

Complaint

121 F.T.C.

IN THE MATTER OF

WLAR CO., ET AL.

CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATION OF
SEC. 5 OF THE FEDERAL TRADE COMMISSION ACT*Docket C-3641. Complaint, Feb. 21, 1996--Decision, Feb. 21, 1996*

This consent order prohibits, among other things, a Virginia-based corporation and its officer from making unsubstantiated representations for their weight-loss booklets, products or program. The consent order requires the respondents to provide, in future advertisements, a disclosure statement that the products consist solely of a booklet or pamphlet containing information and advice on weight-loss.

*Appearances*For the Commission: *Richard Cleland and C. Lee Peeler.*For the respondents: *Randall Shaheen, Arnold & Porter,*
Washington, D.C.

COMPLAINT

The Federal Trade Commission, having reason to believe that WLAR Co., a corporation, and Michael K. Craig, individually and as an officer of said corporation ("respondents"), have violated the Federal Trade Commission Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

PARAGRAPH 1. Respondent WLAR Co. is a corporation organized, existing, and doing business under and by virtue of the laws of the State of Delaware. Its principal place of business is located at 5622 Columbia Pike #106, Falls Church, VA.

Respondent Michael K. Craig is or was at relevant times herein the sole owner, officer, and employee of the corporate respondent. Individually, or in concert with others, he participated in and/or formulated, directed, and controlled the acts and practices of the corporate respondent, including the acts and practices alleged in this complaint. His address is the same as that of the corporate respondent.

PAR. 2. Respondents have advertised, offered for sale, sold, and distributed weight-loss and body-shaping products, consisting of booklets containing advice on dieting and exercise, to the public. Respondents have marketed these products under various names, including "Swedish 19," "Body Maker," "BM Program," "New Shape," and "Swedish System."

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 for their products, including but not necessarily limited to the attached Exhibits A through E. These advertisements contain the following statements:

A. Swedish 19:

Get the look that boys really notice!

You can have a cute body!

Now you, too can have the cute, foxy body you've always wanted -- the kind of body that really gets you noticed. And it can happen faster than you think!

You can have a narrower waist, thinner hips, legs and thighs, and a firmer behind. That's right -- no matter what you look like right now, just a few short weeks from today you could have a body that's thinner, firmer and cuter than you ever thought possible! JUST FOLLOW THE EASY INSTRUCTIONS IN THE SWEDISH 19 GUIDE!

No matter how many times you've tried and failed before, this time you really can do it. Finally, here's something that really works!

How Swedish 19 works

Swedish 19 will quickly show you how to lose weight while eating the foods you like -- including those snacks you love so much. It's not a diet -- so there's no list of things you have to eat. No list of things you can't eat, either. But when you use Swedish 19, you'll end up eating less (but still enough to keep you healthy.) Pretty soon, all those extra pounds will be gone for good.

Swedish 19 will help you control your appetite before meals and avoid over-eating -- even when you're dying to have a snack! And before you know it, you'll have a whole new set of eating habits, be thin, and stay thin -- with nothing more to buy. This is not like those diet pills you have to keep buying over and over again!

And -- if you're too skinny and just dying to get some curves -- you can make your body cuter and foxier -- adding shape and curves in all the right places!

Made for a teenage girl's body

Swedish 19 was designed especially for a teenage girl's body. It's the safest, most natural way to lose weight we could find for you. It's a safe, healthy way to lose weight. And it works. Show it to your doctor -- we're sure he'll agree!

Complaint

121 F.T.C.

Here's more good news. You never have to do any long boring exercises -- and you won't need to! When you use Swedish 19 you'll just feel like being more active all the time. You'll burn up calories while you're having fun!

It works!

Just days after you get Swedish 19, you can be eating less, feeling more active, and really happy about the changes starting to take place.

* * * *

Try to imagine how gorgeous you'll look. How your body can be really slim, trim and firm. Really picture it in your mind. It can happen to you!

You can do it!

The best part is -- you'll be sooo. . . proud of yourself when you find out you really can have a cute body. It's not your fault you haven't lost weight -- it's those worthless diets that don't work!

* * * *

Get a totally cute body - - or your money back!

Swedish 19 has worked for thousands of girls. And we're so sure it'll work for you, too, that we want you to try it for a whole month at no risk.

Go ahead -- really use it as much as you want. Let it help you slim down, shape up and beautify your body.

* * * *

Here's all you've got to do. Fill out the coupon and send it in with \$12 right away. We'll send you Swedish 19 fast. (The package won't say who it's from or what's inside.)

* * * *

(Exhibit A)

B. Swedish System:

New! How you can...

Get the shape that boys really notice!

You can have a cute body!

Now you, too can have the cute, foxy body you've always wanted - the kind of body that really gets you noticed. And it can happen faster than you think!

Swedish girls are famous for their beautiful bodies. And the awesome Swedish System will quickly and easily show you how to get rid of excess, flabby fat - while adding shape and curves in all the right places!

You can have a narrower waist, thinner hips, legs and thighs, and a firmer behind. Yes - just a few short weeks from today you could have a body that's thinner, firmer and cuter than you ever thought possible!

No matter how many times you've tried and failed before, this time you really can do it. Finally, here's something that really works!

How the Swedish System works

When you use the Swedish System, you still get to eat the same foods you've been eating - including those snacks you love so much. It's not a diet - so there's no list of things you have to eat. No list of things you can't eat, either. But when you use the Swedish System, you'll end up eating less (but still enough to keep you healthy.) Pretty soon, all those extra pounds will be gone for good.

If you're overweight, the Swedish System will help you control your appetite before meals and avoid over-eating - even when you're dying to have a snack! And before you know it, you'll have a whole new set of eating habits, be thin, and stay

thin - with nothing more to buy. This is not like those diet pills you have to keep buying over and over again!

Or - if you're too skinny and just dying to get some curves - you can make your body shapelier and foxier - adding shape and curves in all the right places!

Made for a teenage girl's body

The Swedish System was designed especially for a teenage girl's body. It's the safest, most natural weight loss product we could find for you. . . .

Here's more good news. You never have to do any long boring exercises - and you won't need to! When you use the Swedish System you'll just feel like being more active all the time. You'll burn up calories while you're having fun!

It works!

Just days after you start using the Swedish System, you can be eating less, feeling more active, and really happy about the changes starting to take place. Just follow the easy directions in the Swedish System guide.

* * * *

Can you see it? Try to imagine how gorgeous you'll look. How every part of your body can be slim, trim and firm. Really picture it in your mind. It can happen to you!

You can do it!

The best part is - you'll be sooo. . . proud of yourself when you find out you really can have a cute body. It's not your fault you haven't lost weight - it's those worthless diets that don't work! Now you really can make your dreams come true. Definitely!

* * * *

Try it for a whole month!

This system has worked for thousands of girls. And now we've made it even better! We're so sure it'll work for you, too, that we want you try it for a whole month at no risk.

* * * *

(Exhibit B)

C. BM Program:

Get the body that gets the boys

How to lose weight fast and look great

You can have the cute, thin body you've always wanted -- the kind of body that really gets boys' attention. And lose weight fast from your waist, butt, hips and thighs -- so you're thin everywhere. You can do it without going on the usual kind of diet -- thanks to a special new discovery called the BM Program.

A great new body

You'll lose fat from every part of your body. Want a narrow waist? No problem. Firm behind? You got it. Slim hips? Sure. Thin legs? Of course. The BM Program's extra fast action will work on every part of your body. So -- no matter what parts of your body are too big right now -- you'll have the great body you want fast and easy.

It doesn't matter whether you need to lose ten, twenty, even forty pounds or more. You can get them off and keep them off for good. . . .

Every square inch of your body can be trim and firm. . . .

Complaint

121 F.T.C.

At last, here's something that really works. No matter how many times you've tried and failed to lose weight before, now you can do it. Just follow the easy directions in the BM Program guide.

Why diets don't work

You know what all those diets are like. You're supposed to have half a grapefruit for lunch and nothing else. But if you had the willpower to eat just that, you wouldn't have a weight problem now, would you?

* * * *

But it's not your fault. The big problem with diets is that they leave you hungry, and you can only hold out for so long. Heavy exercise just makes you tired and hungry. And diet pills can be dangerous.

It's new

The BM Program is totally different from anything you've ever tried before. Don't confuse this program with any other one. Here's why it's different. It helps you fight hunger and change your eating habits so you eat less -- without getting hungry. There's no "diet" or list of things you have to eat. No forbidden foods, either. No calorie-counting. You can keep on eating your favorite foods -- even snacks. But you'll end up eating less. You just won't feel like pigging out. And, best of all, those extra pounds that make you look ugly will go away fast!

It works

Even if you've tried everything else and failed, the BM Program is the last weight loss solution you'll ever need. It really works.

BM can help you to 1) stop gaining weight, 2) lose weight by getting rid of body fat and best of all 3) help you stay slim and trim.

BM works fast, too. You'll start changing your eating habits the first day -- giving you results you can start to notice in just a couple of weeks. And although not everyone loses weight at the same speed, the results will be absolutely amazing.

This program is so powerful that you have to be careful not to lose weight too fast. If that happens, just stop using it for a day or two. BM is safe and natural. There are no drugs or anything artificial.

* * * *

Here's proof

How well does the BM Program work? We had 100 girls try it. Desperate girls who had tried almost everything else, and who had given up hope. And -- guess what? Only two of them asked for their money back. Just two out of 100.

So we're 98% sure that it'll work for you. . . .

Hard to believe it could be so easy? Of course it is. That's what those other girls thought before they tried it. Boy, were they surprised!

It's the best

We've checked out over a dozen weight loss systems and this one's the best one we found. Just give it a try and we know you'll agree.

* * * *

(Exhibit C)

D. New Shape:

New! How you can...

Get the cute shape that boys like and girls envy!

* * * *

The perfect body

Now you, too, can have the kind of body that boys like and girls envy; thin, shapely legs and thighs, firm behind, narrow waist, and foxy, exciting curves in all the right places. . . .

No matter how many times you've tried and failed before, now you can really do it -- thanks to an excellent new discovery that can really work for you

Extra help for special areas

New Shape™ does more than just help you get rid of excess fat. It helps you add shape and firmness too. It's a total shape-up system that you can customize to your own special needs Whether you're too fat or too skinny, New Shape can help you get the kind of body you've always wanted. It really works.

This system was designed especially for teenage girls and is made to fit your lifestyle. So you can still have snacks and go out for hamburgers with your friends.

Works twice as fast

The New Shape System works twice as well -- and twice as fast -- because it combines two powerful factors. Yet it's completely natural and safe for girls of all ages. With no dangerous crash diets, no drugs, and no special foods.

It's easy and safe (no drugs!)

You won't find a faster, easier, safer way to slim down and shape up your body. We know -- because we've tried pretty much everything there is. Don't confuse New Shape with any other product or company.

* * * *

Order the New Shape System. You'll get it fast -- in a plain, unmarked package Use it as much as you need to get the body you want We've helped thousands of girls just like you -- and we know we can help you, too.

* * * *

(Exhibit D)

E. Body Maker:

HOW YOU CAN HAVE A FIRM, FOXY,
THINNER BODY - in just a few weeks!

THE BODY YOU'VE ALWAYS WANTED!

You can have the cute, foxy body you've always wanted -- the kind of body that really gets guy's attention. And you can look that way sooner than you think!

Just a few short weeks from today you could have a body that's thinner, firmer and cuter than you ever imagined -- thanks to an awesome new discovery.

Body Maker™ helps you lose weight from every part of your body. You can have a narrower waist, thinner hips, legs and thighs, and a firmer behind -- and add shape, firmness and curves in all the right places!

No matter how many times you've tried and failed before, now the awesome new Body Maker can quickly and easily show you how to get a body that's cuter and foxier than you ever thought possible! Finally, here's something that really works!

HOW BODY MAKER WORKS

With Body Maker, you still get to eat the foods you like -- including those snacks you love so much. It's not a diet -- so there's no list of things you have to eat. No list of things you can't eat, either. But when you follow the Body Maker program, you'll end up eating less (but still enough to keep you healthy.) You just

won't feel like pigging out! And pretty soon, all those extra pounds will be gone for good.

Body Maker will help you cut down on your appetite before meals and avoid over-eating -- even when you're dying to have a snack! And before you know it, you'll have a whole new set of eating habits, be thin, and stay thin -- with nothing more to buy. This is not like those diet pills you have to keep buying over and over again!

MADE ESPECIALLY FOR TEENAGE GIRLS

Body Maker was created especially for a teenage girl's body. It's the safest, healthiest way to lose weight we've ever seen. And it works! . . .

Here's more good news. You never have to do any exercises -- and you won't need to! With Body Maker you'll just feel like being more active all the time!

IT WORKS!

Just days after you get Body Maker, you can be eating less, feeling more active, and really happy about the changes starting to take place.

* * * *

It's not your fault you haven't lost weight -- it's those worthless diets that don't work!

* * * *

Body Maker has worked for thousands of girls . . .

Go ahead -- really use it as much as you want. Let it help you slim down, shape up and beautify your body.

* * * *

(The Package won't say who it's from or what's inside.)

* * * *

(Exhibit E)

PAR. 5. Through the use of the statements contained in the advertisements referred to in paragraph four, including, but not necessarily limited to the advertisements attached as Exhibits A through E, respondents have represented, directly or by implication, that:

A. BM Program, New Shape, and Body Maker are new weight-loss discoveries; and

B. Users of Swedish 19, Swedish System, BM Program, New Shape, and Body Maker are not required to consciously diet to lose weight.

PAR. 6. In truth and in fact:

A. BM Program, New Shape, and Body Maker are not new weight-loss discoveries; and

B. Users of Swedish 19, Swedish System, BM Program, New Shape, and Body Maker are required to consciously diet to lose weight. These products are booklets containing advice for reducing caloric intake and require conscious dieting to lose weight.

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

PAR. 7. Through the use of the statements contained in the advertisements referred to in paragraph four, including but not necessarily limited to the advertisements attached as Exhibits A through E, respondents have represented, directly or by implication, that:

A. Swedish 19, Swedish System, BM Program, New Shape, and Body Maker cause fast and easy weight loss;

B. Swedish 19, Swedish System, BM Program, New Shape, and Body Maker are more effective than other products or programs in controlling appetite and causing weight loss;

C. Purchasers of Swedish 19, Swedish System, BM Program, New Shape, and Body Maker are successful in controlling appetite, losing weight, and reducing body fat;

D. Swedish 19, Swedish System, BM Program, and Body Maker cause users to develop a new set of eating habits, thereby reducing caloric intake and causing significant and long-term or permanent weight loss; and

E. Thousands of girls have successfully lost weight by using Swedish 19, Swedish System, New Shape, and Body Maker.

PAR. 8. Through the use of statements contained in the advertisements referred to in paragraph four, including but not necessarily limited to the advertisements attached as Exhibits A through E, respondents have represented, directly or by implication, that at the time they made the representations set forth in paragraph seven, respondents possessed and relied upon a reasonable basis that substantiated such representations.

PAR. 9. In truth and in fact, at the time they made the representations set forth in paragraph seven, respondents did not possess and rely upon a reasonable basis that substantiated such representations. Therefore, the representation set forth in paragraph eight was, and is, false and misleading.

PAR. 10. In their advertising and sale of Swedish 19, Swedish System, BM Program, New Shape, and Body Maker, respondents have represented that these products will reduce appetite and result in significant weight loss. Respondents have failed to disclose adequately that these products consist only of booklets or pamphlets containing advice concerning techniques for reducing caloric intake and/or exercise, and that reducing caloric intake and/or increasing exercise is required to lose weight. These facts would be material to consumers in their purchase or use decisions regarding the products. The failure to disclose these facts, in light of the representations made, was, and is, a deceptive practice.

PAR. 11. The acts and practices of respondents as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

Chairman Pitofsky recused.

EXHIBIT A

Get the look that boys really notice!

You can have a cute body!

Now, you, too can have the cute, foxy body you've always wanted -- the kind of body that really gets you noticed. And it can happen faster than you think!

You can have a narrower waist, thinner hips, legs and thighs, and a firmer behind. That's right -- no matter what you look like right now, just a few short weeks from today you could have a body that's thinner, firmer and cuter than you ever thought possible! **JUST FOLLOW THE EASY INSTRUCTIONS IN THE SWEDISH 19 GUIDE!**

No matter how many times you've tried and failed before, this time you really can do it. Finally, here's something that really works!

How Swedish 19 works

Swedish 19 will quickly show you how to lose weight while eating the foods you like -- including those snacks you love so much. It's not a diet -- so there's no list of things you have to eat. No list of things you can't eat, either. But when you use Swedish 19, you'll end up eating less (but still enough to keep you healthy.) Pretty soon, all those extra pounds will be gone for good.

Swedish 19 will help you control your appetite before meals and avoid over-eating -- even when you're dying to have a snack! And before you know it, you'll have a whole new set of eating habits, be thin, and stay thin -- with nothing more to buy. This is not like those diet pills you have to keep buying over and over again!

And -- if you're too skinny and just dying to get some curves -- you can make your body cuter and fatter -- adding shape and curves in all the right places!

Made for a teenage girl's body

Swedish 19 was designed especially for a teenage girl's body. It's the safest, most natural way to lose weight we could find for you. It's a safe, healthy way to lose weight. And it works. Show it to your doctor -- we're sure he'll agree!

Here's more good news. You never have to do any long boring exercises -- and you won't need it! When you use Swedish 19 you'll just feel like being more active all the time. You'll burn up calories while you're having fun!

It works!

Just days after you get Swedish 19, you can be eating less, feeling more active, and really happy about the changes starting to take place.

Before you know it, you'll be going to the mall to get that cute bikini you always wished you could wear. And when you look in the mirror, you won't believe how good you

look! Can you see it? Try to imagine how gorgeous you'll look. How your body can be really slim, trim and firm. Really picture it in your mind. It can happen to you!

You can do it!

The best part is -- you'll be sooooo proud of yourself when you find out you really can have a cute body. It's not your fault you haven't lost weight -- it's those worthless diets that don't work! Now you really can make your dreams come true. Definitely!

Your high school years are supposed to be the happiest time of your life. Make sure you don't miss out on all those special moments -- the beach, parties, school dances, the prom.

Sure -- once you look so good, all those guys that never noticed you before might start asking you out. But don't just do this for the guys. Do it for yourself. You deserve it!

Get a totally cute body -- or your money back!

Swedish 19 has worked for thousands of girls. And we're so sure it'll work for you, too, that we want you to try it for a whole month at no risk.

Go ahead -- really use it as much as you want. Let it help you slim down, shape up and beautify your body.

Then -- if you feel you haven't changed enough -- if you don't have the awesome body you've always wanted -- just send everything back to us and we'll give you your money back. We don't want your money unless you get the body you want!

Do it now!

Here's all you've got to do. Fill out the coupon and send it in with \$12 right away. We'll send you Swedish 19 fast! (The package won't say who it's from or what's inside.)

So don't wait. If you put it off you might forget, and miss out on the cute body you want, and all the good times you deserve.

Do it now. You'll be so glad you did.

P.S.: Wanna get a cute body even faster? We've put together some really easy, fun exercises you can do in just 15 minutes a day. Use them with Swedish 19 and you'll get terrific results super-fast! They're yours for just \$3 extra when you get Swedish 19. Good deal!

Plus -- we'll even throw in a...

FREE Gift!

You'll also get a chart to keep track of your weight loss absolutely FREE, just for ordering Swedish 19.

Hurry up and be the first one at your school to get that cute body! Make this the best year of your life!

© 1995 Swedish 19. Coupon good! Send \$12 with your name and address to Swedish 19, P.O. Box 2245, Kensington, MD 20891.



FREE 30-DAY TRIAL!

Swedish 19 3-S
 Nicholson Lane
 P.O. Box 2245
 Kensington, MD 20891-2245

Cool! I want a totally cute body. Send me Swedish 19 fast! Money back guarantee. Here's
 \$12 for just Swedish 19
 \$15 for Swedish 19 plus exercises

PRINT
 Name _____
 Address _____
 City _____ State _____ Zip _____

BODY GOALS SURVEY FORM
 (Answer only if you want to)
 I'm overweight and want a thinner body... or
 I'm too skinny and want more shape & curves

I want to change: (Check as many as you want)

<input type="checkbox"/> Arms	<input type="checkbox"/> Waist	<input type="checkbox"/> Thighs
<input type="checkbox"/> Stomach	<input type="checkbox"/> Butt	<input type="checkbox"/> Legs
<input type="checkbox"/> Chest	<input type="checkbox"/> Hips	<input type="checkbox"/> Other _____



Complaint

121 F.T.C.

EXHIBIT B

New! How you can ...

Get the shape that boys really notice!

You can have a cute body!

Now you, too can have the cute, sexy body you've always wanted - the kind of body that really gets you noticed. And it can happen faster than you think!

Swedish girls are famous for their beautiful bodies. And the awesome Swedish System will quickly and easily show you how to get rid of excess, flabby fat - while adding shape and curves in all the right places!

You can have a narrower waist, thinner hips, legs and thighs, and a firmer behind. Yes - just a few short weeks from today you could have a body that's thinner, firmer and cuter than you ever thought possible!

No matter how many times you've tried and failed before, this time you really can do it. Finally, here's something that really works!

How the Swedish System works

When you use the Swedish System, you still get to eat the same foods you've been eating - including those snacks you love so much. It's not a diet - so there's no list of things you have to eat. No list of things you can't eat, either. But when you use the Swedish System, you'll end up eating less (but still enough to keep you healthy.) Pretty soon, all those extra pounds will be gone for good!

If you're overweight, the Swedish System will help you control your appetite before meals and avoid over-eating - even when you're dying to have a snack! And before you know it, you'll have a whole new set of eating habits, be thin, and stay thin - with nothing more to buy. This is not like those diet pills you have to keep buying over and over again!

Or - if you're too skinny and just dying to get some curves - you can make your body shapelier and fatter - adding shape and curves in all the right places!

Made for a teenage girl's body

The Swedish System was designed especially for a teenage girl's body. It's the safest, most natural weight loss product we could find for you. It won't hurt or harm your body in any way. Everything in the Swedish System is healthy for you. Show it to your doctor - we're sure he'll agree!

Here's more good news. You never have to do any long boring exercises - and you won't need to! When you use the Swedish System you'll just feel like being more active all the time. You'll burn up calories while you're having fun! **It works!**

Just days after you start using the Swedish System, you can be eating less, feeling more active, and really happy about the changes starting to take place. Just follow the easy directions in the Swedish System guide.

Before you know it, you'll be going to the mall to get that cute bikini you always wished you could wear. And when you look in the mirror, you won't believe how good you look!

Can you see it? Try to imagine how



gorgeous you'll look. How every part of your body can be slim, trim and firm. Really picture it in your mind. It can happen to you!

You can do it!

The best part is - you'll be sooo... proud of yourself when you find out you really can have a cute body. It's not your fault you haven't lost weight - it's those worthless diets that don't work! Now you really can make your dreams come true. Definitely!

The new school year is just starting. Your high school years are supposed to be the happiest time of your life. Make sure you don't miss out on all those special moments - the beach, parties, school dances, the prom.

Sure - once you look so good, all those guys that never noticed you before might start

asking you out. But don't just do this for the guys. Do it for yourself. You deserve it! **Try it for a whole month!**

This system has worked for thousands of girls. And now we've made it even better! We're so sure it'll work for you, too, that we want you to try it for a whole month at no risk.

Go ahead - really use it as much as you want. Let it help you slim down, shape up and beautify your body.

Then - if you feel you haven't changed enough - if you don't have the awesome body you've always wanted - just send back the Swedish System and we'll give you your money back. We don't want your money unless you get the body you want!

Do it now!

Here's all you've got to do. Fill out the coupon and send it in with \$12 right away. We'll send you the Swedish System fast. (The package won't say who it's from or what's inside.)

So don't wait. If you put it off you might forget, and miss out on the cute body you want, and all the good times you deserve.

Do it now. You'll be so glad you did.

P.S.: Wanna get a cute body even faster? We've put together some really easy, fun exercises you can do in just 15 minutes a day. Use them with the Swedish System and you'll get terrific results super-fast! They're yours for just \$3 extra when you get the Swedish System. Good deal!

Plus - we'll even throw in a . . .

FREE Gift!

You'll also get a chart to keep track of your weight loss absolutely FREE, just for ordering the Swedish System.

Hurry up and be the first one at your school to get that cute body! Make this the best year of your life!

©1991 Swedish System

30-Day Trial Coupon

Swedish System 1-5
 Nicholson Lane
 P.O. Box 2245
 Gaithersburg, MD 20878-2245

Good! I want a totally cute body. Send me the Swedish System fast! Money back guarantee. Here's

\$12 for just the Swedish System
 \$15 for the Swedish System plus exercises

PRINT
 Name _____
 Address _____
 City _____ State _____ Zip _____

Body Goals Survey Form
 (Answer only if you want to)

I'm overweight and want a thinner body... or
 I'm too skinny and want more shape & curves

I want to change: (Check as many as you want)

Arms Waist Thighs
 Stomach Butt Legs
 Chest Hips Other _____

EXHIBIT
B

EXHIBIT C

Get the body that gets the boys

How to lose weight fast and look great

You can have the cute, thin body you've always wanted - the kind of body that really gets boys' attention. And lose weight fast from your waist, butt, hips and thighs - so you're thin everywhere. You can do it without going on the usual kind of diet - thanks to a special new discovery called the BM Program.

A great new body

You'll lose fat from every part of your body. Want a narrow waist? No problem. Firm behind? You got it. Slim hips? Sure. Thin legs? Of course. The BM Program's extra fast action will work on every part of your body. So - no matter what parts of your body are too big right now - you'll have the great body you want fast and easy.

It doesn't matter whether you need to lose ten, twenty, even forty pounds or more. You can get them off and keep them off for good. And get the look that really gets you noticed.

Every square inch of your body can be trim and firm. Your body will have a great new shape. You'll look great in shorts, a miniskirt, or a bikini. You'll be able to wear the kinds of clothes that show off your new thin body - instead of trying to find clothes to hide it. Even your face will look prettier as you lose extra weight.

At last, here's something that really works. No matter how many times you've tried and failed to lose weight before, now you can do it. Just follow the easy directions in the BM Program guide.

Why diets don't work

You know what all those diets are like. You're supposed to have half a grapefruit for lunch and nothing else. But if you had the willpower to eat just that, you wouldn't have a weight problem now, would you?

So you cheat on your diet. And end up feeling fat and guilty.

But it's not your fault. The big problem with diets is that they leave you hungry, and you can only hold out for so long. Heavy exercise just makes you tired and hungry. And diet pills can be dangerous.

It's new

The BM Program is totally different from anything you've ever tried before. Don't confuse this program with any other one. Here's why it's different. It helps you fight hunger and change your eating habits so you eat less - without getting hungry. There's no "diet" or list of things you have to eat. No forbidden foods,

either. No calorie-counting. You can keep on eating your favorite foods - even snacks. But you'll end up eating less. You just won't feel like pigging out. And, best of all, those extra pounds that make you look ugly will go away fast!

It works

Even if you've tried everything else and failed, the BM Program is the last weight loss solution you'll ever need. It really works.

BM can help you to 1) stop gaining weight, 2) lose weight by getting rid of body fat and best of all 3) help you stay slim and trim. BM works fast, too. You'll start changing your eating habits the first day - giving you results you can start to notice in just a couple of weeks. And although not everyone loses weight at the same speed, the results will be absolutely amazing.

This program is so powerful that you have to be careful not to lose weight too fast. If that happens, just stop using it for a day or two. BM is safe and natural. There are no drugs or anything artificial.

What makes BM extra special is that it was originally developed especially for actresses and models. They need to get and keep a great-looking body fast. But you don't have to be an actress or model to have a slim body that gets you noticed. Very soon all the cute boys will start paying lots of attention to you - instead of the other girls.

Here's proof

How well does the BM Program work? We had 100 girls try it. Desperate girls who had tried almost everything else, and who had given up hope. And - guess what? Only two of them asked for their money back. Just two out of 100.

So we're 98% sure that it'll work for you. And if for any reason it doesn't, you'll get your money back. So you've got nothing to lose by giving it a try.

Hard to believe it could be so easy? Of course it is. That's what those other girls thought before they tried it. Boy, were they surprised!

It's the best

We've checked out over a dozen weight loss systems and this one's the best one we found.

Just give it a try and we know you'll agree. You know what it's like being ignored at a school dance. Or being too embarrassed to be seen in a bikini. You deserve better than that.

Now it's your turn to look great. Your turn to get all the cute boys' attention. Your turn to



have some fun.

You can't get the BM Program in stores. They don't have it yet. But you don't have to wait. You can get it by mail right now.

Send in the coupon with \$12 now and you'll get it right away, in a plain package. And pretty soon you'll have the great-looking body you've always wanted.

Give yourself a chance. You'll be glad you did.

Do it now - before some other girl does and gets all the boys' attention.

FREE bonus gift

P.S.: Order now and you'll also get a special chart to keep track of your weight loss, absolutely FREE.

BM Program	2-W
Twinbrook Center	
P.O. Box 727	
Rockville, MD 20848-0727	
Hey! I know what kind of body I want. Send me the BM Program in a plain package right away. Here's \$12. Money back guarantee.	
PRINT Name _____	
Address _____	
City _____	State _____ Zip _____

EXHIBIT

EXHIBIT D

New! How you can ...

Get the cute shape that boys like and girls envy!

There's a girl in every school who is so beautiful -- so foxy -- that all the boys just can't keep their eyes off her. A girl who's surrounded by cute guys wherever she goes. A girl that can have any guy she wants. Very soon, that girl could be you!

The perfect body

Now you, too, can have the kind of body that boys like and girls envy: thin, shapely legs and thighs, firm behind, narrow waist, and foxy, exciting curves in all the right places. With THAT kind of body you'll look great in shorts or a miniskirt, and totally awesome in that cute little two-piece swimsuit that you always wished you could wear.

No matter how many times you've tried and failed before, now you can really do it -- thanks to an excellent new discovery that can really work for you. Just think -- only a few short weeks from today you could have a whole new look!

Extra help for special areas

New Shape™ does more than just help you get rid of excess fat. It helps you add shape and firmness too. It's a total shape-up system that you can customize to your own special needs. So you can work on your legs, waist, butt, hips, thighs and other problem parts of your body to make them shapelier, firmer, tighter and more beautiful. You can change your flabby, embarrassing features -- but keep your good parts. Whether you're too fat or too skinny, New Shape can help you get the kind of body you've always wanted. It really works.

This system was designed especially for teenage girls and is made to fit your lifestyle. So you can still have snacks and go out for hamburgers with your friends.

Works twice as fast

The New Shape System works twice as well -- and twice as fast -- because it combines two powerful factors. Yet it's completely natural and safe for girls of all ages. With no dangerous crash diets, no drugs, and no special foods.

It's easy and safe (no drugs!)

You won't find a faster, easier, safer way to slim down and shape up your body. We know -- because we've tried pretty much everything there is. Don't confuse



bikini. You can make the other girls envy you. You can get that cute boy to really notice you in school (and hopefully ask you out!) You can have all the fun you've been missing out on -- and you deserve it!

You can do it. You really can make your dream come true.

Here's all you have to do: Order the New Shape System. You'll get it fast -- in a plain, unmarked package. Try it out for a week, a month, even two months. Use it as much as you need to get the body you want. Then take a look in the mirror. You'll look sooo... cute and foxy you won't believe your eyes! And you can stay that way, too, with nothing more to buy.

We guarantee it

But if you feel you haven't changed enough -- if you don't think you look like a total babe -- just send everything back to us and you'll get your money back right away. We guarantee New Shape because it really works. We've helped thousands of girls just like you -- and we know we can help you, too.

Do it now!

So don't just think about having a beautiful body. Don't just dream about what it would be like. If you put it off until tomorrow, you might never do it. Do something about it now -- and make your dream come true. Don't wait until some other girl starts going out with that guy you've got your eye on. Do it now. Just send in the coupon with \$12 today, and get the kind of body you really want. You'll be so glad you did.

FREE bonus gift

You'll also get an extra free bonus -- a special surprise gift that can help you get a more beautiful body even faster. This free gift is available only while supplies last. Get it before we run out!

©1991 NS
Coupon good? No problem! Just send your name and address with \$12 to New Shape, P.O. Box 2245, Kensington, MD 20891.

You'll love having handsome hunks fight over you!

New Shape with any other product or company.

And, best of all, you'll start working on your own special problem areas right away -- to give them the special attention they need and help you get the cute, foxy shape you really want.

You know what it's like being laughed at in gym class or being ignored at a party. Why put up with it when you don't have to?

It really works

You can look beautiful in that special party dress. You can look awesome in a

New Shape	3-N
Nichols Lane	
P.O. Box 2245	
Kensington, MD 20891-2245	
Yes! I definitely want to look like a babe. Send me the New Shape System in a plain package right away. Here's \$12. Money back guaranteed.	
PRINT Name _____	
Address _____	
City _____ State _____ Zip _____	



EXHIBIT E

HOW YOU CAN HAVE A FIRM, FOXY, THINNER BODY - in just a few weeks!

THE BODY YOU'VE ALWAYS WANTED!

You can have the cute, foxy body you've always wanted -- the kind of body that really gets guys' attention. And you can look that way sooner than you think!

Just a few short weeks from today you could have a body that's thinner, firmer and cuter than you ever imagined -- thanks to an awesome new discovery.

Body Maker™ helps you lose weight from every part of your body. You can have a narrower waist, thinner hips, legs and thighs, and a firmer behind -- and add shape, firmness and curves in all the right places!

No matter how many times you've tried and failed before, now the awesome new Body Maker can quickly and easily show you how to get a body that's cuter and foxier than you ever thought possible! Finally, here's something that really works!

HOW BODY MAKER WORKS

With Body Maker, you still get to eat the foods you like -- including those snacks you love so much. It's not a diet -- so there's no list of things you have to eat. No list of things you can't eat, either. But when you follow the Body Maker program, you'll end up eating less (but still enough to keep you healthy.) You just won't feel like pigging out! And pretty soon, all those extra pounds will be gone for good.

Body Maker will help you cut down on your appetite before meals and avoid over-eating -- even when you're dying to have a snack! And before you know it, you'll have a whole new set of eating habits, be thin, and stay thin -- with nothing more to buy. This is not like those diet pills you have to keep buying over and over again!

MADE ESPECIALLY FOR TEENAGE GIRLS

Body Maker was created especially for a teenage girl's body. It's the safest, healthiest way to lose weight we've ever seen. And it works! Show it to your doctor -- we're sure he'll agree!

Here's more good news. You never have to do any exercises -- and you won't need to! With Body Maker you'll just feel like being more active all the time!

IT WORKS!

Just days after you get Body Maker, you can be eating less, feeling more active, and really happy about the changes starting to take place.



"I tried your product, and it worked." -- Anna, age 16, California (That's her picture, above!)

Before you know it, you'll be going to the mall to get that cute bikini you always wished you could wear. And when you look in the mirror, you won't believe how good you look!

Can you see it? Try to imagine how gorgeous you'll look. How every part of your body can be slimmer, trimmer and cuter than you ever thought possible. Really picture it in your mind. It can happen to you!

YOU'LL FEEL GOOD ABOUT YOURSELF!

The best part is -- you'll be so proud of yourself when you find out you really can lose weight. It's not your fault you haven't lost weight -- it's those worthless diets that don't work! Now you really can make your dreams come true. Absolutely!

Your high school years are supposed to be the happiest time of your life. Make sure you don't miss out on all those special moments -- the beach, pool parties, the prom.

Sure -- once you look so good, all those guys that never noticed you before will start asking you out. But don't just do this for the guys. Do it for yourself. You

deserve it!

TRY IT FOR 30 DAYS

Body Maker has worked for thousands of girls. And we're so sure it'll work for you, too, that we want you to try it for a whole month at no risk.

Go ahead -- really use it as much as you want. Let it help you slim down, shape up and beautify your body.

Then -- if you feel you haven't changed enough -- if you don't have the awesome body you've always wanted -- just send back Body Maker and we'll give you your money back. We don't want your money unless you get the body you want!

DO IT NOW!

Here's all you've got to do. Fill out the coupon and send it in with \$12 right away. We'll send you Body Maker fast. (The package won't say who it's from or what's inside.)

So don't wait. If you put it off you might forget, and miss out on the cute body you want, and all the good times you deserve.

Do it now. You'll be so glad you did.

P.S.: Want a cute body even faster? We've put together some really easy, fun exercises that you can do in just 15 minutes a day. Use them with Body Maker for extra-fast results! They're just \$3 extra when you get Body Maker. Good deal!

Plus -- we'll even throw in a...

FREE GIFT!

You'll also get a chart to keep track of your weight loss absolutely free, just for ordering Body Maker.

Hurry up and be the first one at your school to get that cute body! Coupon gone? No problem! Just send \$12 to Body Maker, P.O. Box 727, Rockville, MD, 20848.

FREE 30-DAY TRIAL COUPON

Body Maker 12-WN
Years Mill Road
P.O. Box 727
Rockville, MD, 20848-0727

Yes! I want a totally cute body. Send me Body Maker right away! Money back guarantee. Here's:
 \$12 for Body Maker and free bonus
 \$15 for Body Maker, free bonus, and exercises

PRINT Name _____

Address _____

City _____ State _____ Zip _____

PERSONAL BODY GOALS FORM

(Answer only if you want to)

I weigh _____ pounds. I WANT to weigh _____

These are the parts of my body I want to change (Check as many as you want)

Face Arms Hips

Neck Waist Thighs

Chest Butt Legs

©1991 Body Maker

May 1991 EXHIBIT

DECISION AND ORDER

The Federal Trade Commission having initiated an investigation of certain acts and practices of the respondents named in the caption hereof, and the respondents having been furnished thereafter with a copy of a draft of complaint which the Bureau of Consumer Protection proposed to present to the Commission for its consideration and which, if issued by the Commission, would charge respondents with violation of the Federal Trade Commission Act; and

The respondents, their attorney, and counsel for the Commission having thereafter executed an agreement containing a consent order, an admission by the respondents of all the jurisdictional facts set forth in the aforesaid draft of complaint, a statement that the signing of said agreement is for settlement purposes only and does not constitute an admission by respondents that the law has been violated as alleged in such complaint, or that the facts as alleged in such complaint, other than jurisdictional facts, are true and waivers and other provisions as required by the Commission's Rules; and

The Commission having thereafter considered the matter and having determined that it had reason to believe that the respondents have violated the said Act, and that a complaint should issue stating its charges in that respect, and having thereupon accepted the executed consent agreement and placed such agreement on the public record for a period of sixty (60) days, and having duly considered the comments received, now in further conformity with the procedure prescribed in Section 2.34 of its Rules, the Commission hereby issues its complaint, makes the following jurisdictional findings and enters the following order:

1. Respondent WLAR Co. is a corporation organized, existing, and doing business under and by virtue of the laws of the State of Delaware, with its office and principal place of business located at 5622 Columbia Pike #106, in the City of Falls Church, State of Virginia.

Respondent Michael K. Craig is or was at relevant times herein the sole owner, officer, and employee of said corporation. Individually or in concert with others, he participated in and/or formulated, directed, and controlled the acts and practices of said corporation and his address is the same as that of said corporation.

2. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the respondents, and the proceeding is in the public interest.

ORDER

For purposes of this order:

1. "*Clearly and prominently*" shall mean as follows:

(a) In a television or videotape advertisement, the disclosure shall be presented simultaneously in both the audio and video portions of the advertisement. The audio disclosure shall be delivered in a volume and cadence and for a duration sufficient for an ordinary consumer to hear and comprehend it. The video disclosure shall be of a size and shade, and shall appear on the screen for a duration, sufficient for an ordinary consumer to read and comprehend it.

(b) In a print advertisement, the disclosure shall be in close proximity to the representation that triggers the disclosure and given in at least twelve (12) point type.

(c) In a radio advertisement, the disclosure shall be delivered in a volume and cadence sufficient for an ordinary consumer to hear and comprehend it.

2. "*Competent and reliable scientific evidence*" shall mean tests, analyses, research, studies, or other evidence based on the expertise of professionals in the relevant area, that has been conducted and evaluated in an objective manner by persons qualified to do so, using procedures generally accepted in the profession to yield accurate and reliable results.

3. "*Weight-loss product*" shall mean any product or program designed or used to prevent weight gain or to produce weight loss, reduction or elimination of fat, slimming, or caloric deficit in a user of the product or program.

I.

It is ordered, That respondents, WLAR Co., a corporation, its successors and assigns, and its officers; and Michael K. Craig, individually and as an officer of WLAR Co.; and respondents' agents,

representatives and employees, directly or through any partnership, corporation, subsidiary, division or other device, in connection with the manufacturing, advertising, packaging, labeling, promotion, offering for sale, sale, or distribution of Swedish 19, Swedish System, BM Program, New Shape, Body Maker, or any substantially similar product, in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, do forthwith cease and desist from representing, in any manner, directly or by implication, that:

- A. Such product is new or is a new weight-loss discovery; or
- B. Such product does not require dieting.

II.

It is further ordered, That respondents, WLAR Co., a corporation, its successors and assigns, and its officers; and Michael K. Craig, individually and as an officer of WLAR Co.; and respondents' agents, representatives and employees, directly or through any partnership, corporation, subsidiary, division or other device, in connection with the manufacturing, advertising, packaging, labeling, promotion, offering for sale, sale, or distribution of any weight-loss product, in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, do forthwith cease and desist from representing, in any manner, directly or by implication, that:

- A. Such product causes fast or easy weight loss;
- B. Such product is more effective than other products or programs in controlling appetite or causing weight loss;
- C. Purchasers of such products are successful in controlling appetite, losing weight, or reducing body fat;
- D. Such product causes users to develop a new set of eating habits, thereby reducing caloric intake and causing significant and long-term or permanent weight loss; or
- E. Such product has any effect on users' weight, body size or shape, body measurements, or appetite,

unless, at the time of making such representation, respondents possess and rely upon competent and reliable scientific evidence that substantiates the representation.

