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Attorneys for Plaintiff FEDERAL TRADE COMMISSION

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

CATLIN ENTERPRISES, INC., and GEORGE CATLIN, individually and as Chief Executive Officer of Catlin Enterprises, Inc.,

Defendants.

Case No. 1:17-cv-403

COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF

Plaintiff, the Federal Trade Commission ("FTC"), for its Complaint alleges:

1. The FTC brings this action under Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), to obtain permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other equitable relief for Defendants' acts or practices in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52, in connection with the labeling, advertising,

marketing, distribution, and sale of Withdrawal Ease and Recovery Ease, products marketed to treat opiate withdrawal symptoms and help persons overcome opiate dependency.

JURISDICTION AND VENUE

- 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a) and 53(b).
- 3. Venue is proper in this district under 28 U.S.C. § 1391(b)(1), (b)(2), (c)(1), (c)(2), and (d), and 15 U.S.C. § 53(b).

PLAINTIFF

- 4. The FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces Section 12 of the FTC Act, 15 U.S.C. § 52, which prohibits false advertisements for food, drugs, devices, services, or cosmetics in or affecting commerce.
- 5. The FTC is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and to secure such equitable relief as may be appropriate in each case, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies. 15 U.S.C. §§ 53(b).

DEFENDANTS

6. Defendant Catlin Enterprises, Inc., is a Utah corporation with its principal office or place of business in Austin, Texas. Catlin Enterprises transacts or has transacted business in this district and throughout the United States. At all times material to this Complaint, acting

alone or in concert with others, Catlin Enterprises has labeled, advertised, marketed, or sold Withdrawal Ease and Recovery Ease to consumers throughout the United States.

Catlin Enterprises. Defendant Catlin manages the day-to-day activities of the company. He formulated the Withdrawal Ease and Recovery Ease products and participated in developing the opiate withdrawal and dependency advertising representations challenged in this Complaint.

Among other things, he controls or controlled all the representations appearing on the www.withdrawal-ease.com website. Defendant Catlin has signatory authority on corporate bank accounts and credit cards and has signed corporate tax returns. At all times material to this Complaint, acting alone or in concert with others, Defendant Catlin has formulated, directed, controlled, had the authority to control, or participated in the acts and practices of Catlin Enterprises, including the acts and practices set forth in this Complaint. Defendant Catlin resides in this district and, in connection with the matters alleged herein, transacts or has transacted business in this district and throughout the United States.

COMMERCE

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

DEFENDANTS' BUSINESS ACTIVITIES

9. Defendants have marketed both Withdrawal Ease and Recovery Ease to opiate-dependent people in two formulations: Daytime Formula and Nighttime Formula.
Both Withdrawal Ease and Recovery Ease Daytime Formulas are comprised of combinations of

vitamins and minerals, and what product labeling identifies as "proprietary blends" of herbs and other compounds. The Nighttime Formulas of both products are made up of different "proprietary blends" and do not contain vitamins and minerals.

- 10. Defendants market Withdrawal Ease and Recovery Ease primarily from the website at www.withdrawal-ease.com and sell the products directly from that site.
- 11. To induce consumers to purchase Withdrawal Ease and Recovery Ease,

 Defendants have disseminated or have caused to be disseminated advertisements for the

 products, including, but not limited to, the attached Exhibits A and B. These advertisements

 contain the following statements and depictions, among others:

Excerpts from www.withdrawal-ease.com (attached as Exhibit A)

o The Leader in Home Opiate Detox Since 2009

Withdrawal Ease has helped tens of thousands of people take their first step towards getting their lives back. If you or someone you love is suffering from the debilitating physical symptoms of opiate withdrawal, it can help you too.

"Don't wait until tomorrow. Take your first step today."

(November 17, 2015)

 Withdrawal Ease specifically targets the common symptoms of opiate withdrawal and opiate detox.

How does Withdrawal Ease work? The following content describes in detail why certain ingredients were included in the Withdrawal Ease system and the corresponding symptoms that they help relieve. It is also a powerful detox that can help restore normal organ function and cleanse the body of toxins and free-radicals. We have even provided some excerpts to relevant clinical study abstracts listed with the NIH (National Institutes of Health) when we cite the efficacy of a certain ingredient. It's our hope that you come away from this with a strong understanding of how Withdrawal Ease does what it says it does.

The Brain

The brain is where many of your withdrawal symptoms originate. Withdrawal-Ease targets specific brain functions in order to help "reboot" your brain's natural chemical balance and function.

Symptoms and Solutions

Symptom: Depression

Withdrawal Ease Solution: Lemon Balm, L-Tyrosine

Symptom: Anxiety and Irratibility

Withdrawal Ease Solution: Passionflower, Valerian

Symptom: Lethargy or Lack of Energy

Withdrawal Ease Solution: L-Tyrosine, Magnesium, Ginseng, and Zinc

Symptom: Insomnia

Withdrawal Ease Solution: Melatonin, Valerian Root, Passionflower

Symptom: Headache

Withdrawal Ease Solution: Peppermint, Cayenne, Alpha Lipoic Acid

Symptom: Lack of Appetite

Withdrawal Ease Solution: Ginger, Ginseng

Proof of Efficacy: How Do We Know it Can Help?

Clinical Study Abstracts from The National Institutes of Health (NIH)

- Passionflower: "Can Be As Effective In The Treatment of Opiate Withdrawal As Traditional Care [Clonidine and Benzos]"
- Melatonin: "Can Be An Effective Sleeping Aid"
- Valerian: "Can Help Insomnia and Lead To More Restful Sleep"

The Internal Organs

It's no surprise that opiate addiction and consequent withdrawal wreak havoc on many of the vital internal organs in your body. Withdrawal-Ease is engineered to provide a comprehensive detox to rid the body of toxins and free-radicals as well as help treat many of the withdrawal symptoms that originate in the Digestive System, Liver and Musculature.

Symptoms and Solutions

Symptom: Nausea, Diarrhea and Indigestion

Withdrawal Ease Solutions:

— Nausea: Ginger, Peppermint, Lemon Balm

— Diarrhea: Iron, Ginger, Cayenne

— Irritable Bowel/Indigestion: Lemon Balm,

Passionflower, Peppermint

Symptom: Liver Toxicity/Restoring Liver Function

Withdrawal Ease Solution: Milk Thistle, Reduced Glutathione, Methionine,

Tumeric [sic]

Symptom: Elevated Heart Rate

Withdrawal Ease Solution: Lemon Balm, Magnesium

Symptom: Muscle Aches and Pains

Withdrawal Ease Solution: Cayenne, Alpha Lipoic Acid

Proof of Efficacy: How Do We Know It Can Help?

Clinical Study Abstracts From The National Institutes of Health (NIH)

- <u>Milk Thistle:</u> A Powerful Liver Detoxifier
- Tumeric [sic] (Curcumin): An Anti-Inflammatory Tool For The Digestive System
- Peppermint: "An Effective Natural Aid For Abdominal Distress"
- Ginger: "Can Reduce Nausea and Help Increase Appetite"

. . .

The Withdrawal-Ease Opiate Withdrawal Natural Supplement System employs ingredients that have been proven efficacious under rigorous clinical trials. There is no other product like the Withdrawal-Ease System on the market today; it's the most effective and advanced natural treatment for opiate withdrawal and detox that you can buy.

Due to the overwhelmingly positive customer testimonials and robust clinical evidence, I strongly believe that Withdrawal-Ease along with our Opiate Withdrawal Survival Guide can help you reduce the discomfort of your opiate withdrawal symptoms. Being more comfortable during your withdrawal will significantly increase your chances for a successful detox.

(September 23, 2015)

o All-Natural Treatment for Opiate Withdrawal Relief

A more comfortable and affordable way to detox at home

The Withdrawal Ease Nutritional Supplement System® has been specifically engineered to reduce opiate withdrawal symptoms. It's a proprietary blend of 16 vitamins, amino acids and herbs that would cost over \$300 for a month's supply if bought separately. The System includes two custom formulations — Daytime and Nighttime, in capsule form.

Withdrawal Ease customers have reported a significant decrease in the intensity their withdrawal symptoms after using [sic] system and following the instructions in our Opiate Withdrawal Survival Guide.

The Benefits:

• **Designed Specifically for Opiate Withdrawals and Detox:** A nutraceutical formulation specifically engineered for opiate painkiller withdrawals.

...

Can Help Both Acute and Post Acute Withdrawal Symptoms (PAWS):
 Can be taken for opiate and partial-agonist opiate withdrawals due to
 Suboxone (Buprenorphine) and Subutex treatments.

. . .

The Daytime Formulation Is Designed for:

- Flu-like symptoms
- Anxiety
- Depression
- Lack of energy
- Shakiness
- Gastrointestinal issues such as nausea and diarrhea
- Pain (muscle aches and pains)
- Loss of appetite

Daytime Formulation dose: 2 capsules in the morning with food

The Nighttime Formulation Is Designed for:

Insomnia

- Anxiety
- Restless Leg Syndrome (RLS)
- Gastrointestinal issues

Nighttime Formulation dose: 2 Capsules Before Bed

(September 23, 2015)

O What is Withdrawal Ease and how do you take it?

Withdrawal Ease is a nutritional supplement that is specifically engineered for acute opiate withdrawal. The system includes daytime and nighttime formulations, both uniquely formulated to help relieve withdrawal symptoms either during the day and [sic] at night. Each formulation comes in capsule form and contains a month's supply (60 capsules in each bottle). The system also includes our 65 page Opiate Withdrawal Survival Guide which provides education, strategies, a tapering guide, daily detox planner and much more. To learn more about the fundamental aspects of The Withdrawal Ease Program and how the product works within the program, please read the following article: "How To Detox From Opiates"

(September 23, 2015)

- "After seeing the results from the people who have used the Withdrawal Ease System and researching the active ingredients, I now recommend and prescribe the Withdrawal Ease System to patients for help in combating the physical and mental symptoms of withdrawal from opiates."
 - Dr. Brian Earthman, MD. [sic] Psychiatrist
 Addictionologist and Board Certified by The American Society of Addiction
 Medicine
 (ASAM)

(June 7, 2016)

o "I would like to say Thank You for this wonderful product! I abused Vicodin on and off for about 2+ yrs. I went cold turkey a few times and wow, that was horrid. I ordered this product and after 3 days my life begin to get back on track in every aspect possible, love life, depression, anxiety...pretty much everything...This product didn't cure all symptoms at once but made it easier to deal with them one hr at a time. I feel great today; just walked 3 miles and only have small aches that are equivalent to

o working out like I used to before opiates took my freedom.....People this is an awesome product but you really have to want to quit for your own well being."

-Kevin R.

(June 7, 2016)

o "Thank you, for your great product. I was going through pretty severe Oxycontin withdrawal when I went cold turkey 3 days ago. I searched around on the web and came across your product. I ordered it yesterday rush and got it 2 hours ago. About an hour later, I felt soooo much better! I was hesitant that there was really a natural product that could help me through this difficult time, but any doubts I had have been put to rest. It's amazing how much more energy I have with little to no discomfort. I will recommend your product to everyone, as I have some friends that are pretty heavy into Oxycontin that need help too. You also have my permission to use this as a testimonial if you wish. I can safely say that buying your product was the best decision I've made in my life since starting taking Oxycontin 3 years ago (as their hasn't been many good ones within that span)."

-Daryl G.

(June 7, 2016)

o "My job entails a lot of heavy lifting: 100 lbs and up and a lot of driving which during my Vicodin withdrawals I got tired but I have to say that this product helped me greatly and I was able to get through it. I know when I was on Vicodin I changed. I was short tempered and had loss of memory, but now I'm doing so much better. I got my life back which is priceless. I hope this helps someone [take the first step]."

-Jason L.

(June 7, 2016)

o "NOW....you are NOT going to believe this. I hardly had any withdrawals at all!!!!!!! It almost scares me b/c I think maybe the withdrawals haven't started yet. I kept waiting for the other shoe to drop, but it didn't! Today is Day 5 from my last Hydrocodone!!!!! No, I'm not in a good mood...but I'm not kickin' the cat around the house either! And I'm not sick."

-Cathy C.

(June 7, 2016)

o Hello G,

"I am writing you a follow up to let you know that I am still free of Vicodin. I never thought it would happen as easily as it did. . I even called a facility in Fla to go to, but tried your product first. Your Withdrawal-Ease is a LOT less money!

I just wanted to thank you once again and if I can ever help you out by talking with a customer, write to me.

By the way, it has been a couple of months for me [off the vicodin] and I'll never go back..."

Joanne L.

(June 7, 2016)

 You've worked hard to get your life back.
 Maintain a healthy mind, body and spirit with Recovery Ease.

What is Recovery Ease and how can it help long-term recovery from opiate dependency?

Sometimes the hardest part about breaking a dependency to opiates is maintaining your recovery. The Post Acute Withdrawal Symptoms (PAWS) can feel as challenging as the original withdrawal symptoms. That's why we created Recovery Ease — the only all-natural, daily supplement system designed for optimal health and function on your road to recovery from opiate dependency.

The Top 5 Benefits of Recovery Ease

Recovery Ease is a balanced blend of bio-available herbal extracts, vitamins, minerals and amino acids specifically formulated to help detoxify and restore organ function from prolonged opiate use.

- 1. The Recovery Ease Daytime formulation can help ease prolonged withdrawal symptoms caused by Post Acute Withdrawal Syndrome (PAWS) such as: Lethargy, Depression, Irritability, Loss of Focus, Shakiness, Restless Leg Syndrome, Anxiety and Loss of Appetite
- 2. The Recovery Ease Nighttime formulation contains additional amino acids, herbs and vitamins designed to help you with insomnia that often accompanies post acute withdrawal. It's an all-natural sleep aid that's effective and non-addictive.

. .

"Many of our customers continue to use Withdrawal Ease after their detox to help them maintain optimal health, and reduce their Post Acute Withdrawal Symptoms. These customers asked for an affordable option specifically optimized for their long-term needs after opiate detox. The Recovery Ease SystemTM is our solution."

−George C.

(June 7, 2016)

VIOLATIONS OF THE FTC ACT

- 12. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits "unfair or deceptive acts or practices in or affecting commerce."
- 13. Misrepresentations or deceptive omissions of material fact constitute deceptive acts or practices prohibited by Section 5(a) of the FTC Act.
- 14. Section 12 of the FTC Act, 15 U.S.C. § 52, prohibits the dissemination of any false advertisement in or affecting commerce for the purpose of inducing, or which is likely to induce, the purchase of food, drugs, devices, services, or cosmetics. For the purposes of Section 12 of the FTC Act, Defendants' Withdrawal Ease and Recovery Ease products are either "foods" or "drugs" as defined in Section 15(b) and (c) of the FTC Act, 15 U.S.C. § 55(b), (c).

FALSE OR UNSUBSTANTIATED EFFICACY CLAIMS

COUNT I

- 15. Through the means described in Paragraph 11, Defendants have represented, directly or indirectly, expressly or by implication, that Withdrawal Ease:
 - A. Significantly alleviates the symptoms of opiate withdrawal; and
 - B. Significantly increases the likelihood of a person overcoming opiate dependency.

- 16. The representations set forth in Paragraph 15, above, are false or misleading or were not substantiated at the time the representations were made.
- 17. Therefore, the making of the representations as set forth in Paragraph 15, above, constitutes a deceptive act or practice, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

COUNT II

- 18. Through the means described in Paragraph 11, Defendants have represented, directly or indirectly, expressly or by implication, that Recovery Ease significantly alleviates Post Acute Withdrawal Symptoms.
- 19. The representation set forth in Paragraph 18, above, is false or misleading or was not substantiated at the time the representation was made.
- 20. Therefore, the making of the representation as set forth in Paragraph 18, above, constitutes a deceptive act or practice, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

FALSE ESTABLISHMENT CLAIM

COUNT III

- 21. Through the means described in Paragraph 11, Defendants have represented, expressly or by implication, that clinical studies show that Withdrawal Ease significantly alleviates the symptoms of opiate withdrawal.
- 22. In truth and in fact, clinical studies do not show that Withdrawal Ease significantly alleviates the symptoms of opiate withdrawal.

23. Therefore, the representation set forth in Paragraph 21, above, is false or misleading, and constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

CONSUMER INJURY

24. Consumers have suffered and will continue to suffer substantial injury as a result of Defendants' violations of the FTC Act. In addition, Defendants have been unjustly enriched as a result of their unlawful acts or practices. Absent injunctive relief by this Court, Defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

THIS COURT'S POWER TO GRANT RELIEF

25. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt and redress violations of any provision of law enforced by the FTC. The Court, in the exercise of its equitable jurisdiction, may award ancillary relief, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies, to prevent and remedy any violation of any provision of law enforced by the FTC.

PRAYER FOR RELIEF

- 26. Wherefore, Plaintiff FTC, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and the Court's own equitable powers, requests that the Court:
 - A. Enter a permanent injunction to prevent future violations of the FTC Act by Defendants;

- B. Award such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the FTC Act, including, but not limited to, rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies; and
- C. Award Plaintiff the costs of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper.

Respectfully submitted,

DAVID C. SHONKA Acting General Counsel

Dated: May 3, 2017

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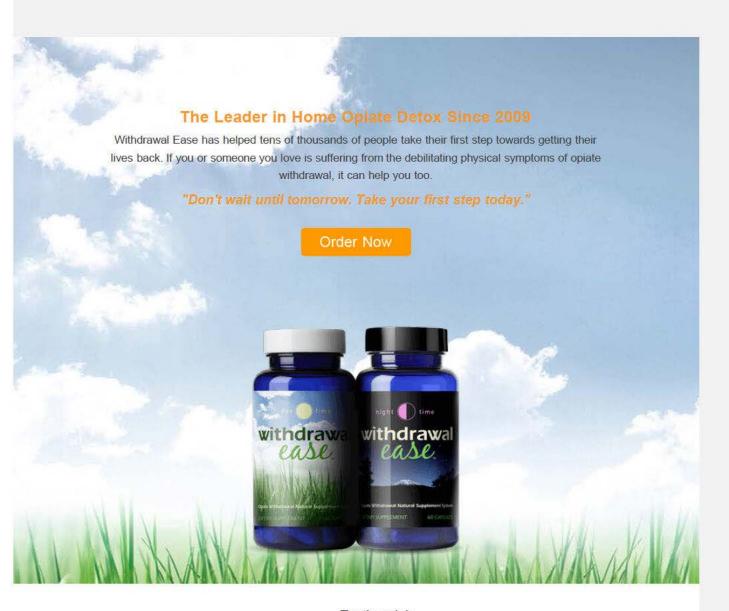
Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

EXHIBIT A

Order by phone: Mon - Fri 9am-5pm Central Time: 888-732-6684

ORDER NOW





Testimonials

"...your product and help truly transformed me back to the person I used to be — and I was a good person — and am finally back to that person..."

The personal stories from some of the thousands of people Withdrawal Ease has helped to take their first step towards beating their op dependency.

Read more

The Withdrawal Ease Story

George Catlin, founder of Withdrawal Ease, talks about the opiate painkiller crisis, and how Withdrawal Ease can help.

Promotion: Free Chill Towel



FREE Withdrawal Ease Chill Towel With Every Order!

Withdrawal Ease maintains a 98% customer approval rating and an A+ rating from the Better Business Bureau.

Complete system includes <u>Daytime & Nighttime Formulas</u>, <u>Opiate Withdrawal</u>
<u>Survival Guide</u> and free Priority Shipping. Only \$89.95.

Order Now

From George:

Why Withdrawal Ease?

Withdrawal Ease has been providing relief for those suffering from opiate withdrawal since 2009. Fast forward to 2015 and we are still #1 home remedy for opiate withdrawal. Read more about our commitment to earning your trust and helping you get your happiness ba from opiates.

Read more

Essential Reading

Proven Home Remedies For Opiate Withdrawal

Are you are one of the thousands right now dreading opiate withdrawal and feeling as though you have no choice but to sit back and g out? Well I have good news for you; there are proven home remedies for opiate withdrawal that can help. These strategies ...

Read more Survival Guide

The Opiate Withdrawal Survival Guide.

The Opiate Withdrawal Survival Guide: Now with over 65-pages of essential information. Withdrawal Ease has researched out to eve corner ...

Read more











Many websites display 3rd party endorsement logos. Ours actually mean something. Find out more.

Company Profile

Hi, my name is George and I would I ke to welcome you to Withdrawal-Ease.com. Before starting Withdrawal Ease I was a small business owner and partner in health care marketing company. I decided to create Withdrawal Ease due to my own personal experience with prescription painking and to help the millions of people out there suffering from ...

Read more

Recent Posts

- > How to Detox From Suboxone at Home
- > Ready For Takeoff!
- > In Withdrawal? Love The Pain!
- > Proven Home Remedies for Opiate Withdrawal
- ▶ The Top Ten Reasons To Stop Taking Opiates

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Contact

Feel free to reach out to us with any questions or concerns. Your health and safety are our number one priority.

Contact us now

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Table of Contents [show]

Withdrawal Ease specifically targets the common symptoms of opiate withdrawal and opiate detox.

How does Withdrawal Ease work? The following content describes in detail why certain ingredients were included in the Withdrawal Ease System and the corresponding symptoms that they help relieve. It is also a powerful detox that can help restore normal organ function and cleanse the body of toxins and free-radicals. We have even provided some excerpts to relevant clinical study abstracts listed with the NIH (National Institutes of Health) when we cite the efficacy of a certain ingredient. It's our hope that you come away from this with a strong understanding of how Withdrawal Ease does what it says it does.

The Brain

The brain is where many of your withdrawal symptoms originate. Withdrawal-Ease targets specific brain functions in order to help "reboot" your brain's natural chemical balance and function.



Symptoms & Solutions

Symptom: Depression

Withdrawal Ease Solution: Lemon Balm, L-Tyrosine

Symptom: Anxiety and Irritability

Withdrawal Ease Solution: Passionflower, Valerian,

Symptom: Lethargy or Lack of Energy

Withdrawal Ease Solution: L-Tyrosine, Magnesium, Ginseng and Zinc

Symptom: Insomnia

Withdrawal Ease Solution: Melatonin, Valerian Root, Passionflower

Symptom: Headache

Withdrawal-Ease Solution: Peppermint, Cayenne, Alpha Lipoic Acid

Symptom: Lack of Appetite

Withdrawal-Ease Solution: Ginger, Ginseng

Proof of Efficacy: How Do We Know It Can Help?

Clinical Study Abstracts From The National Institutes of Health (NIH)

- Passionflower: "Can Be As Effective In The Treatment of Opiate Withdrawal As Traditional Care [Clonidine and Benzos]"
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It's no surprise that opiate addiction and consequent withdrawal wreak havoc on many of the vital internal organs in your body. Withdrawal-Ease is engineered to provide a comprehensive detox to rid the body of toxins and free-radicals as well as help treat many of the withdrawal symptoms that originate in the Digestive System,

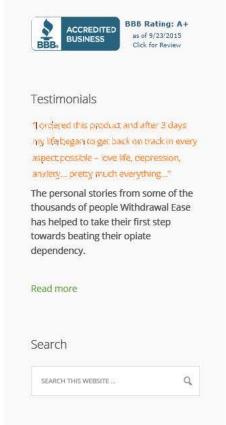
Liver and Musculature.

Related Pages

- > How to Detox From Opiates at Home
- > Top Ten Reasons To Quit Opiates
- > The Art of Opiate Tapering

Complete system includes Daytime &
Nighttime Formulas, Opiate Withdrawal
Survival Guide and free Priority
Shipping, Only \$89.95.

Order Now



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Symptoms & Solutions

Symptom: Nausea, Diarrhea and Indigestion

Withdrawal Ease Solutions:

- Nausea: Ginger, Peppermint, Lemon Balm
- Diarrhea: Iron, Ginger, Cayenne
- Irritable Bowel/Indigestion: Lemon Balm,

Passionflower, Peppermint

Symptom: Liver Toxicity/Restoring Liver Function

Withdrawal Ease Solution: Milk Thistle, Reduced Glutathione, Methionine, Tumeric

Symptom: Elevated Heart Rate

Withdrawal Ease Solution: Lemon Balm, Magnesium

Symptom: Muscle Aches and Pains

Withdrawal Ease Solution: Cayenne, Alpha Lipoic Acid

Proof of Efficacy: How Do We Know It Can Help?

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- Milk Thistle: A Powerful Liver Detoxifier
- Tumeric (Curcumin): An Anti-Inflammatory Tool For The Digestive System
- Peppermint: "An Effective Natural Aid For Abdominal Distress"
- Ginger: "Can Reduce Nausea and Help Increase Appetite"

The Central Nervous System

The Central Nervous System is "Ground Zero" for opiate withdrawal. Although the brain is a part of the Central Nervous System, it's important to note that much of the science and formulation behind Withdrawal-Ease was dedicated to restoring normal Sympathetic Nervous System Function.



Symptoms & Solutions

Symptom: Restless Leg Syndrome

Withdrawal-Ease Solution: Valerian, Gaba, Mucuna

Prurein

Symptom: Dizziness/"Fuzzy Brain"

Withdrawal-Ease Solution: Alpha Lipoic Acid,

Pomegranate, L-Tyrosine

Symptom: Muscle Twitches or Tics

Withdrawal-Ease Solution: Gaba, Mucuna Prureins

Symptom: Shakiness in Extremities

Withdrawal-Ease Solution: Methionine, Valerian

Symptom: Decreased Dopamine & Serotonin production (Reward Center/Pleasure

Pathway)

Withdrawal-Ease Solution: Mucuna Prureins, Gaba, L-Tyrosine, Magnesium

Proof of Efficacy: How Do We Know It Can Help?

Clinical Study Abstracts From The National Institutes of Health (NIH)

- Valerian Root: "Valerian Could Help Restless Legs Syndrome and Muscle Twitches"
- <u>Mucuna Prureins:</u> "Can Help Restore Norepinephrine, Dopamine and Serotonin Levels in The Brain"

"The Withdrawal-Ease Opiate Withdrawal Natural Supplement System employs ingredients that have been proven efficacious under rigorous clinical trials. There is no other product like the Withdrawal-Ease System on the market today; it's the most effective and advanced natural treatment for opiate withdrawal and detox that you can buy.

Due to the overwhelmingly positive customer testimonials and robust clinical evidence, I strongly believe that Withdrawal-Ease along with our Opiate Withdrawal Survival Guide

can help you reduce the discomfort of your opiate withdrawal symptoms. Being more comfortable during your withdrawal will significantly increase your chances for a successful detox.

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Don't go through opiate withdrawal alone; if Withdrawal-Ease can reduce the discomfort of your symptoms and make them more tolerable isn't it worth it? I can promise you one thing; you're far better off with Withdrawal-Ease than you are without it!"

Ity Co

-George Catlin Founder, CEO

Withdrawal-Ease











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All-Natural Treatment for Opiate Withdrawal Relief

A more comfortable and affordable way to detox at home



The Withdrawal Ease Nutritional Supplement System® has been specifically engineered to reduce opiate withdrawal symptoms. It's a proprietary blend of 16 vitamins, amino acids and herbs that would cost over \$300 for a month's supply if bought separately. The System includes two custom formulations — Daytime and Nighttime, in capsule form.

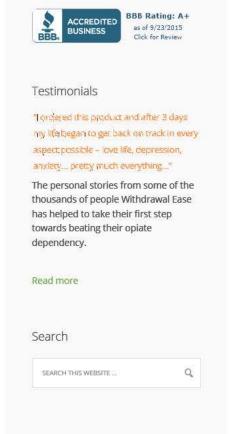
Withdrawal Ease customers have reported a significant decrease in the intensity of their withdrawal symptoms after using system and following the instructions in our Opiate Withdrawal Survival Guide.

The Benefits:

- Designed Specifically for Opiate Withdrawals and Detox: A nutraceutical formulation specifically engineered for opiate painkiller withdrawals.
- Affordable: Less expensive than costly pharmaceutical, rehab and inpatient detox options.
 - Average cost for 30 day in-patient rehab = \$30,000
 - Average cost of hospital in-patient detox = \$5,000
 - Average monthly cost of Suboxone = \$300 (w/insurance!) \$1,200 (without insurance gulp)
- A Powerful Detox and Liver Recovery Therapy: Contains essential amino acids, vitamins and herbs to help cleanse the body of toxins and restore proper liver function.
- It's Easy: You can detox in the comfort and privacy of your own home.
- All Natural: Formulated using the highest quality natural and certified organic ingredients.
- Highest Quality: Manufactured by a GMP (Good Manufacturing Practices) approved facility that employs FDA certified manufacturing and quality control procedures.
- Can Help Both Acute and Post Acute Withdrawal Symptoms (PAWS): Can be taken for opiate and partial-agonist opiate withdrawals due to Suboxone (Buprenorphine) and Subutex treatments
- Each Order Includes a Month's Supply of Daytime and Nighttime
 Formulations: Plenty of each formulation for pre-detox tapering, the acute phase of withdrawal, and any lingering symptoms after detox.
- The Opiate Withdrawal Survival Guide: This essential, 65-page guide on opiate withdrawal will guide you through the detox process and provide everything you need to know to reduce your discomfort and help you get your happiness back!

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The Daytime Formulation Is Designed for:

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- Flu-like symptoms
- Anxiety
- Depression
- Lack of energy
- Shakiness
- Gastrointestinal issues such as nausea and diarrhea
- Pain (muscle aches and pains)
- Loss of appetite

Daytime Formulation dose: 2 capsules in the morning with food



The Nighttime Formulation Is Designed for:

- Insomnia
- Anxiety
- Restless Leg Syndrome (RLS)
- Gastrointestinal issues

Nighttime Formulation dose: 2 Capsules Before Bed











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Questions (FAQ's)

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Take a moment to read over our most frequently asked questions (FAQ's). Can't find the question you're looking for? Just email us at info@withdrawalease.com

What is Withdrawal Ease and how do you take it?

Withdrawal Ease is a nutritional supplement that is specifically engineered for acute opiate withdrawal. The system includes daytime and nighttime formulations, both uniquely formulated to help relieve withdrawal symptoms either during the day and at night. Each formulation comes in capsule form and contains a month's supply (60 capsules in each bottle). The system also includes our 65 page Opiate Withdrawal Survival Guide which provides education, strategies, a tapering guide, daily detox planner and much more. To learn more about the fundamental aspects of The Withdrawal Ease Program and how the product works within the program, please read the following article: "How To Detox From Opiates"

Is Withdrawal Ease safe?

Withdrawal Ease has been formulated using the highest quality ingredients and best practices in dosage and drug interaction prevention. All of the ingredients used have been classified by the FDA as ingredients that are regarded as safe. If you have any serious medical conditions, or are pregnant or nursing, please consult your doctor before use.

How Do I know that Withdrawal Ease is made properly with safe ingredients?

Withdrawal Ease is manufactured by one of the largest vitamin and nutritional supplement companies in the US. Our manufacturing facilities are FDA certified "GMP" (Good Manufacturing Processes) which assures that every step they take during the manufacturing and packaging process is safe, sterile and of the highest quality. All natural ingredients are certified organic. We never use ingredients that contain metals. To learn about the ingredients, click this link.

Who should take Withdrawal Ease?

Withdrawal Ease is meant for people who are detoxing off of opiates and would like to reduce the acuity (severity) of their symptoms. Along with the Withdrawal Survival Guide, Withdrawal Ease can help reduce the discomfort associated with the acute and post-acute phase of opiate withdrawal.

When should I begin to take Withdrawal Ease?

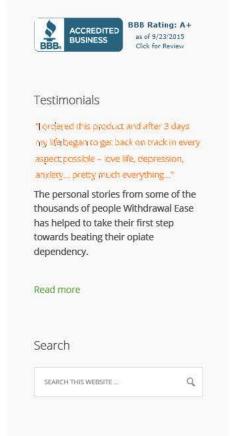
You can start taking Withdrawal Ease at any time during your detox. However, we recommend that you begin taking Withdrawal Ease as part of a tapering regimen about 5-7 days before completing your taper. In other words, if you taper down your

dose of Vicodin over a period of 2 weeks, we would recommend that you begin taking Withdrawal Ease at the beginning of the second week of your taper along

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> The Art of Opiate Tapering

Complete system includes Daytime &
Nighttime Formulas, Opiate Withdrawal
Survival Guide and free Priority
Shipping, Only \$89.95.
Order Now



https://withdrawal-ease.com/faqs/







Summer Promotion! Free NUUN® Hydration Tabs With Every Order





Customer Testimonials & Reviews

Withdrawal Ease Customers Offer Their Reviews and Personal Success Stories

"Will Withdrawal Ease Work For Me?" This is (by far) the most common question we receive; and rightly so! We can't think of a better way to answer this very question than to share the personal stories from some of the many people who Withdrawal Ease has helped take their first step towards beating opiate dependency.

The "first step" as I refer to it, is the detox and withdrawal process. Of course, we cannot cure opiate addiction or dependence but we can help you get started. As you read these success stories, I hope you recognize that many of these folks have also used our Withdrawal Survival Guide. By properly tapering and following the instructions in the Survival Guide, you are giving yourself a better chance to feel more comfortable as you complete the detox process.

-George



"After seeing the results from the people who have used the Withdrawal Ease System and researching the active ingredients, I now recommend and prescribe the Withdrawal Ease System to patients for help in combating the physical and mental symptoms of withdrawal from opiates."

- Dr. Brian Earthman, MD. Psychiatrist Addictionologist and Board Certified by The American Society of Addiction Medicine (ASAM)



"I would like to say Thank You for this wonderful product! I abused Vicodin on and off for about 2+ yrs. I went cold turkey a few times and wow, that was horrid. I ordered this product and after 3 days my life begin to get back on track in every aspect possible, love life, depression, anxiety...pretty much everything...This product didn't cure all symptoms at once but made it easier to deal with them one hr at a time. I feel great today; just walked 3 miles and only have small aches that are equivalent to working out like I used to before opiates took my freedom.....People this is an awesome product but you really have to want to quit for your own well being."

-Kevin R.



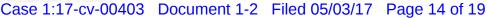
"I am a healthcare professional (39 years) and am very impressed with your product. Your product has been an answer to prayer. I exercised very poor judgment in my own life, but I'm making good progress in turning things around...again and for the last time. I won't hesitate to suggest your product to others."

-William K., MD



"Thank you, for your great product. I was going through pretty severe Oxycontin withdrawal when I went cold turkey 3 days ago. I searched around on the web and came across your product. I ordered it yesterday rush and got it 2 hours ago. About an hour later, I felt soooo much better! I was hesitant that there was really a natural product that could help me through this difficult time, but any doubts I had have been put to rest. It's amazing how much more energy I have with little to no discomfort. I will recommend your product to everyone, as I have some friends that are pretty heavy into Oxycontin that need help too. You also have my permission to use this as a testimonial if you wish. I can safely say that buying your product was the best decision I've made in my life since starting taking Oxycontin 3 years ago (as their hasn't been many good ones within that span)."

-Daryl G.





"George , You have my full permission and I would be honored if you would use any of my emails as testimonials. I feel very strong about how helpful your product is. While I was in the deep crud, your emails made me feel like I wasn't doing it alone. When you're getting off Oxycodone and in withdrawal, time stands still, a minute feels like an hour, with that said, your product changed my [withdrawals] from impossible to tolerable. The night time formula worked great for helping me get what rest I needed. I know I'm starting to go on and on, but I cant help it. I have gained control over my life again and I owe a big part of it to a man named George. I think you came up with a product a lot of people need. I can only hope to help others like you did with me. Life is too precious to live imprisoned by opiates! THANKS AGAIN your friend... Andros."

Andros M.



"Our worse night was the night before we got the product. IT was BAD! He did not sleep. After he started taking the product he did sleep...overall he has been resting well. He seems to want to eat at night. The pain is not as bad as I thought it was going to be, he says it's tolerable. Overall. I think it was a blessing to have gotten the Withdrawal-Ease. I do think it has made a huge difference with his withdrawal and detox [from Vicodin]! The combo of herbs seem to really work well together and you are right, if we purchased them separately it would be way too expensive!"

-Jen W. (Re: Her Husband's Vicodin Withdrawal)



"My job entails a lot of heavy lifting: 100 lbs and up and a lot of driving which during my Vicodin withdrawals I got tired but I have to say that this product helped me greatly and I was able to get through it. I know when I was on Vicodin I changed. I was short tempered and had loss of memory, but now I'm doing so much better. I got my life back which is priceless. I hope this helps someone [take the first step]."

-Jason L.



"Yes that's totally fine to use my testimonial. I would like other people to read it and to realize how much Withdrawal-Ease really does help and that Suboxone is just another

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drug in my eyes."

-Spencer K.



"My wife keeps telling me all the little things she is noticing now that I'm off the Percocet. I actually talk to her again, my eyes aren't red and little slits and she said even my tone of voice sounds different. These are just a few things that have changed for the better for me. Once again Thank YOU! I cant put into words what you've helped me through. Finding your website as like God sending me an angel THANK YOU AND GOD BLESS YOU! I will never forget this turning point in my life and especially you treating me with dignity and genuine concern."

-Adrian G.



I just wanted to say thank you and that Withdrawal-Ease has helped tremendously with Suboxone withdrawal. I used Suboxone on the street to stop taking street methadone and oxycontin then got addicted to Suboxone but with Withdrawal-Ease and your Survival Guide I'm on day 10 without subs and feel much better!

Thank you George and Dr. Earthman.

-Peter S.



"NOW....you are NOT going to believe this. I hardly had any withdrawals at all!!!!!!!! It almost scares me b/c I think maybe the withdrawals haven't started yet.

I kept waiting for the other shoe to drop, but it didn't! Today is Day 5 from my last Hydrocodone!!!!! No, I'm not in a good mood...but I'm not kickin' the cat around the house either! And I'm not sick."

-Cathy C.



66 "I am finishing up day 11 of my program and doing very well. I started weaning myself off the same day I ordered my [Withdrawal-Ease]. No problems what so ever. Thanks to all who gave me the tools to end my addiction. The guide was most helpful as well..."

-Bruce C.



"He said the (Withdrawal-Ease) pills are helping him a lot and I am so happy about that. Thanks so much for caring."

-Kelli J. (Re: Her Husband's Vicodin Withdrawal)



"I am writing you a follow up to let you know that I am still free of Vicodin. I never thought it would happen as easily as it did. . I even called a facility in Fla to go to, but tried your product first. Your Withdrawal-Ease is a LOT less money!

I just wanted to thank you once again and if I can ever help you out by talking with a customer, write to me.

By the way, it has been a couple of months for me [off the vicodin] and I'll never go back..."

Joanne L.



"Thank you for your product. I am on day five of Hydrocodone withdrawal and I feel great besides the occasional belly ache and some depression. The (last) time I quit I had two miserable weeks. This time was close to a breeze. My doctor had me on two Lorcet 10/500 for a slipped disc, and two bulging discs, but I was taking twice that much or more some days. I am thirty years old, and glad to have my life back. My energy is [good] enough that I will go back to work today. With your product, and my wife and parent's support, I am doing great. Thanks Again!"

withdrawal ease





Summer Promotion! Free NUUN® Hydration Tabs With Every Order





Recovery Ease

You've worked hard to get your life back. Maintain a healthy mind, body and spirit with Recovery Ease.

What is Recovery Ease and how can it help long-term recovery from opiate dependency?



Sometimes the hardest part about breaking a dependency to opiates is maintaining your recovery. The Post Acute Withdrawal Symptoms (PAWS) can feel as challenging as the original withdrawal symptoms. That's why we created Recovery Ease — the only all-natural, daily supplement system designed for optimal health and function on your road to recovery from opiate dependency.

The Top 5 Benefits of Recovery Ease

Recovery Ease is a balanced blend of bio-available herbal extracts, vitamins, minerals and amino acids specifically formulated to help detoxify and restore organ function from prolonged opiate use.

1. The Recovery Ease Daytime formulation can help ease prolonged withdrawal symptoms caused by

Case 1:17-cv-00403 Document 1-2 Filed 05/03/17 Page 18 of 19 Post Acute Withdrawal Syndrome (PAWS) such as: Lethargy, Depression, Irritability, Loss of Focus, Shakiness, Restless Leg Syndrome, Anxiety and Loss of Appetite

- The Recovery Ease Nighttime formulation contains additional amino acids, herbs and vitamins designed to help you with insomnia that often accompanies post acute withdrawal. It's an allnatural sleep aid that's effective and non-addictive.
- Recovery Ease contains the highest quality ingredients that are certified GMP (Good Manufacturing Processes) by the FDA.
- 4. Recovery Ease is priced at only \$69.95 for a 30-day supply, which makes it more affordable than Withdrawal Ease and volume pricing is available.
- The Recovery Ease System helps address the unique needs of those in recovery from opiate dependency for lifelong health. (see ingredients)

Complete System Only \$69.95

Price Includes Priority Mail Shipping

Click Here To Order



"Many of our customers continue to use Withdrawal Ease after their detox to help them maintain optimal health, and reduce their Post Acute Withdrawal Symptoms. These customers asked for an affordable option specifically optimized for their long-term needs after opiate detox. The Recovery Ease System™ is our solution."

–George C.

Complete system includes Daytime & Nighttime Formulations, *The Withdrawal Survival Guide* and Free Priority Shipping. Only \$89.95.

Order Now



For Orders by 3pm CST Mon-Fri



For All Orders over \$50



Mon-Fri 9-5: (888) 732-6684



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