Billing** 17 18 48. In numerous instances, in the course of advertising and selling their 19 smoking-cessation and skin-care products, Defendants have caused charges to be 20 submitted for payment to the credit and debit cards of consumers: who cancelled or attempted to cancel their enrollment in 21 a. Defendants' continuity programs; or 22 who were not adequately informed of the terms and conditions of 23 b. Defendants' continuity programs; 24 25 and therefore did not provide express informed consent for the charges. 49. Defendants' practice of causing charges to be submitted for payment to the 26 27 credit and debit cards of consumers without obtaining the consumers' express informed 28 consent causes or is likely to cause substantial injury to consumers that is not reasonably Page 12 Complaint

1	avoidable by consumers themselves and that is not outweighed by countervailing benefits
2	either to consumers or competition.
3	50. Therefore, Defendants' practice, as described in Paragraph 48, is an unfair
4	act or practice in violation of Section 5(a) of the FTC Act.
5	<u>COUNT IV</u>
6	Superiority and Effectiveness Claims
7	51. Through the means described in Paragraphs 32-35, Defendants have
8	represented, expressly or by implication, that:
9	a. Nicocure, StopSmoking 180 [®] , and ZeroNicotine are more effective
10	than nicotine-based products for smoking cessation;
11	b. Nicocure and StopSmoking 180® have a 97 percent effectiveness
12	rate for smoking cessation; and
13	c. Nicocure and StopSmoking 180® enable smokers to quit smoking
14	permanently.
15	52. The representations set forth in Paragraph 51 are false or were not
16	substantiated at the time the representations were made. Therefore, the making of the
17	representations set forth in Paragraph 51 constitutes a deceptive practice, and the making
18	of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of
19	the FTC Act, 15 U.S.C. §§ 45(a) and 52.
20	ELECTRONIC FUND TRANSFER ACT AND REGULATION E VIOLATIONS
21	<u>COUNT V</u>
22	53. In numerous instances, Defendants have debited consumers' bank accounts
23	on a recurring basis without obtaining a written authorization signed or similarly
24	authenticated from consumers for preauthorized electronic fund transfers from the
25	accounts, thereby violating Section 907(a) of the EFTA, 15 U.S.C. § 1693e(a), and
26	Section 205.10(b) of Regulation E, 12 C.F.R. § 205.10(b).
27	54. Pursuant to the EFTA, 15 U.S.C. § 16930(c), every violation of the EFTA
28	and Regulation E constitutes a violation of the FTC Act.

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55. By engaging in violations of the EFTA and Regulation E as alleged in Paragraph 53, Defendants have engaged in violations of the FTC Act.

CONSUMER INJURY

56. Consumers throughout the United States have suffered and continue to suffer substantial monetary loss as a result of Defendants' unlawful acts or practices. In addition, Defendants have been unjustly enriched as a result of their unlawful practices. Absent injunctive relief from this Court, Defendants are likely to continue to injure consumers and harm the public interest.

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THIS COURT'S POWER TO GRANT RELIEF

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

1. Award Plaintiff such preliminary injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action and to preserve the possibility of effective final relief, including, but not limited to, temporary and preliminary injunctions, an order freezing assets, immediate access, and appointment of a receiver;

24 2. Enter a permanent injunction to prevent future violations of the FTC Act
25 and the Electronic Fund Transfer Act;

3. Award such relief as the Court finds necessary to redress injury to
 consumers resulting from Defendants' violations of the FTC Act and the Electronic Fund
 Transfer Act including, but not limited to, rescission or reformation of contracts,

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1 restitution, the refund of monies paid, and the disgorgement of ill-gotten monies; and

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

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5	Dated: March 31, 2008	Respectfully Submitted,
6		WILLIAM BLUMENTHAL General Counsel
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8		/S/ JANICE L. CHARTER
9		DAVID M. NEWMAN THOMAS DAHDOUH
10		Attorneys for Plaintiff Federal Trade Commission
11		Federal Trade Commission
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Members Login

		Members Login
THE WORLD'S MOST EFFECTIVE Q	UIT SMOKING PROGRAM	
Ready to lose those cravings w	ithout any withdrawal symptoms?	
	Quit Smoking:	Free 10 - Day Trial plus shipping and handling
	24 Hours a Day!	
		First Name: Last Name;
		Email:
	Limited Time Offer	Subscribe to our newsletter and agree to
	FREE 10-Day Supply	Privacy Policy
	plus shipping and handling	> YES! RUSH ME MY FREE TRIAL
>> HOW IT WORKS	🕨 QUIT SMOKING PLAN	► FAQ's
The primary all-natural ingredient Lobelia Inflata (herb), effectively fools "Nicotine Receptors" in your body into thinking it's getting more Nicotine and satisfies the body's cravings without all the negative side effects of the patches containing actual nicotine! It does this while keeping you calm and relaxed duringwithdrawal. It will help you quit smoking forlife, for good. The first day you use StopSmoking180® patch you will smoke up to half or less of what you usually smoke. Gradually withdrawal symptoms will be milder due to the natural nicotine substitute. StopSmoking180's herbal formulation contains herbal ingredients that also combat the anxiety and depression that affect most people who are trying to quit smoking. The nicotine content in your body will gradually fade off as you wear the patch and most of the harmful effects of smoking for years will start to disappear gradually once you stop smoking completely. More than 10 years of experience have contributed to the patented herb extraction process used to process the unique herbal formulation in StopSmoking180® Patch.	You probably know that cigarette smoking is harmful to your health and a high risk factor for heart disease, lung cancer and stroke, but did you know that cigarette smoking is one of the main killers in the world? Why then do so many people still smoke? The many answers to this question prove that quitting smoking is not a simple matter. Keeping this in mind, the stop smoking 180 program offers leading products as well as a support system to aid you to a better, smokeless life. We are so confident that StopSmoking180 will work for you, we offer our customers a 10-day FREE TRIAL (retail value \$49.95)! The StopSmoking180 Patch will help you to: • stop smoking safely and naturally • reduce nicotine cravings • quit smoking without withdrawal symptoms We are offering for a limited time:	 StopSmoking180 has been effective with over 97% of those who try it. Compare that with the meager 20% of nicotine-based products. We receive scores of testimonial letters each week praising our product, and thanking us for returning good health and energy to exsmokers. Testimonial "I quit smoking in 98 days!" – Josh C., Kansas "After smoking for 15+ years I always knew in the back of my head that I needed to quit for my family's and own health. I tried all kinds of ways to quit including nicotine patch and gum Nothing seemed to work. I tried the free 10 day trial of the StopSmoking180 program and it made a hybe difference. My cravings were down and what's really cool is I had an actual support system. The program's consultants provided for 15 years but it took me less than 6 months to quit the habit and regain back my les. I wen had more energy! My family loves <i>it</i>" Lisa M., California Thaven't felt this healthy and free since 1 was 18!" Ken W., New Jersey
http://www.stopsmoking180.com/	 / E	Exhibit A - Page 1 2/14/2003



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You will receive a package containing a 10-day supply of the product, for which you pay only \$3.95 for shipping and handling. With the first shipment, you will also receive an extra 20-day supply of the product. If you are happy with the product, continue to use the remaining 20-day supply (2 boxes) and your credit card will be charged \$99.95.

In the event you are dissatisfied with the product, you must return the remaining 20-day supply and pay a \$7.95 restocking fee. If you do not cancel, you will continue to receive a 30-day supply of the product every 30 days for a charge of \$99.95.

Information on this site is provided for informational purposes only. It is not meant to substitute for medical advice provided by your physician or other medical professional. You should not use the information contained herein for diagnosing or treating a health problem or disease, or prescribing any medication. You should read carefully all product packaging and labels. If you have or suspect that you have a medical problem, promptly contact your physician or health care provider. Information and statements regarding dietary supplements have not been evaluated by the Food and Drug Administration and are not intended to diagnose, treat, cure, or prevent any disease.

Customer Service: 800-630-2403

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http://www.stopsmoking180.com/

2/14/2008

Page 1 of 2

From bounce-algdib8hicdl1hmv5u2gglec@payoryoshikohosting.net Thu Sep 21 11:18:23 2006 Return-Path: Received: from spammy2.ftc.gov (spammy2.uce.gov [164.62.4.6]) by pug.ftc.gov (8.12.10/8.12.10/SuSE Linux 0.7) with ESMTP id k8LFIJUg023219 for ; Thu, 21 Sep 2006 11:18:23 -0400 Received: from spammy2.ftc.gov (localhost [127.0.0.1]) by spannny2.ftc.gov (8.13.6/8.13.6) with ESMTP id k8LFGZYF015848 for ; Thu, 21 Sep 2006 11:16:35 -0400 (EDT) Received: from mailbox2.eagletel.us (mail.eagletelecom.us [66.194.202.44]) by spammy2.ftc.gov (8.13.6/8.13.6) with ESMTP id k8LEv6IJ003232 for ; Thu, 21 Sep 2006 11:16:34 -0400 (EDT) Resent-To: spam@uce.gov Resent-From: loriken@tbconnect.com Resent-Message-Id: Resent-Date: Thu, 21 Sep 2006 11:03:57 -0400 Received: from database02 (unverified [66.194.202.20]) by mailbox2.eagletel.us (Vircom SMTPRS 5.1.202) with SMTP id for ; Thu, 21 Sep 2006 11:03:57 -0400 Received: from 192.168.11.101 by database02 (InterScan E-Mail VirusWall NT); Thu, 21 Sep 2006 11:07:40 -0400 Received: (gmail 7688 invoked from network); 21 Sep 2006 15:03:03 -0000 Received: from unknown (HELO ernest.caravati-servers.com) (208.67.252.124) by in.scg.us with SMTP; 21 Sep 2006 15:03:03 -0000 Received: by ernest.caravati-servers.com id h2akge0bgjkf; Thu, 21 Sep 2006 11:01:39 -0400 (envelope-from) Date: Thu, 21 Sep 2006 11:01:39 -0400 Errors-To: bounce-alqdib8hicdl1hmv5u2qq1ec@payoryoshikohosting.net Message-ID: <5MSMV7MI7VAVVGU3TGNJ@payoryoshikohosting.net> From: Quit Smoking Subject: Stop smoking naturally - Join today for a complimentary 10 day sample To: loriken@tbconnect.com Mime-Version: 1.0 Content-Type: multipart/mixed; boundary="----=_NextPartTM-000-50f06285-1f80-4122-8f0a-362182e25f30" Date: Thu, 21 Sep 2006 11:01:39 -0400 FTC-Received-Date: 09-21-2006 ----- NextPartTM-000-50f06285-1f80-4122-8f0a-362182e25f30 Content-Type: multipart/alternative; boundary="Boundary QVOxKOoSbfEwsV6QQWzUQFsw16 2q9 29UvJE" --Boundary QVOxKOoSbfEwsV6QQWzUQFsw16 2q9 29UvJE Content-Type: text/plain; charset=us-ascii Content-Transfer-Encoding: 8bit Content-Disposition: inline StopSmoking180.com is an exclusive offer owned by NextClickMedia. The worlds most effective guit smoking program. Exclusive online 10 day free trial offer. http://web.payoryoshikohosting.net/alqdib8hicdl1hmv5u2qq1ec3?r=247283125&x=loriken@tbconnect.com To unsubscribe: http://web.payoryoshikohosting.net/alqdib8hicdl1hmv5u2qq1ec2?host=http://www.stopsmoking180.com StopSmoking180 P.O. Box 390351, Mountain View, CA 94039 You are subscribed to payoryoshikohosting.net with the email address loriken@tbconnect.com. If you wish to be excluded from future payoryoshikohosting.net mailings, please use the link below: http://web.payoryoshikohosting.net/r/alqdib8hicdl1hmv5u2qq1ec or write us at: 287 S. Robertson Blvd., Suite #407, Beverly Hills, CA 90211 --Boundary_QVOxKOoSbfEwsV6QQWzUQFsw16 2q9 29UvJE Content-Type: text/html; charset=us-ascii; Content-Transfer-Encoding: 8bit

Title:

Title: Untitled

Content-Disposition: inline

http://server:8080/rware/search/docFrame.jsp

4/27/2007

Page 19 of 19 Page 2 of 2



*With 180 day program participation. See Terms and Conditions on website. This email is a commercial advertisement sent in compliance with the CANSPAM Act of 2003. We have no desire to send you information that is not wanted, therefore, if you wish to be excluded from future mailings, please use the link at the bottom of the page. If you wish to opt out of receiving future emails from Stopsmoking180.com, please CLICK HERE or write to us at : StopSmoking180 P.O. Box 390351, Mountain View, CA 94039

You are subscribed to payoryoshikohosting.net with the email address loriken@tbconnect.com. If you wish to be excluded from future payoryoshikohosting.net mailings, please <u>click here</u> or write us at: 287 S. Robertson Blvd., Suite #407, Beverly Hills, CA 90211

--Boundary_QVOxKOoSbfEwsV6QQWzUQFsw16_2q9_29UvJE-- -----=_NextPartTM-000-50f06285-362182e25f30--

http://server:8080/rware/search/docFrame.jsp

Exhibit B -Page 2

4/27/2007

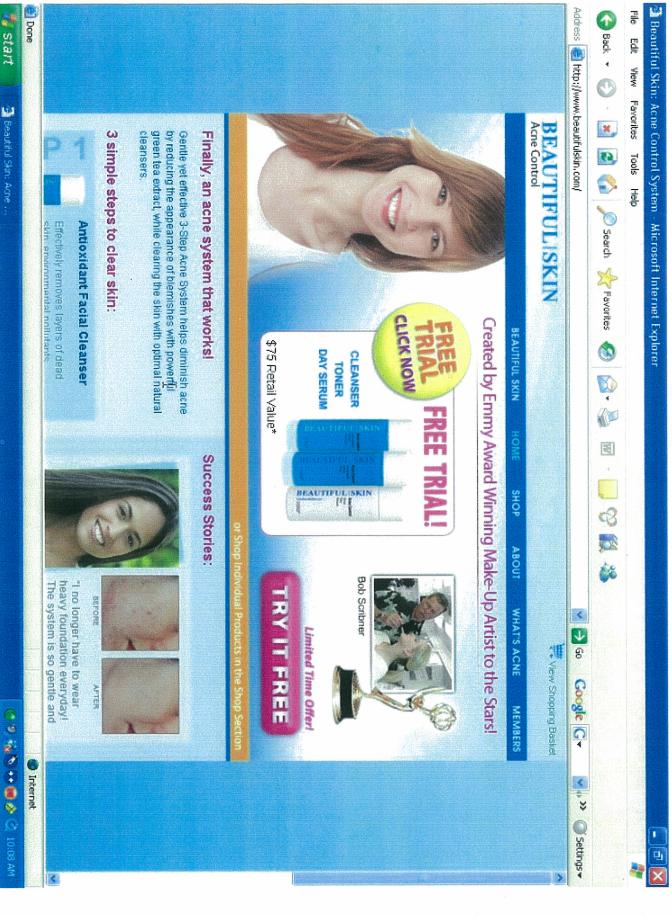




Exhibit C -Page 2



Resolve to Kick the Habit in 2007!

The Stop Smoking Resolution is an innovative stop smoking patch designed to help you give up smoking naturally. With its unique blend of ingredients, The Stop Smoking Resolution offers you the best possible chance to finally kick the habit for good! If you are serious about your decision to quit, you've come to the right place.

We offer only the highest quality in transdermal technology. Our patches are very high end. They are much thicker than other "band-aid" patches and the adhesive on them is incredibly strong. You can shower, exercise, sleep and they will not come off. Our patches have a polyeurothane base with a multi-layer laminate, compressed cotton gauze comfort pad and a quilted membrane. Trust only the best, trust The Stop Smoking Resolution.

Customer Testimonial

"Honestly - I hope that word of this patch spreads incredibly fast! The Stop Smoking Resolution has made quitting a breeze! I'm 3 FULL days into quitting and haven't felt a strong urge yet! I've tried everything from: the nicotine patch, to the inhalers, nicotine gum, even other herbal/homeopathic remedies & flower essences. Truthfully speaking, The Stop Smoking Resolution works so much better & so much smoother than any other method!

.... I just wanted to say THANK YOU and I truly hope, people cross the line and actually buy your product..... I bought it for myself thinking there's no way it would work! It was a last ditch effort that turned out to be serendipity! I could possibly owe you my life..."

Smoking costs as much as \$2000 per year.

Smoking is the **single-most** preventable cause of illness in the US today.

http://www.stopsmokingresolution.com/

6/20/2007

Filed 03/31/2008

Page 2 of 5



-M. Norton Whitmore Lake, Mi

Why The Stop Smoking Resolution Really Works

The Stop Smoking Resolution is easy to use. Each patch contains a dose of the most effective herbal ingredients, formulated to alleviate the symptoms of nicotine withdrawal while cleansing the system of all smoking-related toxins. To break free from smoking, you need to break free from nicotine. Unlike other stop smoking patches, The Stop Smoking Resolution's all-natural formula eliminates, rather than replenishes, the level of nicotine in your body, helping you break the habit.

Kick the Nicotine Habit Naturally

It is a well-known fact that withdrawal from nicotine is very unpleasant. In fact, it is the single thing that causes even the most committed quitters to go back to smoking. What makes the The Stop Smoking Resolution patch so amazing is that it combines the all-natural healing properties of a unique variety of traditional herbal formulas to completely and naturally eliminate your body's need for nicotine. Try The Stop Smoking Resolution, and take the first step to claiming your life back. Order the stop smoking patch today!

Consider the Benefits of Quitting

Aren't you tired of being a slave to cigarettes? Below is a list of health benefits you can receive from quitting smoking for good:

Stroke risk is reduced to that of a person who never smoked after 5 to 15 years of not smoking. Cancers of the mouth, throat, and esophagus risks are halved 5 years after quitting. Cancer of the larynx risk is reduced after quitting. Coronary heart disease risk is cut by half 1 year after quitting and is nearly the same as someone who never smoked 15 years after quitting. Chronic obstructive pulmonary disease risk of death is reduced after you quit Lung cancer risk drops by as much as half 10 years after quitting. Ulcer risk drops after quitting. Bladder cancer risk is halved a few years after quitting. Peripheral artery disease goes down after quitting. Cervical cancer risk is reduced a few years after quitting. Low birth weight baby risk drops to normal if you quit before pregnancy or during your first trimester the benefits of quitting.

Click Here to learn more about the great benefits of using The Stop Smoking Resolution

©Copyright 2007 StopSmokingResolution.com. All rights reserved. Terms & Conditions | Privacy Policy | Contact Us « After smoking for years, I didn't know how to get through a day without nicotine. The ZeroNicotine Patch helped me learn how to do that. »



6/20/2007

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StopSmoking180

Page 1 of 1



THE WORLD'S MOST EFFECTIVE QUIT SMOKING PROGRAM

Start Your Stop Smoking 180 Day Program 10 Day FREE Trial. For a limited time, you can try the remarkable stop smoking program people are raving about...FREE for 10 days. Simply fill out the information below to start your FREE trial today. Simply pay low shipping and handling.

SECURE WEBSERVER

Get Started No			Rico, or US territory ad NOTE: if your email sp add support@stopsm	US addresses only. No APO, FPO, Puerto
			* Salutation:	Select
			* First Name:	Joe
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uantity Description	Value	Your Cost	*Address:	
1 StopSmoking180 Free Trial Offer	\$49.95	FREE	* City:	
Shipping and Handling	\$3.95	\$3.95	*State:	Select a State
Total Value:	\$53.90	\$3.95	State.	
			*Zip Code:	
SPECIAL BONUS OF	FERI	AS SEEN ON	* Email Address:	jwant@yahoo.com
ENJOY SMOKING WITH LESS WORRY!	My		* Re-enter Email:	
Nic-Out • Cuts down on tarl	UY 2 ET 1	3	*Phone:	555-111-9000
•Save your lungs! •Breathe easier!			* Birth Year:	Select (may be used for verification)
THE NICOL	tine F	ilter		Submit

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https://www.stopsmoking180.com/?shipping

Exhibit E



THE WORLD'S MOST EFFECTIVE QUIT SMOKING PROGRAM

Start Your Stop Smoking 180 Day Program 10 Day FREE Trial. For a limited time, you can try the remarkable stop smoking program people are raving about...FREE for 10 days. Simply fill out the information below to start your FREE trial today.

mply fill out the information below to start your FREE trial toda Simply pay low shipping and handling.

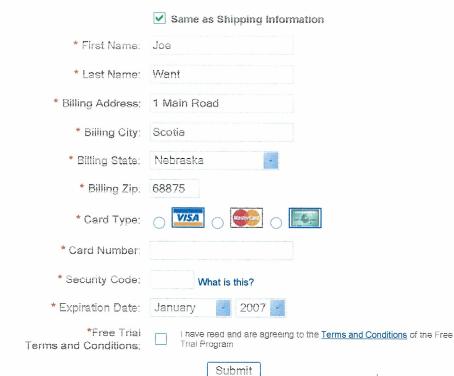
🔒 SECURE WEBSERVER



Why do you need my credit card information? Your 10 day trial is absolutely free! Charges will only be made to your credit card if you find that StopSmoking180 is the product for you and you choose to continue with the stop smoking 180 program for a discounted membership price.

Required fields are marked with *

Billing Information



https://www.stopsmoking180.com/?checkout billing

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Stop Smoking 180 Membership Program (10 Day Free Trial) Upon placing your order for our 10 day free sample and agreeing to the Terms and Conditions:

You will receive a full 30 day supply of Nicocure or StopSmoking180 patches of which the first 10 day supply is yours to try for FREE. You will be enroled in our complimentary and convenient "Stop Smoking 180" Membership Program If you are happy with the product, continue to use the remaining 20 day supply (2) boxes) and your credit card will be charged \$99.95. Our "Stop Smoking 180" Membership Program is designed to conveniently ensure that you always have your Nicocure or StopSmoking180 patches, and you will continue to receive your product every 30 days at a discounted price of \$99.95 (+3.95) snipping. You can cancel any future orders anythme. risk free



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Terms and Conditions

Commit to Quit VIP Membership Program (10-Day Free Sample)

Upon placing your order for our 10 day free sample and agreeing to the Terms and Conditions:

You will receive a full 30 day supply of Nicocure of which the first 10 day supply is yours to try for FREE.

You will be enrolled in our complimentary and convenient "Commit to Quit VIP" Membership Program

If you are happy with the product, continue to use the remaining 20 day supply (2 boxes) and your credit card will be charged \$99.95. Our "Commit to Quit VIP" Membership Program is designed to conveniently ensure that you always have your Nicocure patches, and you will continue to receive your product every 30 days at a discounted price of \$99.95 (+3.95) shipping. You can cancel any future orders anytime, risk free.

Return Policy -- Our Money Back Guarantee

We are so confident in our products that we'll refund your purchase price on all unopened boxes for the first order only less a restocking fee of \$7.95. The 10 day Free Trial portion is yours to keep. You can also cancel anytime, risk free in order to not incur any charges on future orders.

For the RMA number, visit <u>MEMBERS</u> at <u>www.stopsmoking180.com</u> and view the order history. Click on the return link for the order you wish to return and follow the directions.

Furthermore, you may discontinue your "Commit to Quit VIP" Membership enrollment at anytime by visiting MEMBERS and click on the Cancel Subscription Link.

Please Note:

All returns must be received by our warehouse within 20 days of order creation. We will refund your purchase price on unopened boxes only (\$49.95/unopened box), less a restocking fee of \$7.95* for the first order. For subsequent following orders, you must cancel prior to the next shipment to not incur any charges and no returns can be made. We will then refund purchase price less a shipping and handling fee of \$7.95 for each order (see below).

* Restocking Fee of \$7.95 is non-refundable.

We will **ONLY** refund the first order that is included with your free trial shipment. All subscription orders are non-refundable and the customer can only cancel a future month's shipment by cancelling his/her subscription on our website's MEMBERS section.

We will not process or refund packages marked Return to Sender. Corporate addresses: StopSmoking180.com, 2525 E. Charleston Road, Suite 101, Mountain View, CA 94043. NCMB Ltd. Michalakopoulu, 12 4th Floor, Flat Office 401 Cypress

When we charge your credit card, this is what will appear on your credit card statement "stopsmoke.net"

Close

Return and Cancellation Policy for Individual purchases or any non-subscription/trial offer purchase:

Please Note: We will accept returns within 30 days of purchase date on individual item purchases or any non-subscription/trial offer purchases.

What do I do if I receive a damaged product?

Product(s) damaged during shipping will be replaced at no charge. Save the package and all contents, and contact our Customer Service at support@beautifulskin.com

What if shipping and delivery errors occurred with my order?

Should you experience any problems with your order, please contact our Customer Service Support at support@beautifulskin.com immediately, so that we may correct it in a timely matter.

Return and Cancellation Policy for Subscription/Trial Offers:

We believe in complete customer satisfaction.

This is reflected in our 30-days satisfaction guaranteed return policy.

if you are unsatisfied with the product, you may return the unused portion 30 days from the shipped date and you will not be billed for the product order. Restocking fees may be charged. Please note the following terms:

- Returns are only applicable for the first free trial order. Subscription orders are non-refundable.
- All returns from non-calicenter orders will include a non-refundable \$7.95 restocking fee
- All returns must be received received by our warehouse within 20 days to not incur the first trial charge. The customer also has a 10-day grace period for a credit, minus restocking fee.

If you wish to return your order, please obtain a Return Merchandise Authorization (RMA) number first.

How do you get an RMA? Upon order confirmation, you will be provided a username and password to login to our BeautifulSkin.com Members section. Please keep this information. The members section link to request an RMA is located in the confirmation email you will receive as well as directly shown on our homepage www.beautifulskin.com . To request an RMA, please login to the members section of BeautifulSkin and click the "My Subscriptions" tab. On the My Subscriptions page you will see your order subscription details listed. To cancel your trial order or subscription order please click the "Cancel Trial" or "Cancel Subscription" link. Then on the following page, please click "Get RMA." Once you've received your RMA #, we will email you with additional steps and a summary of the details needed for returning the product.

The fastest way to obtain an RMA number is to log onto the Member section on this Web site and click on the tab marked " My Subscriptions." If you do not have a Membership Account, please Click Here.

- We cannot process or refund packages marked "Return to Sender."
- Refunds will be issued to the same credit card to which they were charged. .
- To ensure prompt processing, please send returns to the address provided along with your RMA number. The warehouse personnel are not . allowed to accept packages without an RMA number.

Please send returns to: BeautifulSkin.com 2525 Charleston Rd. Suite 101 Mountain View, CA 94043

How long will it take to process returns?

After the warehouse receives your return, it generally takes 2-5 business days to process your refund.

Please keep in mind that your bank typically posts credit in the billing cycle in which it was received. Therefore, the number of days it takes for credit to post to your account may vary, depending on your bank's billing and credit schedule.

What do I do if I receive a damaged product?

Product(s) damaged during shipping will be replaced at no charge. Save the package and all contents, and contact our Customer Service at support@beautifulskin.com

What if shipping and delivery errors occurred with my order?

Should you experience any problems with your order, please contact our Customer Service Support at support@beautifulskin.com immediately, so that we may correct it in a timely matter.

Corporate addresses:

BeautifulSkin.com, 2525 E. Charleston Road, Suite 101, Mountain View, CA 94043. NCMB Ltd. Michalakopoulu, 12 4th Floor, Flat Office 401 Cypress

http://www.beautifulskin.com/?cancellation

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Filed 03/31/2008

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When we charge your credit card, this is what will appear on your credit card statement "www.onlinedirectproducts.com"

Close

http://www.beautifulskin.com/?cancellation

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Document 1-4



THE WORLD'S MOST EFFECTIVE QUIT SMOKING PROGRAM

The 180 Plan

It's hard to find a smoking cessation program that's truly effective. Most remedies on the market do little more than slightly reduce your cravings for a short time. That's definitely not enough to make you quit! Still, you know you need to quit; after only a year of quitting, your risk of smoking-related heart disease is cut in half, and after five to 15 years, your risk of stroke returns to a normal level!

At stopsmoking180.com, we offer an innovative, all-natural program that will help you quit for good.



Our natural Nicocure patches are the safest and most effective products on the market, enjoying a 97 percent success rate! Compare that to the 20 percent success rate of most smoking cessation products. These patches allow you to quit without experiencing the common symptoms of withdrawal like irritability, tension, insomnia, and weight gain.

When you use most quit smoking programs, you are still introducing nicotine into your system. This does not give you the chance to ever rid your body of the substance you are addicted to, so your cravings never truly subside. No wonder so many people start smoking again after a few weeks or months! Our patches use a combination of natural formulas that eliminate your need for cigarettes and other tobacco products altogether.

When you use Nicocure patches, you will still experience the "calmness" that you associate with smoking, because these patches mimic the effect that nicotine has on your brain and your body. However, you will not be introducing anything harmful into your system, and after 30 days or less you will find that your cigarette cravings have simply disappeared. With Nicocure, you can make a difference in your health, starting today!

* see terms and conditions for more details

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http://www.stopsmoking180.com/?180plan

Exhibit I

5/30/2007

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Iter the		each week praising our product, and thanking us for returning good health and energy to ex- smokers.	Case all the negative side effects of the world? patches containing actual nicotine! It does this while keeping you calm and relaxed duringwithdrawal. It will help the many answers to this question prove you guit smoking forlife, for good. that mitting emotion is not a simple
I rem n I r		We receive scores of testimonial letters	
eng in any use in any use i		Nicocure has been effective with over 97% of those who try it. Compare that with the meager 20% of nicotine-based products.	How does Nicocure® work to help me Quit Smoking? The Nicocure® formula is primarily based around our proprietary herbal blend. It is safe and non- addictive, and it can provide your "nicotine receptor cells" with the same sensation provided by
sing is in the first hans: I are to the first handing I are to tha		¥ FAQ's	Mest people feel the cravings for Nicoture with start working r receive a 30-day supply should you feel the need to stay on the program a bit longer.
ine ine ine ine ine ine ine ine ine ine		 YESI RUSH ME MY FREE TRIAL 	Can Nicocure® be used during Pregnancy? No. Nicocure®, like most other herbal preparations, should NOT be used while pregnant or nursing.
rie mild nausea ine mild nausea ine mild nausea ine mild nausea inte program, s hithe program, inte strong and handling inte strong and handl		Phone:	Yes! Nicocure® work on Chewing (smokeless) Tobacco as well? Yes! Nicocure® works to remove your addiction to all forms of nicotine-based tobacco products, regardless of how they are introduced into your system.
Texhibit J -		Free 10 - Day T plus shipping and hand	What are the side effects? If you decide to cheat and try to smoke while on the program, you may experience some mild nausea and diziness. That's your signal that Nicocure® is working exactly as intended. No side effects should appear if you remain off nicotine for the duration of the program. When you finish the program, you will no longer have cravings for nicotine. We are not aware of any drug interactions. Nicocure® contains no nicotine or other drugs. The formula is completely herbal and all-natural.
Members Logi Members Logi Membe	Exhi		Im a Diabetic. Does Nicocure® contain any sugar? No Nicocure® contains no sugar and will not react with insulin in any way. Diabetics can feel safe and take Nicocure® with confidence. If concerned, please consult your physician.
		Members Login	Page equently Asked Questions
			THE WORLD'S MOST EFFECTIVE QUIT SMOKING PROGRAM
	100 100 100 100 100 100 100 100 100 100		2 StopSmoking18
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start 3 StopSmoking180 - Mic 3 http://www.stopsmo	javascript:pop("?faq', '600', '580');	Case all the negative side effects of the world? patches containing actual nicotine! It does this while keeping you calm and relaxed duringwithdrawal. It will help the many answers to this question prove that autiting emploids the second prove that autiting employed the second prove the second p	Bione Internet	evaluated by the Food and Drug Administration and are not intended to diagnose, treat, oure, or prevent any disease.	product packaging and labels. If you have or suspect that you have a medical problem, promptly contact your prospection or health care provider. Information and statements regarding dietary supplements have not been	Typesimation on this site is provided for informational purposes only. It is not meant to substitute for medical advice provided by your physician or other medical professional. You should not use the information contained herein for disease, or prescribing any medication. You should read carefully all dramosing or treating a health problem or disease, or prescribing any medication. You should read carefully all	D Copyright@2007 StopSmoking180 All rights reserved.	Is Nicocure® still safe for me? Nopocure® contains only natural herbal ingredients. Certainly, if you're able to quit smoking, your problems may fade as the deadly chemicals from smoking are flushed from your body. The body's natural defenses become stronger and are able to combat many devastating conditions if given the peper environment.	l Maye a bad liver, kidney, heart, high blood pressure, recent surgery, etc.	What about similar products on the Internet? There is nothing similar to Nicocure®. Many other products force you to take 3 or more formulas a developed our own proprietary blend. It's specially concentrated to allow you to take just one kind account of the same potency.	Winat is the Guarantee? Intry Nicocure® for a full 10 days. If at any time you feel the product is not working for you, simply return the unused portion for a full refund.	Remember, patches and gums simply feed you more nicotine. That's NOT the way to break an acticitive habit.	nicotine. The difference is that you won't crave the sensation anymore after finishing the Nicocure®	How does Nicocure® work to help me Quit Smoking? The Nicocure® formula is primarily based around our proprietary herbal blend. It is safe and non- addictive, and it can provide your "nicotine receptor cells" with the same sensation provided by	nttp://www.subshoking.iou.com - subshoking.iou - accusate memory comercial	ktter (kaant staaswakisa) 20. com StaaSmaking) 20. Microsoft Internet Evaluter 🗌 🗖 🕅
(한 44 약) 👬 🗞 🏈 👀 🕃 11:18 AM	Internet	each week praising our product, and thanking us for returning good health and energy to ex- smokers.	We receive scores of testimonial letters	Nicocure has been effective with over 97% of those who try It. Compare that with the meager 20% of nicotine-based products.	➤ FAQ's	➤ YESI RUSH ME MY FREE TRIAL	Lagree to the Privacy Policy	First Name: Last Name: Email: Phone:	1 a	Exclusive Online Offer TRY IT FREET	Members Login		✓ O Google C			





Ingredients

The all-natural blend of herbs in The Stop Smoking Patch work both independently and synergistically to decrease cravings, lower stress and anxiety levels, and purge toxins from your system. This formula also contains ingredients that help curb the hunger and irritability associated with quitting smoking. Below you will find a detailed list of ingredients and their key functions:

Gotu Kola is used to promote relaxation, improve memory and blood flow, reduce inflammation, and increase liver function. It has been directly linked to significant improvements in concentration skills. Gotu kola also has a historic reputation for aiding a variety of serious illnesses.

Hops have pronounced sedative effects, producing a calm, soothing feeling. As one of the traditional agents employed in folk medicine throughout the Western world, Hops' tonic and muscle-relaxing properties are especially effective in reducing physical cravings.

Skullcap is a powerful medicinal herb used in the treatment of a wide range of nervous conditions including insomnia, hysteria, anxiety, delirium tremens, and withdrawal from barbiturates and tranquilizers. High in minerals required for a healthy nervous system, Skullcap is a reliable central nervous system tonic and sedative. It relaxes all states of nervous tension, nourishing and strengthening the nervous system at the same time. Also used effectively for treating nervous headache and restlessness.

Oat, also called Wild Oat, was historically prescribed as a traditional botanical medicine for the treatment of disorders of the liver, kidney and joints. The herb was also used as a tonic to help control the nerves, depression and as a natural strength enhancer for both and women. Recognized as a natural anti-depressant, Oat's calming effect can help relieve tension, fatigue, and anxiety. It also has effective antioxidant properties.

Peppermint stimulates circulation and helps to calm nerves. Its purification properties work to refresh, restore, and rejuvenate both mind and body. Highly valued for its healing properties, Peppermint also clears the lungs and respiratory passages, making breathing easier.

Ginger Root has been used in China and other countries for thousands of years as a tonic. Ginger Root is a proven homeopathic remedy for upset stomach, indigestion, cramps, and chills. Ginger Root also provides essential vitamins and nutrients, such as protein, calcium, phosphorous, iron, sodium, potassium, and magnesium.

Gentian is used to aid in digestion. It improves circulation, helps prevent heartburn, and stimulates the body's production of gastric juices, bile, and saliva. Gentian can help normalize the functioning of the thyroid and may be useful in the treatment of

Smoking costs as much as \$2000 per year.

Smoking is the single-most preventable cause of illness in the US today.

« After smoking for years, I didn't know how to get through a day without nicotine. The ZeroNicotine Patch helped me learn how to do that. »

- Missy Cal.



ulcers.

Myrrh has been recognized throughout the ages for its excellent antiseptic and astringent properties, making it effective in the treatment of mouth sores, coughs, sore gums, and asthma.

Safflower was first used in Chinese herbal medicine to treat stomach tumors, relieve abdominal pain, and to cleanse and heal wounds and sores. Research indicates that Safflower helps to soothe coughs and bronchial conditions, while stimulating immune function.

Eucalyptus is often used for asthma and other respiratory ailments. Its primary uses are as an antiseptic, expectorant, and stimulant. The oil derived from Eucalyptus has many healing properties and is useful in treating lung disease, colds, and sore throat.

Slippery Elm, noted primarily for its soothing properties, is one of the best agents for combating coughs. Slippery El m h as a lubricating action that protects and softens all the membrane linings in the body. It is also an immune system booster. An effective purifier, Slippery Elm gathers up dissolved toxic waste in your body, including your bowels, and helps discharge it accordingly.

Licorice Root has been utilized for centuries as a tonic and as a relief for colds, coughs, and sore throats. It is used to remove buildup of toxic metabolic substances in the body, because it increases the liver's ability to filter out these wastes. Licorice Root can also help symptoms of depression and fatigue.

Alfalfa is rich in vitamins, minerals, and chlorophyll. It is an excellent source of balanced nutritional content. Alfalfa has been found to reduce heart disease, prevent fluid retention, and relieve high blood pressure. It acts as a tonic and stimulant and is very useful for respiratory disorders and discomforts.

Passion Flower relieves tension, anxiety, and insomnia, due to its calming effect on the central nervous system. Studies conducted since the 1930's indicate that Passion Flower is a non-addictive herb that promotes relaxation. It is also mildly effective in treating nervous stomachs and indigestion.

Sarsaparilla is used for problems involving the blood, skin, circulation, and intestines. With its distinctive tonic properties, Sarsaparilla increases energy levels and can help to remove harmful toxins from the blood and body. It can also aid in relieving low mood and debility.

Bayberry helps to increase circulation and prevent bacterial infections. It can also be used as a tonic and stimulant to support the body's defense against a range of ailments such as coughs, colds, flu, fevers, headache, and sore throat.

Echinacea Powder is a popular herb used primarily to reduce the symptoms and duration of colds and flu-like illnesses. It helps the body resist cravings and boosts the immune system.

Click Here to start your free 10-day trial of The Stop Smoking Resolution!

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