

IN THE MATTER OF

NATIONAL DIETARY RESEARCH, INC., ET AL.

CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATION OF
SECS. 5 AND 12 OF THE FEDERAL TRADE COMMISSION ACT

Docket 9263. Complaint, Nov. 9, 1993--Decision, Nov. 7, 1995

This consent order prohibits, among other things, two Florida-based corporations and their owner from making claims regarding weight loss, hunger reduction, calorie absorption, cholesterol reduction, effects on cellulite or body measurements, or any other health benefits of any product or program they advertise or sell, unless the respondents possess competent and reliable scientific evidence to substantiate the claims. Also, the consent order prohibits the respondents from misrepresenting test results, from representing that any advertisement is something other than a paid advertisement, and from representing that an endorsement is typical of the experience of consumers who use the product, unless the claim is substantiated. In addition, the consent order requires the respondents to pay \$100,000 to the Commission.

Appearances

For the Commission: *Joel Winston, Richard Cleland, C. Lee Peeler and Joan Bernstein.*

For the respondents: *Roger Furey, Arter & Hadden, Washington, D.C. and Donovan Conwell, Fowler, White, Gillen, Boggs, Villareal & Banker, Tampa, FL.*

COMPLAINT

The Federal Trade Commission, having reason to believe that National Dietary Research, a corporation, The William H. Morris Company, a corporation, and William H. Morris, individually and as the sole officer of said corporations ("respondents"), have violated Sections 5(a) and 12 of the Federal Trade Commission Act (15 U.S.C. 45 (a) and 52), and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

PARAGRAPH 1. (a) Respondent National Dietary Research is a Florida corporation, with its principal office or place of business located at 1377 K Street, N.W., Suite 553, Washington, D.C.

(b) Respondent William H. Morris Company is a Florida corporation, with its principal office or place of business located at 2804 Smither Road, Tampa, Florida.

(c) Respondent William H. Morris is the President of both National Dietary Research and the William H. Morris Company. Mr. Morris owns 100 percent of the capital stock of both corporations. Individually or in concert with others, he formulates, directs, and controls the acts and practices of the corporate respondents, including the acts and practices alleged in this complaint. His principal office or place of business is located at 2804 Smither Road, Tampa, Florida.

PAR. 2. Respondents have advertised, offered for sale, sold and distributed Food Source One, a compressed tablet made largely from plant fiber, as a weight loss product. Respondents have also advertised, offered for sale, sold and distributed Vancol 5000, a compressed tablet made from plant fiber and other substances, as a product that reduces serum cholesterol. Each of these products is a "food" and/or "drug" within the meaning of Sections 12 and 15 of the Federal Trade Commission Act.

PAR. 3. The acts and practices of respondents alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.

PAR. 4. Respondents have disseminated or have caused to be disseminated advertisements and promotional materials for Food Source One, including, but not necessarily limited to, the attached Exhibits A-F and J-L. These advertisements and promotional materials contain the following statements:

1. WEIGHT LOSS SURPRISES RESEARCHERS

WASHINGTON – A nutrition organization was hopeful that a nutritionally complete "hi-tech" food tablet would help erase world hunger problems, until a study revealed that one of the ingredients could cause significant weight loss without dieting! Researchers in Europe found that an ingredient in the aptly named product Food Source One actually caused people to lose weight, even though specifically instructed not to alter normal eating patterns, according to one study published in the prestigious British Journal of Nutrition. Researchers in an earlier study had speculated that the weight loss was due to a decrease in the intestinal absorption of calories.

While the development of Food Source One, a project of National Dietary Research, would not be used to successfully fulfill its original goal, the discovery has been a windfall for overweight people. A Daytona Beach, Florida woman fighting a weight battle for 12 years used the product on the recommendation of her physician and lost 30 pounds. She stated, "Not only have I lost 30 pounds but my

cholesterol has dropped from 232 to 143. I have two closets full of clothes which have not fit me in two years that I can now wear." In a separate report, a telephone interview revealed that a Wilmington, North Carolina pharmacist lost 14 pounds in 15 days on the product and was never hungry. (Exhibits A, J and L).

2. WEIGHT LOSS MYSTERY Baffles Scientists

WASHINGTON -- Scientists are baffled by a natural food ingredient that causes people to lose weight even though they don't change the way they normally eat.

A study published in *The British Journal of Nutrition* says that the ingredient, often used to thicken ice cream, can cause significant weight loss without dieting. Although several explanations for the weight loss are suggested, the most likely according to scientists in a Finnish study, is that the ingredient seems to decrease the intestinal absorption of calories.

National Dietary Research, an organization committed to the research and development of nutritional solutions to world-wide health problems, along with consulting scientists, have successfully isolated and incorporated the ingredient into an improved method that greatly enhances the potential for weight loss over the ingredient alone. Called Food Source One, the significant breakthrough in nutritional weight control provides a three-way scientifically designed method to help prevent calorie absorption.

The mechanism by which Food Source One works to decrease body weight is a complicated process called nutri-bonding. When chewed and swallowed immediately before meals, high calorie fats are replaced with lower calorie nutrients, thereby providing optimum nutrition and a minimum number of fat calories as explained in an instruction sheet that accompanies the tablets. The instruction sheet should be followed for optimum results.

....

Physicians and pharmacists are praising Food Source One as a natural, drug free alternative for the treatment of obesity. (Exhibits B and K).

3. WHAT IS FIBERSPAN?

Fiberspan is the trade name for a special formulation of soluble type fiber shown to be effective for weight loss.

....

HOW DOES SOLUBLE FIBER HELP ONE LOSE WEIGHT?

Studies published in respected scientific journals including the *American Journal of Clinical Nutrition* and *The British Journal of Nutrition* found that soluble fiber caused patients to lose weight. Part of the reason for the weight loss, according to scientists, is probably due to the appetite reduction properties. However, some studies have found that patients consuming soluble fiber lost weight without altering their normal eating patterns. The appetite reducing effects of the fiber cannot justify this phenomenon. Thus, scientists speculate that the fiber reduces intestinal absorption of a portion of the calories you consume leading to weight loss. The calories are trapped when the fiber forms a gel and are eliminated.

IS FS-1 MORE EFFECTIVE FOR WEIGHT LOSS THAN THE FIBER ALONE?

FS-1 provides a three way scientifically designed process for improved weight loss that fiber alone cannot provide. The human appetite is too complex to be tricked for any length of time by the placement of a non-nutritive substance in the stomach. This is why the nutritional portion of FS-1 is so important.

....

WHAT IS FOOD SOURCE ONE WITH FIBERSPAN?

Food Source One with Fiberspan, commonly referred to as FS-1, is a nutritionally concentrated food tablet with a high fiber content. FS-1 functions just like real food but without all the calories. When chewed, swallowed and followed with water FS-1 expands in the stomach like a sponge as it soaks up water. The nutritional components of the tablet are then released in the stomach so that they are available for absorption.

HOW DOES FS-1 CONTROL THE APPETITE?

The same way eating a six course meal would kill the appetite, with food. First, the fiber creates a temporary full feeling, then the nutritional portion of the tablet gives a gentle rise in blood sugar levels for prolonged appetite suppression, just like a meal. (Exhibit C).

4. Food Source One also contains a unique blend of natural food fiber called Fiberspan. Fiberspan expands in the stomach to many times its own size to help reduce hunger. Furthermore, scientists say that the fiber in Fiberspan helps you lose weight by preventing the absorption of a portion of the calories you consume from food.

....

THE NO DIET DIET - Chew 3 to 5 FS-1 tablets followed by an 8 oz. glass of water, 30 minutes before each meal. FS-1 will reduce hunger so you will be satisfied with less food. You still enjoy all your favorite foods, but you will eat less. (Exhibit D).

5. ACCIDENTAL DISCOVERY MAY END OBESITY

WASHINGTON - Researchers may have discovered a way to end obesity--by accident!

In a study with a potential cholesterol lowering agent, scientists noted an unusual side effect. Instead of lower cholesterol levels, patients receiving a natural plant colloid lost weight while body weight in a control group remained constant.

The scientists say the mechanism behind the weight loss is not clear, but suggest it is partially due to a decrease in the intestinal absorption of calories. Scientists in another study published in the British Journal of Nutrition, found that patients consuming the same colloid lost weight in spite of being instructed not to alter normal eating patterns. Despite this evidence, other scientists may not agree on the weight loss benefits of colloids. Someday, pending further study, there could be universal agreement that colloids are helpful in confronting the problem of obesity. (Exhibit E).

6. WEIGHT LOSS SURPRISES RESEARCHERS

WASHINGTON -- A nutrition organization was hopeful that a nutritionally complete "hi-tech" food tablet would help erase world hunger problems, until a study revealed that one of the ingredients could cause significant weight loss.

Although other studies and scientists may not agree, researchers in Europe found that the ingredient, a natural plant colloid, actually caused people to lose weight, even though specifically instructed not to alter normal eating patterns, according to one study published in the prestigious British Journal of Nutrition. Researchers in an earlier study had speculated that the weight loss was due to a decrease in the intestinal absorption of calories.

While the development of the product called Food Source One, a project of National Dietary Research, would not be used to successfully fulfill its original goal, the formula which has since been improved with other natural colloids has

been a windfall for overweight people. A Daytona Beach, Florida woman fighting a weight battle for 12 years used the product on the recommendation of her physician and lost 30 pounds. She stated, "Not only have I lost 30 pounds but my cholesterol dropped from 232 to 143. I have two closets full of clothes which have not fit me in two years that I can now wear." In a separate report a telephone interview with a Wilmington, North Carolina pharmacist lost 14 pounds in 3 weeks on the product and was never hungry A variety of nutritionally sound diet plans are specially prepared by NDR, accompany each bottle and provide a natural, drug free alternative for confronting the problem of obesity. (Exhibit F)

PAR. 5. Through the use of the statements contained in the advertisements and promotional materials referred to in paragraph four, including but not necessarily limited to the advertisements and promotional materials attached as Exhibits A-F, and J-L, respondents have represented, directly or by implication, that:

- (a) Food Source One causes significant weight loss.
- (b) Food Source One causes significant weight loss without dieting or otherwise changing normal eating patterns.
- (c) Food Source One is an effective treatment for obesity.
- (d) Food Source One reduces hunger and is an effective appetite suppressant.
- (e) Food Source One decreases the intestinal absorption of calories.
- (f) Food Source One may significantly reduce serum cholesterol.

PAR. 6. Through the use of the statements contained in the advertisements and promotional materials referred to in paragraph four, including but not necessarily limited to the advertisements and promotional materials attached as Exhibits A-F, and J-L, respondents have represented, directly or by implication, that at the time they made the representations set forth in paragraph five, respondents possessed and relied upon a reasonable basis that substantiated such representations.

PAR. 7. In truth and in fact, at the time they made the representations set forth in paragraph five, respondents did not possess and rely upon a reasonable basis that substantiated such representations. Therefore, the representation set forth in paragraph six was, and is, false and misleading.

PAR. 8. Through the use of the statements contained in the advertisements and promotional materials set forth in paragraph four, including but not necessarily limited to the advertisements and

promotional materials attached as Exhibits A-F, and J-L, respondents have represented, directly or by implication, that:

(a) Scientific studies of certain ingredients contained in Food Source One, including studies published in the British Journal of Nutrition and the American Journal of Clinical Nutrition, demonstrate that Food Source One causes significant weight loss.

(b) Scientific studies of certain ingredients contained in Food Source One, including a study published in the British Journal of Nutrition, demonstrate that Food Source One causes significant weight loss without dieting.

(c) Food Source One has a high fiber content.

(d) National Dietary Research is a *bona fide*, independent research organization that has conducted research seeking nutritional solutions to world-wide health problems.

PAR. 9. In truth and in fact:

(a) Scientific studies of certain ingredients contained in Food Source One, including studies published in the British Journal of Nutrition and the American Journal of Clinical Nutrition, do not demonstrate that Food Source One causes significant weight loss.

(b) Scientific studies of certain ingredients contained in Food Source One, including a study published in the British Journal of Nutrition, do not demonstrate that Food Source One causes significant weight loss without dieting.

(c) Food Source One does not have a high fiber content.

(d) National Dietary Research is not a *bona fide*, independent research organization and has not conducted research seeking nutritional solutions to world wide health problems.

Therefore the representations set forth in paragraph eight were, and are, false and misleading.

PAR. 10. Respondents have represented, directly or by implication, that certain of its advertisements for Food Source One, including, but not necessarily limited to, Exhibits B, J, K and L, are independent newspaper stories and not paid advertisements.

PAR. 11. In truth and in fact, the advertisements for Food Source One referred to in paragraph ten are paid commercial advertisements

and not independent newspaper stories. Therefore, the representation set forth in paragraph ten was, and is, false and misleading.

PAR. 12. Respondents have disseminated or have caused to be disseminated advertisements and promotional materials for Vancol 5000, including, but not necessarily limited to, the attached Exhibits G-I. These advertisements and promotional materials contain the following statements:

1. CHOLESTEROL DISCOVERY PASSES MOM'S TEST

WASHINGTON - The mother of a research scientist recently lowered her cholesterol more than 20% without changing her eating habits.

After a visit to her doctor, a Florida woman learned that her cholesterol level was an elevated 308 and she was encouraged to change her eating habits. When she returned 10 weeks later, the doctor was astounded that her cholesterol level has dropped to 243. Asked if she achieved the amazing results just by dieting she replied, "No I didn't diet at all, in fact I ate the things I shouldn't eat like bacon, sausage and ice cream. The only thing I did different was take some tablets my son gave me."

The woman's son is Dr. William Morris, director of research and development [at] National Dietary Research, an Organization dedicated to finding nutritional solutions to health problems.

....

Vancol 5000 is a chewable food tablet that contains extracts from foods known to lower cholesterol. According to the exclusive distributor for Vancol 5000, inquiries about the new product are being received from all over the country and has peaked [sic] the interest of doctors used to prescribing expensive cholesterol lowering drugs. (Exhibit G).

2. THE VANCOL 5000 CHOLESTEROL LOWERING PLAN GUARANTEE

A blood cholesterol level over 270 puts you at a high risk for heart disease. Have your cholesterol checked. If you need to lower your cholesterol, use Vancol 5000 as directed for 30 days. After 30 days, have it checked again. If your cholesterol has not been lowered significantly, bring your test results and empty bottle back for a FULL REFUND! LOWER YOUR CHOLESTEROL IN 30 DAYS OR YOUR MONEY BACK!

National Dietary Research - Washington, D.C. (Exhibit H).

3. Recent Scientific data suggests that the ingredients contained in Vancol 5000

have a beneficial effect on lowering total blood cholesterol levels, LDL cholesterol and may even increase HDL cholesterol. The Vancol 5000 Plan and the nutrients contained in the Vancol 5000 tablet were developed to lower cholesterol levels, improve overall health status and an individuals [sic] quality of life.

....

Beta Sitosterol has been shown experimentally to decrease elevated plasma cholesterol by interfering with the intestinal absorption [sic] of cholesterol.

....

Chromium picolinate supplementation has been shown to decrease LDL and total cholesterol levels and is effective in the treatment of hyperlipidemia.

....

Psyllium decreases absorption of cholesterol and lipids in the small intestines and causes the formation of short chain fatty acids, which are rapidly absorbed and may inhibit cholesterol synthesis.

.....

Calcium carbonate and magnesium stearate have been found to decrease cholesterol as explained in further detail on the following page.

.....

VANCOL 5000

Elevated Cholesterol Levels and Dietary Supplementation Chromium Picolinate
Experimental study: Supplementation with 50-200 mcg of chromium daily, improved blood cholesterol and triglyceride levels. The decrease was due to chromiums [sic] function in fat metabolism and sugar metabolism. (Anderson, Richard A. Agricultural Research, 10:14-16, 1990)

Experimental Double-blind Crossover Study: During a 42 day period, 28 subjects were given chromium tripicolinate (200 mcg) or a placebo daily. The subjects ingesting chromium had a significant decrease in total cholesterol, LDL cholesterol (10.5% decrease) and serum apolipoprotein B, (the principal protein of LDL cholesterol fraction) decreased. HDL cholesterol and apolipoprotein A increased. Subjects ingesting the placebo had elevated apolipoprotein B levels. (Press RI et al. The effect of chromium picolinate on serum cholesterol and apolipoprotein fractions in human subjects. West J. Med. 1990 Jan; 152:41-45)

Psyllium

Double-blind Placebo Controlled Study: 26 hypercholesterolemic men were treated with psyllium or a placebo for 8 weeks. The psyllium group showed a 14% decrease in total cholesterol, 14.8% decrease in LDL/HDL cholesterol ratio and 20% decrease in LDL cholesterol. The placebo group showed no significant changes. (Anderson, J.W. et al. Cholesterol lowering effect of psyllium for hypercholesterolemic men. Arch Intern Med. 148:292-296)

Double-blind Study: 96 subjects with hypercholesterolemia were given 5.1 gms of psyllium or a placebo twice daily for 16 weeks, while following a prudent diet. Psyllium decreased total cholesterol by 5.6% and LDL cholesterol by 8.6%. The levels in the placebo group were unchanged. (Levin, E.G. et al. Comparison of psyllium and cellulose as adjuncts to a prudent diet in the treatment of hypercholesterolemia. Arch Intern Med. 150: 1822-1827, 1990)

BETA SITOSTEROL

Experimental Study: A diet containing .5% cholesterol plus .5% sitosterol, resulted in a significant decrease of liver cholesterol, showing the inhibitory effect of sitosterol on cholesterol absorption [sic]. (Ikeda, I. et al. J. Nutr. Sci. Vitaminol 35:361-369, 1989)

QUINONES

Quinones are natural antioxidants that help control and minimize free radical reactions to help lower cholesterol.

Calcium Carbonate

Although the mechanism of action is unknown, calcium has been shown to decrease cholesterol. One physician, a former medical editor for a national magazine, has advanced his "hard water" theory as a possible answer. CaCO_3 is the most common substance in hard water. According to the doctor, just as body oils and detergents mix with CaCO_3 to form an insoluble "bathtub ring", it can also inhibit the intestinal absorption of fat and cholesterol.

Magnesium Stearate

Magnesium stearate is a by product of stearic acid. Scientific data has shown, that when stearic acid is used in place of other fats in the diet, there is a significant reduction of plasma levels of cholesterol and LDL cholesterol (total cholesterol decreased by an average of 14%).

NOTE: No statement contained in this publication shall be construed as a claim or representation that any product is intended for use in the diagnosis, cure, mitigation, treatment, or prevention of any disease. This report is intended for professional use only. Certain persons considered experts may disagree with one or more of the statements and/or conclusions found in this report. Notwithstanding the above, this information is of current nutritional interest and is based upon sound and reliable authority. (Exhibit I).

PAR. 13. Through the use of the statements contained in the advertisements and promotional materials referred to in paragraph twelve, including but not necessarily limited to the advertisements and promotional materials attached as Exhibits G-I, respondents have represented, directly or by implication, that:

- (a) Vancol 5000 significantly reduces serum cholesterol.
- (b) Vancol 5000 significantly reduces serum cholesterol without changes in diet or eating habits.

PAR. 14. Through the use of the statements contained in the advertisements and promotional materials referred to in paragraph twelve, including but not necessarily limited to the advertisements and promotional materials attached as Exhibits G-I, respondents have represented, directly or by implication, that at the time they made the representations set forth in paragraph thirteen, respondents possessed and relied upon a reasonable basis that substantiated such representations.

PAR. 15. In truth and in fact, at the time they made the representations set forth in paragraph thirteen, respondents did not possess and rely upon a reasonable basis that substantiated such representations. Therefore, the representation set forth in paragraph fourteen was, and is, false and misleading.

PAR. 16. Through the use of the statements contained in the advertisements and promotional materials set forth in paragraph twelve, including but not necessarily limited to the promotional materials attached as Exhibit I, respondents have represented, directly or by implication, that scientific studies of certain ingredients

contained in Vancol 5000 demonstrate that Vancol 5000 significantly reduces serum cholesterol.

PAR. 17. In truth and in fact, scientific studies of certain ingredients contained in Vancol 5000 do not demonstrate that Vancol 5000 significantly reduces serum cholesterol. Therefore, the representation set forth in paragraph sixteen was, and is, false and misleading.

PAR. 18. Through the use of the statements contained in the advertisements set forth in paragraphs four and twelve, including but not necessarily limited to the advertisements attached as Exhibits A, F, G, J and L, respondents have represented, directly or by implication, that testimonials from consumers appearing in advertisements for Food Source One and Vancol 5000 reflect the typical or ordinary experience of members of the public who have used the products.

PAR. 19. Through the use of the statements contained in the advertisements set forth in paragraphs four and twelve, including but not necessarily limited to the advertisements attached as Exhibits A, F, G, J and L, respondents have represented, directly or by implication, that at the time they made the representation set forth in paragraph eighteen, respondents possessed and relied upon a reasonable basis that substantiated such representation.

PAR. 20. In truth and in fact, at the time they made the representation set forth in paragraph eighteen, respondents did not possess and rely upon a reasonable basis that substantiated such representation. Therefore, the representation set forth in paragraph nineteen was, and is, false and misleading.

PAR. 21. 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.

Complaint

EXHIBIT A

November 14, 1990

EXHIBIT A

Weight Loss Surprises Researchers

WASHINGTON — A nutrition organization was hopeful that a nutritionally complete "nutraceutical" would help erase world hunger problems until a study revealed that one of the ingredients could cause significant weight loss without dieting. Researchers in Europe found that an ingredient in the aptly named product Food Source One actually caused people to lose weight even though specifically instructed not to alter normal eating patterns according to one study published in the prestigious British Journal of Nutrition. Researchers in an earlier study had speculated that the weight loss was due to a decrease in the intestinal absorption of calories. While the development of Food Source One, a project of National Dietary Research, would not be used to successfully fulfill its original goal, the discovery has been a windfall for

overweight people. A Daytona Beach, Florida woman fighting a weight battle for 12 years used the product on the recommendation of her physician and lost 20 pounds in six weeks. "Not only have I lost 20 pounds but my cholesterol has dropped from 232 to 143. I have two closets full of clothes which have not fit me in two years that I can now wear." In a separate report, a telephone interview revealed that a Wilmington, North Carolina pharmacist lost 14 pounds in 15 days on the product and was never hungry. Food Source One is available through physicians and pharmacies without a prescription because it is not a drug and contains only natural ingredients already known to be safe. Copies of the referenced study are available free from National Dietary Research, Suite 553, 1377 K St., Washington, DC 20008, however please include \$2 postage & handling for each request.

ASK YOUR PHARMACIST

Food Source One is available at a pharmacy near you:

- | | | |
|--|---|---|
| Bridley Drug Co.
604 Hwy. 100
357-1122 | Bradshaw Drugs
4041 Hillsboro Rd.
385-3828 | Brooks Pharmacy
6701 Transdale Dr.
832-1647 |
| Drug Mart
2614 Old Lebanon Rd.
833-8518 | Health Care Plus
1613 Hillsboro Rd.
385-3861 | Hickory Park Pharmacy
2634 Old Lebanon Road
833-8813 |
| Mayfield Drug Co.
3302 Nolanville Rd. + Antioch Pike
832-1790 | Malone Drug Co.
2762 Lebanon Rd.
883-3298 | Marshallburg Rd.
2648 Marshallburg Rd.
385-4687 |
| Green Hills Prescription Shoppe
3900 Hillsboro Rd.
297-4086 | The Medicine Shoppe
1910 Church St.
329-2211 | Todd's Drug Store
2319 Dickerson Rd.
262-1911 |
| 601 Gallean Rd.
1113 Murfreesboro Rd.
Sewards Ferry Pike | J.P. Brown Drug Store
227-1101
361-5700
883-0131 | 3109 Dickerson Rd.
228-3531
3637 Dickerson Rd.
865-0287 |
| Elders Pharmacy
210 Goodlettsville Plaza
856-1331 | McGee's Prescription Shoppe
842 Union Street
684-7936 | Portland Prescription Shoppe
105 Broadway
325-4161 |
| P & P Drugs
811 W. Main St.
824-1215 | Esperville Drug Center
Highway 41-A
274-4866 | Woodbury Drug Center
223 W. Main St.
363-2332 |
| Martin Retail Drugs
On The Square
973-7286 | Murfreesboro Drug Center
1703 Bradyville Rd.
1004 N. Highland
1115 Memorial Blvd.
893-6023
893-7413
896-9161 | |
| Pugh's Pharmacy Inc.
511 Gallean Rd. #9
866-3432 | The Medicine Shoppe
232 S. 4th Ave. N.
794-3070 | Memphis Drug
S. N. Water Ave.
482-3434 |

Complaint

120 F.T.C.

EXHIBIT B

**WEIGHT LOSS
MYSTERY
BAFFLES
SCIENTISTS**

WASHINGTON—Scientists are baffled by a natural food ingredient that causes people to lose weight even though they don't change the way they normally eat.

A study published in *The British Journal of Nutrition* says that the ingredient, often used to thicken ice cream, can cause significant weight loss without dieting. Although several explanations for the weight loss are suggested, the most likely according to scientists in a Finnish study, is that the ingredient seems to decrease the intestinal absorption of calories.

National Dietary Research, an organization committed to the research and development of nutritional solutions to world-wide health problems, along with consulting scientists, have successfully isolated and incorporated the ingredient into an improved method that greatly enhances the potential for weight loss over the ingredient alone. Called Food Source One, the significant breakthrough in nutritional weight control provides a sure-way scientifically designed method to help prevent calorie absorption.

The mechanism by which Food Source One works to decrease body weight is a complicated process called nutrient-bonding. When chewed and swallowed immediately before meals, high calorie fats are replaced with low-calorie nutrients, thereby providing optimum nutrition and a minimum number of fat calories as explained in an instruction sheet that accompanies the tablets. The instruction sheet should be followed for optimum results.

Food Source One is unlike any other product on the market and is available immediately because it is not a drug and only contains natural ingredients already known to be safe. Physicians and pharmacists are praising Food Source One as a natural, drug free alternative for the treatment of obesity.

© 1990 Dineon International
Food Source One is available at:
M Prescription Pharmacy
23 12th Avenue NW 223-0671
(Advertisement)

Ardmoreite
Ardmore, OK
December 9, 1990

19081

EXHIBIT C

EXHIBIT C Page One

QUESTIONS & ANSWERS ABOUT

FOOD SOURCE ONE

with **FIBERSPAN™**

Concentrated Food Tablets

WHAT IS A FOOD TABLET?

A food tablet is not just a vitamin tablet, because it packs the balanced nutrition of a meal into a compact tablet. Just as we get our required calories from food, a food tablet can provide the calories your body needs to function without the excess calories you would get from an average meal.

The concept for a food tablet probably began when the time space travel became a reality. The need for nutrition in outer space, yet in a convenient compact form led scientists in search of a solution. A food tablet packs optimum nutrition into the smallest possible form.

WHAT IS FOOD SOURCE ONE WITH FIBERSPAN?

Food Source One with Fiberspan, commonly referred to as FS-1, is a nutritionally concentrated food tablet with a high fiber content. FS-1 functions just like real food but without all the calories. When chewed, swallowed and followed with water, FS-1 expands in the stomach like a sponge as it soaks up water. The nutritional components of the tablet are then released in the stomach so that they are available for absorption.

HOW DOES FS-1 CONTROL THE APPETITE?

The same way eating a six course meal would kill the appetite, with food. First, the fiber creates a temporary full feeling, then the nutritional portion of the tablet gives a gentle rise in blood sugar levels for prolonged appetite suppression, just like a meal.

DOES FS-1 HAVE SIDE EFFECTS?

FS-1 is food and not a drug, so side effects are limited to those that might be experienced when one overeats. For example, some people become full after consuming a small amount of food whereas others require more food to become full. Therefore, some people will be satisfied with fewer FS-1 tablets, while others will require more tablets to become full. If you become "bloating" or experience an upset stomach when taking FS-1, reducing the number of tablets for the first few days will alleviate this feeling.

HOW MUCH DOES FS-1 COST?

The price of FS-1 is about 75 cents per serving which is easily offset by the reduction in food one would ordinarily consume. On a serving per serving basis, FS-1 is about the same price as the leading liquid weight loss formula.

CAN I EAT EVERYTHING I WANT WHEN TAKING FS-1?

Dieters often get discouraged when they are deprived of their favorite foods. Unfortunately, FS-1 will help you feel satisfied with less, but that's not a good thing.

FOOD SOURCE ONE WITH FIBERSPAN

Research and development by:
NATIONAL DIETARY RESEARCH
 SUITE 553, 1377 K STREET
 WASHINGTON, DC 20005

Distributed world wide by:
OMICRON INTERNATIONAL
 P.O. Box 270665
 Tampa, FL 33688

© 1990 NATIONAL DIETARY RESEARCH, WASHINGTON, DC 20005
 ALL RIGHTS RESERVED

Complaint

120 F.T.C.

EXHIBIT C

patterns. The appetite reducing effects of the fiber cannot justify this, the respondent. Thus, scientists speculate that the fiber reduces the nutritional absorption of a portion of the calories you consume, leading to weight loss. The calories are trapped when the fiber forms a gel and are eliminated.

IS FS-1 MORE EFFECTIVE FOR WEIGHT LOSS THAN THE FIBER ALONE?

FS-1 provides a three way scientifically designed process for improved weight loss that fiber alone cannot provide. The human appetite is completely satisfied for any length of time by the placement of a non-nutritive substance in the stomach. This is why the nutritional portion of FS-1 is so important.

WHAT IS NUTRI-BONDING?

Nutri bonding is the process that makes the FS-1 tablet so unique. The nutritional portion of the tablet is bound to the fiber portion. When the tablet is consumed, the nutrients are released from the fiber so they can be absorbed into the body. Without nutri bonding the nutrients would be absorbed by the fiber and eliminated from the body without being absorbed.

IS CHEWING THE TABLETS IMPORTANT?

Yes, chewing the tablets is important but not absolutely essential. First, chewing retards the rate of caloric ingestion and secondly, chewing satisfies a psychological need for chewing often absent or decreased in persons on a weight reduction program. National Dietary Research, however, has formulated several delectable milk shake recipes using FS-1 as a base. These milk shakes are also effective in weight reduction. A powder form of FS-1 used with skim milk is also available. The powder form of FS-1 is also very popular.

IS FS-1 A DRUG?

No! FS-1 is a natural food substance with all ingredients previously recognized as safe by the FDA. Just as regular supermarket food is inspected, FS-1 is federally inspected by the FDA.

HOW DOES THIS HELP ONE LOSE WEIGHT?

Think of a six course meal which would contain many calories. FS-1 only contains a few calories per tablet. FS-1 satisfies your desire to eat, but with a minimum number of calories.

WHAT IS FIBERSPAN?

Fiber span is the trade name for a special formulation of soluble type fiber shown to be effective for weight loss.

WHAT IS SOLUBLE FIBER?

Fiber is the residue from plants that resists digestion in the gastrointestinal tract. Fiber is not absorbed and does not supply calories in the diet. Although there are five types of dietary fiber, generally fiber is classified as either soluble or insoluble. Soluble fiber is derived from various plant sources and when ingested takes on water to form a gel. Insoluble fiber is found mostly in cereal grains, and bran and does not take on water.

IS INSOLUBLE FIBER HELPFUL FOR WEIGHT LOSS?

No, only soluble type fiber has been shown to help in weight loss. Insoluble fiber's effect is generally limited to its ability to act as a laxative by increasing fecal bulk. Bran and grain fibers are being promoted by some companies for weight loss, however one should be cautioned that these fibers are virtually useless for weight loss.

HOW DOES SOLUBLE FIBER HELP ONE LOSE WEIGHT?

Studies published in respected scientific journals including the American Journal of Clinical Nutrition and the British Journal of Nutrition found that soluble fiber caused patients to lose weight. Part of the reason for weight loss, according to scientists, is probably due to the appetite reduction properties. However, some studies have found that patients consuming soluble fiber lost weight without altering their normal eating

EXHIBIT C Page 240

EXHIBIT D

EXHIBIT D

Page One

NEW IMPROVED FORMULA - LESS FAT - FEWER CALORIES

NATURAL NUTRITIONAL

★ ★ ★ WEIGHT LOSS ★ ★ ★

with

FOOD SOURCE ONE

With

Fiberspan™

Concentrated Food Tablets

THE NO DIET DIET - Chew 1 to 3 FS-1 tablets, followed by an 8 oz. glass of water, 30 minutes before each meal. FS-1 will reduce hunger so you will be satisfied with less food. You still enjoy all your favorite foods, but you will eat less.

BUSINESSMAN'S DIET OR SALESMAN'S DELIGHT - This plan is designed for those people who must entertain clients for lunch. Substitute an FS-1 milkshake in place of breakfast and dinner. For lunch, chew 2 or 3 FS-1 tablets, followed by 8 oz. of water. 30 minutes before you eat, then enjoy your usual meal.

SNACKER'S DELIGHT - This plan is the answer for those individuals who don't eat a lot at mealtimes, but are continually hungry and satisfied by that hunger by nibbling. In place of candy bars, potato chips and other snack food, substitute 2 or 3 FS-1 tablets followed by an 8 oz. glass of water to satisfy hunger.

FASTING - For one or two days each week, eliminate all regular food and drink one FS-1 milkshake 3 times a day.

FAST START - For the first 3 days of your diet, eliminate all regular food in place of food, substitute one FS-1 milkshake 3 times a day. At the end of 3 days, continue by selecting one of the plans above.

Remember, when dieting be sure to drink 8 glasses of water or fluid daily. Restrictive diets containing less than 1,000 calories per day should not be continued for more than 6 consecutive weeks without a 2 week rest period. Food Source One is not intended to be the sole source of nutrition for more than 3 consecutive days or 3 days per week.

Research and development by:
NATIONAL DIETARY RESEARCH
Suite 553, 1377 K Street
Washington, DC 20005

Distributed world-wide by:
OMICRON INTERNATIONAL
P.O. Box 270465 Tampa, FL 33688

Food Source One with Fiberspan is a wholesome and nutritionally balanced dietary regimen in a pleasant tasting compact chewable tablet. Food Source One has the proper balance of the essential vitamins, minerals, protein, carbohydrates, fatty acids and fiber that would be contained in a well balanced meal, but with a minimum number of fat calories. Food Source One also contains a unique blend of natural food fiber called Fiberspan. Fiberspan expands in the stomach to many times its own size to help reduce hunger. Furthermore, scientists say that the fiber in Fiberspan helps you lose weight by preventing the absorption of a portion of the calories you consume from food.

The Food Source One program is truly a nutritional breakthrough for weight control. Scientifically designed, Food Source One nutritionally satisfies your whole body for a longer period of time.

EXHIBIT D

DINNER TIME - Substitute an FS-1 milk shake twice daily in place of breakfast and lunch. In the evening, chew 2 to 3 FS-1 tablets followed by an 8 oz. glass of water 30 minutes before enjoying your usual dinner meal.

DINNER TIME (MODIFIED) - Same as above, but in place of your usual evening meal create your dinner by selecting one item from each column. For dessert you may have one serving of flavored low calorie gelatin. You may also have diet sodas, coffee, tea, and artificial sweetener. Steak sauce, ketchup, lemon juice, vinegar and mustard should be used sparingly.

1	2	3	4	5
4 med. sliced whole wheat 2 tbsp low cal dressing	8 oz skim milk 8 oz low fat yogurt	3/4 oz broiled or baked fish 3/4 oz broiled ground round or chuck 3/4 oz chicken or turkey (skin removed) 3/4 oz shrimp, lobster or crab	1 cup of any of the following: spinach, broccoli, cabbage, brocol sprouts, beans, onions, spinach 2 cups cauliflower 12 asparagus spears	1 roll or pie crust with 1 pat low calorie margarine 1 slice whole wheat with 1 pat low calorie margarine 1 small baked potato with 1 pat low calorie margarine
1 sliced ham with 1 tbsp low cal dressing	4 oz low fat fruit yogurt	3/4 oz steak or turkey (skin removed) or steamed		1/2 cup cooked pasta 1 cup veggie table or chicken noodle soup 1/2 cup cooked rice 1 small eat of corn with 1 pat low calorie margarine
2 raw carrots				
1 8 oz glass tomato juice				
1/2 cup apple-sauce				

EXHIBIT D Page Two

HOW TO USE FS-1

Here are 8 methods for living weight naturally and safely with FS-1, however always remember that you should be checked by a physician before starting any weight loss program to make sure you are in otherwise good physical condition. FS-1 level tablets can be taken before meals to reduce hunger and caloric intake or transformed into delicious milk shakes (see separate recipe brochure) as a meal replacement.

BREAKFAST CLUB - Studies indicate that individuals who consume two thirds of their daily calories before noon are less likely to be obese. Chew 2 or 3 FS-1 tablets 30 minutes before breakfast, followed by an 8 oz. glass of water. Then create and build your choice of breakfast by selecting one item from each column listed below. Drink an FS-1 milk shake in place of your other two meals. You may also have diet soft drinks, coffee, tea, and artificial sweeteners.

1	2	3	4
1 medium apple	8 oz skim milk	1 oz broiled salmon	2 slices whole wheat toast
1 medium orange	8 oz low fat yogurt	1 oz smoked ham (fat removed)	1 small bagel
6 oz orange juice	4 oz low fat fruit yogurt	1 oz broiled ground round	1 small English muffin
1 large tomatoe		1 oz chicken or turkey (skin removed) baked or steamed	2 biscuits
1/2 large grapefruit		1 oz broiled or baked fish	2 plain donuts
4 banana		1/2 cup low fat cottage cheese	1 pancake or waffle with 1 tbsp the syrup
10 grapes		1 egg scrambled with 2 egg whites (use no oil and 1 serving of one of the items above)	1 cup corn flakes
1 wedge cantaloupe			

893

Complaint

EXHIBIT E

EXHIBIT E

Oakland Tribune
September 20, 1992

ADVERTISEMENT

Accidental discovery may end obesity

WASHINGTON—Researchers may have discovered a way to end obesity—by accident.

In a study with a potential cholesterol lowering agent, scientists noted an unusual side effect. Instead of lower cholesterol levels, patients receiving a natural plant colloid lost weight while body weight in a control group remained constant.

The scientists say the mechanism behind the weight loss is not clear, but suggest it is partially due to a decrease in the intestinal absorption of calories. Scientists in another study published in the *British Journal of Nutrition*, found that patients consuming the same colloid lost weight in spite of being instructed not to alter normal eating patterns. Despite this evidence, other scientists may not agree on the weight loss benefits of colloids. Someday, pending further study, there could be universal agreement that colloids are helpful in confronting the problem of obesity.

National Dietary Research, whose research topics have been the subject of articles published in recent medical and nutritional journals, has successfully incorporated a series of colloids into a chewable food tablet called FS-1. When used as directed, FS-1 replaces high calorie fats with lower calorie nutrients, thus providing optimum nutrition with a minimum number of fat calories. According to an article published in the *American Journal of Clinical Nutrition*, consciously limiting the amount of food one consumes is not necessary to lose weight, provided you limit the fat.

A Florida company has obtained exclusive distribution rights to FS-1, which is available through pharmacies and other health care professionals.

©1992 Quilora International

Food Source One is available at:
LINCOLN SQUARE PHARMACY
4100 Redwood Road 531-0602
MONTCLAIR PHARMACY
6123 Lasalle Ave 339-9393

EXHIBIT F

EXHIBIT F



Weight Loss Surprises Researchers

WASHINGTON — A Nutrition organization was hopeful that a nutritionally complete "hi-tech" food tablet would help erase world hunger problems, until a study revealed that one of the ingredients could cause significant weight loss.

Although other studies and scientists may not agree, researchers in Europe found that the ingredient, a natural plant colloid, actually caused people to lose weight, even though specifically instructed not to alter normal eating patterns, according to one study published in the prestigious British Journal of Nutrition. Researchers in an earlier study had speculated that weight loss was due to a decrease in the intestinal absorption of calories.

While the development of the product called Food Source One, a project of National Dietary Research, would not be used to successfully fulfill its original goal, the formula which has since been improved with other natural colloids has been a windfall for overweight people. A Davtons Beach, Florida woman, fighting a weight battle for 12 years, used the product on the recommendation of her physician and lost 30 pounds. She stated, "Not only have I lost 30 pounds but my cholesterol dropped from 232 to 143. I have two closets full of clothes which have not fit me in two years that I can now wear." In a separate report a telephone interview with a Wilmington, North Carolina pharmacist lost 14 pounds in 3 weeks on the product and was never hungry.

Food Source One tablets are part of National Dietary Research's comprehensive plan to bring a rapid end to obesity in this country. A variety of nutritionally sound diet plans are specially prepared by NDR, accompany each bottle and provide a natural, drug free alternative for confronting the problem of obesity.

ASK YOUR PHARMACIST FOOD SOURCE ONE IS AVAILABLE AT:

- | | | |
|--|--|--|
| ALEXANDRIA
Pharmacia
1111 Washington St
Alexandria, Va
703-461-1111 | CHRY CHASE
Pharmacia
1111 Washington St
Chry Chase, Va
703-461-1111 | DC (Continental)
Pharmacia
1111 Washington St
Washington, DC
202-462-1111 |
| ANNAPOLIS
Pharmacia
1111 Washington St
Annapolis, Md
410-261-1111 | COLLIER PARK
Pharmacia
1111 Washington St
Collier Park, Va
703-461-1111 | FAIRFAX
Pharmacia
1111 Washington St
Fairfax, Va
703-461-1111 |
| ARLINGTON
Pharmacia
1111 Washington St
Arlington, Va
703-461-1111 | TARDIA PARK
Pharmacia
1111 Washington St
Tardia Park, Va
703-461-1111 | FALLS CHURCH
Pharmacia
1111 Washington St
Falls Church, Va
703-461-1111 |
| BETHESDA
Pharmacia
1111 Washington St
Bethesda, Md
301-461-1111 | BRIDGE
Pharmacia
1111 Washington St
Bridge, Va
703-461-1111 | BLANCKENBURG
Pharmacia
1111 Washington St
Blanckenburg, Va
703-461-1111 |
| BETHESDA
Pharmacia
1111 Washington St
Bethesda, Md
301-461-1111 | BRIDGE
Pharmacia
1111 Washington St
Bridge, Va
703-461-1111 | BRIDGE
Pharmacia
1111 Washington St
Bridge, Va
703-461-1111 |
| BETHESDA
Pharmacia
1111 Washington St
Bethesda, Md
301-461-1111 | BRIDGE
Pharmacia
1111 Washington St
Bridge, Va
703-461-1111 | BRIDGE
Pharmacia
1111 Washington St
Bridge, Va
703-461-1111 |

Washington Post January 27, 1993

Miami Herald
April/May 1992

ADVERTISING
**Cholesterol Breakthrough
Passes Mom's Test**

WASHINGTON — The mother of a research scientist recently lowered her cholesterol more than 20% without changing her eating habits.
After a visit to her doctor a Florida woman learned that her cholesterol level was an elevated 308 and she was encouraged to change her eating habits. When she returned 10 weeks later, the doctor was astounded that her cholesterol level has dropped to 213. Asked if she achieved the amazing results just by dieting she replied, "No I didn't diet at all, in fact I ate the things I shouldn't eat like bacon, sausage and my cream. The only thing I did different was take some tablets my son gave me."
The woman's son is Dr. William Morris, director of research and development National Dietary Research, an organization dedicated to finding

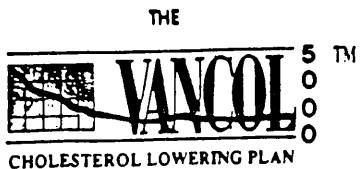
nutritional solutions to health problems. Dr. Morris admits that the tablets called Vancol 5000 were designed as a dietary supplement to be used with a low fat diet plan. "She just wanted to put the tablets to the test," says Dr. Morris. "Of course I was pleased with the results she achieved, but now we're working on reducing some of the fat in her diet to lower her cholesterol even further."
Vancol 5000 is a cholesterol food tablet that contains extracts from foods known to lower cholesterol. According to the exclusive distributor for Vancol 5000, inquiries about this new product are being received from all over the country and has peaked the interest of doctors used to prescribing expensive, cholesterol lowering drugs. A 30 day supply of the Vancol 5000 Cholesterol Lowering Plan is only \$29.98.
© 1991 National Dietary Research

- BAY HARBOR
847 HARBOR DRUGS
1001 KANE CONCOURSE
398-7142
- CANAL CITY
CANAL PHARMACY
470 N.W. 187 STREET
524-1272
- LA PRODIGEAL PHARMACY
481 N.W. 182nd STREET
555-9113
- WHEELER'S PHARMACY
371 N.W. 107th STREET
554-1247
- COCONUT GROVE
COCOA BEER PHARMACY
3265 GRAND AVE.
444-8841
- CORAL GABLES
GABLES APOTHECARY
476 BIRLINGHAM WAY
462-1922
- MAJORA DRUGS
180 FORCE OF LEON BLVD.
464-1727
- RIVERA PHARMACY
4739 LE JUNE RD.
861-4321
- SOUTH PARK PHARMACY
1523 MACAROLA AVE.
555-3321
- SUPER DRUGS PHARMACY
3513 SW 9th ST.
465-6892
- CORAL REEF
577 PHARMACY
12044 S. OCEAN HWY.
229-0474
- FLORIDA CITY
1908 PHARMACY & BEAUTY
280 WEST PALM DRIVE
246-6394
- MALDEN
MALDEN PHARMACY
869 W. 4th AVE.
369-8931
- HOMESTEAD
ROYAL PALM DRUGS
628 N. SHORE AVE.
947-4348
- KEY BISCAYNE
KEY PHARMACY
780 CHANDLER BLVD.
351-6448
- LEWISBURG CITY
LEWIS CITY PHARMACY
2034 S.W. 123rd AVE.
346-9424
- MIAMI
MIE MEDICAL PHARMACY
230 S.W. 11th ST.
371-7927
- ALLEYS BY PHARMACY
400 RD. 50, 51 & 52 RD. 50,
14070 N.W. 70th AVE.,
86-2021
- 1570 BROADWAY PHARMACY
1573 S.W. 27th AVE.
594-7898
- CANDELLA PHARMACY
1526 N.W. 27th AVE.
639-4792
- CANDELLA PHARMACY
2638 CORAL WAY
593-0442
- CONTINENTAL PHARMACY
288 S.W. 28th ST.
524-2211
- CORAL BRAY PHARMACY
6885 S.W. 24th ST.
282-6177
- MARLBOROUGH BEACH
7400 N. HENDALL DR.
653-1443
- DOCTOR'S PHARMACY
192 S.W. 28th ST.
642-6233
- GRACE'S PHARMACY
5411 S.W. 49th ST.
652-7171
- HAS BECKLEY PHARMACY
6236 S.W. 6th ST.
354-6288
- JORGE PHARMACY
1761 CORAL WAY
552-1292
- LEO'S PHARMACY
20880 OLD CUTLER RD.
232-9149
- LITTLE HARBOR DRUGS
1288 S.W. 9th ST.
654-1266
- MARCO DRUGS AND GIFTS
6940 S. Ocean Hwy.
555-4111
- MARCO DRUGS AND GIFTS
17888 S. OCEAN HWY.
522-7972
- OMEGA PHARMACY
6137 S.W. 72nd ST.
579-8929
- PARICWAY PHARMACY
1280 S.W. 22nd ST.
864-4262
- REDWOOD PHARMACY
1622 S.W. 57th AVE.
653-6283
- BLUE PHARMACY
143 S.W. 27th AVE.
649-1924
- SEE PHARMACY & BEAUTY
3275 CORAL WAY
597-4282
- SEVENTY DRUGS
13277 N. HENDALL DR.
262-9692
- SEVENTY DRUGS
197 S.W. 12th ST.
371-6232
- STONE'S PHARMACY
11223 N.E. 2nd AVE.
759-5222
- SUPER DRUGS PHARMACY
12805 N.W. 70th AVE.,
593-7121
- SUPER DRUGS PHARMACY
12805 S. OCEAN HWY.
335-7077
- THE SEE BEHNKE PHARMACY
1526 N.W. 27th AVE.
639-4792
- CANDELLA PHARMACY
2638 CORAL WAY
593-0442
- CONTINENTAL PHARMACY
288 S.W. 28th ST.
524-2211
- CORAL BRAY PHARMACY
6885 S.W. 24th ST.
282-6177
- MIAMI BEACH
LEE JAY PHARMACY
688 N.W. 32nd AVE.
654-4327
- METOWNE PHARMACY
321 APRIL DRIVE RD.
678-9177
- SWINE BECKLEY PHARMACY
1074 MENDOTA AVE.
628-9883
- MOTEL PHARMACY
17259 COLLINS AVE.
647-4261
- WY BECKLEY PHARMACY
1523 MACAROLA AVE.
555-3321
- SHOPPER'S PHARMACY
644 SW 22
555-8877
- SUN OUT RITE DRUGS
1426 COLLINS AVE.
654-9545
- WORTH DRUGS
MEDICAL SUPPLIES
888 S.W. 12th ST.
352-6221
- RELIABLE SUPER DRUGS
7418 SW 62nd ST.
555-8284
- TRUCK DRUGS
1870 N.E. 162nd DR.
649-9252
- YOUR DRUGS
624 S.W. 12th ST.
555-6442
- NORTH BETHLEHEM
BETHLEHEM DRUGS
281 SE WYCKOFF ST.
597-2121
- BETHLEHEM DRUGS
1516 N.W. 13th AVE.
522-7121
- DRUGS BY THE SEA
1516 N.W. 13th AVE.
522-7121
- DRUGS BY THE SEA
1516 N.W. 13th AVE.
522-7121

Complaint

120 F.T.C.

EXHIBIT H



GUARANTEE

A blood cholesterol level over 270 puts you at a high risk for heart disease. Have your cholesterol checked. If you need to lower your cholesterol, use Vancol 5000 as directed for 30 days. After 30 days, have it checked again. If your cholesterol has not been lowered significantly, bring your test results and empty bottle back for a **FULL REFUND!**

**LOWER YOUR CHOLESTEROL IN 30 DAYS
OR YOUR MONEY BACK!**



893

Complaint

EXHIBIT I

Technical Sheet

Research & Development by
NATIONAL DIETARY RESEARCH
 1377 K Street, Suite 553
 Washington, DC 20005

VANCOL 5000

Mini Flavored Chewable
 Tablets with Cholesterol
 Lowering Plan

Cholesterol Lowering Formula

Each Chewable Tablet Supplies:
 Beta Sitosterol 10 mg
 Psyllium 200 mg
 Chromium from picolinate 50 mcg
 with Natural quinone antioxidants in a base of
 Calcium carbonate & Magnesium stearate

VANCOL 5000 is composed of nutrients which research has shown to decrease LDL cholesterol levels. VANCOL 5000 is available in chewable tablet form and intended to be used with a cholesterol lowering diet as a drug free alternative for the problem of elevated blood cholesterol levels.

Recent scientific data suggests that the ingredients contained in Vancol 5000 have a beneficial effect on lowering total blood cholesterol levels, LDL cholesterol and may even increase HDL cholesterol. The Vancol 5000 Plan and the nutrients contained in the Vancol 5000 tablet were developed to lower cholesterol levels, improve overall health status and an individual's quality of life.

Beta Sitosterol has been shown experimentally to decrease elevated plasma cholesterol by interfering with the intestinal absorption of cholesterol.

Researchers have found that patients with coronary heart disease had lower concentrations of chromium in the blood than healthy patients. Picolinic acid is a natural chelating agent, which aids in trace mineral absorption. Chromium picolinate supplementation has been shown to decrease LDL and total cholesterol levels and is effective in the treat-

ment of hyperlipidemia.

Psyllium has been studied as a cholesterol reducing agent because it binds to bile acids in the gut preventing reabsorption. Psyllium decreases absorption of cholesterol and lipids in the small intestines and causes the formation of short chain fatty acids, which are rapidly absorbed and may inhibit cholesterol synthesis.

Calcium carbonate and magnesium stearate have been found to decrease cholesterol as explained in further detail on the following page. While quinones may lower cholesterol levels, they are natural antioxidants that prevent oxygen from combining with cholesterol to form plaque on arterial walls.

RECOMMENDATIONS: Chew 2 tablets with each meal.

Package Size: 180 tablets

Distributed by:

**OMICRON
 INTERNATIONAL**
PO Box 27041 Tampa, FL 33624

1-800-634-2348

