

IN THE MATTER OF

KENT & SPIEGEL DIRECT, INC., ET AL.

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

Docket C-3769. Complaint, Sept. 18, 1997--Decision, Sept. 18, 1997

This consent order requires, among other things, the California-based infomercial company and its officers, who marketed the Abflex abdominal exerciser, to have competent and reliable evidence for future claims regarding weight loss and the benefits, efficacy or performance of such a product in promoting weight loss. In addition, the consent order requires that the testimonials in the respondents' advertisement and infomercial either represent the typical experience of users, or include disclosures of the generally expected results or that users should not expect similar results.

Appearances

For the Commission: *Kerry O'Brien* and *Jeffrey Klurfeld*.

For the respondents: *Barry J. Cutler* and *Julia A. Oas*, *McCutchen, Doyle, Brown & Enersen*, New York, N.Y. and *Arthur Herold, Webster, Chamberlain & Bean*, New York, N.Y.

COMPLAINT

The Federal Trade Commission, having reason to believe that Kent & Spiegel Direct, Inc., a corporation, and Marsha Kent and Peter Spiegel, individually and as officers of the corporation ("respondents"), have violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Kent & Spiegel Direct, Inc. is a Delaware corporation with its principal office or place of business at 6133 Bristol Parkway, Suite 150, Culver City, California.
2. Respondent Marsha Kent is an officer of the corporate respondent. Individually or in concert with others, she formulates, directs, or controls the policies, acts, or practices of the corporation, including the acts or practices alleged in this complaint. Her principal office or place of business is the same as that of Kent & Spiegel Direct, Inc.
3. Respondent Peter Spiegel is an officer of the corporate respondent. Individually or in concert with others, he formulates, directs, or controls the policies, acts, or practices of the corporation,

including the acts or practices alleged in this complaint. His principal office or place of business is the same as that of Kent & Spiegel Direct, Inc.

4. Respondents have advertised, labeled, offered for sale, sold, and distributed weight-loss and body-shaping products to the public, including the "Abflex," an abdominal exercise device.

5. 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.

6. Respondents have disseminated or have caused to be disseminated advertisements for the Abflex, including but not necessarily limited to the attached Exhibits A through E. These advertisements contain the following statements:

A. ["The Abflex Home" page (Exhibit A2)]

"Welcome to abflex YOU ARE SECONDS AWAY FROM THE ABS YOU'VE ALWAYS WANTED

WHAT CAN ABFLEX DO FOR YOU?

SEE WHY ABFLEX IS THE BEST MACHINE FOR ABS

WHO USES ABFLEX?

DON'T BELIEVE US? WATCH THIS!"

["What can Abflex do for you?" page (Exhibits A3-A4)]

"If you spend 3 minutes a day with the ABFLEX, you will have firm, tight abs.

We guarantee it.

The ABFLEX Guarantee:

If you don't lose 5 inches and 10 pounds within 30 days, you can return the ABFLEX for a full refund.

HERE'S HOW:

ABFLEX uses four basic exercises to guarantee you the maximum results:"

["See why Abflex is the best machine for abs" page (Exhibits A5-A7)]

"Q&A

How do I know ABFLEX really works?

The ABFLEX Guarantee!!!

If you don't lose 5 inches and 10 pounds within 30 days, you can return the ABFLEX for a full refund."

["Who uses Abflex" page (Exhibit A8)]

"Who uses ABFLEX?

The question is: Who DOESN'T use ABFLEX to achieve tighter firmer abs?

Join an all-star line-up of celebrities, professional athletes, fitness experts and hundreds of thousands of people across the country and discover the fast, safe way to a firm stomach, a slim waistline and a healthy back.... Besides celebrity users, there are hundreds of thousands of people-- people like you and me -- who simply want the sexiest and flattest abs possible with only 3 minutes a day of exercise. Just look at what people like you are saying about ABFLEX:

The ABFLEX Guarantee:

If you don't lose 5 inches and 10 pounds within 30 days, you can return the ABFLEX for a full refund"

["Just look at what people like you are saying about Abflex" page (Exhibit A9)]
 "ABFLEX WORKS!!
 If you don't lose 5 inches and 10 pounds within 30 days, you can return ABFLEX for a full refund."

Consumer endorser: "I Lost 12 inches"

Consumer endorser: "I Lost 6 inches in 30 Day [sic]"

[The advertisement depicts before-and-after photographs of the two consumers.]

["Don't believe us? Watch this!" page (Exhibit A10)]

"

The ABFLEX Guarantee:

If you don't lose 5 inches and 10 pounds within 30 days, you can return the ABFLEX for a full refund." (Exhibit A: Internet Advertisement).

B. "FLATTEN YOUR STOMACH IN JUST 3 MINUTES A DAY!* ABFLEX...The Fast, Easy Way to a Flat Stomach, Shapely Waistline, and a Healthy Back.

* 4 days a week if you follow the workout program."

Celebrity endorser: "I look better than I ever have! I workout less, and I eat more, all because of the Abflex."

"Home Exercise Machine That Works The Upper, Lower, & Side Abdominals With 1 SIMPLE EXERCISE!

Flatten your abs with the Abflex. Because the abdominals are non-jointed muscles, direct resistance is the way to work-out these non-jointed muscles. Abflex's patented direct resistance design zeros right in on those hard to target abdominal muscles. The result: You can have a firm flat stomach, and a slim waistline in just 3 minutes a day, 4 days a week!

The Abflex targets the abs much better than sit-ups; it doesn't strain your back like sit-ups, and you don't even have to get on the floor to use it! It's so effective, you can see dramatic results in just a few short weeks....

INCLUDED: A 1-hour LIFESTYLE FITNESS VIDEO which is like 3 great videos in 1:

1. It's an instructional tape that demonstrates your "3 minutes flat" Abflex workout. 2. It's a 20-minutes aerobics tape. 3. It's a guide to safe-back exercise. Plus, you'll receive a 250-page Abflex nutritional guide, which lists over 2000 low-fat foods, and gives you more than 90 delicious, healthy recipes.

And most importantly, you get the Abflex guarantee: If you don't lose 3 to 6 inches and 10 pounds within 30 days, simply return the Abflex for a full refund." (Exhibit B).

C. "RECOMMENDED BY ORTHOPEDIC DOCTORS TO FIRM STOMACH AND IMPROVE LOWER BACK PERFORMANCE!

ABFLEX™

The unique Abflex™ System will provide you with the most complete abdominal workout available anywhere! With an excellent step-by-step video ..., you'll perform a routine that gradually works up to ab-isolating floor crunches. For cardiovascular fitness, there's exciting low-impact aerobics Plus a sensible eating program that provides plenty of eating satisfaction. Best of all, Abflex™ flattens your stomach in just 3 minutes a day - no matter what your current fitness level!"

Includes:

* Abflex™

* Medium and Light Resistance Bands and Accessories

* 270-Page Abflex™ Lifestyle Eating Program Book

* Instructional Video" (Exhibit C).

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D. "GET A FLAT, SEXY STOMACH IN JUST 3 MINUTES A DAY!
While You Sit In A Chair or Even Watch TV!

ABFLEX®
The Fastest, Easiest,
Safest Way Ever
To Achieve:
A flat, toned stomach
A shapelier waistline
A healthier back

HERE'S THE MAGIC OF ABFLEX:

Only the ABFLEX patented direct resistance design targets all the abdominal muscles simultaneously in one easy exercise to:

- * Flatten a bulging tummy
- * Eliminate a spare tire * Trim the waistline
- * Get rid of those "love handles" at the sides of the waist with its special attachment"

Consumer endorser: "Lost 3 inches and 13 pounds in 30 Days!"

[The advertisement depicts before-and-after photographs of a consumer.] .

"DRAMATIC RESULTS IN JUST A FEW WEEKS... AND NO BACK STRAIN!

....
ALL THIS FOR JUST 3 EASY PAYMENTS OF \$19.95

The Revolutionary New ABFLEX System, plus the 1-hour ABFLEX Lifetime Fitness Instructional Video and the 250 page ABFLEX Nutritional guide which lists over 2,000 low-fat foods and gives you over 90 delicious recipes!

....
ABFLEX NO RISK GUARANTEE

If you don't lose 3 to 6 inches and 10 pounds within 30 days, simply return the ABFLEX System for a full refund of your purchase price! You have nothing to lose but your paunch!"

The advertisement contains a statement at the bottom, left-hand corner, in approximately 4-point type: "The ABFLEX System includes a low-fat diet and aerobic exercise. The results may vary." (Exhibit D).

E. "Male Narrator 1: Does your stomach look like this?

[The advertisement depicts stomachs of three obese individuals. Superscript: "Does Your Stomach Look Like This?]

In just a few minutes a day, it could look like this.

[The advertisement depicts three individuals with flat stomachs and slim waistlines.

Superscript: "It Could Look Like This."]

[Superscript: "If You Start Using This."]

If you start using this. It's the revolutionary ABFLEX ...

[Superscript: "Abflex"]

... and it's so easy to use....

[The advertisement depicts before and after photographs of a consumer.

Superscript: "Your results may vary"]

Van Allen: We're talking tummies, gang. How do we firm 'em up and slim 'em down.

Sometimes it seems hopeless, right? But today we're going to hear about a new machine called the Abflex. Well, they say it can flatten our stomachs in just a few minutes a day....

Jennilee Harrison: And let's look at the results some of these people got after just a few weeks on the Abflex System.

[The advertisement depicts before-and-after photographs of a consumer. Superscript: "Lost 13 lbs in 30 days. The Abflex program includes a low-fat diet and aerobic exercise."]

[[The advertisement depicts before-and-after photographs of a consumer. Superscript: "Lost 6 inches in 30 days. Your results may vary."]

Van Allen: Hey you guys, look at the difference.

Jennilee Harrison: And it can work for anybody. Just three minutes a day and you can flatten that tummy right up.

Van Allen: That sounds great."

Consumer endorser: "You don't even know you are doing, you don't even know you are doing your exercises. And you're doin' it the whole time and pretty soon your stomach is like a brick. And you've lost all that weight."

[Superscript: "The Abflex program includes a low-fat diet and aerobic exercise. Your results may vary."]

[[Consumer endorser: "After using the Abflex 30 days I lost two inches off my waist and I lost 13 lbs. so I went from a size 36 slacks back to a 34. Perfect."

[Superscript: "The Abflex program includes a low-fat diet and aerobic exercise. Your results may vary."]

[[Jennilee Harrison: And for us women who are trying to get rid of that pooch down here and for you guys trying to get rid of the love handles, forget it. This exercise [abdominal crunch] is useless. But, now here, this is the answer. This is the Abflex crunch

[[Jennilee Harrison: Well you can have it. Look at this woman. If you'd like to go down a few sizes, the Abflex System is the fast way to lose those inches."

[The advertisement depicts before-and-after photographs of a consumer. Superscript: "Lost 6 inches in 30 days. Best case results. Your results may vary."]

Consumer endorser: "... Well I think in about 21 days I've, I've lost about 2 inches."

[Superscript: "The ABFLEX program includes a low fat diet and aerobic exercise."]

Consumer endorser: "After 30 days I lost a full 6 inches...."

[Superscript: "Your results may vary"]

Consumer endorser: "Four and half inches I lost. I was 39 ½ and went down to 35. Boom, just like that."

Consumer endorser: "With the Abflex I have lost 5 to 6 inches within 30 days and I have seen the results and so has everybody else. It works great."

[[Announcer: ... it's so effective you can see dramatic results in just a few weeks."

[The advertisement depicts a woman demonstrating how many inches she has lost around her waist by wearing jeans, which now are too large for her around the waist. Superscript: "Dramatic Results in a Few Weeks"]

Consumer endorser: "Within, I would say, the third or fourth day that I started using it I started noticing tightening, firmness and my pants had started loosening up a little. I kept continuing using it and before I knew it I was back to a 5/6 from a 9/10. It was very dramatic."

[Superscript: "Your results may vary."]

"Announcer: ... you get the Abflex Guarantee. If you don't lose 3 to 6 inches and 10 pounds within 30 days, simply return the ABFLEX for a full refund of your purchase price. The Abflex, it's the fast way to a flat stomach, a shapely waistline, and a healthy back."

[The advertisement depicts a woman demonstrating how many inches she has lost around her waist by wearing jeans, which now are too large for her around the waist. Superscript: "Abflex GUARANTEE If you don't lose 3 to 6 inches and 10 pounds within 30 days, simply return the ABFLEX for a full refund."]

Consumer endorser: "I saw results in the first five to seven days. I could see visual results of the Abflex program. I lost about an inch to an inch-and-a-half in the waist and also lost five pounds...."

[Superscript: "Your results may vary"]

Van Allen: ... The Abflex definitely works.

Jennilee Harrison: And it can work for anyone.

[The advertisement depicts before and after photographs of a consumer. Superscript: "Lost 12 Inches. The Abflex program includes a low-fat diet and aerobic exercise."]

Jennilee Harrison: Think about how great you're going to feel when you start using the Abflex...

[The advertisement depicts before and after photographs of a consumer. Superscript: "Lost 13 lbs in 30 days. The Abflex program includes a low-fat diet and aerobic exercise."]

Jennilee Harrison: ...and you start losing those inches.

[The advertisement depicts before and after photographs of a consumer. Superscript: "Lost 6 inches in 30 days. Best case results. Your results may vary."]

Jennilee Harrison: Think about how great you're going to feel when you look terrific in your jeans again. Anybody can have a great body; the Abflex makes it easy.

Martin Van Der Hoeven: And I guarantee results. If you don't lose three to six inches and 10 pounds within 30 days, you can return the Abflex for a full refund.

Jennilee Harrison: It only takes three minutes a day to flatten your tummy....

Van Allen: We can all spare three minutes to get rid of our spare tires, It can flatten our stomachs, it can slim our waistlines," (Exhibit E).

7. Through the means described in paragraph six, respondents have represented, expressly or by implication, that:

- A. The Abflex causes fast and significant weight loss.
- B. Consumers lose at least ten pounds and five inches, or three to six inches, off their waistline within thirty days by using the Abflex for just three minutes a day.
- C. The Abflex causes weight loss and fat reduction in specific, desired areas of the body.
- D. Testimonials from consumers appearing in the advertisements for the Abflex reflect the typical or ordinary experience of members of the public who use the product.

8. Through the means described in paragraph six, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representations set forth in paragraph seven, at the time the representations were made.

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

10. 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.

300

Complaint

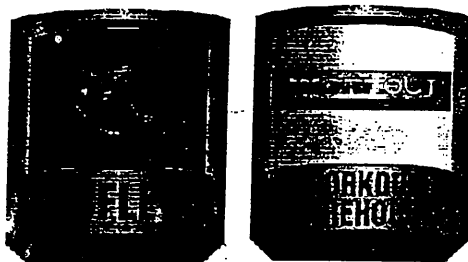
EXHIBIT A

Shopping Stores

<http://www.tvshopping.com/>

Directory

Choose Store Below



☐ If you would like more information on how to be a merchant, please e-mail Webmaster@tvshopping.com



Complaint

124 F.T.C.

EXHIBIT A

abflex Home Page

<http://www.shopping.com/abflex/>

Welcome to ABFLEX
 YOU ARE SECONDS AWAY FROM
 * THE ABS YOU'VE ALWAYS WANTED



EXHIBIT A-C

300

Complaint

EXHIBIT A

Minutes a Day

<http://tvshopping.com/abflex/page1.html>

If you spend 3 minutes a day with the ABFLEX, you will have firm, tight abs.



We guarantee it.

The ABFLEX Guarantee :

If you don't lose 5 inches and 10 pounds within 30 days, you can return the ABFLEX for a full refund.

HERE'S HOW:

ABFLEX uses four basic exercises to guarantee you the maximum results:

I. The Tummy Crunch tightens your stomach and slims your waist.



II. Advanced Pull-In offers you a progressive resistance which, combined with the floor crunch position, blasts you to the firmest possible abs.



III. The side crunch slims and strengthens the side and oblique abs.

Complaint

124 F.T.C.

EXHIBIT A

Minutes a Day

http://1.shopping.com/abflex/page1.htm



ABFLEX
Homepage

Order
Information

300

Complaint

EXHIBIT A

<http://tvshopping.com/abflex/page2.html>



EXHIBIT A-3

Complaint

124 F.T.C.

EXHIBIT A

Q & A

How do I know ABFLEX really works? ↓

The ABFLEX Guarantee!!!
If you don't lose 5 inches and 10 pounds within 30 days,
you can return the ABFLEX for a full refund.

Who needs ABFLEX? ↓

Any one who wants a sexy, flatter stomach in just 3
minutes a day. Who doesn't want to look sexier with a
better physique?

How does it compare to other equipment? ↓

If you can prove another fitness product can target the abs
better than ABFLEX you will receive a \$100,000 from ABFLEX.

How does ABFLEX work? ↓

Other than the heart, the abs are the only muscles in
your body that aren't connected to any joints. That's
why they're almost impossible to target.
The only way to target them is with direct resistance.
Most people have never really worked their abs in their
entire life until they've used the ABFLEX.

What about sit-ups and crunches? ↓

With sit-ups, you're bending the hip joint so you're
working the hip flexor muscles, but you're hardly
working the abs at all. Worst of all, 90% of the
stress goes right to your lower back. Doctors will tell
you sit ups do more harm than good.
And crunches only work the upper abs - not the lower abs
or the sides. Therefore, to flatten the bulge or the love
handles, it is useless to do crunches.

What is the ABFLEX made of? How much does it weigh? ↓

ABFLEX is made of sturdy plastic and weighs approximately
5 pounds.

EXHIBIT A-6

300

Complaint

EXHIBIT A

Is ABFLEX built to last? ↓

ABFLEX is guaranteed for one year on parts...but it is built so tough it should last well past 5 years!

Will ABFLEX work my arms? ↓

ABFLEX is a terrific all around upper body workout. In addition to giving you rock hard abs, ABFLEX will help tone your biceps, lats and pectoral muscles.

EXHIBIT A-F

Complaint

124 F.T.C.

EXHIBIT A

no uses ABFLEX

<http://tvsnopping.com/abflex/page1.htm>**Who uses ABFLEX?**

The question is: **Who DOESN'T** use **ABFLEX** to achieve tighter firmer abs?

Join an all-star line-up of celebrities, professional athletes, fitness experts and hundreds of thousands of people across the country and discover the fast, safe way to a firm stomach, a slim waistline and a healthy back. **ABFLEX** is used by thousands every day to give them a real advantage in their exercise program.

You may have seen our recent nationally aired TV show showing the benefits of **ABFLEX**. The show is hosted by two devoted users of **ABFLEX**: Television star Jennilee Harrison (the costar of Dallas and Three's Company) and Martin Van Der Hoeven, the inventor of **ABFLEX**.

In fact, Jennilee believes in the results she has gotten so much she has become the spokesperson for the company.



Martin van Der Hoeven the inventor of **ABFLEX** developed his drum tight abdomen in only two months using the **ABFLEX** System.

Besides celebrity users, there are hundreds of thousands of people— people like you and me — who simply want the sexiest and flattest abs possible with only 3 minutes a day of exercise. Just look at what people like you are saying about **ABFLEX**.

To get abs in 3 minutes that you can only usually get in 45 minutes, order your own **ABFLEX** today. (radio button that clicks the user to the order page)

The **ABFLEX Guarantee :**

If you don't lose 5 inches and 10 pounds within 30 days, you can return the **ABFLEX** for a full refund



EXHIBIT A-3

300

Complaint

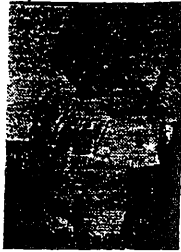
EXHIBIT A

ABFLEX Works!!

<http://tvshopping.com/abflex/people.html>

ABFLEX WORKS!!

If you don't lose 5 inches and 10 pounds within 30 days, you can return ABFLEX for a full refund.



"I Lost 12 inches "



See What and Hear What People Are Saying
About the ABFLEX!!

- Customer 1—[Qtime.Avi](#)
- Customer 2—[Qtime.Avi](#)
- Customer 3—[Qtime.Avi](#)



"I Lost 6 inches in 30 Day"



[ABFLEX
Homepage](#)

[Order
Information](#)

Complaint

124 F.T.C.

EXHIBIT A

...y smashed on a users stomach. Unbelievable!!! <http://tvshopping.com/abflex/page3.htm>

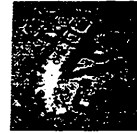
Click here [Quicktime .Avi](#) to see a loyal *ABFLEX* customer have an actual cinder block smashed on his stomach with a sledge hammer. It will make a believer of you!

The ABFLEX Guarantee :

If you don't lose 5 inches and 10 pounds within 30 days, you can return the *ABFLEX* for a full refund.



ABFLEX
Homepage



Order
Information

300

Complaint

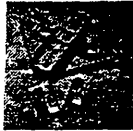
EXHIBIT A

ABFLEX Order Information

<http://tvshopping.com/abflex/purchase.html>

ABFLEX
THE FASTEST, EASIEST,
SAFEST WAY EVER
TO ACHIEVE:

- A flat, toned stomach
- A shaplier waistline
- A healthier back



The Complete
ABFLEX SYSTEM

ALL THIS FOR JUST 3 EASY PAYMENTS OF

\$19.99

The revolutionary new ABFLEX System plus the 1-hour ABFLEX LIFETIME Fitness Instructional Video and the 250-page ABFLEX Nutritional Guide which lists over 2,000 low-fat foods and gives you over 90 delicious recipes!

Call 800-293-7100 to order NOW

MAIL CHECK

PURCHASE ONLINE



EXHIBIT A-11

Complaint

124 F.T.C.

EXHIBIT A

Mail Order Form

<http://www.shopping.com/abflex/mail.html>

Check Orders

I prefer to send the full amount now. Enclose \$59.85 plus \$7.95 S&H. Total \$67.80.

I want to target my side abs for faster trimmer waistline. Please add your special attachment and instructional video. Enclose a total of \$30.70

TX res. add 8%, CA res. add 8.25% sales tax. Check Money Order

Print

Name
Address Apt#
City State Zip

Mail to: ABFLEX, Box 6015, Culver City, CA 90233

ABFLEX
Homepage

EXHIBIT A-11

300

Complaint

EXHIBIT A

Abflex Order Form

<http://www.shopping.com/abflex/order.html>

ABFLEX ORDER FORM TO ORDER ON-LINE

On-Line Credit Card Orders

YES! Please rush my ABFLEX with a no-risk money-back guarantee!

Charge my credit card for 3 easy payments of only \$19.95 each plus \$7.95 S&H (4-6 wk delivery)

Charge my credit card for full amount of \$59.85 plus \$7.95 S&H and *receive free express handling* (2 week delivery)

I want to target my side abs for a faster trimmer waistline, please add your special attachment and instructional video. Charge my credit card an additional \$9.95 plus \$2.95 S&H.

Martin VanDerHoeven, the inventor of the Abflex, would like you to try *for free* an incredible new all natural weight loss product. A recent scientific study showed that the regular use of this quick slimming formula safely produced a greater level of weight loss, reduced appetite, fewer cravings for sweets and increased energy. Martin will send you a 30-day supply *free* for two weeks. If you choose to keep SlimQuick, your accounts will be charged \$14.95 plus \$2.95 shipping and handling. So that you never run out, a new bottle will be sent approximately every four weeks and, of course you keep only the bottles you want. Check this paragraph to add to your order.

First Name:
Last Name:

Address: Apt:

City: State:
Zip:

Daytime Telephone:
Evening Telephone:

Email Address:

Credit Card: American Express Visa Mastercard

EXHIBIT A-11

Complaint

124 F.T.C.

EXHIBIT A

Abflex Order Form

<http://www.shipping.com/abflex/order.html>

Card Number:

Expiration Date:



300

Complaint

EXHIBIT A

Abflex Order Form

http://tvshopping.com/abflex_order.html

ABFLEX ORDER FORM TO ORDER ON-LINE

On-Line Credit Card Orders

YES! Please rush my ABFLEX with a no-risk money-back guarantee!

Charge my credit card for 3 easy payments of only \$19.95 each plus \$7.95 S&H (4-6 wk delivery)

Charge my credit card for full amount of \$59.85 plus \$7.95 S&H and receive free express handling (2 week delivery)

I want to target my side abs for a faster trimmer waistline, please add your special attachment and instructional video. Charge my credit card an additional \$9.95 plus \$2.95 S&H.

Martin VanDerHoeven, the inventor of the Abflex, would like you to try *for free* an incredible new all natural weight loss product. A recent scientific study showed that the regular use of this quick slimming formula safely produced a greater level of weight loss, reduced appetite, fewer cravings for sweets and increased energy. Martin will send you a 30-day supply *free for two weeks*. If you choose to keep SlimQuick, your accounts will be charged \$14.95 plus \$2.95 shipping and handling. So that you never run out, a new bottle will be sent approximately every four weeks and, of course you keep only the bottles you want. Check this paragraph to add to your order.

First Name:

Last Name:

Address: Apt:

City: State:

Zip:

Daytime Telephone:

Evening Telephone:

Email Address:

Credit Card: American Express Visa Mastercard

EXHIBIT A-15

Complaint

124 F.T.C.

EXHIBIT A

Abiflex Order Form

<http://www.shopping.com/abiflex/order.html>

Card Number:

Expiration Date:



300

Complaint

EXHIBIT B

Shell credit card syndication July, 1995

Montgomery Ward November, 1985
Amoco November, 1995

FLATTEN YOUR STOMACH
— IN JUST 3 MINUTES A DAY! —

FABFLEX...The Fast, Easy Way to a Flat Stomach, Shapely Waistline, and a Healthy Back
4 days a week if you follow the workout program.

FREE 21-Day Home Trial

BUSINESS REPLY MAIL
FIRST CLASS MAIL PERMIT NO. 609 ELMHURST, IL

POSTAGE WILL BE PAID BY ADDRESSEE

SHELL MERCHANDISE CENTER
489 W FULLERTON AVE
ELMHURST IL 60126-9484

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

100% SATISFACTION GUARANTEED
-FREE FOR 21 DAYS-NO OBLIGATION TO BUY-

Item Name #	Description	Qty. Available	Single Payment	Shipping & Handling
899	Anti-Elastic Exercise Equipment	10 Months	\$19.99	\$1.95

THE FINANCE CHARGE and applicable taxes on your Shell account. (See MERCHANDISE TERMS CARD for details.) Shell reserves the right to change payment terms at any time. If this applies to your order, you will receive a separate letter. Shell reserves the right to change payment terms at any time.

Only Shell items are eligible for this program. This program is subject to credit review. There is no obligation to buy. If you are unable to pay your Shell account within 6 months after you buy, you will be charged a late fee of \$10.00 per month. This program allows you to buy with complete peace of mind and confidence. This loan program allows you to buy with complete peace of mind and confidence. This loan program allows you to buy with complete peace of mind and confidence.

Send no money. Your Shell account will be billed. By Shell account number is: (First 9 digits)

PLEASE PRINT NAME AS SHOWN ON MONTHLY STATEMENT

NAME _____

STREET NUMBER _____ STREET NAME _____ APT. NO. _____

CITY _____ STATE _____ ZIP _____

Signature of person placing order. (Must be signed to be valid.)

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RECOMMENDED BY ORTHOPEDIC DOCTORS TO FIRM STOMACH AND IMPROVE LOWER BACK PERFORMANCE!

ABFLEX™

The unique Abflex™ System will provide you with the most complete home abdominal workout available anywhere! With an excellent step-by-step video hosted by actress Jenilee Harrison, you'll perform a routine that gradually works you up to ab-isolating floor crunches. For cardiovascular fitness, there's exciting low-impact aerobics led by aerobics champion Ken Rosenthal. Plus a sensible eating program that provides plenty of eating satisfaction. Best of all, Abflex™ flattens your stomach in just 3 minutes a day - no matter what your current fitness level!

Includes:

- Abflex™
- Medium and Light Resistance Bands and Accessories
- 270-Page Abflex™ Lifestyle Eating Program Book
- Instructional Video

Measures 29" x 19" x 4"

Slice! Dice! Shred! Grate! Chop!
This hand-held "food processor" does it all!

SUPER SLICER™

There's no counter-top mess or tedious hand-cutting with this nifty multi-grater! A complete food preparation system, the Super Slicer™ has 5 interchangeable stainless steel blades that allow you to grate, chop, shred, slice and much more - easily and uniformly. There's even a rotary dial that lets you adjust the thickness of the slice with just a twist of your wrist! Designed with safety in mind, the Super Slicer™ is a must for every kitchen!

8-Piece Set includes:

- Spiral Cutter
- V-Knife
- Orange Squeezer
- Slicer
- Waffle Cutter
- Grater
- Instruction Manual
- Safety Holder

Measures 13-7/8" x 2" x 4-7/8"
Disassembles for easy cleaning; top rack dishwasher safe.
*Slices, dices, shreds, grates & chops in seconds and more!

Rotary dial lets you adjust thickness with the twist of your wrist!

Safety holder prevents accidents!

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01/25/91

