

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES**

In the Matter of

**HEALTH RESEARCH LABORATORIES, LLC,
a limited liability company,**

**WHOLE BODY SUPPLEMENTS, LLC,
a limited liability company, and**

**KRAMER DUHON,
individually and as an officer of
HEALTH RESEARCH LABORATORIES, LLC
and WHOLE BODY SUPPLEMENTS, LLC.**

DOCKET NO. 9397

**COMPLAINT COUNSEL'S OPPOSITION TO
MOTION TO AMEND ANSWER AND CROSS MOTION TO AMEND COMPLAINT**

Through a new motion attempting to plead “no contest” to portions of the Complaint, Respondents now seek—for a second time—to terminate this case on terms they dictate, and without unequivocally admitting all material allegations. However, exactly as their last attempt exceeded what the Rules permit, *see* No. 6006007 (Feb. 1, 2021) (denying motion), Respondents’ second try violates Rule 3.12(b)(2)’s requirement that they unequivocally admit that “**all**” material facts in the Complaint are “true.” (Emphasis added.) Additionally, Respondents continue to assert affirmative defenses disputing facts and the Commission’s ability to issue relief—although Rule 3.12(b)(2) does not authorize affirmative defenses. Because Respondents’ proposed partial *nolo contendere* amendment challenges several material facts and preserves the right to challenge others later, their motion must be denied.

However, even if their motion could be granted, which it cannot, conditions would have to be imposed because litigation would continue concerning Respondents’ remaining affirmative defenses, the scope of relief, and potential findings (which Respondents reserve the right to propose). First, Complaint Counsel should be permitted to submit an amended Complaint with additional detail relevant to these issues. Second, Respondents’ ambiguous proposed

amendment obscures which alleged facts they allegedly no longer contest. To avoid unnecessary litigation concerning what (if anything) Respondents have conceded, they must be ordered to resubmit their Answer, responding to the Complaint's allegations specifically, paragraph-by-paragraph. Third, the ALJ should permit discovery concerning any remaining factual issues; it is unfair to allow Respondents to propose findings of fact while disallowing discovery on those same facts.

Separately, regardless of the resolution of Respondents' motion, Complaint Counsel's cross-motion to amend the Complaint should be granted. *See* CCX-A. The amendment will facilitate a determination on the merits because it provides greater notice. *See* Rule 3.15(a)(1). However, because the amendment adds only details, not new theories, counts or defendants, it falls "reasonably within the scope of the original complaint[.]" *Id.* Therefore, this tribunal can grant the motion without certifying it to the Commission. *See id.* Furthermore, because Respondents have not served any discovery, the proposed amendment is not unduly prejudicial.

BACKGROUND

To dodge discovery likely to reveal that Respondents knew they lacked substantiation for disease claims they aggressively made to consumers in poor health, Respondents sought to impose a "contested stipulated cease-and-desist" order on Complaint Counsel. *See* Order, No. 6006007. After the ALJ denied Respondents' "novel" request made without "any case or other precedent," *id.* at 3, Respondents moved to amend their answer, ostensibly to admit certain unspecified allegations while maintaining or obfuscating their position concerning others. Notably, Respondents motion emphasizes that they are simply "elect[ing] not to contest" allegations rather than admitting their truth. Motion at 2; *see also id.* (discussing their "election to not contest"); *id.* at 3 (Respondents have "elected not to contest" allegations).

Respondents also underscore their "concern that this election to not contest the allegations may be misconstrued" as, they imply, a genuine admission to the allegations. *See id.* at 2. Respondents then provide reasons for their decision not to contest certain allegations—

none of which admit the truth of the allegations. Instead, Respondents complain they cannot contest the facts in the Complaint for various reasons including that administrative litigation is not “fair, impartial, or constitutional.”¹ *Id.* at 3. Respondents also purport to lack “resources to continue this fight,” thereby implying that, with greater resources, they could disprove the Complaint’s allegations. *Id.* Finally, Respondents cite “additional material reasons” for their attempted “no contest” plea, but they “cannot disclose those reasons at this time” because they concern their “former legal counsel,” *id.* at 4, whom Respondents have repeatedly identified to Complaint Counsel as responsible for the claims their advertising makes.

Respondents’ motion attaches a proposed Answer that (incorrectly) asserts that Respondents admit the Complaint’s material allegations, but tellingly does not specify which allegations they consider material. Furthermore, Respondents assert affirmative defenses that challenge or preserve the right to challenge facts critical to the Complaint:

- The proposed Answer contends the case is moot because, purportedly, “all alleged conduct (*i.e.*, marketing and advertising) referenced in the Complaint ceased more than a year prior to the filing of the Complaint and will not recur in the future.” Proposed Answer at 2. Thus, the Answer contests important factual allegations necessary to maintain this action. *See id.* (“[T]he FTC Act does not grant the FTC the authority to seek a cease and desist order under these [factual] circumstances.”).
- Although the Complaint alleges—as it must under 15 U.S.C. § 45—that this action is “in the public interest,” *see* Complaint at 1, Respondents’ proposed Answer contends that the matter is “not in the public interest,” Proposed Answer at 2. Of course, the FTC cannot maintain an action not “in the public interest.” *See id.* at 2 (disputing that the action is “in the public interest,” which is “required”).
- The proposed Answer asserts that administrative hearings are unconstitutional and unlawful for many reasons. In this regard, the Answer preserves Respondents’ ability to challenge any admissions or no-contest positions both on appeal in this matter, *see* 15 U.S.C. § 45(c), and in any subsequent case under Section 19, 15 U.S.C. § 57b(a)(2).

¹ Contrary to Respondents’ accusations, respondents prevail when Complaint Counsel fails to prove its case. *See, e.g., McWane, Inc.*, No. 9351, 2014 WL 556261, *1-*2 (Jan. 30, 2014) (dismissing six of seven counts, including two on which the ALJ found liability); *Benco Dental*, No. 9379 (Oct. 15, 2019) (ALJ finding that Complaint Counsel failed to prove case against one respondent; Complaint Counsel did not appeal).

As discussed below, the absence of unequivocal admissions to material facts makes Respondents' motion insufficient under 16 C.F.R. § 3.12(b)(2).²

LEGAL STANDARDS

Unlike Federal Rule 15, “which requires that leave to amend be freely granted, FTC Rule 3.15(a) provides that ‘appropriate’ amendments ‘may’ be allowed, upon such conditions as will avoid prejudice to the parties and the public interest, if the amendments will facilitate a determination on the merits.” *Daniel Chapter One*, 2009 WL 871702, *2 (Mar. 9, 2009) (quoting 16 C.F.R. § 3.15(a)(1)). Answers may contain affirmative defenses if the respondent contests the Complainant's allegations. *See* Rule 3.12(b)(1)(i). However, Rule 3.12(b)(2) concerns circumstances in which the “allegations of complaint are admitted,” and contains no provision permitting defenses.

Regarding Complaint Counsel's proposed amendment, the ALJ may allow amendments that will facilitate this matter's determination and are “reasonably within the scope of the original complaint.[.]” 16 C.F.R. § 3.15(a)(1). Amendments that do not add new legal theories are “reasonably within the scope[.]” *See, e.g., Century 21 Commodore Plaza*, 89 F.T.C. 238, *1 (1977) (amendments permissible if they “clarif[y] allegations of the complaint or add[.] examples of practices already alleged”) (citation omitted); *Capitol Records Distrib. Corp.*, 58 F.T.C. 1170, *3 (1961) (amendments likely appropriate when they “relate only to details” and do not “cover any new or different practices”).

² Additionally, on February 23, Respondents filed a “corrected” meet-and-confer compliance certificate that effectively concedes they failed to meet-and-confer. Specifically, at 1:20 PM on Friday, February 12, before President's Day weekend, Respondents asked to confer about this motion. CCX-B. Complaint Counsel offered to confer immediately after the holiday—on the next business day—but Respondents filed on February 12 anyway. *See id.* Respondents subsequently offered to confer about their already-filed motion, but counsel must certify that he has *already* conferred *before* filing. *See* Rule 3.22(g) (counsel must represent that she “has conferred”); Scheduling Order ¶ 4 (same).

ARGUMENT

I. Respondents' Motion Should Be Denied or, Alternatively, Granted Conditionally.

A. Respondents Have Improperly Asserted Affirmative Defenses Rather Than Unequivocally Admitting All Material Facts.

1. Respondents Improperly Assert Affirmative Defenses.

Rule 3.12(b) only permits respondents to assert affirmative defenses if the “allegations of complaint are contested.” *See* 16 C.F.R. § 3.12(b)(1) (permitting affirmative defenses); *id.* at § 3.12(b)(2) (making no provision for defenses). Because the proposed Answer asserts defenses that Rule 3.12(b)(2) does not authorize, the Respondents’ motion must be denied.

2. Respondents Deny Material Facts.

Respondents have not satisfied Rule 3.12(b)(2)’s requirement that the answer admit “all of the material allegations [in the Complaint] to be true” because their affirmative defenses challenge at least two critical facts. First, Respondents deny that this action “is in the public interest,” Proposed Answer at 2—a jurisdictional fact. *See* 15 U.S.C. § 45. Second, as noted above, Respondents contend that this matter is moot. *See* Proposed Answer at 2. Alleged mootness is always material because the Commission cannot order any relief if the matter is truly moot, *see, e.g., TRW, Inc. v. FTC*, 647 F.2d 942, 954 (9th Cir. 1981), and mootness is a fact question, *see, e.g., South Carolina State Bd. of Dentistry*, No. 9311, 2004 WL 1814165, *18 (July 28, 2004) (“The issue of whether this case is moot raises a question of disputed fact[.]”). Accordingly, Respondents have not admitted all material facts.

3. Respondents Have Not Unequivocally Admitted That the Complaint’s Allegations Are True.

Rule 3.12(b)(2) requires judicial admissions, or declarations “for the purpose of dispensing with proof of formal matters or of facts about which there is no real dispute.” *U.S. Energy Corp. v. Nukem, Inc.*, 400 F.3d 822, 833 n.4 (10th Cir. 2005); *see also Heritage Bank v. Redcom Labs.*, 250 F.3d 319, 329 (5th Cir. 2001) (defining the elements of a judicial admission generally consistent with Rule 3.12(b)(2)’s requirements, including that the admission

concern “facts essential to the theory of recovery” and upon “which a judgment for the opposing party can be based”). Importantly, such admissions must be unequivocal. *See, e.g., In re Teleglobe Commc 'ns Corp.*, 493 F.3d 345, 377 (3d Cir. 2007) (citation omitted) (“[A]dmissions must be unequivocal.”); *Meehancombs Glob. Credit v. Caesars Entm't Corp.*, 162 F. Supp. 3d 200, 212 (S.D.N.Y. 2015) (statement not a judicial admission when not “unequivocal[]” in part because party also made contrary statements). However, the proposed Answer’s constitutional and statutory affirmative defenses preserve Respondents’ ability to challenge factual findings based on the Complaint that they nominally suggest they no longer contest. Opting not to contest facts now while preserving the ability to challenge them later is not an admission at all, let alone an “unequivocal” one. Furthermore, Respondents accompany their proposed Answer with a brief “explain[ing]” their admissions in a manner that suggests their nominal admissions are insincere. *See Motion*, at 2. Because Respondents’ strategic *nolo contendere* approach admits nothing unequivocally, the ALJ should deny their motion for this reason as well.

B. Alternatively, the ALJ Should Impose Conditions on Respondents’ Amendment.

1. Complaint Counsel Should Also Receive Leave To Amend.

If Respondents were permitted to amend, which the law does not allow, Complaint Counsel should be allowed to amend as well. *See* 16 C.F.R. § 3.15(a)(1) (ALJ may impose conditions). Importantly, Respondents reserve their right to submit proposed findings of fact and law—and, as explained above, Respondents assert affirmative defenses. Thus, if Respondents are allowed to amend, considerable litigation regarding potential findings and relief remains. *Cf. Mutual Constr.*, 87 F.T.C. 621, *10 (1976) (after respondent stipulated that complaint’s allegations were true, the issue of “the scope of the remedy” remained). Complaint Counsel’s amendment contains additional factual allegations and detail relevant to the remaining factual disputes—the public interest at issue, alleged mootness, and the scope of relief. *See CCX-A*. In short, because these factual issues remain if Respondents’ motion is granted, Complaint Counsel should be permitted to amend the Complaint to address these issues.

2. Respondents Should Be Required To Identify Which Allegations They Admit.

Because Respondents' proposed Answer states only that Respondents no longer contest "material" facts without answering the Complaint paragraph-by-paragraph, it is impossible to determine which allegations Respondents no longer contest. This, in turn, will complicate the continuing litigation over proposed findings and the scope of relief as the parties inevitably dispute whether Respondents have admitted particular facts. Accordingly, if Respondents were allowed to amend, such permission must be conditioned on Respondents resubmitting a proposed Answer specifying which facts they no longer contest.

3. Discovery Should Be Permitted Regarding the Remaining Issues.

Finally, Complaint Counsel must be granted discovery concerning all remaining issues (public interest, alleged mootness, scope of relief). As discussed above, it is unclear which facts Respondents no longer contest, and Respondents intend to propose findings of fact. As Complaint Counsel's pending motions to compel make clear, Respondents have stone-walled discovery. It is impractical and unfair to permit Respondents to propose findings concerning remaining issues without affording Complaint Counsel the opportunity to take discovery on the subjects those findings address. Such a position essentially allows any Respondent to block discovery and cross examination, while continuing to contest the facts alleged. Accordingly, the ALJ should permit discovery to continue concerning all remaining issues.

II. The ALJ Should Grant Complaint Counsel Leave To Amend.

Regardless of how the ALJ resolves Respondents' pending motion, the parties will litigate the public interest at stake, alleged mootness, and the scope of relief—including facts that support the broad relief Complaint Counsel seeks. Accordingly, Complaint Counsel seeks leave to file an Amended Complaint, which adds factual allegations related to these issues. *See* CCX-A. These new allegations derive substantially from information (albeit limited) that Respondents have disclosed within the past month. CCX-B. Importantly, the amendment will "facilitate a determination on the merits," *see* Rule 3.15(a)(1), by providing greater notice regarding what

Complaint Counsel will prove.³ Additionally, the amendment falls “within the scope of the original complaint,” *id.*, because it only adds details, not new theories or practices, *see, e.g., Century 21*, 89 F.T.C. 238 at *1, *Capitol Records*, 58 F.T.C. 1170 at *3.

Notably, Respondents have served no discovery to Complaint Counsel or third parties, CCX-B, and more than nine weeks remain before fact discovery closes. *See, e.g., Nat’l Rifle Ass’n v. Cuomo*, 480 F. Supp.3d 404, 413 (N.D.N.Y. 2020) (no undue prejudice where “the cross-motion to amend has been made . . . approximately three months after the filing of the original complaint and before discovery has commenced”); *Fulk v. Hartford Life Ins.*, 839 F. Supp. 1181, 1184 (M.D.N.C. 1993) (no prejudice where “motion to amend was filed before discovery had begun and plaintiff [was] not alleging any new causes of action”).⁴ Because Respondents have not served discovery and ample time remains to do so, and because the amendment adds no new theories, there is no undue prejudice to Respondents.

Conclusion

For all the aforementioned reasons, the ALJ should deny Respondents’ motion and grant Complaint Counsel’s cross-motion.

³ Additionally, the amendment adds facts related to the scope of relief. As Complaint Counsel has already informed Respondents, Complaint Counsel will seek to ban Respondents from the supplement industry.

⁴ The fact that Respondents have already moved to terminate this matter (on terms they dictate) is immaterial to whether the proposed amendments are unduly prejudicial—they are not. *See, e.g., Miramontes v. Mills*, No. 11-cv-8604, 2015 WL 13609449, *10 (C.D. Cal. May 18, 2015) (fact that motion to amend followed motion for summary judgment “does not weigh against granting leave to amend”).

Respectfully submitted,

s/ Jonathan Cohen

Elizabeth J. Averill

Jonathan Cohen

Federal Trade Commission

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Complaint Counsel

CERTIFICATE OF COMPLIANCE

Pursuant to Paragraph 4 of the ALJ's December 14, 2020 Scheduling Order, the undersigned counsel represents that he and co-counsel Elizabeth Averill met and conferred on February 23, 2021 with Respondents' counsel, Joel Reese, in a good faith effort to seek Respondents' agreement to the proposed Amended Complaint.

s/ Jonathan Cohen

Jonathan Cohen

Federal Trade Commission

600 Pennsylvania Ave, NW, CC-9528

Washington, DC 20580

CERTIFICATE OF SERVICE

I certify that I served a copy of Complaint Counsel's Opposition and Cross-Motion on counsel for the Respondents on February 24, 2021 via electronic mail.

Joel Reese
Joshua Russ
Reese Marketos LLP
750 N. Saint Paul St., Suite 600
Dallas, TX 75201
Joel.reese@rm-firm.com
Josh.russ@rm-firm.com

I also served one electronic copy via the Administrative E-Filing System and one electronic courtesy copy to the **Office of the Secretary** via email to ElectronicFilings@ftc.gov.

I served one electronic courtesy copy via email to the **Office of the Administrative Law Judge:**

The Honorable D. Michael Chappell
Administrative Law Judge
600 Pennsylvania Ave, N.W., Room H-110
Washington, DC 20580

s/ Jonathan Cohen
Jonathan Cohen
Federal Trade Commission
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Washington, DC 20580
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**HEALTH RESEARCH LABORATORIES, LLC,
a limited liability company,**

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**KRAMER DUHON,
individually and as an officer of
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and WHOLE BODY SUPPLEMENTS, LLC.**

DOCKET NO. 9397

**[PROPOSED] ORDER GRANTING COMPLAINT COUNSEL'S
CROSS-MOTION TO AMEND THE COMPLAINT**

This matter having come before the Chief Administrative Law Judge on February 24, 2021, upon Complaint Counsel's Cross-Motion To Amend the Complaint, it is hereby

ORDERED that:

1. The Motion is **GRANTED**; and
2. Complaint Counsel's proposed Amended Complaint is accepted.

ORDERED:

Date:

D. Michael Chappell
Chief Administrative Law Judge

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COMPLAINT COUNSEL'S EXHIBIT A (CCX-A)

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Rebecca Kelly Slaughter, Acting Chair**
 Noah Joshua Phillips
 Rohit Chopra
 Christine S. Wilson

In the Matter of

**HEALTH RESEARCH LABORATORIES, LLC,
a limited liability company,**

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DOCKET NO. 9397

COMPLAINT

The Federal Trade Commission, having reason to believe that Health Research Laboratories (“HRL”), a limited liability company, Whole Body Supplements (“WBS”), a limited liability company, and Kramer Duhon, individually and as an owner and officer of HRL and WBS (collectively, “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 HRL is a Nevada limited liability company with its principal office or place of business at 16250 Knoll Trail Drive, Dallas, TX 75248.
2. Respondent WBS is a Nevada limited liability company with its principal office or place of business at 16250 Knoll Trail Drive, Dallas, TX 75248.
3. Respondent Kramer Duhon is the Chief Operating Officer and managing member of HRL and the Chief Operating Officer and managing member of WBS. Individually or in concert with others, he controlled or had the authority to control the acts and practices of HRL and WBS, including the acts and practices alleged in this complaint. His principal office or place of business is 16250 Knoll Trail Drive, Dallas, TX 75248.

4. The FTC and Respondents HRL and Kramer Duhon signed a Stipulated Final Judgment and Order (“Order”) entered by U.S. District Judge Jon D. Levy on January 16, 2018 in *FTC and State of Maine v. Health Research Laboratories, et al.*, 2:17-cv-00467 (Dkt. 15). Section III of the Order prohibits Respondents from making “any representation about the health benefits, safety, performance, or efficacy” of a dietary supplement, food, or drug “unless the representation is non-misleading, and, at the time of making such representation, they possess and rely upon competent and reliable scientific evidence that is sufficient in quality and quantity based on standards generally accepted by experts in the relevant disease, condition, or function to which the representation relates, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that the representation is true.” Section III further provides that “competent and reliable scientific evidence means tests, analyses, research, or studies (1) that have been conducted and evaluated in an objective manner by experts in the relevant disease, condition, or function to which the representation relates; (2) that are generally accepted by such experts to yield accurate and reliable results; and (3) that are randomized, double-blind, and placebo-controlled human clinical testing of the Covered Product, or of an Essentially Equivalent Product, when such experts would generally require such human clinical testing to substantiate that the representation is true.”

5. Following entry of the Order, Respondents advertised, labeled, offered for sale, sold, and distributed, or caused to be distributed a number of dietary supplement products to consumers. HRL sold, among other products, Black Garlic Botanicals, The Ultimate Heart Formula, and Neupathic. WBS sold BG18, among other products. Black Garlic Botanicals, BG18, The Ultimate Heart Formula, and Neupathic are “food” and/or “drugs” within the meaning of Sections 12 and 15 of the Federal Trade Commission Act.

6. Respondents’ advertisements for Black Garlic Botanicals, BG18, The Ultimate Heart Formula, and Neupathic included representations that the products would effectively prevent, reduce the risk of, cure, treat, or mitigate cardiovascular disease, atherosclerosis, hypertension, or diabetic neuropathy without adequate substantiation to support the representations.

7. 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.

Black Garlic Botanicals

8. HRL began selling Black Garlic Botanicals in November 2016 and continued to sell it following entry of the Order and after the filing of a contempt motion against Respondents in *FTC and State of Maine v. Health Research Laboratories, LLC, et al.*, 2:17-cv-00467-JDL. HRL continued to sell the product to consumers through at least January 2021, despite the filing of the contempt motion and the Complaint in this administrative proceeding.

9. Each capsule of Black Garlic Botanicals contains 600 mg of the active ingredient black garlic, and the recommended dosage is two capsules a day. HRL sells a one-month supply of Black Garlic Botanicals for \$39.95, plus shipping and handling. HRL also sold the product to consumers in other quantities and at different prices.

10. HRL has disseminated or has caused to be disseminated advertising and promotional materials for Black Garlic Botanicals in multi-page mailers sent to consumer residences and on company websites. Following entry of the Order, HRL disseminated or has caused to be disseminated more than 800,000 mailers to consumer residences in the United States and Canada. HRL continued to disseminate these mailers as late as August 2019 despite Respondents’ awareness that the FTC was investigating whether advertising for Black Garlic Botanicals violated the Order.

11. The Black Garlic Botanicals mailer attached as Exhibit A opens with the following representations and depictions:

Every 90 seconds, someone dies from heart disease in the U.S. – are you next?

1 in 7 people die from heart disease.

Only 10% of people survive cardiac arrest if treated by emergency medical services. What are you waiting for?

GOOD NEWS: Everything you need to know about your heart health is in this issue!

In This Heart Health Breaking News Issue:	
Cardiovascular disease — #1 cause of death in the world!	2
Diabetes & venous insufficiency are additional risks	6
Overweight? Belly fat creates new risk factors	7
Why don't people suffer from high cholesterol in Japan?	8
One Man's Personal Journey Created an Empire of Good Health . . .	10
Black Garlic all over the news!	12

HEALTH RESEARCH LABS – Breaking News Cardiovascular Issue

Exhibit A (Black Garlic Botanicals mailer)

This front-page content is followed by additional descriptions of the dangers of cardiovascular disease. For example, the second and third pages display a banner across the top, which states, “Cardiovascular Disease: #1 cause of Death in the world, especially

the U.S.!” A banner at the bottom states, “There’s a miraculous natural solution that can help – find out what it is!!”

The mailer continues with the following statements about the efficacy of black garlic in reducing arterial plaque, blood pressure, and cholesterol:

- **BLACK GARLIC WORKS WITH YOUR BODY**
 - Cholesterol: Black Garlic helps maintain healthy cholesterol levels.
 - Clotting: Black Garlic supports healthy platelet aggregation, which can help to keep blood circulating and works against clotting.
 - Supports and helps maintain healthy blood pressure levels to combat risks.

- **Healthy Arteries**

Plaque build-up in arteries can lead to unhealthy heart conditions. Black Garlic helps keep blood vessels barrier-free to create smooth flow, which could address symptoms of fatigue. It may also inhibit calcium binding, which is responsible for arterial plaque formation.

- **Want Healthy Blood Pressure & Cholesterol? Black Garlic helps maintain healthy blood pressure, cholesterol and triglyceride levels.**

- **BLACK GARLIC
A BREAKTHROUGH FOR**
 - ✓ Cholesterol
 - ✓ Blood Sugar
 - ✓ Blood Pressure
 - ✓ The Heart
 - ✓ The Brain

- “I made the switch to Black Garlic Botanicals and within the span of 3 months my LDL levels have reduced from 300 to 150. This product works!” ~ Gerald W.

- “I now have my blood pressure under control with Black Garlic Botanicals. This is a quality product!” ~ Rolf M.

BG18

12. WBS began selling BG18 in August 2017 and continued to sell it after entry of the Order and after the filing of a contempt motion against Respondents in *FTC and State of Maine v. Health Research Laboratories, LLC, et al.*, 2:17-cv-00467-JDL in December 2019.

13. BG18 has identical ingredients to Black Garlic Botanicals. Each capsule contains 600 mg of the active ingredient black garlic, and the recommended dosage is two capsules a day. WBS sells a one-month supply of BG18 for \$44.95, plus shipping and handling. WBS also sold the product to consumers in other quantities and at different prices.

14. WBS has disseminated or has caused to be disseminated advertising and promotional materials for BG18, including multi-page mailers and content on company websites. Following entry of the Order, WBS disseminated or caused to be disseminated more than 400,000 mailers to consumer residences in the United States and Canada. WBS continued to disseminate these mailers as late as June 2019 despite Respondents' awareness that the FTC was investigating whether advertising for BG18 violated the Order.

15. An example of a mailer for BG18 is attached as Exhibit B.

The front page of the attached BG18 mailer features an image of a caduceus and, a photograph of a doctor in a white coat, and states "Black Garlic has shown an amazing power to improve heart and cardiovascular health, maintain normal cholesterol levels, boost your immune system. And MUCH MORE!" The mailer continues with the following representations:

- Black Garlic is a proven miracle for . . . Cholesterol . . . Hypertension . . . Your Heart.
- [Black Garlic] can help reverse plaque build-up in arteries – not just slow it down. Black Garlic keeps blood vessels barrier-free to create a smooth blood flow and alleviates symptoms of fatigue. It also strongly inhibits calcium binding, which is responsible for plaque build-up.
- Reduces Blood Pressure and Cholesterol. . . Black Garlic helps reduce high blood pressure and lowers high levels of bad cholesterol and triglycerides.
- "My blood pressure has also been lowered. I recommend this product because IT WORKS!" ~ Lorraine T.
- On the following page, the brochure poses this question and answer:

**Could Black Garlic be the Japanese Secret
to Significantly Reducing Heart Attack Risk? For all
natural, safe, effective heart health, nothing even
compares to Black Garlic!**

That's why, for many people across the U.S., Black Garlic has been the answer to reducing their risk of America's #1 killer...

Each year, 635,000 people in the U.S. have their first heart attack!
And cardio-vascular disease is the leading cause of global death, causing 17.3 million deaths a year – a number that's expected to grow to more than 23.6 million by 2030.

Exhibit B (BG18 mailer).

- Yes, Black Garlic is a true miracle for cardiovascular health! Just 1 capsule knocks down cholesterol and high blood pressure within days. It can also unblock, clean, and strengthen your arteries.
- The cardio-protective effect of black garlic. . . Black garlic can also improve your lipid profile, an important factor in protecting against cardiovascular problems.

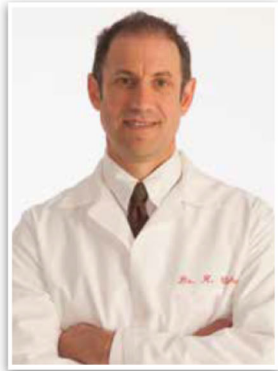
The Ultimate Heart Formula

16. HRL began selling The Ultimate Heart Formula (“UHF”) in November 2008 and continued to sell it following entry of the Order and after the filing of a contempt motion against Respondents in *FTC and State of Maine v. Health Research Laboratories, LLC, et al.*, 2:17-cv-00467-JDL. HRL continued to sell the product to consumers through at least January 2021, despite the filing of the contempt motion and the Complaint in this administrative proceeding.

17. UHF contains Vitamins C, E, and B12 as well as garlic extract (25 mg), Tetrasodium EDTA (40 mg), Ubiquinol (CoEnzyme Q-10) (5 mg), and Nattokinase (10 mg). The recommended dosage is 20 drops or 1ml, twice per day. HRL sold a one-month's supply of UHF for \$39.95, plus shipping and handling. HRL also sold the product to consumers in other quantities and at different prices.

18. HRL disseminated or caused to be disseminated advertisements for UHF, including multipage mailers and company websites. Following entry of the Order, HRL disseminated or caused to be disseminated more than 200,000 mailers to consumer residences in the United States and Canada.

19. An example of a mailer for UHF is attached as Exhibit C, which contains the following statements and depictions on its first and second pages:



Richard Cohen, M.D.
Scientific Advisor

**“When it comes to a sudden heart attack...
What You Don’t Know CAN Hurt You!””**

Do you **KNOW** what **YOUR** arteries look like right now?

-  **All Clear!**
-  **Uh Oh!**
-  **DANGER!**

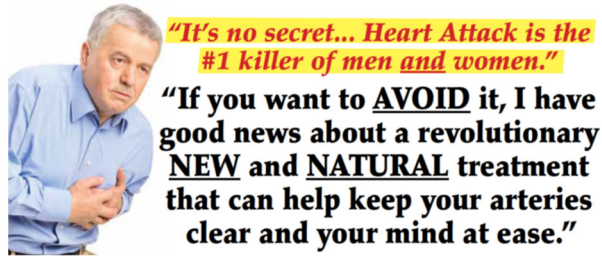


Keeping your risk low and your **HEART** healthy is all about keeping your arteries **CLEAR!** See inside for help from a revolutionary, new, heart-helping liquid drop formula...

SEE INSIDE to discover a natural nutrient that is up to **95% EFFECTIVE** at maintaining clear arteries and reducing risk of a heart problem!



Exhibit C (The Ultimate Heart Formula mailer).



Avoiding a heart attack is all about keeping your arteries clear, your cholesterol in check, your blood pressure low and your risk of a blood clot low... so accumulated plaque does not close off an artery or break off and cause a stroke.



Now there's a new, improved twist on our most effective natural, heart-helping treatment.

Exhibit C (The Ultimate Heart Formula mailer, p.2)

These depictions and representations are followed by a number of additional claims, including:

- Instead, right before you is a simple, safe, inexpensive, non-painful and preventative option that could help you say goodbye to your heart surgeon and avoid an angioplasty.
- Our Ultimate Heart Formula can help support a healthy heart, healthy cholesterol and healthy blood pressure. As blockages in your veins and arteries become clear, you can experience better blood circulation – resulting in more energy, better sleep, sharper mental clarity and better health.
- The Ultimate Heart Formula also contains a powerful, clot-busting agent!
- The Ultimate Heart Formula is an all-natural combination of 19 powerful herbs and essential nutrients that counter the causes of poor cardio health. The Ultimate Heart Formula's unique "Senior Formula" is made with ingredients specifically shown to help improve the effects of a weakened heart, clogged arteries, high blood pressure and high cholesterol for older people!
- With our Ultimate Heart Formula ...You get it ALL ... Amazing heart and artery protection ... without side effects!

- Yes, with the Ultimate Heart Formula, a lifetime of plaque build up could disappear before you know it! The artery-flushing power of this formula does not even require a doctor's visit or stay in the hospital!

Neupathic

20. Beginning in August 2016, HRL also sold a dietary supplement called Neupathic. HRL continued to sell the product following entry of the Order and after the filing of a contempt motion against Respondents in *FTC and State of Maine v. Health Research Laboratories, LLC, et al.*, 2:17-cv-00467-JDL. Neupathic contains the following active ingredients: Vitamins E (30 IU), B1 (33.3 mg), B6 (33.3 mg), B12 (16.7 mcg), and folate (266.7 mcg), and Evening Primrose Oil (666.7 mg). The recommended dosage is two capsules per day. HRL sold a one-month's supply of Neupathic for \$39.95, plus shipping and handling. HRL also sold the product to consumers in other quantities and at different prices.

21. HRL has disseminated or caused to be disseminated advertising and promotional materials for Neupathic, including multi-page mailers and content on company websites. Following entry of the Order, HRL disseminated or caused to be disseminated more than 400,000 mailers to consumer residences in the United States and Canada. HRL continued to disseminate these mailers as late as June 2019 despite Respondents' awareness that the FTC was investigating whether their advertising for Neupathic violated the Order.

22. An example of a mailer is attached as Exhibit D, which contains the following depictions and statements on the first page:

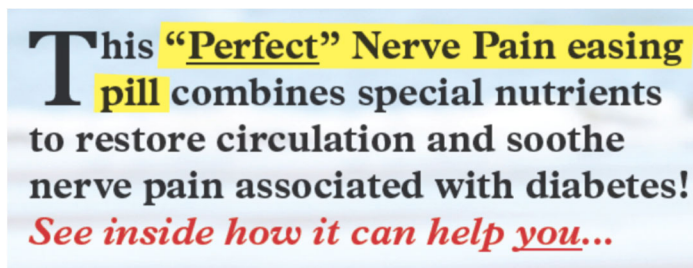




Exhibit D (Neupathic mailer).

The mailer continues inside with additional claims:

- If you have diabetic nerve pain, you could suffer with any or all of the symptoms below.
 - ✓ Shooting pain
 - ✓ Burning
 - ✓ Pins and needles
 - ✓ Electric shock-like pain
 - ✓ Extra sensitivity
 - ✓ Numbness
 - ✓ Throbbing
 - ✓ Tingling
 - ✓ Stinging
 - ✓ Stabbing
 - ✓ Radiating

Neupathic was specifically formulated with 6 distinct nutrients to help address ALL these issues and more.

- A “perfect” nerve pain supplement that was formulated from the ground up to improve your circulation and ease the numbness, tingling, itching, burning and swelling from excess fluid trapped in your legs.
- Take this easy step towards normal, pain free legs and feet again! Non-drug ... proven ingredients.

It can also help address the direct cause of nerve pain and neuropathy, damaged nerves, excess fluid — and poor circulation.

Allowing you to:

- ...Increase** your mobility
- ...Relieve** nerve pain
- ...Reduce** swelling and tightness
- ...Gain back** your freedom to move easily and enjoy your favorite activities again

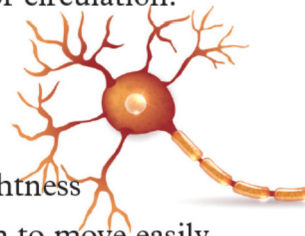


Exhibit D (Neupathic mailer, p. 11).

- Respond now if your nerve pain is driving you crazy! You’ll get completely natural, real relief from your discomfort. All natural Neupathic is 100% effective and safe to use every day! Remember, it has [*sic*] shown to help reverse damaged nerves to help you feel great all day and all night.
- “Great reduction of pain. No more nerve pain in my feet. I also hardly notice any leg cramps. This product is great!” — Ruth J.
- “Neupathic is a great ‘miracle-like product’ which starts working the very first day you use it. Then it continues to control your pain every day. My feet have began [*sic*] to feel normal. Neupathic has improved my life. My nerve pain is gone and I will continue to take Neupathic until my numbness is gone too!” — Gloria R. *Id.*

23. Respondents did not have competent and reliable scientific evidence to support the representations in their advertisements. Further, they relied in part on advice from consultants and/or advisors who did not have appropriate qualifications or expertise to evaluate substantiation for the representations.

Count I
Respondents’ Unsubstantiated Claims Related to Black Garlic Botanicals
(HRL and Duhon)

24. In connection with the advertising, promotion, offering for sale, or sale of Black Garlic Botanicals, HRL and Kramer Duhon have represented, directly or indirectly, expressly or by implication, that Black Garlic Botanicals:

- a. Prevents or reduces the risk of cardiovascular disease including by lowering blood pressure, improving blood flow, reducing cholesterol, or decreasing arterial plaque;

- b. Treats cardiovascular disease including by lowering blood pressure, improving blood flow, reducing cholesterol, or decreasing arterial plaque;
- c. Prevents or reduces the risk of atherosclerosis including by reducing cholesterol or decreasing arterial plaque;
- d. Treats atherosclerosis including by reducing cholesterol or decreasing arterial plaque; and
- e. Cures, treats, or mitigates hypertension including by decreasing arterial plaque or lowering blood pressure.

25. The representations set forth in Paragraph 24 were not substantiated at the time the representations were made.

Count II
Respondents' Unsubstantiated Claims Related to BG18
(WBS and Duhon)

26. In connection with the advertising, promotion, offering for sale, or sale of BG18, WBS and Kramer Duhon have represented, directly or indirectly, expressly or by implication, that BG18:

- a. Prevents or reduces the risk of cardiovascular disease including by lowering blood pressure, improving blood flow, reducing cholesterol, or decreasing arterial plaque;
- b. Treats cardiovascular disease including by lowering blood pressure, improving blood flow, reducing cholesterol, or decreasing arterial plaque.
- c. Prevents or reduces the risk of atherosclerosis including by reducing cholesterol or decreasing arterial plaque;
- d. Treats atherosclerosis including by reducing cholesterol or decreasing arterial plaque; and
- e. Cures, treats, or mitigates hypertension including by decreasing arterial plaque or lowering blood pressure.

27. The representations set forth in Paragraph 26 were not substantiated at the time the representations were made.

Count III
Respondents' Unsubstantiated Claims Related to UHF
(HRL and Duhon)

28. In connection with the advertising, promotion, offering for sale, or sale of UHF, HRL and Kramer Duhon have represented, directly or indirectly, expressly or by implication, that UHF

- a. Prevents or reduces the risk of cardiovascular disease including by lowering blood pressure, improving blood flow, reducing cholesterol, or decreasing arterial plaque;
- b. Treats cardiovascular disease including by lowering blood pressure, improving blood flow, reducing cholesterol, or decreasing arterial plaque.
- c. Prevents or reduces the risk of atherosclerosis including by reducing cholesterol or decreasing arterial plaque;
- d. Treats atherosclerosis including by reducing cholesterol or decreasing arterial plaque; and
- e. Cures, treats, or mitigates hypertension including by decreasing arterial plaque or lowering blood pressure.

29. The representations set forth in Paragraph 28 were not substantiated at the time the representations were made.

Count IV
Respondents' Unsubstantiated Claims Related to Neupathic
(HRL and Duhon)

30. In connection with the advertising, promotion, offering for sale, or sale of Neupathic, HRL and Kramer Duhon have represented, directly or indirectly, expressly or by implication, that Neupathic:

- a. Cures, treats, or mitigates diabetic neuropathy including by improving blood circulation, or eliminating or alleviating diabetic nerve pain and discomfort.

31. The representations set forth in Paragraph 30 were not substantiated at the time the representations were made.

Violations of Sections 5 and 12

32. The acts and practices of Respondents as alleged in this complaint constitute unfair or deceptive acts or practices, and the making of false advertisements, in or affecting commerce in violation of Sections 5(a) and 12 of the Federal Trade Commission Act.

NOTICE

You are notified that on July 13, 2021, at 10:00 a.m., at the Federal Trade Commission offices, 600 Pennsylvania Avenue, NW, Room 532-H, Washington, DC 20580, an Administrative Law Judge of the Federal Trade Commission will hold a hearing on the charges set forth in this Complaint. At that time and place, you will have the right under the Federal Trade Commission Act to appear and show cause why an order should not be entered requiring you to cease and desist from the violations of law charged in this Complaint.

You are notified that you are afforded the opportunity to file with the Federal Trade Commission (“Commission”) an answer to this Complaint on or before the 14th day after service of the Complaint upon you. An answer in which the allegations of the Complaint are contested must contain a concise statement of the facts constituting each ground of defense; and specific admission, denial, or explanation of each fact alleged in the Complaint or, if you are without knowledge thereof, a statement to that effect. Allegations of the Complaint not thus answered will be deemed to have been admitted.

If you elect not to contest the allegations of fact set forth in the Complaint, the answer should consist of a statement that you admit all of the material facts to be true. Such an answer will constitute a waiver of hearings as to the facts alleged in the Complaint and, together with the Complaint, will provide a record basis on which the Commission may issue a final decision containing appropriate findings and conclusions and a final order disposing of the proceeding. In such answer, you may, however, reserve the right to submit proposed findings of fact and conclusions of law under FTC Rule § 3.46.

Failure to answer timely will be deemed to constitute a waiver of your right to appear and contest the allegations of the Complaint. It will also authorize the Commission, without further notice to you, to find the facts to be as alleged in the Complaint and to enter a final decision containing appropriate findings and conclusions and a final order disposing of the proceeding.

The Administrative Law Judge will hold an initial prehearing scheduling conference not later than 10 days after the answer is filed by the last answering Respondent. Unless otherwise directed by the Administrative Law Judge, the scheduling conference and further proceedings will take place at the Federal Trade Commission, 600 Pennsylvania Avenue, NW, Room 532-H, Washington, DC 20580. Rule 3.21(a) requires a meeting of the parties’ counsel as early as practicable before the prehearing scheduling conference, but in any event no later than 5 days after the answer is filed by the last answering Respondent. Rule 3.31(b) obligates counsel for

each party, within 5 days of receiving a Respondent's answer, to make certain initial disclosures without awaiting a formal discovery request.

Moreover, the Commission has reason to believe that, if the facts are found as alleged in the Complaint, it may be necessary and appropriate for the Commission to seek relief to redress injury to consumers. Such relief could be in the form of restitution for past, present, and future consumers and such other types of relief as are set forth in Section 19(b) of the Federal Trade Commission Act. The Commission will determine whether to apply to a court for such relief on the basis of the adjudicative proceedings in this matter and such other factors as are relevant to consider the necessity and appropriateness of such action.

NOTICE OF CONTEMPLATED RELIEF

Should the Commission conclude from the record developed in any adjudicative proceedings in this matter that Respondents have violated or are violating Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52, the Commission may order such relief against Respondents as is supported by the record and is necessary and appropriate, including but not limited to:

- a. A prohibition on any representation that Respondents' products cure, treat, mitigate, prevent, or reduce the risk of any disease.
- b. A prohibition on representations about the health benefits, safety, efficacy, or the performance of Respondents' products unless those representations are supported by competent and reliable scientific evidence.
- c. A prohibition on misrepresentations regarding tests, studies, or other research.
- d. A requirement that Respondents preserve records relating to competent and reliable clinical tests or studies.
- e. A requirement that Respondents send appropriate notification of the order to all affected customers.
- f. A requirement that Respondents cancel any automatically recurring orders for Black Garlic Botanicals, BG18, UHF, or Neupathic for any existing customer who was first charged before the issuance of the Complaint.
- g. A requirement that Respondents will not use, sell, rent, lease, or transfer any identifying information related to any customer who paid money to any Respondent for Black Garlic Botanicals, BG18, UHF, or Neupathic prior to the issuance of the Complaint.
- h. A requirement that, for a period of time, Respondents send acknowledgments of the order to the Commission.
- i. A requirement that, for a period of time, Respondents create and preserve certain records demonstrating compliance with the order.
- j. A requirement that, for a period of time, Respondents provide notice of all new business activity to the Commission.
- k. A requirement that Respondents file periodic compliance reports with the Commission.
- l. A requirement that Respondents' compliance with the order be monitored for a term to be determined by the Commission.

- m. Any other relief appropriate to correct or remedy the effects of Respondents' deceptive practices or of any or all of the conduct alleged in the complaint.

IN WITNESS WHEREOF, the Federal Trade Commission has caused this complaint to be signed by its Secretary and its official seal to be hereto affixed at Washington, DC, this 24th day of February 2021.

By the Commission.

April J. Tabor
Acting Secretary

SEAL:

Exhibit A

Every 90 seconds, someone dies from heart disease in the U.S. – are you next?

1 in 7 people die from heart disease.

Only 10% of people survive cardiac arrest if treated by emergency medical services. What are you waiting for?

GOOD NEWS: Everything you need to know about your heart health is in this issue!

In This Heart Health Breaking News Issue:

Cardiovascular disease — #1 cause of death in the world!	2
Diabetes & venous insufficiency are additional risks	6
Overweight? Belly fat creates new risk factors	7
Why don't people suffer from high cholesterol in Japan?.	8
One Man's Personal Journey Created an Empire of Good Health . .	10
Black Garlic all over the news!.	12



Cardiovascular Disease: #1 cause of

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635,000 people in the U.S. have their first heart attack each year!

Cardiovascular disease is the leading cause of global death, causing **17.3 million deaths per year** — a number that's expected to grow to more than 23.6 million by 2030.

The American Heart Association, the Centers for Disease Control and Prevention, the National Institutes of Health, and many government sources keep trying to save lives, but this global affliction seems to spare only the Japanese!

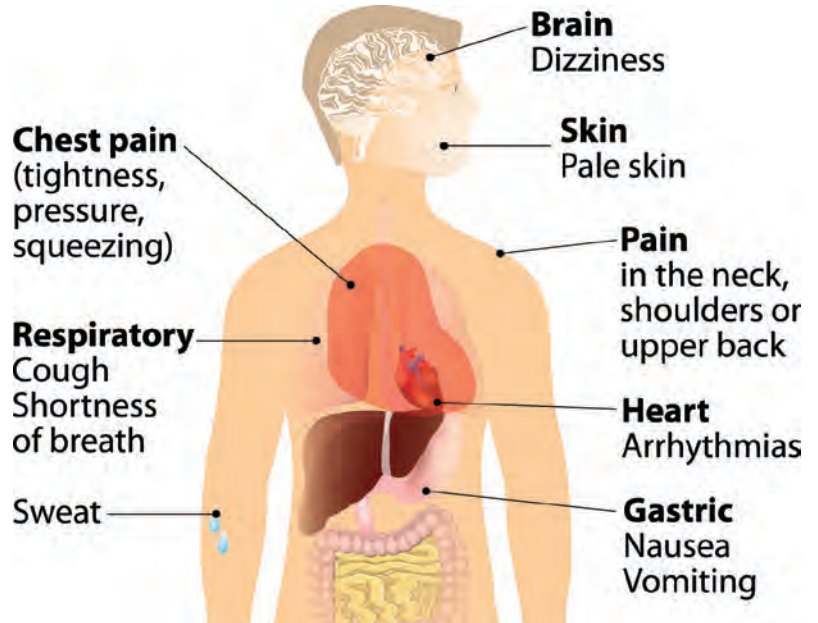
Despite smoking and blood pressure levels comparable to that in Western countries, what are the Japanese doing differently?

Black Garlic.

This discovery in 2001 has turned out to be a really powerful elixir for the heart and the whole cardiovascular system.



HEART ATTACK WARNING SIGNS



- 1 Pain or Discomfort in Chest
- 2 Lightheadedness, Nausea, Vomiting
- 3 Jaw, Neck, or Back Pain
- 4 Pain or Discomfort in Arm or Shoulder
- 5 Shortness of Breath

Characteristics you can't control: age, sex, race, or ethnicity. All of these affect your risk for heart disease.

LIFESTYLE CHOICES THAT INCREASE RISK

Unhealthy Diet

- ✓ High in saturated fat, trans fat, and cholesterol.
- ✓ Too much sodium can raise blood pressure levels.



Physical Inactivity

- ✓ Not getting enough physical activity can increase the chances of obesity, high blood pressure, high cholesterol, and diabetes.



Obesity

- ✓ Excess body fat is linked to higher "bad" cholesterol & triglyceride levels, and can lead to high blood pressure and diabetes.



There's a miraculous natural solution

HRL004985

What Cholesterol Do I Have to Worry About?

Cholesterol can't dissolve in the blood. It must be transported through your blood by carriers called lipoproteins. There are 2 types:

LDL (Bad) Cholesterol

- Contributes to plaque (a thick, hard deposit that can clog arteries & make them less flexible). If a clot forms and blocks a narrowed artery, heart attack or stroke can result.
- Plaque buildup can also narrow an artery supplying blood to the legs.

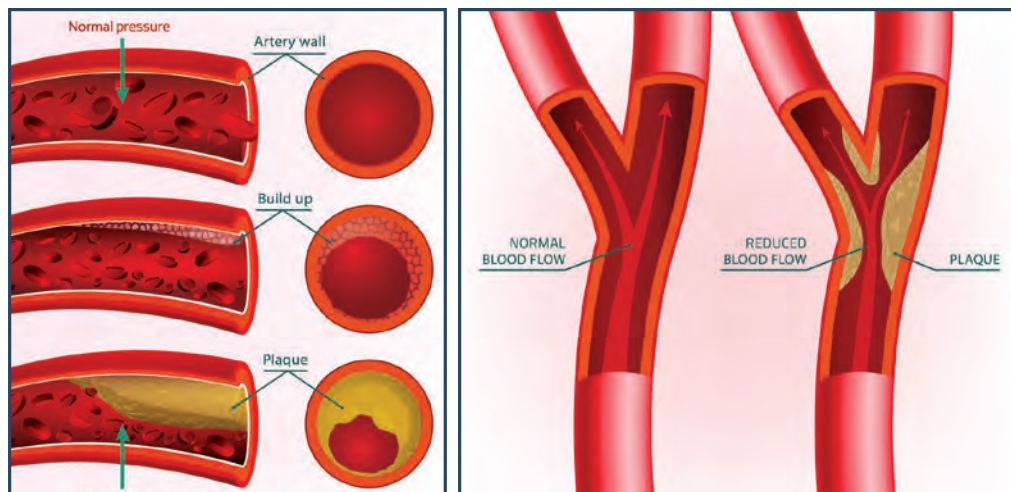
HDL (Good) Cholesterol

- Helps remove LDL cholesterol from the arteries, carrying it back to the liver, where it's broken down and passed from the body.

Where does plaque come from?

Excess cholesterol can form plaque between layers of artery walls, making it harder for your heart to circulate blood. Plaque can break open and cause clots.

- If a clot blocks an artery that feeds the brain, it causes a stroke.
- If a clot blocks an artery that feeds the heart, it causes heart attack.



Are your arteries getting more clogged every minute?

Slow-growing cholesterol plaque may never cause any symptoms — even with severely blocked arteries — and can suddenly rupture!

Watch Out for Damage & Death to Heart Tissue

Atherosclerosis is the hardening of arteries and formation of plaque, caused by LDL Cholesterol.

This deadly plaque grows silently & slowly.



SE YOUR RISK FOR HEART ATTACK.



Too Much Alcohol

- ✓ Drinking too much alcohol can raise blood pressure levels & the risk for heart disease. It increases levels of triglycerides, a form of cholesterol, that can harden your arteries.



Tobacco Use

- ✓ Cigarette smoking can damage the heart & blood vessels, which increases your risk for heart conditions such as atherosclerosis and heart attack. Nicotine raises blood pressure, and carbon monoxide reduces the amount of oxygen that your blood can carry.
- ✓ Exposure to other people's secondhand smoke can increase the risk for heart disease even for nonsmokers.

that can help – find out what it is!!

Diabetes or prediabetes puts you at inc

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Diabetes is a major risk factor for heart disease.

2 out of 3 people with diabetes die of heart disease or stroke.

What truths do you need to know?

- **47%** of Americans are unaware that diabetes can lead to heart disease.
- **58%** don't know that it can affect one's sex life.
- **28%** don't believe diabetes is a serious disease.
- **35%** don't believe diabetes can affect the eyes.
- Having high amounts of sugar in the bloodstream develops into fat that clogs, narrows, and inflames the blood vessels, causing them to wear and tear.



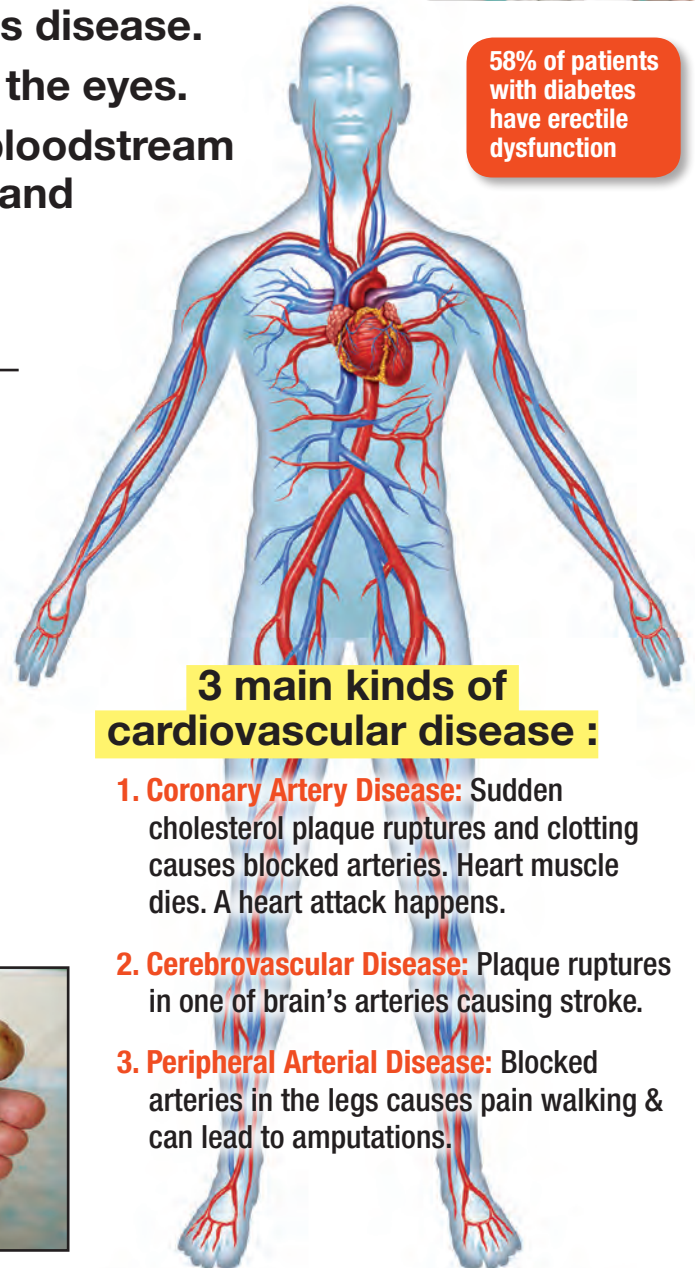
58% of patients with diabetes have erectile dysfunction

What is venous insufficiency — and why do you need to worry about it?

Leg and foot ulcers in diabetic patients have a common underlying cause: venous insufficiency.

Chronic venous insufficiency occurs when the leg veins do not allow blood to travel back to the heart. These valves that are not working properly can cause blood in the legs to pool. If left untreated, chronic venous insufficiency can cause pain, swelling, and leg ulcers. The condition can be disabling.

Venous insufficiency is most commonly caused by a blood clot. Alert a healthcare provider as soon as possible for certain symptoms. **Do not wait!**



3 main kinds of cardiovascular disease :

1. **Coronary Artery Disease:** Sudden cholesterol plaque ruptures and clotting causes blocked arteries. Heart muscle dies. A heart attack happens.
2. **Cerebrovascular Disease:** Plaque ruptures in one of brain's arteries causing stroke.
3. **Peripheral Arterial Disease:** Blocked arteries in the legs causes pain walking & can lead to amputations.

Diabetes and cardiovascular disease go hand-in-hand.

68% of people with diabetes die of heart disease or stroke.

Maintaining healthy blood sugar and glucose levels can be a constant struggle. Lowering blood sugar levels helps to prevent damage to your kidneys, blood vessels, skin, and eyes.

BLACK GARLIC WORKS WITH YOUR BODY:

- **Cholesterol:** Black Garlic helps maintain healthy cholesterol levels.
- **Clotting:** Black Garlic supports healthy platelet aggregation, which can help to keep blood circulating and works against clotting.
- **Supports and helps maintain healthy blood pressure levels to combat risks.**



*"I feel energized. I feel like I have a whole new body! I can now climb steps the normal way, I am no longer tired all the time, and my mind seems clearer. Black Garlic Botanicals really does MAKE YOU FEEL GREAT! I really think it should be part of your everyday regimen for wellness." ~ Delores L.**



MAIN SYMPTOMS OF DIABETES

NERVOUS SYSTEM

- Lethargy
- Stupor

With **Black Garlic** you achieve healthy blood pressure levels, enhancing your energy, and governing the regulatory system.

EYES

- Blurred vision

Black Garlic keeps the blood vessels healthy, including the tiny blood vessels that nourish the retina.

LIVER & KIDNEYS

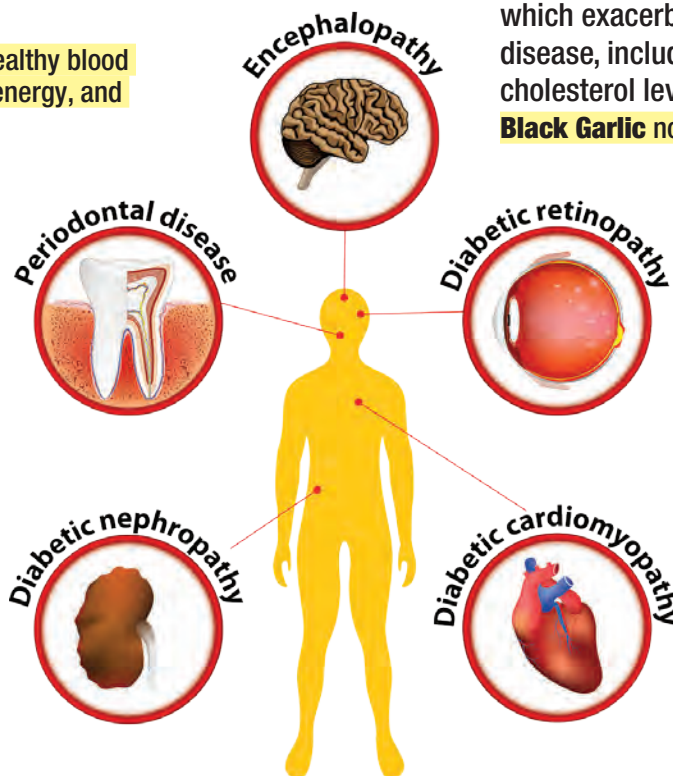
- Liver toxins

Black Garlic supports a healthy liver, to enhance detoxification capabilities that are essential when taking medications.

GASTRIC

- Nausea
- Vomiting
- Abdominal pain
- Obesity

Black Garlic helps protect your digestive system.



HEART

– People with diabetes have conditions which exacerbate risk for developing heart disease, including high blood pressure, abnormal cholesterol levels, and lack of physical activity.

Black Garlic nourishes your heart muscle.

FEET & LEGS

– Circulation difficulties can cause neuropathy (nerve damage) and poor circulation can lead to ulcers, bone loss, and deformity.

Black Garlic helps maintain healthy blood sugar levels and supports vital circulation throughout your body.

SEXUALITY

– Men with erectile dysfunction often later learn they have diabetes. Sexual problems can indicate nerve damage, blocked arteries, and even imbalanced hormones.

Black Garlic supports a healthy circulatory system to encourage a vibrant sex drive and erections.

Black Garlic is the all-natural maintenance plan for your heart and all of your vital functions.

Japanese have lowest incidence of heart

What are your treatment options for heart disease?

SENSIBLE DIET

Being overweight is just 1 factor that puts you at risk for heart disease. Losing weight doesn't guarantee lowering cholesterol, blood pressure, or triglycerides (a type of fat in your blood).

- **Ornish Diet:** Very little wiggle room for food choices, only 10% of calories can come from fat, & can be pricey for produce, whole grains, and fish.
- **Mediterranean Diet:** Not a structured diet, so it's up to you to figure out on your own how many calories you need to eat to lose or maintain weight & how active you'll be.
- **Vegan Diet:** No animal products allowed, even dairy and eggs. Takes work to ensure you get sufficient amounts of key nutrients. Limited options for eating out, may require a lot of time to prep for meals.

PHYSICAL ACTIVITY

Recommended exercise at least 30 minutes a day, 5 days a week in order to improve heart health.

GENETICS

Many heart conditions are passed on from generation to generation. While you can't change your genes, you can learn your family history and prepare your body and your mind for any potential upcoming challenges with natural preventative solutions.

STATINS

Medications with possible side effects: muscle pain, liver damage, kidney failure, even death.

The Miraculous Solution in Japan: Black Garlic

The Aomori prefecture is the garlic capital of Japan, producing as much as 80% of the total garlic in the nation. What it's really famous for is the fermented **Black Garlic**.

Popular in Asian cuisine, **Black Garlic** is fermented under highly controlled conditions for 3-4 weeks, which is what gives it its black color. While many are hesitant to try it because of its color, it is actually easy to digest and odorless, can be enjoyed as a preserved fruit, used as a spice or condiment, and the garlic skin can be used to brew tea.

A Natural Supplement Improving Lives

Black Garlic gained popularity after Hirosaki University professor, Jiniti Sasaki, showed that **Black Garlic had a beneficial effect on harmful cells in the body** — the same research was conducted using white garlic and did not yield the same results.



Black Garlic is studied for:

- ✓ **Increasing energy**
- ✓ **Strengthening the immune system**
- ✓ **Promote anti-aging effects**
- ✓ **Enhancing recovery from fatigue**
- ✓ **And, improving restfulness**



Food Pressure Yet, Low Cholesterol!

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attacks in the world. Why?

Black Garlic is the... “perfect human health food.” **Black Garlic** antioxidant capacity is the best in more than 300 kinds of food!

Black Garlic must be fermented in precise conditions for over 60 days with increasing efficacy the longer it ferments. It contains 18 kinds of amino acids needed by the human body.

Healthy Arteries

Plaque build-up in arteries can lead to unhealthy heart conditions. **Black Garlic** helps keep blood vessels barrier-free to create smooth flow, which could address symptoms of fatigue. It may also inhibit calcium binding, which is responsible for arterial plaque formation.

Prevent Health Crises Before They Take Hold

Black Garlic is being tested in both population studies and clinical trials to see how effective it is at preventing and treating the root cause of many key health issues.

Want Healthy Blood Pressure & Cholesterol?

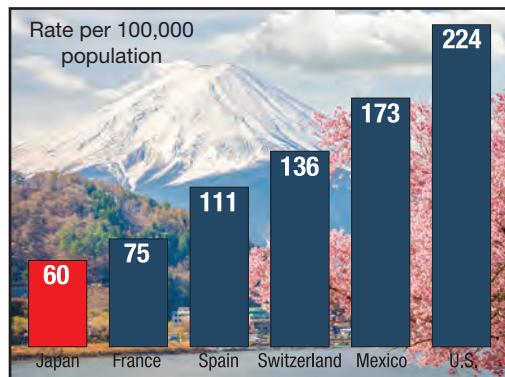
Black Garlic helps maintain healthy blood pressure, cholesterol and triglyceride levels.

Overweight? Belly Fat Creates New Risk Factors

Some fat is a normal function of the human body and helps to regulate blood sugar. But belly fat in particular loses sensitivity to insulin, and can often trigger the body’s natural function of pumping insulin. This can cause metabolic syndrome, which may further develop into high blood pressure, excess bad cholesterol, and even type 2 diabetes.



Fermentation Process of Garlic



Lowest Heart Disease in Japan



BLACK GARLIC A BREAKTHROUGH FOR:

- ✓ **Cholesterol**
- ✓ **Blood Sugar**
- ✓ **Blood Pressure**
- ✓ **The Heart**
- ✓ **The Brain**

I'm Jesse Duvell, and I live with my wife and daughter in Dallas, Texas. Four years ago, **I was diagnosed with two types of cancer.** I feared my life being cut short, and I wasn't ready to go.

The doctors prescribed a number of strong medications before I even started radiation treatment, which left me sicker than I had ever been in my life. My body started to shut down. I was in my early fifties and couldn't figure out where I went wrong.

Growing up, my dad told me every day that if I can't change my circumstances, I could always change my mind.

So I read books, I talked with experts and learned everything I could to stay at the cutting edge of supplements, where modern science meets the old ways of healing. I changed what I ate, though I still enjoyed some pizza and beer on the weekends. I started walking around outdoors again. I changed my work schedule to allow more time to relax and spend time with my family. I sought out the best supplements I could find to help my healing journey.

Today, my cancer is in complete remission.

My results may not be your results, but it changed my life. I knew I had to do something to help other people around me suffering.

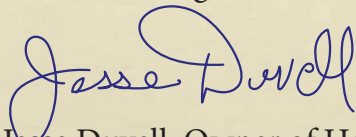
I was in a unique position. I had already created Health Research Labs, but now, I wanted to ensure we source top quality supplements, then price them so that everyone has access to them.

Yet, we needed to get the word out for real preventative care!

I wanted to now make sure people knew how they could change their lives for the better. I'm so convinced our products work, **I offer a 100% money back guarantee** if you don't love the product, no questions asked.

I only hope I can be of service and that my products can help you spend your time here on earth living comfortably with the people you love.

With warm regard,



Jesse Duvell, Owner of Health Research Labs



FEDERAL TRADE COMMISSION | OFFICE OF THE SECRETARY | FILES 2/24/2011 | OSCAR NO. 60017 | TEL: 1-800-368-1024

More than 100 drugs pose extra dangers if you're at risk for heart failure.

Move from the fear of dying to the joy of living!

People with heart failure take an average of 7 prescription medications a day.

Each additional medication increases the risk of side effects or dangerous drug interactions.

Some may be serious enough to require going to the hospital. Some can even bring on heart failure!

What types of drugs can exacerbate heart failure?

- Used to treat diabetes, pain, psychiatric conditions, cancer, and other conditions.

Natural heart regimens can help to balance cholesterol levels and blood pressure, and maintain a healthy heart:

- Mayo Clinic notes that cholesterol-lowering supplements and natural remedies can be helpful for heart disease factors.
- Natural remedies can be accessed without a prescription!



NATURAL BLACK GARLIC IS ALL OVER THE NEWS!

"The evidence is 'quite compelling' that the supplement seems to help mitigate cardiac risk factors, such as high cholesterol and blood pressure."

~ **David L. Katz, director of Yale University's Yale-Griffin Prevention Research Center**

"[Black Garlic is] high in S-allyl cysteine, or SAC, a sulfur-based compound that dissolves in water and is easy for the body to metabolize. SAC is an antioxidant, a type of molecule believed to reduce damage to cells."

~ **Wall Street Journal**

WALL STREET JOURNAL

"Black Garlic helps to repair age damaged skin. Uniquely colored due to its fermentation process, Black Garlic contains twice the antioxidants as regular garlic... and restores skin cells damaged by the aging process." ~ Dr. Oz



"Newly developed Black garlic has made a sensational debut with a strong immune system enforcement... anti-oxidant activity"

~ **Journal of Life Sciences**

*"I told my church friends about Black Garlic — it makes me feel so much better and helps keep my blood circulation at super healthy levels." ~ Milan L.**



*"I am now more alert and have a better sense of well-being. I know that I have a good product!" ~ Victor P.**

*"I feel very good since I started Black Garlic about 3 months ago. My energy level has improved very much to the point that I feel I can do so much more than I used to." ~ R. Mcneil**

* These are Real Results from Real Users of Black Garlic Botanicals! Individual results may vary. We guarantee you will love this product or your money back.

Black Garlic Can Impr

People just like you are thriving like never before!

**READY TO KEEP YOUR
BLOOD SUGAR LEVELS HEALTHY?**



*“My blood sugar numbers are now close to normal and I haven’t had a headache since I started using Black Garlic Botanicals” ~ Gus H.**



*“My doctor told me to come back when I’m sick. I feel great and I no longer need to run to the doctor! Thank you Health Research Labs!” ~ Lloyd G.**

**From
Fatigue to
Fitness**



*“I made the switch to Black Garlic Botanicals and within the span of 3 months my LDL levels have reduced from 300 to 150. This product works!” ~ Gerald W.**



*“I am no longer as tired and I can even climb the stairs much easier. My mind also seems clearer. Black Garlic Botanicals really does make you feel great! I really believe that you should take this product every day for your well being!” ~ Delores S.**

Results may vary depending on your body type. We are excited to see what Black Garlic can do for you! We guarantee you will love this product or your money back.

**An
Active Sex
Life**



**Black Garlic
has all the essentials
to help your heart.**

MINERAL CONTENT:

- Sodium (Na)
- Potassium (K)
- Magnesium (Mg)
- Calcium (Ca)
- Iron (Fe)
- Zinc (Zn)

AMINO ACID CONTENT:

- Isoleucine
- Leucine
- Lysine
- Methionine
- Histidine
- Phenylalanine
- Tryptophan
- Valine

- Arginine
- Alanine
- Asparagine
- Glutamine
- Glycine
- Proline
- Serine
- Tyrosine
- Cystine

Qualities of Black Garlic

- ✓ Antioxidants
- ✓ Helps Maintain Healthy Blood Pressure
- ✓ Heart Protection
- ✓ Supports Healthy & Balanced Cholesterol
- ✓ Anti-Bacterial
- ✓ Circulation Support
- ✓ Strong Immunity



**You can improve your life now, too!
Try it free risk-free today – only
pay if you see results.**

*“Black Garlic Botanicals relieved the pain in my legs and feet. My circulation is better than it has been in a long time. This product is amazing and I can’t live without it.” ~ John I.**



*“Black Garlic helps me sleep better at night — I can’t believe how rested I feel in the mornings now!” ~ Michelle M.**

More Black Garlic Benefits



**Just 2 capsules
a Day!**

**Finally Get
the Rest You
Deserve**

HEALTHY WEIGHT MANAGEMENT

“A thicker waistline increases heart attack risk,” says Nieca Goldberg, MD. Stomach fat is linked to high blood sugar, increased blood pressure, and raised levels of triglycerides, all of which are major risk factors for heart disease. Belly fat is also called visceral fat, which is closer to internal organs, and can be related to hormones — that’s why many women start seeing their tummies thicken during menopause.

Black Garlic is an excellent addition to a healthy diet and exercise for overall health. Sustainable weight management is the most sensible and practical option for anyone concerned about heart health.

IMMUNITY BOOSTER

Black Garlic addresses inflammation, boosts immune function, and is toxic to invading bodies. The allicin in garlic, a sulfur-rich compound, is a powerful weapon against harmful conditions and promotes overall health. **Black Garlic** contains twice the antioxidant punch of fresh garlic, because of the fermentation process. This makes it an ideal health booster for every season.

AGE DEFYING

Black Garlic is a great energizer and helps prolong a healthy lifestyle! It also helps repair damaged skin with double the amount of antioxidants than regular garlic. Like rust attacking metal, free radicals eat away at cells and destroy them, causing the aging effect. **Black Garlic** positively impacts cellular immunity, causing a rejuvenated appearance.

DETOX

Black Garlic acts as a blood purifier and cleanses the body in general. It has antibacterial, anti-fungal properties that create a hostile environment for *Candida albicans* and can decrease bacteria linked to stomach ulcers. Your gut is also known as your second brain, because the health of your gastrointestinal system is extremely important to your overall wellbeing. **Black Garlic** supports cell regeneration and alkalizes your body to form a habitat resistant to takeover. It also features abundantly rich oxygen for healthy cell activity, so you can discover even more wonderful overall health with just 2 capsules per day!

PREMIER BLACK GARLIC FROM JAPAN



Richard Cohen, M.D.
Anti-Aging Specialist



Health Research Labs

“Research has proven garlic has powerful health benefits, but you must take it in high concentrations to have a noticeable effect.

*That’s why **Black Garlic Botanicals** supplement is such a miraculous solution. Rather than eat 8-12 cloves per day, you simply need to take 2 capsules per day.*

If you’re serious about protecting your heart and arteries with a natural solution, it’s important to act now, because there really is no time to waste.

*I believe your life is important, which is why I’ve arranged for you to try premium quality **Black Garlic Botanicals** – free of risk – for 60 days, so you can see for yourself how it can improve your entire well-being and appearance almost instantly.*

*As a health professional, I highly recommend you try **Black Garlic Botanicals** today.*

To your wellness,

*Richard Cohen, MD, Anti-Aging Specialist
American Academy for Advancement in Medicine*



60 Days Customer Satisfaction Guarantee



We promise you’ll be satisfied with your purchase — or you don’t pay.

Health Research Labs products are made with premium quality standards and the latest scientific research to ensure you’re happy with the results.

Here’s what we promise:

- Premier natural products developed by the best international scientific team of experts, doctors, and health professionals that meet rigid quality specifications.
- Unparalleled rebates to ensure the smartest investment in your health.
- An opportunity to try our products **FREE**, so that you can experience life-changing results firsthand.



**Call 1-888-461-0599
NOW to order**

For the next 7 days, you can SAVE UP TO \$289 on a powerful natural booster that may change your life.



*“I now have my blood pressure under control with Black Garlic Botanicals. This is a quality product!”
~ Rolf M.**



*“Black Garlic gives me more energy, more boost, and less stress. This product is excellent!!”
~ Bobby Mitchell**



*“My acid reflux is a thing of the past!”
~ Eldon K.**

The products offered in this publication are not intended to cure or diagnose health problems. These statements have been evaluated by the Food & Drug Administration. If you are currently on cardiovascular medication, do not discontinue. Speak to your physician before changing any medical regimen.

1 person in the U.S. dies every 40 seconds from these factors!

Are you at risk?

- You're over 50.
- You're 10-20 lbs. overweight.
- You smoke.
- You drink 2 or more glasses of wine or beer per day.
- You have a parent who has cardiovascular disease.
- You have high LDL cholesterol or a total cholesterol higher than 200 mg/DL.
- You have diabetes.
- You do not exercise regularly.
- You have a diet of rich foods.
- You don't sleep well.



DID YOU ANSWER "YES" to even one of these questions?

By answering "yes" to even one of these questions, your risk for heart disease is real and imminent.

If you fall into any of these categories, your risk is even higher!

- You are a woman.
- You are White, African-American, Hispanic, or Asian-American.
- You have had cardiac arrest or experienced a heart attack before.
- You live in the Southern part of the U.S.

YOUR RISK-FREE TRIAL OFFER GUARANTEE Get up to \$289 in savings!

Through this **RISK FREE TRIAL GUARANTEE**, HRL undertakes to send you the **Black Garlic Botanicals** regimen of your choice with the assurance you can try it for 2 full months without any financial risk on your part.

As such, you can freely judge for yourself, for 2 months, the exceptional natural benefits of **Black Garlic Botanicals** on your entire body. If by some extraordinary reason, during this trial period of 2 months, you felt that the benefits of **Black Garlic Botanicals** was disappointing, you simply return your order (even if the bottles are empty) along with your invoice, within 60 days of your order and return it to the address on this order form. In this case, HRL undertakes to reimburse you the full purchase amount by mail, less shipping and handling, regardless of the duration of the treatment chosen and without asking any questions.

With such a **RISK-FREE TRIAL GUARANTEE**, you can order the treatment of **Black Garlic Botanicals** of your choice without hesitation: in case of dissatisfaction on your part, you don't risk losing a single penny by ordering your **RISK-FREE TRIAL** of **Black Garlic Botanicals**.



SUPER-INTENSIVE

6 Bottles ...
plus 6 Bottles **FREE!**

Save a **TREMENDOUS \$440!**



MEGA-INTENSIVE

3 Bottles,
plus 3 Bottles **FREE!**

Save a **WHOPPING \$210!**



ULTRA-INTENSIVE

2 Bottles,
plus 1 Bottle **FREE!**

Save **\$80!**



INTENSIVE

1 Bottle
Save **\$10!**



Health
Research
Labs

**FOR FASTEST
SERVICE
CALL TODAY!
1-888-461-0599**



We at Health Research Labs believe your heart is of the utmost importance. That's why we're offering incredible options for you to thrive like never before — at no risk!

You receive an entire year's supply of supplements and only pay if you're completely satisfied.

But, the only way you can benefit is if you take advantage of this offer now. After seven days, we may not have it available anymore. Call to place your order now and be sure you don't miss out on unbelievable savings on this proven, best-in-class natural supplement.

**CLAIM YOUR ULTIMATE DIABETIC NEUROPATHY STRATEGY
NEUPATHIC SUPPLEMENT — THE PERFECT COMPANION TO BLACK GARLIC BOTANICALS**

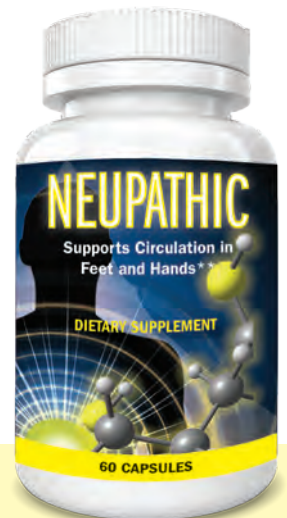
Diabetes Can Cause Nerve Pain & Tingling Numbness

Maintaining healthy blood sugar levels can help to stabilize conditions that in a diabetic state might damage your kidneys, blood vessels, skin, and eyes.

Common diabetic nerve pain symptoms include: shooting burning, pins and needles, numbness, electric shock-like throbbing, tingling, stinging, stabbing, radiating, and sensitivity to touch.

Nurohealth features a groundbreaking formula that can dramatically:

- ✓ Promote healthy blood sugar
- ✓ Promote increased wound healing
- ✓ Promote healthy insulin sensitivity & production
- ✓ Promote healthy heart and blood vessels
- ✓ Healthy blood sugar levels
- ✓ Vigor and alertness
- ✓ Healthy blood circulation
- ✓ Healthy nerve endings



Hurry! Limited-time offer for Black Garlic Botanicals customers only! Call 1-888-461-0599 to qualify or send in the order form.

BLACK GARLIC BOTANICALS RISK-FREE REPLY FORM

FEDERAL TRADE COMMISSION OFFICE OF THE SECRETARY FILED 2/24/2021 OSCAR NO. 60077 PUBLIC

YES! I'm ready to live better and enjoy a higher quality of life with a healthy heart! Please send me the supply indicated below.

ORDERED BY: (PLEASE PRINT)

Name _____

Address _____

City _____

State _____

Zip _____

Email _____

PAYMENT METHOD

I have enclosed a check or money order payable to "HRL" for the amount of \$ _____

Please charge the full amount to my credit card   

Credit Card Account Number

Expiration Date (MO/YR)

Signature _____

Daytime Phone _____



Health Research Labs
165 Pleasant Avenue
South Portland, ME 04106

3 Ways to Place Your Order:

1. BY MAIL: Place your order with cash, check or credit card. Simply detach this form and place it into the enclosed mailing envelope.

2. BY PHONE:
1-888-461-0599

3. ONLINE:
www.HRLsupplements.com

Subtotal	_____
S&H	_____
*RUSH Processing	+ \$4.95
TOTAL	_____

SUPER-INTENSIVE I get a 6 month supply, plus a 6 month bonus supply absolutely FREE! I pay only \$189.95 plus \$8.95 S&H (total of \$198.90) That's a total 12 month supply for only \$198.90! That's only 52¢ per day!



~~\$479.90~~ **\$189.95**

2 MONTH FREE TRIAL

SAVE \$289.45!

MEGA-INTENSIVE I get a 3 month supply, plus a 3 month bonus supply absolutely FREE! I pay only \$119.95 plus \$7.95 S&H (total of \$127.90) That's a total 6 month supply for only \$127.90! That's only 65¢ per day!



~~\$239.70~~ **\$119.95**

2 MONTH FREE TRIAL

SAVE \$119.75!

ULTRA-INTENSIVE I get a 2 month supply, plus 1 month bonus supply absolutely FREE! I pay only \$79.95 plus \$6.95 S&H (total of \$86.90) That's a total 3 month supply for only \$86.90! That's only 88¢ per day!



~~\$119.85~~ **\$79.95**

2 MONTH FREE TRIAL

SAVE \$39.95!

INTENSIVE I get a 1 month supply at the very lowest price available! I pay only \$39.95 plus \$5.95 S&H (total of \$45.90) for a 1 month supply.



\$39.95

2 MONTH FREE TRIAL

BLACK GARLIC BOTANICALS TOTAL PACKAGE WITH NEUOPATHIC The "Complete" package for those people also concerned about overall health. Get everything in the "MEGA-INTENSIVE" package plus FREE S&H, plus buy 3 months of Neuopathic for only \$119.95 and get another 3 months FREE! You save an incredible 50% off the regular price. Total price only \$239.90.



~~\$479.90~~ **\$239.95**

2 MONTH FREE TRIAL

SAVE \$239.95!

Quantities Are Limited.

Please Order By Next Tuesday! 1-888-461-0599

CALL NOW

RUSH PROCESSING: Add \$4.95

100% RISK FREE GUARANTEE Health Research Labs promises to provide you with only Pharmaceutical Grade supplements, doctor-formulated and manufactured in FDA Approved. Certified Good Manufacturing Process (CGMP) Labs in the USA. If you are not for any reason satisfied with the quality of any of our supplements, simply return the unused portion within 60 days of receipt for a prompt, no questions asked full refund, less S&H. Pharmaceutical Grade, FDA Approved Laboratory CERTIFIED By Health Research Labs.

Please remove my name from future mailings

HEALTH RESEARCH LABS

BREAKING NEWS: The Amazing Discovery
from Japan That's Improving Lives

BLACK GARLIC: The Most Incredible 'Food' For Your Body!

Worried about your blood sugar levels and cholesterol?



- ✓ See how this powerhouse directly affects your cells!
- ✓ Cleanse your body of unwanted toxins.
- ✓ Why you need to know about this "perfect human health food".



**2 easy capsules –
big health benefits.**

LEARN MORE INSIDE

LIMITED TIME OFFER — ORDER TODAY!

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U.S. Postage
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Research Labs

Exhibit B

Superfood Discoveries for Superior Health



Throughout History ...

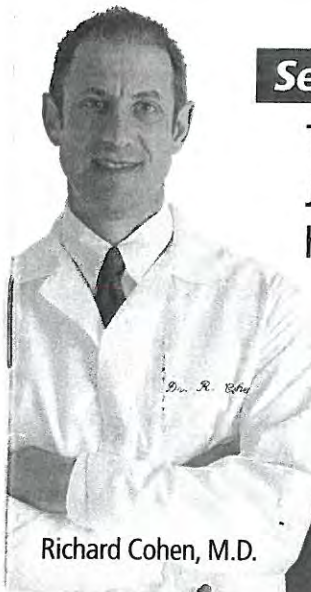
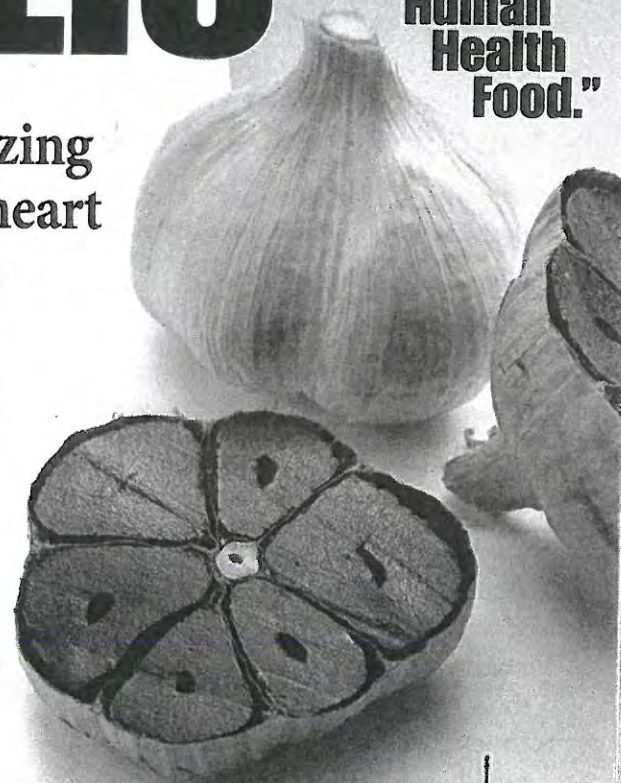
BLACK GARLIC

AVB

Called by Doctors and Scientists:
"The Perfect Human Health Food."

Has shown an amazing power to improve heart and cardiovascular health, maintain normal cholesterol levels, boost your immune system.

And MUCH MORE!



Richard Cohen, M.D.

See inside now...

To learn about a extraordinary city in Japan where many people live to a healthy 100+ with none of these common health problems we suffer from here in America...



Supported by Concrete Clinical Studies:

WALL STREET JOURNAL



Cutting-Edge Natural Medicine

“If you’re looking for a stronger heart and complete health overhaul...

Black Garlic is one of the few “Full Body Healers” on earth I trust 100%.”

Black Garlic is a proven miracle for... Cholesterol... Hypertension... Diabetes... Your Heart... Your Brain... Hyperglycemia... Weight Control and more.

Dear Friend,

What I’m about to tell you is really pretty amazing...

You see, there’s a place in Japan, called the Aomori prefecture, which is the **garlic capital of Japan...**

This ONE district produces nearly 80% of the total garlic crop in Japan.

But what it’s really famous for around the world is its fermented, healing Black Garlic! A proven super-food that has helped its citizens for thousands of years to live longer and healthier than you or I can expect to.

In fact, this Japanese city could be considered a miraculous “Blue Zone,” much like nearby Okinawa. This is defined by National Geographic Magazine as a place where people eat a unique diet that gives them extraordinary health benefits.

Black Garlic as a healing and longevity agent first gained a modern following and global popularity after Hirosaki University professor, Jiniti Sasaki, showed that Black Garlic reduced cell size of certain serious diseases.

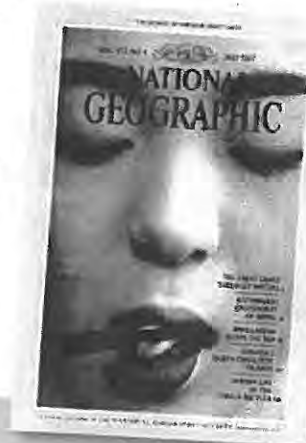
He knew he was on to something important when he conducted the same research using white garlic, but did not yield the same healthier results.

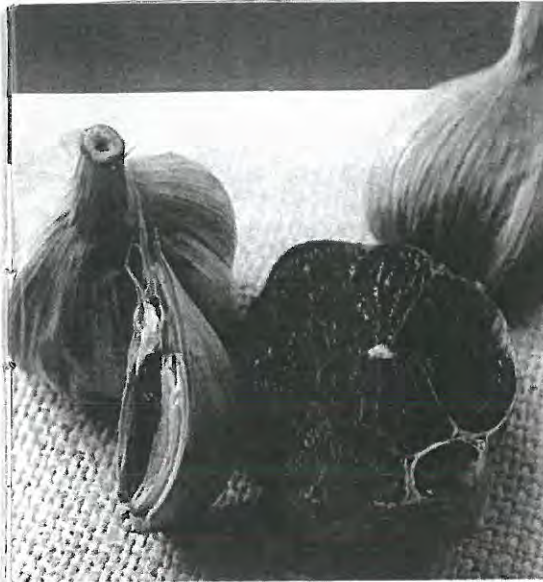
And while his clinical research confirmed that black garlic absolutely has unique healing properties...

This was NOT news to the

Japanese people who have been using it for thousands of years to live longer and healthier!

So while you may occasionally see garlic used as a ingredient in a natural





ONLY Black Garlic gives you a whopping 23 essential, health improving nutrients.

6 Essential Minerals:

- Sodium
- Potassium
- Magnesium
- Calcium
- Iron
- Zinc

18 Important Amino Acids:

- Isoleucine
- Luecine
- Lysine
- Methionine
- Histidine
- Phenylalanine
- Tryptophan
- Valine
- Arginine
- Alanine
- Asparagine
- Glutamine
- Glycine
- Proline
- Serine
- Tyrosine
- Cystine
- Threonine

BG18 is loaded with these nutrients your body needs!



supplement to promote good health, it is not anywhere near as potent and effective as fermented Black Garlic extract!

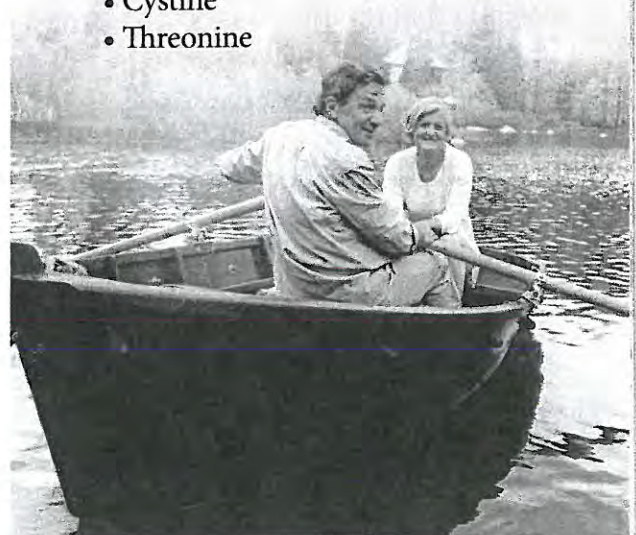
Because you see, when normal white garlic is fermented it undergoes an amazing transformation that COMPLETELY alters its chemical makeup ... and turns it into a supreme superfood!

Black garlic is fermented for a precise period of time at a high temperature, and under high humidity. This process turns garlic cloves dark, gives them a sweet taste, and alters their consistency. And it also makes them more potent and beneficial.

The proven health benefits it offers you are astounding!
For example:

- Black Garlic has been shown to have positive effects for more than 150 different health issues due to its numerous powerful natural phyto-chemicals.

Continued on page 5.



Call now 1-888-200-1834 for BG18 and see how it can help YOU.

BLACK GARLIC...

Is like rocket fuel for your body, your health and your longevity!



So how exactly does it help people in Japan live longer, healthier lives? Let's look at 6 ways it can help you do the same...

“Black Garlic has also been used by millions of Americans to improve heart health!”

1) It Helps Prevents Plaque Buildup...

In fact, it can help reverse plaque build-up in arteries — not just slow it down. Black Garlic keeps blood vessels barrier-free to create a smooth blood flow and alleviates symptoms of fatigue. It also strongly inhibits calcium binding, which is responsible for plaque build up.

2) Reduces Blood Pressure and Cholesterol...

Black Garlic helps reduce high blood pressure and lowers high levels of bad cholesterol and triglycerides.

3) Helps Naturally Regulate Weight...

Black Garlic helps enhance a healthy weight, enhances digestion, removes waste, and improves energy. It also lessens the effects of an unhealthy diet on your blood and liver. Black Garlic helps you get the best, easiest, most natural slimming results without the frustrations that come with diets.

4) Immunity Booster...

Black Garlic helps reduce inflammation and boost immune function. The allicin in black garlic, a sulfur-rich compound, is a powerful weapon against bacteria, viruses, fungi, and parasites. And it contains twice the antioxidant punch of fresh garlic, because of the fermentation process. Black Garlic may be as effective as an immune-boosting shot, and is an ideal preventative remedy.

5) Powerful Anti-Aging... Black Garlic is a great energizer and helps prolong a healthy life! It also helps repair age-damaged skin with double the amount of antioxidants than regular garlic. Like rust attacking metal, free radicals eat away at your cells and destroy them, causing aging. Black Garlic rejuvenates your body by positively impacting cellular health and strength.

6) Amazing Detox Agent... Black Garlic acts as a blood purifier and cleanses your body. It has antibacterial, anti-fungal properties and kills bacteria linked to stomach ulcers. Black Garlic supports cell regeneration and alkalizes your body to protect against disease. It also features abundantly rich oxygen to protect against abnormal cell growth, viruses, and bacteria.

And you can get all this with just TWO BG18 Black Garlic capsules a day!



These statements have not been evaluated by the Food and Drug Administration (FDA). This product is not intended to diagnose, treat, cure or prevent any disease.



Meet Dr. Richard Cohen, MD



Richard Cohen, M.D. is a nationally-recognized medical expert. As a specialist in nutritional medicine, he brings over two decades of experience in treating age-related illness.

He completed his undergraduate degree at Duke University with honors. And received his medical degree from Hahnemann Medical University in Philadelphia. Dr. Cohen is a member of the American College for the Advancement of Medicine.

Dr. Cohen's expertise has earned him the attention of physicians and health professionals across the U.S. He has trained the American medical community on dietary issues for over 20 years. And recently, he was recognized as a leading authority in using diet, nutritional supplements and lifestyle to enhance well-being.

In recent years, he has helped develop a number of successful, innovative treatments like BG18 to help his patients eliminate a variety of health problems.



Continued from page 3.

- It can reduce inflammation, boost immune function and boost cardiovascular health in multiple ways.
- One of Black Garlic's main compounds is allicin, a sulfur-rich compound that is likely its most powerful weapon against bacteria, viruses, fungi, and parasites.
- Black Garlic has also recently been discovered to contain **TWICE** the antioxidant punch of fresh garlic due to its extensive aging process.



It has significant, unique health effects that NO other substance on earth has.

Black Garlic is the best example of a food offered in abundance by Mother Nature, turned into a "Health Bonanza" by ancient man through a simple, yet astonishing process, and then proven by modern science to have a revitalizing effect on your body!

Numerous studies show Black Garlic's amazing health potential in nearly every area of your body, from clogged arteries to preventing insect bites and ear infections.

Black Garlic isn't just a cure-all for your body...

Continued next page...

Raw Garlic vs. Black Garlic



There's NO Comparison When it Comes to Healthy Benefits For You...

As raw garlic ferments and turns black... An astonishing transformation takes place that can improve your health and vitality!

This chart shows just one example of how the fermentation process changes essential amino acids in garlic. These essential amino acids are protein-building blocks that are NOT produced by your body. They must be included in your diet.

Essential Amino Acids	Raw Garlic (per 100g)	Black Garlic (per 100g)
Isoleucine	217 mg	371 mg
Leucine	308 mg	779 mg
Lysine	273 mg	385 mg
Methionine	76 mg	210 mg
Histidine	113 mg	287 mg
Phenylalanine	183 mg	461 mg
Tryptophan	66 mg	102 mg
Valine	291 mg	610 mg

This is only ONE example of what happens to raw garlic during the fermentation process. This is truly amazing... How black garlic creates new nutrients that are enhanced by the fermentation process!

BG18 is packed with the power of 1200 mg of potent, no-taste, no-odor, fermented Black Garlic in daily use capsules.



There's even solid evidence, as seen in Japan's Aomori province, and more, that Black Garlic can help slow your aging process.

Black Garlic contains a wide range of phytochemicals that act together to produce a wide variety of responses in your body. It's

also rich in critical nutrition like manganese, calcium, phosphorus, selenium, and vitamins B6 and C, so it's beneficial for your bones as well as your thyroid.

Garlic also helps your body cleanse itself of toxic heavy metals, such as lead, mercury, cadmium and arsenic.



Clinical studies abound on the amazing effectiveness of Black Garlic...

One of Black Garlic's most potent secret weapon is a compound called Allicin.

Researchers have found that it's a highly-effective natural "antibiotic" that takes care of anything in its path. Even better, in the face of Allicin, bacteria aren't able to resist it. Something rarely seen in medical circles.

In studies, Black Garlic has shown consistent, positive results over fresh garlic, says Matthew Budoff, a professor at the David Geffen School of Medicine at University of California, Los Angeles.

He is also the co-author of a study that found Black Garlic reduced the amount of soft, newly formed plaque

in arteries, compared with placebo.

And in a 2009 animal study, Japanese researchers found that black garlic was more effective than fresh garlic in reducing the size of tumors. The study was published in the journal Medicinal and Aromatic Plant Science and Technology.

In another study, black garlic was found to have twice the antioxidant levels as fresh garlic—as the aging/fermenting process appears to double the antioxidants.

Black garlic is also packed with high concentrations of sulfurous compounds, especially one called s-allylcysteine.

Science has shown a number of health benefits from SAC, including inhibition of cholesterol formation.

Continued next page...

Look at What People are Saying About BG18...



"I'm a natural health consultant and my wife and I have a therapy practice where we recommend supplements. I'm grateful for having BLACK GOLD BG-18 in

my life! The main features I like about this product are heart health, a boosted immune system and living with less problems."

– Douglas S.



"I'm a senior, 83 years old, and just had a good to excellent health checkup!"

– Maria G.



"I feel stronger, feel my general well being is better, and also feel I have stronger immunity. I also have my husband taking this product and he also will not be without it now!"

– Jeannine S.



"My blood sugar levels have improved. My A1C dropped by 2 points. My blood pressure has also been lowered. I recommend this product because IT WORKS!"

– Lorraine T.

These testimonials are from real users of BG18. Results may vary based on the user.

Call now 1-888-200-1834 for BG18 and see how it can help YOU.

Could Black Garlic be the Japanese Secret to Significantly Reducing Heart Attack Risk? For all natural, safe, effective heart health, nothing even compares to Black Garlic!

That's why, for many people across the U.S., Black Garlic has been the answer to reducing their risk of America's #1 killer...

Each year, 635,000 people in the U.S. have their first heart attack! And cardio-vascular disease is the leading cause of global death, causing 17.3 million deaths a year – a number that's expected to grow to more than 23.6 million by 2030.

However, can you guess which ONE country seems to *easily* avoid this serious epidemic... Yes, you, guessed it... JAPAN!

Despite smoking and blood pressure levels similar to those in Western countries, the Japanese are seemingly IMMUNE from the ravages of heart disease.

So what are they doing differently? They are HUGE believers in, and users of, Black Garlic! And this discovery has turned out to be a true miracle elixir for your heart, and your entire cardiovascular system.

Yes, Black Garlic is a true miracle for cardiovascular health! Just 1 capsule knocks down cholesterol and high blood pressure within days. It can also unblock, clean, and strengthen your arteries.

Call now for BG18 and claim the same health benefits for yourself!

There's also great news for those who suffer from type 2 diabetes...

This condition can wreak havoc on your health due to the effects of oxidative stress. Uncontrolled diabetes may lead to serious complications like kidney disease, heart disease, nerve damage and vision problems – sometimes even blindness.

However, the potent antioxidants in black garlic have shown to

lessen oxidative stress caused by increasing blood sugar levels. Multiple studies have found that its high level of antioxidants exert an even stronger effect than regular garlic and could be even more helpful in preventing complications of diabetes.

There's NO doubt... Black Garlic is a perfect "Wonder Food" that EVERYONE should consider taking every day.

Continued on page 10.



Black Garlic also helps you in an unexpected way... *When it comes to your weight.*



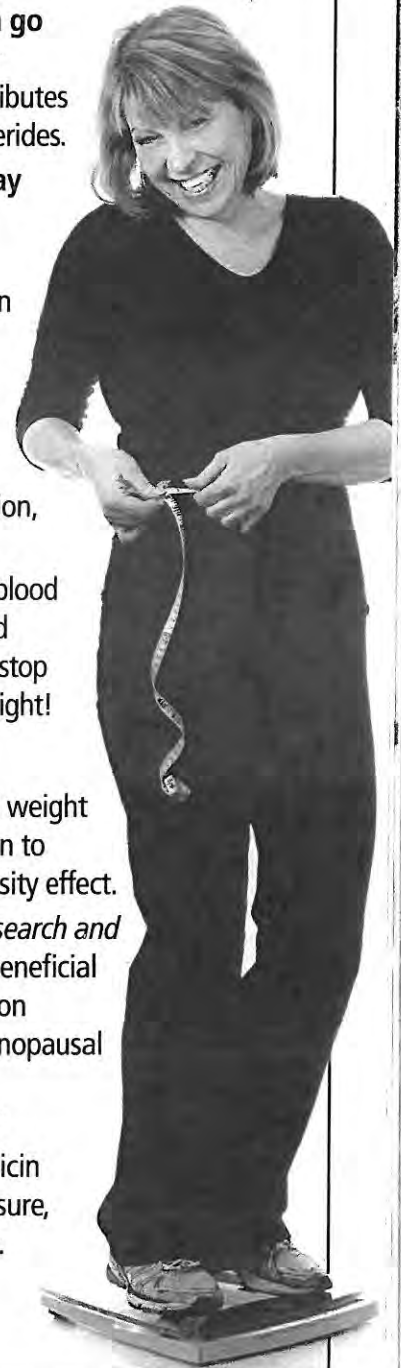
It's no secret that belly fat and poor heart health go hand in hand. In fact, studies show that fat around your stomach poses a higher risk than any other fat, and contributes to high blood pressure, poor metabolism and high triglycerides.

Some good news is that just 2 BG18 capsule a day can help you lose weight and reduce your risk in several different ways ...

- ▶ Allicin, an active component of black garlic, has shown to enhance weight loss.
- ▶ Black Garlic has a high level of iodine, an effective nutrient for treating hyperthyroid conditions, which nearly always leads to extra weight gain.
- ▶ Black Garlic also can help process fat, enhance digestion, remove waste, and improve energy.
- ▶ Plus, it lessens the effects of an unhealthy diet on your blood and liver. So you can boost your immunity, reduce blood pressure, protect your blood vessels from damage, and stop inflammation all while helping you reach your ideal weight!

Clinically proven to work...

- ▶ Korean researchers published findings from an animal weight loss study in the *Journal of Nutrition*. Garlic was shown to reduce body weight and showed a significant antiobesity effect.
- ▶ A 2012 study in *Nutrition Research and Practice* reported incredible beneficial effects of aged garlic extract on cardiovascular risk in postmenopausal women.
- ▶ And the *American Journal of Hypertension* showed that allicin positively impacts blood pressure, insulin, and triglyceride levels.



Call now 1-888-200-1834 for BG18 and see how it can help YOU.



In BG18 you'll get only 100% pure, premium-sourced black garlic extract.

- ✓ Protect your heart!
- ✓ Lower high cholesterol!
- ✓ Find your ideal weight!
- ✓ Protect against diabetes!
- ✓ Cleanse your body of toxins!



Continued from page 8.

So how is Black Garlic transformed into something so special?

Developed in Asia, black garlic has been gaining popularity among Westerners for several years now, but it has recently caught the eye of the health-minded due to studies revealing its impressive nutritional properties.

Black garlic is produced by “fermenting” whole bulbs of fresh garlic in a humidity-controlled environment in temperatures of about 60 to 90 degrees F for 86 days. No additives, no preservatives, just pure garlic.

Once out of the heat, the bulbs are left to oxidize. This lengthy process causes the garlic cloves to turn black and develop a soft texture.

As the white cloves slowly transition into their final black appearance, compounds in the fresh garlic transform into a whole new range of compounds.

In its potent, Blackened form, it is then dried and the powdered extract can be put in a capsule. Just

like you'll find in our BG18 pure Black Garlic extract formula.

Our BG18 Black Garlic formula gives you the full, raw, health-improving power of Black Garlic!

BG18 has only ONE purpose: To give you the same gift of longevity, health and vitality it gives the Japanese people who take it regularly.

Especially when it comes to ending your health problems, low energy and issues related to poor heart health, diabetes overweight issues, aging and more, without drugs.

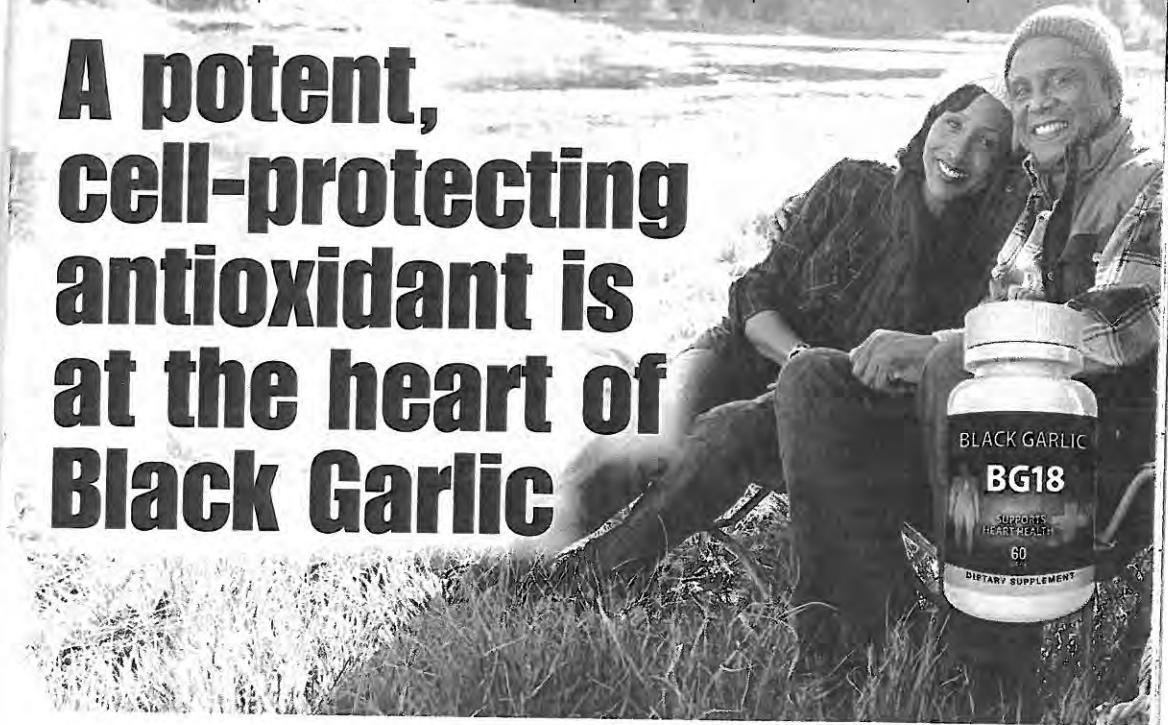
You might find other products that have ingredients for one or the other of these issues, but I guarantee you won't find ANYTHING with the 1,000+ year track record and unique healing power as the Black Garlic in BG18.

BG18 is the *only* 100% all natural solution you need to help add healthy years to your life, and right the ship when it comes to your heart health! All this in a single, daily dose that costs only pennies a day.

Continued on page 12.



A potent, cell-protecting antioxidant is at the heart of Black Garlic



Because of its unique composition, black garlic is recognized for its high antioxidant content, with one... S-allyl-cysteine... having huge scientific interest for its potency.

A study published in 2012 in the *Journal Oxidative Medicine and Cellular Longevity* showed that this antioxidant is especially abundant in black garlic, unlike common white garlic, which contains only small amounts. As a result, black garlic can help fight oxidative stress, free radical damage and cellular aging. In addition, the antioxidant power of S-allyl-cysteine has health benefits for the cardiovascular system.

The cardio-protective effect of black garlic...

Black garlic can also improve your lipid profile, an important factor in protecting against cardiovascular problems. This beneficial effect was the object of a study published in the journal *Nutrition*, where researchers evaluated the potential of black

garlic among 55 people with high blood cholesterol levels. They found increases in 'good' HDL-cholesterol in patients supplemented with black garlic compared with those given a placebo.

Black garlic also has significant anti-inflammatory effects...

Black garlic also contains two compounds – AGE-1 and AGE-2 – which a number of studies suggest offer anti-inflammatory help. To evaluate these effects, Korean researchers studied levels of molecules in the inflammatory response.

Published in the journal, *Phytotherapy Research*, their findings confirmed the anti-inflammatory action of AGE-1 which, reduced levels of nitric oxide and prostaglandin. Secretion of proinflammatory cytokines was similarly suppressed by of AGE-1.

These observations suggest that the AGE-1 compound present in black garlic can have a potent anti-inflammatory effect.

BG18 can deliver all these health benefits to you! Call now.

Call now 1-888-200-1834 for BG18 and see how it can help YOU.



Black Garlic:

As reported by the *Wall Street Journal*...

Black garlic has shown potential health benefits in animal studies, including a report last year by Korean researchers that it helped control cholesterol in rats fed a high-fat diet. Another aged garlic product, called Kyolic from Japan, has shown benefits in humans.

The evidence is "quite compelling" that Black Garlic seems to help mitigate cardiac risk factors, such as high cholesterol and blood pressure, says David L. Katz, director of Yale University's Yale-Griffin Prevention Research Center.



If you're looking to add healthy years to your life, and want to avoid many of the health problems that plague so many seniors, call toll-free 1-888-200-1834 now for BG18.

Continued from page 10.

Reply now 100% risk free for all-natural, health-restoring, risk-reducing BG18!

I've arranged for you to try premium quality BG18 — risk-free — for 60 days, so you can see for yourself how it can improve your entire well-being and appearance almost instantly.

As a health professional, I highly recommend you try BG18 now.

In my opinion, it is the most potent superfood, health-improving formula on the market today! And the ONLY one I'm confident can improve your risky health issues and help you get back to normal.

Don't wait... reply now to start on BG18 and get special, first-time buyer only low pricing. Plus, if you reply now, you'll also get a special offer on our astounding HydraFuel product!

Don't put your good health at risk. BG18 is a popular, natural solution for men and women of all ages who struggle to maintain heart health, healthy blood sugar levels and more. And of course you're backed by our 100% Money Back Guarantee...

Yes, your reply is 100% risk free... If you're not 100% satisfied with your improved health after using BG18, simply send it back for a full refund of your

Doctors' Opinion...



Question:

What is the single, greatest health benefit of Black Garlic?

Answer:

In my experienced medical opinion, Black Garlic's most important benefit is its all natural help for heart issues and diabetes.

From potential life extension to antioxidant help to disease protection, no doubt, Black Garlic can do a lot to help you. But what I see in so many people is poor heart health and serious blood sugar issues. And I believe that is where its greatest benefit lies.

And if you have BOTH, that is a dangerous combination...

- 2 out of 3 people with diabetes die of heart disease or stroke.
- 47% of Americans are unaware that diabetes can lead to heart disease.
- 58% don't know that it can affect their sex life.
- 28% don't believe diabetes is a serious disease.
- Having high amounts of sugar in the bloodstream develops into fat that clogs, narrows, and inflames the blood vessels, causing additional wear and tear.

I'm confident BG18 can help improve both of these dangerous health issues and get you on firmer footing. And no other natural healer can help protect you from both like Black Garlic can. Call now for BG18 and see for yourself.



purchase price within 60 days.
No questions asked.

I look forward to hearing from you!

Sincerely,

Richard Cohen M.D.

Richard Cohen, M.D.
Whole Body Supplements
Medical Director

P.S. Amazing BG18, packed with 1200 mg of pure Black Garlic gives you the power of a variety of needed good-health nutrients all in two capsules!

Most notably, it can help your entire cardio system run smoothly. Reply now if you want to enjoy the longer life



Call now 1-888-200-1834 for BG18 and see how it can help YOU.

and ultimate health benefits Japanese people enjoy every day! BG18 is 100% effective and safe to use daily! Remember, thousands of people have already used it to help extend the healthy years of their life! **Call now risk free 1-888-200-1834.**

P.P.S. Sign up for our FREE weekly email newsletter! It's called *Dr. Cohen's Healthy News Now...* and it discusses the latest news on many different health issues. Our customers love it! **Just give us your email address when you place your order for BG18.**

Get up to 7 Bottles of BG18 FREE!

That's right... See your Risk Free Reply Form now for details! Proven help is on the way for your heart and entire body!



Grab This Combo Offer and Save

When you reply for BG18 now, you also qualify for a special, discounted supply of our trusted HydraFuel Formula.

Support your cellular hydration with this premium formula that contains 14 vitamins and minerals to help keep your cells 100% healthy and hydrated... and you looking and feeling young!

You'll also give your body the combined antioxidant activity of 29 vitalizing superfruits, phytonutrients, herbs and vegetable extracts to hydrate your dried out cells!

Improve heart health, boost energy, improve sexual health, beat stress, improve performance and reduce wrinkles... These are just a few of the benefits found in HydraFuel.

It can fill in your cells' nutrient gaps to give your health a quick and lasting jumpstart. Which is especially important if your healthy has been suffering as a result of poor digestion.

Try the amazing powers of HydraFuel for yourself. You'll SEE and FEEL the difference that Optimum Cellular Hydration can create for you. You'll look and feel years younger... feel more energy... sleep better... move better... and enjoy a revival of your health!

Don't wait... Reply now and get this perfect companion product to BG18.



- Vitamin C
- Vitamin E
- Vitamin B1
- Riboflavin
- Niacin
- Vitamin B6
- Folic acid
- Vitamin B12
- Biotin
- Pantothenic acid
- Calcium
- Magnesium
- Zinc
- Chromium
- SynerTea®
- Amla
- Spectra: which contains over 2 dozen fruit and vegetable extracts



BG18 Risk-Free Reply Form

Up to \$384.85 in total savings and get Free Shipping!

YES! I'm ready to reap the same amazing health rewards the Japanese have enjoyed for centuries. I've seen the impressive research on Black Garlic from leading medical institutions around the world that prove taking black garlic can substantially improve my health! I understand I'm covered by your 60-day money back guarantee... Either BG18 works as promised, or I can get a full and fast refund. Please send me the following supply:

SUPER-INTENSIVE: I get a 5 month supply, plus a 7 month bonus supply absolutely FREE! I pay only \$219.95 and get FREE SHIPPING! **\$604.40 \$219.95
60 DAYS RISK FREE!
SAVE \$384.45!**

MEGA-INTENSIVE: I get a 3 month supply, plus a 3 month bonus supply absolutely FREE! I pay only \$139.95 and get FREE SHIPPING! **\$304.70 \$139.95
60 DAYS RISK FREE!
SAVE \$164.75!**





ULTRA-INTENSIVE: I get a 2 month supply, plus a 1 month bonus supply absolutely FREE! I pay only \$84.95 and get FREE SHIPPING! **\$154.85 \$84.95
60 DAYS RISK FREE!
SAVE \$69.90!**

INTENSIVE: I get a 1 month supply for only \$44.95 + \$5.95 S&H! **\$49.95 \$44.95
SAVE \$5.00!**

TOTAL PACKAGE: I get everything is the Mega-Intensive Package plus buy 3 months of HydraFuel for only \$249.95 and get another 3 months FREE! All of this with FREE SHIPPING! **\$604.40 \$249.95
60 DAYS RISK FREE!
SAVE \$354.45!**

Select Your Preferred Method of Payment:

Enclosed is my check, cash or money order for: \$ _____
(Make check payable to Whole Body Supplements, 165 Pleasant Ave., South Portland, ME 04106)

Please bill my credit card:    

Card #: _____ Expires: ____/____/____

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

E-mail: _____ Tel: (____) _____

**For Fastest Service
Call Toll-Free:
888-200-1834**

Mail Now in the enclosed envelope:
Whole Body Supplements
165 Pleasant Ave.
South Portland, ME 04106

Or visit:
www.WholeBodySupplement.com

Our Iron-Clad Guarantee: Try the BG18 Risk-Free For 60 Days.

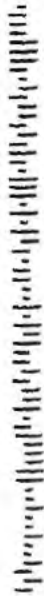
If You Don't Feel 100% Better – YOU'LL GET YOUR MONEY BACK!

YOU will be the only judge. You've read about the amazing and unique health benefits of BG18. For up to 60 days, you can use it completely risk free in your own home and see your results. If you are not 100% satisfied, you can request a full refund of your purchase price. No questions asked.



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BG18-S4-US

FREE SHIPPING!

See Inside to Learn More About This...

BLACK GOLD

That is transforming people's health, especially for their **HEARTS.**



"Nothing improves lives like this does."

- ✓ Increases energy
- ✓ Strengthens the immune system
- ✓ Promotes anti-aging effects
- ✓ Enhances recovery from fatigue
- ✓ Improves restfulness
- ✓ Supports healthy circulation



Richard Cohen, M.D.,
Scientific Advisor

See More Inside Now...

Exhibit E



Richard Cohen, M.D.
Scientific Advisor

“When it comes to a sudden heart attack... What You Don't Know CAN Hurt You!”

Do you **KNOW** what **YOUR** arteries look like right now?



All Clear!



Uh Oh!



DANGER!



Keeping your risk low and your **HEART** healthy is all about keeping your arteries **CLEAR!** See inside for help from a revolutionary, new, heart-helping liquid drop formula...

SEE INSIDE to discover a natural nutrient that is up to **95% EFFECTIVE** at maintaining clear arteries and reducing risk of a heart problem!





"It's no secret... Heart Attack is the #1 killer of men and women."

"If you want to AVOID it, I have good news about a revolutionary NEW and NATURAL treatment that can help keep your arteries clear and your mind at ease."

If you don't think a Heart Attack... Stroke... High Blood Pressure or other life threatening issues could ever happen to you... Please, think again.

Dear Friend,

I'm sure you'd agree, there's *nothing* funny about a heart attack.

As the #1 killer of men AND women in the U.S., if you haven't given any thought to heart attack prevention, it's time to get on board!

Unlike other common health problems related to aging, like low energy, sore joints, bad memory, an enlarged prostate or menopause... you can't always FEEL or SEE a heart attack or stroke coming.

It can come out of nowhere, at any time.

And you don't even *have* to be older. While it is more common for people age 55+, the reality is it can happen to anyone, at any age.

As a medical doctor, I routinely encounter people who don't fully understand that a heart attack or stroke is *not* all about their heart. It is more about their arteries. Your heart is *not* usually the problem. **You can have a strong, healthy heart and STILL suffer a serious, sudden heart attack or stroke.**

Avoiding a heart attack is all about keeping your arteries clear, your cholesterol in check, your blood pressure low and your risk of a blood clot low... so accumulated plaque does not close off an artery or break off and cause a stroke.



Now there's a new, improved twist on our most effective natural, heart-helping treatment.

Before I tell you what this amazing treatment is, I just want to mention that of course you can always undergo a medical procedure to clear out your arteries mechanically.

In fact, heart-related treatments are a huge profit center for hospitals and doctors. But like any procedure, they are expensive, invasive, time-consuming and risky.

Meet Dr. Richard Cohen, M.D.

Richard Cohen, M.D. is a nationally-recognized medical expert. As a specialist in nutritional medicine, he brings over two decades of experience in treating age-related illness.

He completed his undergraduate degree at Duke University with honors. And received his medical degree from Hahnemann Medical University in Philadelphia. Dr. Cohen is a member of the *American College for the Advancement of Medicine*.

Dr. Cohen's expertise has earned him the



attention of physicians and health professionals across the U.S. He has trained the American medical community on dietary issues for over 20 years. And recently, he was recognized as **a leading authority in using diet, nutritional supplements and lifestyle to enhance well-being.**

In recent years, he has helped develop a number of successful, innovative treatments like the **Ultimate Heart Formula to help his patients eliminate a variety of health problems.**

Instead, right before you is a simple, safe, inexpensive, non-painful and preventative option that could help you say goodbye to your heart surgeon and avoid an angioplasty.

As a doctor, I'll *never* recommend surgery if I think there is a better way. And in this case, I do firmly believe there *is* a better, more natural and gentler way to help keep your heart strong and your arteries free and clear for greater peace of mind.

If you take this easy and safe step, and keep the blood inside your arteries moving fast and easy like it should...

- The risk of heart-related issues can be minimized and give you greater peace of mind.
- You could reduce your risk of surgery.

(continued on page 5)

Keep Reading for an Exclusive, Doctor-Approved Clear Artery Support Formula!

Be sure to take advantage of this **GREAT COMBO OFFER** on page 15...

Eydroxin is a 3-in-1 anti-aging miracle that quickly regenerates every cell in your body and can help you live longer and healthier.

It will help you begin to eliminate premature aging and promote wellness everywhere in your body! You'll slow the aging process, restore energy, improve cardiovascular health, help with great looking skin, relieve discomfort, and healthy brain function. And more!

It is the perfect companion product to Ultimate Heart Formula and offered at a deep discount!



Great Combo Offer!

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

Help Keep Your Arteries Clear and Enjoy More Peace of Mind! Call Toll-Free 888-462-9386 • 3 HRL005070

Inside a Blocked Artery...

A very dangerous situation to be in!

Even though it's called a "Heart Blockage," this term is commonly used to refer to coronary artery disease, a build up of plaque that "narrows" the inside of the arteries that supply your heart with blood.

An artery blockage, if severe enough can prevent your heart from getting the blood it needs to function, especially when more blood flow is required, such as during exercise. This can lead to **chest pain** and **shortness of breath**.

Tests can be used to see if there are sections of arteries that are so blocked that blood flow is at risk. However, these tests are *not* perfect, and in people known to be at high risk, the best way to directly assess a blockage is to look at a blood vessel or artery itself with an angiogram.

A moderate amount of blockage is in the 40-70% range. Usually heart blockage in the moderate range does not cause significant limitation to blood flow or cause symptoms.

Severe heart blockage is typically greater than 70%. This degree of narrowing results in significantly reduced blood flow to the heart and can cause chest pain and shortness of breath.



And if there is a 100% blockage, this can stop blood flow and lead to a heart attack! If a heart attack victim is treated quickly, the blockage can be addressed surgically with a stent to allow blood flow to resume. However, if this



Our Ultimate Heart Formula can help support a healthy heart, healthy cholesterol and healthy blood pressure.

As blockages in your veins and arteries become clear, you can experience better blood circulation — resulting in more energy, better sleep, sharper mental clarity and better health.

treatment isn't done within a few hours, then the heart can die, and cannot usually recover.

The other fatal risk is if part of a blockage breaks off and travels into the brain to cause a stroke.

A stroke occurs when the blood supply to your brain is interrupted or reduced and deprives your brain of oxygen and nutrients, which can cause brain cells to die.

A stroke can be caused by a blocked artery or the leaking or bursting of a blood vessel under pressure.

When it comes to your heart, as they say, an ounce of prevention goes a long way! You can do A LOT to support your heart health by taking the Ultimate Heart Formula! So don't wait any longer.

- You could help maintain normal cholesterol and blood pressure.

- You could improve your circulation.

- You could reduce shortness of breath.

Now, I'm sure you'd agree, that is A LOT of worry and health risk you can leave behind!

And here's how you can do it... By using our flagship heart health formula called the **Ultimate Heart Formula**.

I've seen for myself the powerful effect of the ingredients I'm about to show you. And as you'll read on further pages, our **Ultimate Heart Formula** has had a huge effect on people like you, even some who thought they might die when conventional medicine could not help them...



And our Ultimate Heart Formula did!

Now, if you're going to use this formula to help keep your heart strong and your arteries clear, then you should know a little bit about how it can help you. **Take a look...**

CoQ10 is the world's most

proven-powerful, heart-helping nutrient.

This heart and artery friendly miracle was first discovered in 1957. It's called **CoenzymeQ10** – or CoQ10 for short, and it is made naturally in your body.

To date, there have been more than 60 studies showing CoQ10's beneficial effect on heart health, the results of which, were incredible!

Taking this powerful, natural nutrient every day can help significantly strengthen your heart

(continued)

Why Our Revolutionary Drop Formula Will Serve Your Heart Better.

Chances are you may have taken a heart health formula in the past...

And chances are that formula was in the form of a pill or capsule.

However, our leading, **Ultimate Heart Formula** is in the form of a drop that goes under your tongue. **Here's why...**



A "Heart Strong" Formula!

Instant absorption... That's what makes our formula so effective for so many people!

You see, when you take a capsule or pill, it has to pass through your stomach acid, which is strong enough to dissolve a razor blade!

So most pills and capsules don't stand a chance to get into your blood stream where they can be carried to where they need to be.

Our liquid drops go right under your tongue to be instantly absorbed into your body, and can get right to work

strengthening your heart and maintaining clear arteries.

Like so many thousands of others, you'll love our **Ultimate Heart Formula** to not only help you feel better, but to also give you invaluable peace of mind.

You'll know you are doing all you can to keep your cardio system running well! Reply now 100% risk free for Ultimate Heart Formula instant absorption drops!



and help prevent an unexpected heart attack.

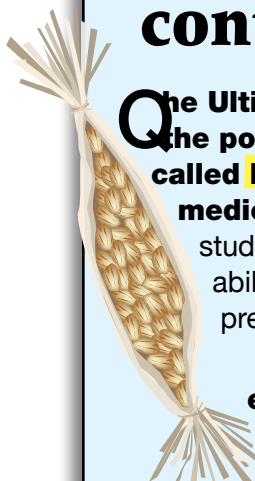
For example, in one study, 100% of cardiologists, treating 806 patients for weakening hearts and loss of blood flow to the heart, reported **“significant improvements”** in their patients’ symptoms.

Two studies reported in the medical journal, *Pharmacotherapy*, that 51% and 43% of people were able to get off blood-pressure and cardiovascular medication with the help of CoQ10 treatment.

In another CoQ10 study, reported in the medical journal, *Clinical Investigator*, 100% of patients with serious heart problems experienced an improvement in their symptoms. And **80% experienced beneficial blood-pressure levels.**

Furthermore, in yet another study involving 2,664 heart patients over a 3-month period, the results showed that 75% of people experienced
(continued on page 8)

The Ultimate Heart Formula also contains a powerful, clot-busting agent!



Que **Ultimate Heart Formula** gives you the power of a Japanese soy plant called **Natto**, with a **1,000-year-old medicinal history!** And recent scientific studies have shown it has the uncanny ability to liquefy blood-clots and help prevent them from occurring at all!

This is so important because even a blood-clot the size of a pin-head can be deadly!

Like EDTA and CoQ10, the results from the clinical studies carried out on Natto have been remarkable!

For example, researchers from JCR Pharmaceuticals, Oklahoma State University, and Miyazaki Medical College, gave people 200-grams of Natto before breakfast. **The result...**

Natto was able to reduce the time it took their bodies to dissolve a dangerous blood-clot by 48% within just two hours of treatment. Plus, their bodies retained this enhanced ability to dissolve blood-clots for up to eight hours. **And that’s not all...**

In another study, performed by Miyazaki Medical College, people were given Natto. Within just two hours, their systolic blood pressure decreased, on average, from



173mmHg to 155mmHg. And their diastolic blood pressure decreased from 101mmHg to 91mmHg.

And according to Dr. Martin Milner, a researcher of cardiology and pulmonary medicine at the Center for Natural Medicine in Oregon...

“Natto represents the most exciting development in the prevention and treatment of cardiovascular related problems. We have finally found a potent natural agent that can help thin and dissolve clots effectively, without side-effects.”

The bottom line is: According to the *American Thrombosis Association*, up to 20-million cases of blood clot-related illnesses are reported each and every year. But now, thanks to Natto in the **Ultimate Heart Formula**, you have a proven safe way to help your body support healthy arteries.

We have been flooded with testimonials for our Ultimate Heart Formula!



“My blood pressure is normal.. Tastes good. I also have more energy and a more stable pulse.”*
—*John A. Jones*

“Excellent Results. No Pain! Easy to Take!”

Thank you for the **Ultimate Heart Formula**. It gives me more energy. It’s easy to take, has no unwanted side effects. **It makes life easier with no pain in my heart. I highly recommend the Ultimate Heart Formula to anyone who has heart problems.”***

—*Dawn Simoneau*



“I have no heart problems since starting Ultimate Heart Formula many years ago. Thank God for the ad I read years ago. I am now 81 and going strong. Sorry I’m bragging now.”* —*Vicki Miles*

“Most products that we send for through the mail do not do what is claimed. I had PVC’s which I hated so much. **After using the Ultimate Heart Formula I feel great and am so happy.”*** —*Darlene H. Juhl*



“I had occasional rapid heart beats and irregular heart beats. **After taking Ultimate Heart Formula I feel great and have felt great since.** I have been taking this product almost 12 months. It’s easy to take and quick to work.

Convenience. Taste. Results.”*

—*Fred Memmer*



“Met my expectations. I like that it is taken orally. **I have been free from chest pains since the start. It gives me confidence when I go to bed at night that I will awake to see another day.** I am 85 and was diagnosed with mitral valve prolapse many years ago.”* —*Diana Lessard*

“Peace of mind. I no longer



have to worry about heart problems. My father did chelation for the heart.”* —*Christine Robbins*

“I feel more positive and more active. My arteries and veins are clear. I feel 50 years old.”*

—*Joan E. Johnson*



Call Toll-Free 888-462-9386 for Ultimate Heart Formula instant absorption drops!

*These are real results from real users of the **Ultimate Heart Formula**. Individual results may vary. We guarantee you will love this product or your money back.

fewer skipped heartbeats and 63% experienced a reduction in irregular heartbeats.

And according to studies reported in the *Cardiovascular Drugs Therapy* medical journal, **CoQ10 can improve the condition of 91% of patients** who have suffered a disastrous interruption of blood-flow to the heart.

In even MORE studies, heart patients taking CoQ10 were found to have less than one-third as much chest pain and 75% fewer heart rhythm problems than those not taking CoQ10.

Best of all: There have been more than 1,000 published papers that PROVE CoQ10 is completely safe. Long term trials have even shown that supplementing with CoQ10 is absolutely safe and non-toxic even after 8-years of use.

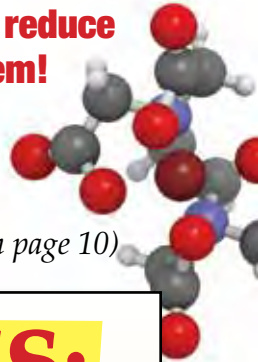
That's why CoQ10 researchers were awarded the Nobel Prize for Science, the Priestly Medal from the American Chemical Society, and the National Medal of Science presented by The President of The United States.

It's absolutely amazing! And that is just the start of our **Ultimate Heart Formula**. There's much more!

EDTA is up to 95% effective at maintaining clear arteries and helping to reduce the risk of a heart problem!

It's true, Ethylene Diamine Tetra-acetic Acid – or **EDTA** has shown to be 95% effective in helping maintain

(continued on page 10)



CONSTRICTED ARTERIES:

**Lead to high blood pressure...
Which is also a huge risk to your health.**

Qhere are few medical conditions that can kill an unsuspecting person more suddenly than a stroke or heart attack... caused in part by **HIGH BLOOD PRESSURE**.



against your artery walls as your heart pumps it through your body, usually caused by blocked arteries. If this pressure rises, and stays high over time, you have **High Blood Pressure**.

Make no mistake, your blood pressure is a KEY indicator of your heart health.

This makes your heart work harder

That's why it's the **FIRST** thing they do when you visit your doctor. It's an instant indicator of your heart health. If it's too high, or too low, and you could be in danger.

to pump blood to your body, and contributes to hardening of the arteries and heart failure. If the pressure gets too great inside your artery, it can actually burst or leak.

It's not always clear you have high blood pressure. But don't be mistaken, it's a very serious condition that can lead to heart failure.

So what exactly is high blood pressure...

Our **Ultimate Heart Formula** can help support your artery health and healthy blood pressure to reduce much of this risk! **Don't wait. Reply now for heart help.**

Blood pressure is the force of blood pushing



MORE praise for Ultimate Heart Formula *from people just like you...*

"It is great! **I am now having much better blood circulation to my hands and feet.**

I am 96 years old."* —*Roy Feather*



"I do not have chest pains. the Ultimate Heart Formula keeps my heart working with no stress. Thank you so much. I just feel so good that I got on with loving life."*

—*Dawn Simoneau*

"My irregular heart beat episodes are a thing of the past. Don't quit producing this product ever!"* —*Fred Memmer*



"I ordered the **Ultimate Heart Formula** and have been using it for about 2 years. **My cholesterol levels have been around 167 or less.**"*

—*Billy J. Huffman*

"My heart is steadier now. My chest doesn't hurt or ache and my general health and circulation is better."*

—*Dean Tollefson*

"My cardiologist says I have a thickened heart and I've had a stint put in my right leg. After



taking the **Ultimate Heart Formula** my legs are no longer causing me any discomfort. **I feel so much better. I have lots more pep.**"*

—*Sheila Brothers*



"I went to a cardiologist. They said I have 2 plugged arteries and since they are close to the heart surgery can't be done. I am 92 years old and I was having trouble breathing even when

washing dishes. The cardiologist gave me two drugs that didn't help. **When I received the ad for the Ultimate Heart Formula I decided to give it a try. It has helped me to breath better and I can walk slowly and not huff and puff.**"* —*Mary A. Lopez*

"This product is a life saver. I am so glad I ordered **Ultimate Heart Formula.** Please don't ever run out of it!"* —*Ron Bryant*

"I feel more alert and have more energy."*
—*Andrew Nero*



"I had a stroke in 2011. In 2013, I was diagnosed with Atrial Fibrillation. This caused me heart palpitations and shortness of breath with episodes of light headedness. After trying different

things, **I tried the Ultimate Heart Formula which worked great.** Of course the doctors don't want to hear about how good the natural stuff can be, but for me I'm sticking with it. Thank you!"* —*Dorothy Davis*



"Stops the pounding in my heart. I feel much safer without chest discomfort."*

—*Ava Zimmerman*

Call Toll-Free 888-462-9386 Today 100% Risk-Free!

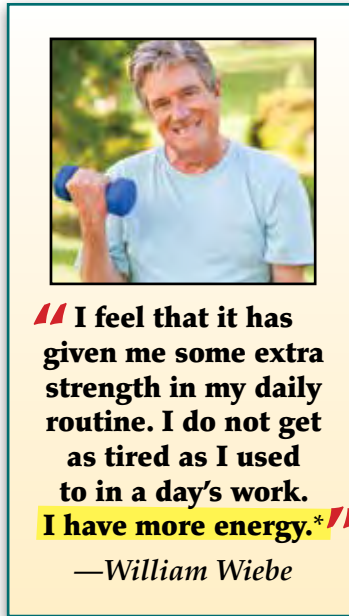
arteries in over 1,823 scientific studies.

EDTA is a natural amino-acid that eliminates dangerous blockages from your veins and arteries – blockages that prevent blood and oxygen from reaching your heart and brain – helping to reduce your risk of a heart attack.

In a study conducted by Dr. Norman Clarke M.D., a cardiologist and Chief of Research at the Providence Hospital Detroit, several hundred patients with chest pains and plaque-filled arteries were given EDTA.

The results were absolutely amazing:

95% of them made a dramatic recovery and experienced remarkable improvements in their health.



In another study, published in the *Journal of Chronic Diseases*, **100% of patients who used EDTA for 90-days saw a reduction in their blood-pressure levels.** In addition, 70% experienced reductions in their cholesterol levels too.

According to a study published in the British medical journal, *Lancet*, common anti-clotting drugs such as aspirin and coumadin are effective against only one-third of blood clot cases. None of them help the whole problem. EDTA, on the other hand, can fight blood-clots by keeping the blood thin, thereby reducing your risk of an attack.

Furthermore, according to Dr. Michael Janson, who’s been treating heart patients with
(continued on page 12)

Let Ultimate Heart Formula Protect YOUR arteries and heart!

Tith or without obvious symptoms... every year more and more people are choosing to be safe instead of sorry... and maintaining their heart health with all natural, side-effect-free Ultimate Heart Formula!

The **Ultimate Heart Formula** is an all-natural combination of 19 powerful herbs and essential nutrients that counter the causes of poor cardio health.

The **Ultimate Heart Formula’s** unique “Senior Formula” is made with ingredients specifically shown to help improve the effects of a weakened heart, clogged arteries,

high blood pressure and high cholesterol for older people!

Many people experience remarkable results in just a matter of days! And you’ll always know it is working in the background of your life to help and protect you. The **Ultimate Heart Formula** also comes with an unconditional 60-day guarantee. If you don’t see and feel remarkable differences in your health, you don’t pay.



Ultimate Heart Formula contains 19 heart helping nutrients!

You won't believe how much **MORE** powerful heart help is in our **Ultimate Heart Formula!**

Vitamin C is known to help blood vessels relax, which can be beneficial for heart health. Damage to the heart caused by a heart attack are related, in part, to the inability of blood vessels to dilate enough to allow blood flow.



reduced blood flow due to narrowed arteries, and hardening of the arteries.

Ginger is linked to healthier hearts and may reduce the risk of many chronic conditions, including high blood pressure and coronary heart disease.



Vitamin E improves vascular function... Has anti-clotting properties... Defends against oxidative damage that can cause heart disease... And reduces CRP, a blood protein linked to heart disease.

Kelp is naturally high in antioxidants and helps to combat oxidative stress and may offer benefits to cardiovascular health.

Vitamin B12 can lower homocysteine levels, which is an indicator of increased risk for heart disease, compared to people with average or low levels of homocysteine.

Mistletoe is used for heart and blood vessel conditions including high blood pressure and hardening of the arteries.

Aloe Vera supports healthy cholesterol levels and blood pressure... Can help regulate heart rhythm...

Onion encourages a healthy heart in many ways, including healthy blood pressure and lowering heart attack risk.



Bilberry can help with LDL (bad) cholesterol levels, and help improve platelet function and blood pressure.

Bromelain supports a healthy heart by helping to reduce inflammation and reducing triglycerides.



Cayenne can help prevent blood clots to help reduce the risk of a heart blockage.

Garlic is used for many conditions related to the heart and blood system. These conditions include high blood pressure, low blood pressure, high cholesterol, inherited high cholesterol,

Support your heart 100% with our powerful Ultimate Heart Formula!



These health benefits have been seen in both human and experimental studies.

EDTA for many years, 90% of his patients report remarkable relief from chest discomfort as a result of EDTA treatment.

And according to Dr. Gary Null, Ph.D., founder and director of the *Nutritional Institute of America*, "EDTA brought relief to more than 93% of patients suffering from heart disease and it can help avoid bypass surgery in 85% of cases. **Thousands of stories from patients and physicians support its effectiveness and safety.**"

As a result of these remarkable findings, massive multi-million dollar EDTA research grants have been given to many of America's most respected health organizations, such as the *National Institutes of Health*, the *U.S. Public Health Service*, and *The Mayo Foundation*.



// My heart palpitations have been cut way down. At the age of 82 I don't get the feeling that my heart is going to pump out of my chest!*///

—Dorothy Davis

Now, those are just 2 of the 19 heart-friendly nutrients you'll find in the **Ultimate Heart Formula!** It contains the ingredients you need to support and strengthen your heart and to maintain your healthy arteries, cholesterol, and blood pressure levels!

Now you just need to take action before it's too late!

With our Ultimate Heart Formula... You get it ALL... Amazing heart and artery protection... without side effects!

Ultimate Heart Formula is

100% safe and can only help you improve your heart health!

The natural ingredients will work hand-in-hand to have a positive effect on your body, only safely, naturally and without side effects.

If you can keep YOUR arteries clear, and YOUR heart strong,

there's no telling how long your heart can work hard for you!

You could increase your life span and quality of life by flushing your arteries free of life threatening plaque!

Yes, with the **Ultimate Heart Formula**, a lifetime of plaque build up could disappear before you know it!

The artery-flushing power of this formula does not even require a doctor's visit or a stay in the hospital!

You simply take 20 drops of our **Ultimate Heart Formula** 2 times a day, that only costs

pennies a day, and is as safe as baby food.

Soon the plaque stuck in your arteries can begin to dissolve, and be naturally passed out of your body!



Paired with a healthy heart, you could add decades of healthy, active living to your life. Reply now!

On the other hand, heart/cardio medications are notorious for their ugly side effects, because those chemicals just aren't good for your body.

**Naturally protect and strengthen your heart and arteries...
Reply now 100% risk free for all-natural Ultimate Heart Formula!**

If you knew how truly debilitating a heart attack or stroke would be for you, taking away your ability to walk, talk, eat by yourself, or even move... You would take this matter very seriously.

It would make your decision to reply now for our **Ultimate Heart Formula** a no-brainer. It is simply among the most potent, natural heart formulas on the market today! As a medical doctor, I'm 100% confident it can support your heart and artery health to help lower your cardio health risk. So you don't have to worry about the damage it will do to your body.

Don't wait... Reply now to join our thousands of satisfied users and get special, first time-buyer-only low pricing. You can also get a greatly discounted price on the perfect companion product, and FREE Shipping!

Don't roll the dice on your good health or your life! Take this easy step now to keep your heart strong and your arteries clear.

Reply now for the Ultimate Heart Formula... America's #1 natural treatment to help maintain cardio health... doctor-recommended and formulated... and already used by thousands of people just like you! Call now!

With daily use, it can rejuvenate your heart and arteries with needed nutrients to give you many years of trouble-free support!

Your reply is 100% risk free... If you're not 100% satisfied with your improvement after using **Ultimate Heart Formula**, simply send it back for a full refund of your purchase



The advertisement image shows a man and a woman riding bicycles on a sandy beach at sunset. In the foreground, there is a brown glass bottle of 'The Ultimate Heart Formula' with a white label and a black dropper cap. A red speech bubble in the top right corner of the image says 'FREE SHIPPING!'. The bottle label includes the text: 'HEALTH RESEARCH LABS', 'The Ultimate Heart Formula', 'Multi-Ingredient Liquid Formula', 'A Herbal Dietary Supplement For Optimal Heart Health', and 'DIETARY SUPPLEMENT 2.0 FL. OZ. (60 mL)'.

Vou can enjoy a healthy trouble-free heart and arteries, naturally, with an effective formula used by thousands of people across America! **Reply now for the Ultimate Heart Formula.**

price within 60 days. No questions asked.

I look forward to hearing from you!

Sincerely,

Richard Cohen

Richard Cohen, M.D.

Health Research Labs, Scientific Advisor

P.S. Our Ultimate Heart Formula can help keep your heart strong and arteries clear, so you can feel great and worry less! Respond now if you want your healthiest heart possible! You'll get completely natural, real support for complete heart protection. All natural **Ultimate Heart Formula** is 100% effective and safe to use every day! Remember, thousands of people have already used it to help keep troubling heart-related problems out of their life! **Call now risk free 888-462-9386.**

P.P.S. Sign up for our FREE weekly email newsletter! It's called *Dr. Cohen's Healthy News Now...* and it discusses many different health issues. Our customers love it! Just give us your email address when you place your order.

Grab This Combo Offer and **SAVE:**

When you request your supply of Ultimate Heart Formula now, you also qualify for a special, discounted supply of our trusted Hydroxin Formula.

Pupport your cellular hydration with **this premium formula** that contains 14 vitamins and minerals to help keep your cells 100% healthy and hydrated... and you looking and feeling young!

You'll also give your body the combined antioxidant activity of 29 vitalizing superfruits, phytonutrients, herbs and vegetable extracts to hydrate your dried out cells!

Improve heart health, boost energy, improve sexual health, beat stress, improve performance and reduce wrinkles... These are just a few of the benefits found in each bottle of **Hydroxin**.

It can fill in your cells' nutrient gaps to give your health a quick and lasting jumpstart. Which is especially important if your healthy has been suffering as a result of poor digestion.

Try the amazing powers of Hydroxin for yourself.

You deserve the opportunity to SEE and FEEL the difference that **Hydroxin** can create for you. You'll look and feel years younger... feel more energy... sleep better... move better... and enjoy a true revival of your health!

With your cells getting and staying hydrated... and with all the nourishment from the remarkable nutrients like Amla Melon Extract, Spectra Total ORAC, SynerTea and Nitric Oxide... you can say "goodbye" to dried up, tired cells and say "hello" to a YOUTHFUL LIFE!

Don't wait... Reply now and get this perfect companion product to Ultimate Heart Formula.



Our Iron-Glad Guarantee:

Try Ultimate Heart Formula Risk-Free For 60 Days.

If You Don't Feel 100% Better — YOU'LL GET YOUR MONEY BACK!

YOU will be the *only* judge. You've read about the cardio-improving and heart-strengthening power of **Ultimate Heart Formula**.

For up to 60 days, you can use it completely risk free in your own home and see your results. **If you are not 100% satisfied, you can request a full refund of your purchase price.** No questions asked.

—Dr. Cohen

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

Ultimate Heart Formula Risk-Free Reply Form

FEDERAL TRADE COMMISSION | OFFICE OF THE SECRETARY | FILED 2/24/2021 | OSCAR NO. 600771 | PUBLIC



YES! I want to do all I can to protect my heart and keep my arteries clear. I want to worry less and have more confidence in my heart health with this natural symptom-relieving, heart health formula! I understand it is doctor-formulated and guaranteed to give my entire cardio system a fresh start. I understand I'm covered by your 60-day money back guarantee... Either the **Ultimate Heart Formula** works for me, or I can get a full and fast refund. **Please send me the following supply:**

SUPER-INTENSIVE: I get a 5 month supply, plus a 7 month bonus supply absolutely FREE! **I pay only \$199.95 and get FREE SHIPPING!**



\$199.95
SAVE \$350.85!
Only 55 cents/day

MEGA-INTENSIVE: I get a 3 month supply, plus a 3 month bonus supply absolutely FREE! **I pay only \$129.95 and get FREE SHIPPING!**



\$129.95
SAVE \$145.45!
Only 66 cents/day

ULTRA-INTENSIVE: I get a 2 month supply, plus a 1 month bonus supply absolutely FREE! **I pay only \$79.95 and get FREE SHIPPING!**



\$79.95

INTENSIVE: I get a 1 month supply for only **\$39.95 + \$5.95 S&H!**

Quantities are limited! Please order by next Tuesday!
CALL NOW TOLL FREE: 888-462-9386

TOTAL PACKAGE: I get everything in the Mega-Intensive Package plus buy 3 months of **Hydroxin** for only \$119.95 and get another 3 months FREE! **All of this with FREE SHIPPING!**



+



\$239.95
SAVE \$310.85!

RUSH PROCESSING: Add \$4.95 for the fastest way to receive your order.

ORDERED BY: (PLEASE PRINT)

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

E-mail: _____

SELECT YOUR PREFERRED METHOD OF PAYMENT:

I have enclosed my check or money order payable to "HRL" for the amount of: \$ _____

Please charge the full amount to my credit card:



□□□□ □□□□ □□□□ □□□□ □□□□

Credit Card Account Number

Exp. Date (MO/YR)

Signature: _____ Daytime Phone: _____

3 Ways to Place Your Order:

1. By Mail: Use the enclosed envelope or mail to:

Health Research Labs,
165 Pleasant Ave.,
South Portland, ME 04106

2. By Phone: CALL TOLL-FREE
888-462-9386

3. Online:
www.HRLsupplements.com

Subtotal _____

S&H _____

*RUSH Processing + 4.95

TOTAL _____

Our Iron-Clad Guarantee: Try Ultimate Heart Formula Risk-Free For 60 Days.

If You Don't Feel 100% Better — YOU'LL GET YOUR MONEY BACK!

YOU will be the only judge. You've read about the cardio-improving and heart-strengthening power of **Ultimate Heart Formula**. For up to 60 days, you can use it completely risk free in your own home and see your results. If you are not 100% satisfied, you can request a full refund. No questions asked. —Dr. Cohen

Please remove my name from future mailings. **15**
HRL005082

Health Research Labs,
165 Pleasant Avenue,
South Portland, ME 04106

Give Your Heart and Arteries a Fresh Start!

FEDERAL TRADE COMMISSION | OFFICE OF THE SECRETARY | FILED 2/24/2021 | OSCAR NO. 600771 | PUBLIC

And, give yourself more peace of mind as you **reduce** the risk of heart problems.



“That’s right... **Peace-Of-Mind, knowing that every day you are doing something to help your heart stay healthy.”**

—Richard Cohen, M.D., Scientific Advisor

Thousands of people just like you have already discovered the powerful effect of our **Ultimate Heart Formula**.

See their amazing stories inside now...

PRSRT STD
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Health
Research Labs

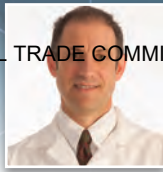


Health Research Labs
165 Pleasant Ave.
South Portland, ME 04106

HRL005083

UHF-D2-US

Exhibit F



NATURAL NERVE PAIN KILLER SPECIAL EDITION
RICHARD COHEN, M.D., SCIENTIFIC ADVISOR

Put Out the Fire on Diabetic Nerve Pain and... Walk, Stand and Sit Comfortably Again!

This **“Perfect”** Nerve Pain easing pill combines special nutrients to restore circulation and soothe nerve pain associated with diabetes!

See inside how it can help you...

OPEN NOW to Ease These Issues:

- ✓ Burning
- ✓ Itching
- ✓ Tingling
- ✓ Numbness
- ✓ Constant cold
- ✓ Swelling and heaviness
- ✓ Cramps and restlessness...

**And SO
MUCH MORE!**



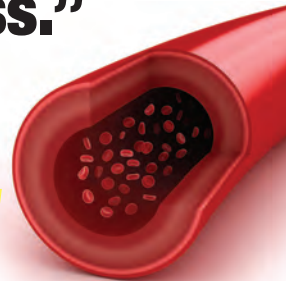
Studies show that there IS a natural, effective treatment for diabetic nerve pain!

HRL005036

“Diabetic nerve pain is affecting more and more people like you, causing them 24/7 discomfort and making them unstable on their feet...”

“That’s why I helped create a ‘perfect’ nerve-pain-relieving formula that puts the ‘fire out’ in your legs, hands and feet, so you can move easily again, *without* pain and numbness.”

Once you get your blood moving freely again in your hands and feet, you will enjoy a world of improvement while standing, sitting or walking!



85% of people with diabetic nerve pain say it affects them daily... according to a Pfizer-sponsored survey.

Dear Friend,

I’ve had patients describe their nerve pain as:

“Pins and needles”

“A hot, burning feeling”

“Like walking on hot coals”

“Like walking on balloons”

“Tingling and itchy”

If any of this sounds familiar, my guess is that you too have diabetic nerve pain and/or neuropathy.

So I hope you’ll keep reading this important report...

Because what most people *don’t* know, is how to get rid of it.

The pain is so bad for many people they can’t stand for long. They have trouble walking. And their hands and feet are always cold and numb.



Meet Dr. Richard Cohen, M.D.

Richard Cohen, M.D. is a nationally recognized medical expert.

As a specialist in nutritional medicine, he brings over two decades of experience in treating age-related illness.

He completed his undergraduate degree at *Duke University* with honors. And received his medical degree from *Hahnemann Medical University* in Philadelphia. Dr. Cohen is a member of the *American College for the Advancement of Medicine*.

Dr. Cohen's expertise has earned him the attention of physicians and health professionals across the U.S. He has trained the American medical community on dietary issues for over 20 years. And recently, **he was recognized as a leading authority in using diet, nutritional supplements and lifestyle to enhance well-being.**

In recent years, he has helped develop a number of successful, innovative treatments to help his patients eliminate a variety of health problems.



If you ask me, that's no way to enjoy life. And your legs and feet are too important to your mobility and quality of life to ignore this problem!

What you really have is a severe circulation problem that is damaging nerves, and causing further complications...

People suffering with diabetes often have elevated blood sugar levels, and over time these elevated levels can cause permanent damage to the nerves in their feet and hands.



Not only that, this can lead to excess fluid in the legs, and swelling that puts further pressure

on your nerve endings and causes even MORE pain, and MORE problems.

This nerve damage causes a very distinct type of pain — diabetic nerve pain. Which is different from the pain you may experience from a headache, a sprained ankle, or arthritis.

Some people with diabetic nerve pain experience shooting, burning, pins and needles or itching, while others may have only mild symptoms. I have found that the type and intensity of the pain varies greatly from person to person.

Diabetic nerve pain is most commonly felt in the feet and hands, and although it can come and go, the damage that caused nerve pain is permanent.

So what can you do about it?

(continued)

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

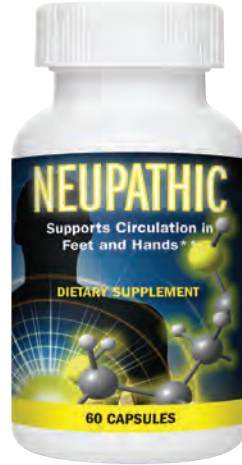
Soothe Diabetic Nerve Pain and More! Call Now Toll Free 888-761-5495 • 3 HRL005038

If you do in fact have diabetes, you need to take care of that by managing your blood sugar with your doctor's help.

As I mentioned, the bad news is, once this nerve damage is done, you can't undo it.

But, fortunately scientists have discovered that you can definitely help it improve, so you are not in constant discomfort.

And in my medical opinion, this is the best way to help address your issues — with a natural supplement that helps your body FIX the



problem on its own. And doesn't just mask the pain.

That is what we have in Neupathic... A "perfect" nerve pain supplement that was formulated from the ground up to improve your circulation and ease the numbness, tingling, itching, burning and swelling from excess fluid trapped in your legs.

Neupathic contains 6 known nerve pain soothers and lower leg health-improving nutrients that can help you see a change for the better in just days. You won't just hope it's working, you can actually feel a difference.

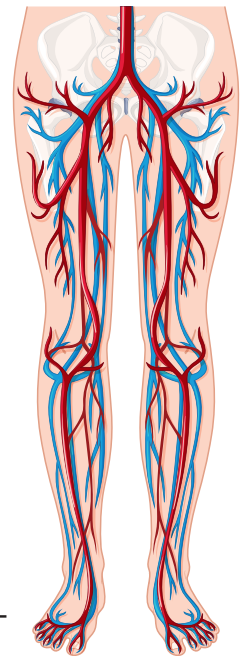
I'd like to tell you briefly about each one. As I believe, just like for my own patients, you should know *how* and *why* each nutrient can help you... and see the clinical proof of effectiveness for yourself.

Vitamin E helps protect and restores health to your damaged nerves...

One of your body's most valuable, natural antioxidants, **Vitamin E**, improves glucose balance and helps protect blood vessels and nerves from free radical damage which is accelerated by diabetes.

This makes it one of the best vitamins for blood sugar issues AND diabetic nerve pain. Studies have shown that high doses of vitamin E may even **reverse** damage to nerves caused by diabetes.

Reduced levels of vitamin E are also seen in people with diabetic neuropathy. Vitamin E supplementation alone has been found to



Symptoms of Diabetic Nerve Pain:

If you have diabetic nerve pain, you could suffer with any or all of the symptoms below.

- ✓ Shooting pain
- ✓ Burning
- ✓ Pins and needles
- ✓ Electric shock-like pain
- ✓ Extra sensitivity
- ✓ Numbness
- ✓ Throbbing
- ✓ Tingling
- ✓ Stinging
- ✓ Stabbing
- ✓ Radiating

Neupathic was specifically formulated with 6 distinct nutrients to help address ALL these issues and more.



Understanding Diabetic Nerve Pain From the Inside...

D **Diabetic neuropathy**, including nerve pain, often starts five to ten years after a person starts having blood sugar issues. It is a progressive degeneration of the nerves caused by diabetes.



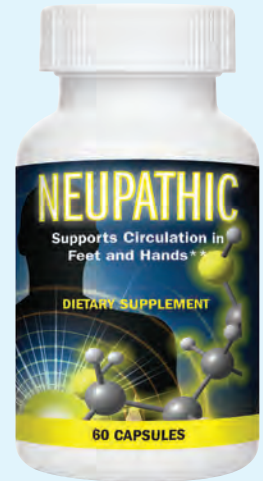
Because of the loss of sensation, injuries can go unnoticed and often become infected. If ulcers or foot injuries go untreated, the infection may affect the bone and require amputation. However, problems

Symptoms of neuropathy include numbness or pain, tingling, burning or swelling in the feet and legs, and coldness in your hands.

The most common type of neuropathy is **peripheral neuropathy**. This damages the nerves of your feet especially. The foot often becomes wider and shorter. Your stride becomes longer or shorter. Foot ulcers can appear as pressure is put on parts of the foot that are less protected.

caused by minor injuries can usually be controlled IF they're caught in time.

Living with this condition long term is both unhealthy and painful! **Neupathic was designed specifically to deal with these unique health problems.**



improve signs of neuropathy, and can also improve nerve conduction in people with type 2 diabetes.

One study found that an antioxidant like vitamin E can help control neuropathy. In the study, 92 people with diabetic neuropathy took a standard pain and blood sugar medication, with or without 400 IU of vitamin E per day. After 12 weeks, blood sugar levels had declined nearly three times **MORE** for those taking vitamin E.

For their neuropathic pain, those over age 50 in the vitamin E group had **TWICE** the pain relief as a placebo. Discussing their findings, doctors said that while there is no cure for

neuropathy, vitamin E *can* help ease pain and improve quality of life.

Vitamin B1 can help stop that prickly feeling in your feet.

Taking **Vitamin B1** (*Thiamine*) combined with vitamin B6 (**also found in Neupathic!**) can improve symptoms of diabetic neuropathy.

Your body uses thiamine to break down sugars that you eat, turn carbohydrates into energy, and help in nervous system functions.



(continued)

Take this easy step towards normal, **pain free** legs and feet again!

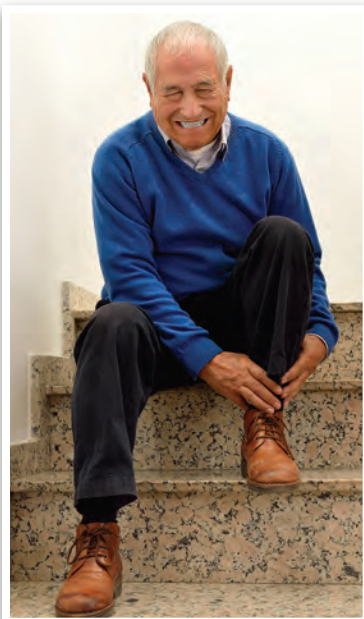
Non-drug... proven ingredients!

CALL NOW toll free to soothe your diabetic nerve pain and more...

888-761-5495



For people with diabetes, the risk of thiamine deficiency increases because your body does not always absorb this vitamin properly, causing it to pass out of your body in your urine.



Without enough thiamine, you'll experience pain, prickly sensations, nerve deadening, and other symptoms related to nerve damage.

Studies have shown that thiamine, either from your diet or in supplement form, plays a key role in vascular

(relating to the nerves in your arms and legs) health.

And some of the latest research has focused on using thiamine therapy to prevent and treat early-stage diabetic neuropathy.

In recent clinical trials, experts found that thiamine supplements can prevent

the development of neuropathy...

A landmark trial in Africa found that supplementing with both vitamin B1 and vitamin B6 led to significant improvement of symptoms of diabetic neuropathy after four weeks.

Another trial found that combining vitamin B1 and vitamin B6 plus vitamin B12 in high amounts led to improvement in diabetic neuropathy in only 12 weeks.

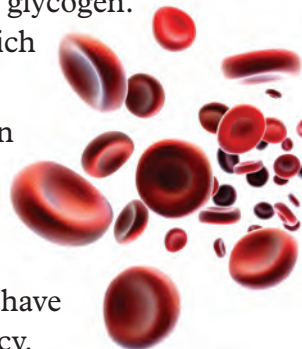
As a result, doctors recommend that people with diabetic neuropathy supplement with vitamin B1.

Vitamin B6 can help keep your nerve endings healthy.

The main job of **Vitamin B6** is to help your body process and use proteins and glycogen. It also helps form hemoglobin, which carries blood in your body.

One of the best diabetic vitamin supplements, Vitamin B6 supports nerve health, which is critical in addressing neuropathy.

And some cases of neuropathy have been linked to vitamin B6 deficiency.



While neuropathy causes numbness and tingling in the hands and feet, it is thought that **vitamin B6 can aid in reducing neuropathy symptoms** by maintaining the covering on nerve endings.

However, at doses higher than 200mg, it actually has the opposite effect, and can make neuropathy worse!

That's why we put a 33.3mg dose in **Neupathic**, an ample amount to help with your symptoms of neuropathy, but not so much it has the opposite effect.

Folic acid helps ward off nerve pain.

Folic acid is a more stable form of folate found in dietary supplements and added to vitamin-fortified foods.



It's a vital nutrient for people with neuropathy and chronic pain. That's because a folic acid deficiency can directly influence the development of neuropathy.

Your body requires adequate levels of folic acid to synthesize the amino acid methionine from homocysteine. When folic acid is lacking, methionine is *not* produced and your levels of homocysteine rise.

A 2001 clinical study published in "*Diabetic Medicine*" found a correlation between elevated levels of homocysteine and the development of diabetic neuropathy symptoms.

And a deficiency in folic acid can have an impact on developing the symptoms of diabetic neuropathy.

You likely need more Vitamin B12, to protect your nerves...

Neuropathy can also occur as a result of
(continued)

"I don't have diabetes, but I definitely have lower leg issues."



Lower leg issues, or neuropathy is also very common among NON-diabetics.

Even if you have a blood sugar imbalance, or some extra weight, your legs and feet may feel burdened, heavy and uncomfortable.

The dynamics are the same, your legs for several reasons, may be retaining fluid, that can make your legs heavy, tired and bulge with veins.

And unfortunately, this can eventually also do nerve damage as that extra fluid puts pressure on those nerves and causes damage.

Take a look... If your own legs and feet are swollen, inflamed, heavy, tired, achy or numb — regardless of anything else, **your legs need some help from Neupathic.**

And I'd advise, don't ignore it, it will only get worse!

Neupathic is ready to help you NOW!

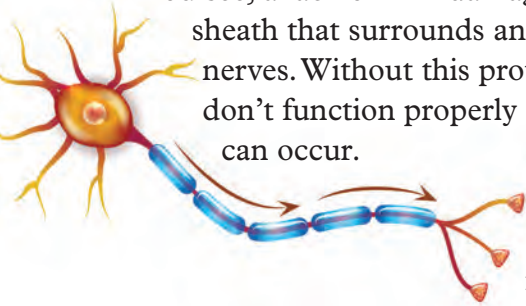


malnutrition, for which there are many causes... And, a clear link has been made between a lack of vitamin B12 and neuropathy.

Vitamin B12 deficiency is common in the United States, especially among seniors.

It's estimated that between 10% and 25% of people over 80 years of age may have a B12 deficiency.

You see, a lack of B12 damages the myelin sheath that surrounds and protects nerves. Without this protection, nerves don't function properly and neuropathy can occur.



Even a B12 deficiency that is relatively mild can affect the nervous system. The nerve damage caused by a lack of B12 can become permanently debilitating, if the underlying condition is not treated. **Symptoms and signs of a B12 deficiency include:**

- Lack of coordination
- Pain and numbness
- Tingling in hands or feet
- Sensory loss
- Weakness



Luckily, we added a healthy dose of Vitamin B12 so you will be fully covered.

Evening Primrose oil contains a unique acid that can improve nerve pain symptoms...

The oil from this flowering plant contains gamma-linolenic acid, and has been found helpful in numerous conditions including eczema, rheumatoid arthritis, and the nerve issues that can come with diabetes.



Evening primrose oil has long been associated with improved diabetic

Neupathic is a Leading Choice for Americans Who Need Nerve Pain and Neuropathy Help!



As lower leg health becomes a larger problem in the U.S., several formulas have come about to address this unique problem.

But few live up to the hype. **Neupathic**, having been carefully doctor-formulated with nutrients that are known to help this situation, makes it a clear winner!

If relief you can rely on long term is what you need, reply now for **Neupathic**. See how wonderful it can make your legs and feet feel again!

CALL NOW toll free to soothe your diabetic nerve pain and more... **888-761-5495**

neuropathy... Supplementing with evening primrose every day for six months has been found in research studies to improve nerve function and relieve pain symptoms in people with diabetic nerve damage.

For people with diabetic nerve pain, a major problem is that nerves can stop functioning. This can lead to damage to the feet and other parts of the body, which significantly reduces the person's quality of life.

Defects with essential fatty acid metabolism appear to contribute to this, leading to a number of studies of evening primrose.

The most recent appeared in the *Journal of Diabetes Care*. Over 100 patients with mild nerve damage were given six capsules of gamma-linolenic acid twice a day for a year, the others, placebo. Sixteen measures of nerve function were followed over the year.

Every measure improved in the group on gamma-linolenic acid compared to the placebo group. For thirteen of the sixteen measures, the improvement was statistically significant.



The treatment was also more effective in those people who were better at keeping their blood sugar normal.

There you have it, 6 powerful nutrients that give you the perfect solution to your nerve pain and other neuropathy symptoms! *Now...*

It's time to ease the discomfort in your legs, feet and hands, and feel normal and comfortable again!

Of course, I know there are other formulas available with different, ingredients for this same problem... *(continued)*

Real Comments From Real Nerve Pain Sufferers...



"Great reduction of pain."

No more nerve pain in my feet. I also hardly notice any leg cramps. This product is great!"

—Ruth J.

"My circulation is now much better."

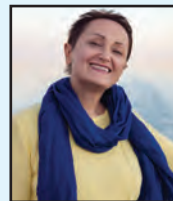
—Marion M.



"No burning, stabbing pain."

No more stiffness. More energy. Move better. **Neupathic** is fantastic. I love it! It should be available at the drug store."

—Naomi R.



"Neupathic is a great 'miracle-like product'

which starts working the very first day you use it. Then it continues to control your pain every day. My feet have begun to feel normal. **Neupathic** has improved my life. My nerve pain is gone and I will continue to take **Neupathic** until my numbness is gone too!"

—Gloria R.



"My feet no longer burn,"

especially after an hour or so of inactivity. I definitely feel more comfortable."

—Margaret J.

Results may vary. These are real users with real results.



BUT... I call Neupathic the “perfect” solution because it was formulated based on the latest medical research, and recent science has now shown these 6 ingredients get the job done better, and work better together.

The fact is, you need powerful nerve treatment at the cellular level to help you. And you will NOT find any other formulas, with this proven nutrient lineup, or at this precise, high dosage. Which leaves all other products lacking for effective relief.

Already, thousands of people have tried **Neupathic** and LOVED the soothing results. They literally tell stories of amazing relief from their agonizing symptoms within just days of use.

**Don't wait any longer...
Stay a step ahead of tingling,
burning, numbness and more!**

The reason why **Neupathic** is the best choice today for long-lasting nerve relief is because it

contains the 6 KNOWN nerve pain, and lower leg health helping nutrients.

You'll help quiet those agitated nerves, and help restore comfort, health and mobility to your legs, hands and feet!

YOU are a perfect candidate for Neupathic if:

■ You find it difficult to walk because you can't feel the ground under your feet.

■ You can't stop the itching, burning, stabbing, pins and needles or tingling in your legs and feet.

■ Your hands, feet and legs are always cold.

■ You don't get a restful night's sleep because of pain and discomfort.

■ It's hard to keep your balance on unsteady legs and feet.

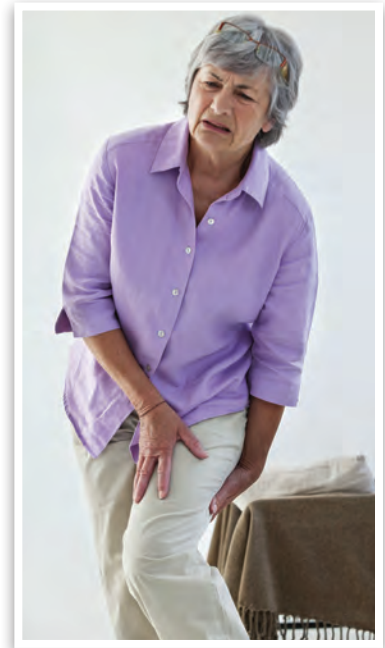
■ It's hard to walk, move, exercise, bend, or enjoy your favorite activities.

■ You feel trapped and immobile because of your unhealthy legs and feet.

■ Your condition is worsening... as your pain gets worse and your legs become more swollen and heavy and tired.

If this describes your life today, I urge you to try the soothing relief that comes from Neupathic!

Neupathic will go to work fast to settle your pain, ease your burning and tingling and numbness, and restore health and mobility to your legs.



More Comments from Happy Neupathic Customers...



“I used to feel like someone was putting a needle in my toes. I no longer feel that and I am quite happy!”

—Willard C.



“Neupathic has helped to relieve the neuropathy in my feet.”

—Henry F.

Results may vary. These are real users with real results.

It can also help address the direct cause of nerve pain and neuropathy, damaged nerves, excess fluid — and poor circulation.

Allowing you to:

- ...**Increase** your mobility
- ...**Relieve** nerve pain
- ...**Reduce** swelling and tightness
- ...**Gain back** your freedom to move easily and enjoy your favorite activities again



Neupathic is different from other nerve pain formulas you've tried...

Neupathic is recognized as one of the more powerful natural nerve pain relief options available.

The 6 ingredients, including several important B vitamins, are the best known nerve-soothing and repair nutrients you can find.

So if you're in constant need of relief for your feet and legs, and you want to stop the cold feeling in your hands and feet... it really can become a "thing of the past" with **Neupathic**.

Once you try it, you can experience **soothing relief from long-term aches and pains, swelling, burning, coldness, shooting pain, leg fatigue, and any issues you have with your legs and feet.**



Thousands have now used **Neupathic** and experienced a rejuvenation of their legs! So make the decision now to relieve *your* pain troubles!

Neupathic is a doctor-formulated, 100% all-natural, and 100% safe product with NO known side effects or harmful ingredients.

(continued)

110,000 miles...



The average person takes about 7,500 steps a day... If you maintain that average until age 80, you'll walk about 216,262,500 steps in your lifetime!

That's about 110,000 miles of travel for your legs and feet... IF you stay healthy and active.

So if you're about age 50, you've already put on about 50,000 miles!

However, if you suffer with poor lower leg health, you'll need some help to stay active and hit 110,000! **And Neupathic stands ready to help you!**

CALL NOW toll free to soothe your diabetic nerve pain and more... 888-761-5495



**And you'll be backed by our
iron-clad GUARANTEE:**

*If you're not 100% satisfied with the soothing, symptom-relieving results of Neupathic, you can return it anytime within 60 days for a full refund.
No questions asked.*

Neupathic's twice-a-day, easy-to-swallow capsules are rapidly absorbed and speed throughout your system to bring you fast relief.

**Neupathic can make getting back
on your feet fast and easy...**

In my opinion as a doctor, there is *nothing* stronger to help you move easier, suffer less, sleep better and get more done than by using Neupathic.

Reply now for Neupathic and get the nerve-pain-easing power of these concentrated nutrients in each capsule.

I give you my personal guarantee that it does

Imagine enjoying a whole day without ever thinking of the PAIN in your feet!



And then having weeks, months and even years of constant comfort!

work. It can help you quickly feel more energetic than you have in years.

As a first-time user, we've made special arrangements for you to try **Neupathic** for 60 days with no risk.

And remember, if you're not utterly delighted with your results by day 60, just call or email us, then send back the unused portion to us — and we will never charge you another cent.

This is a 100% iron-clad guarantee, so you can't possibly lose!

Plus, you'll get FREE SHIPPING and a FREE Gift!

Don't wait... Reply now to get your supply of Risk Free Neupathic!

Yours for Healthy Legs and Feet,

Richard Cohen

Richard Cohen, M.D.

Scientific Advisor

P.S. Neupathic can help get you moving comfortably again! Respond now if your

nerve pain is driving you crazy! You'll get completely natural, real relief from your discomfort. **All natural Neupathic is 100% effective and safe to use every day!** Remember, it has shown to help reverse damaged nerves to help you feel great all day and all night! **Call now 888-761-5495.**



Call now toll free or mail the Reply Form on the next page for soothing Neupathic! And remember, you get FREE SHIPPING!

Are you ready to walk, dance and move easily again!



What have your legs kept you from enjoying...

- ✓ Taking a long walk
- ✓ Running or jogging
- ✓ Playing tennis or golf
- ✓ Working in your yard
- ✓ Sleeping comfortably at night
- ✓ Taking vacations
- ✓ Dancing
- ✓ Going for a drive
- ✓ Fishing
- ✓ Serving others
- ✓ Sitting through a movie
- ✓ Driving
- ✓ Playing with grandkids
- ✓ Biking



DON'T MISS OUT ANY MORE!

CALL NOW toll free to soothe your diabetic nerve pain and more...

888-761-5495

→ Grab This Combo Offer and SAVE:

When you request your supply of **Neupathic**, you also qualify for a special, discounted supply of our **Regimen Cell Rejuvenation Formula.**

Hit Your Body's "RESET" Button... And Help Regenerate All 50 Trillion of Your Body's Cells to "Primary Purity!"

Top U.S. Medical Institutions Verify the Power of the 25 Nutrients in Our **Regimen Cell Rejuvenation Formula. So You Can Help Restore Every Part of Your Health:**

- ✓ Move Freely
- ✓ Maintain Healthy Cholesterol
- ✓ Promote Healthy Hair Growth
- ✓ Boost Energy
- ✓ Diminish Wrinkles
- ✓ Maintain Optimal Weight
- ✓ Enjoy Youthful Sex
- ✓ Maintain Healthy Brain Function
- ✓ Maintain a Healthy Heart
- ✓ Support Optimal Hearing

See What Happens When ALL 50 TRILLION of Your Cells Experience a "Rebirth!"



YOUR FREE GIFT!

Get a FREE Supply of Soothing Glucophene Pain-Relieving Cream!



GET YOUR FREE TUBE NOW WHEN YOU BUY AT LEAST 2 BOTTLES OF NEUPATHIC!

With Neupathic working inside to help your nerve pain and other lower leg health problems, Glucophene cream works outside to help you instantly, upon application, reinvigorate your legs and feet.

Call now toll-free, or return the form on the next page to get your FREE supply with your 2 bottle, or more, supply of **Neupathic**.

This is an exclusive offer that is not available anywhere else.

- ✓ NO RISK
- ✓ NO COST
- ✓ COMPLETELY FREE TRIAL!

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

Neupathic Risk-Free Reply Form

FEDERAL TRADE COMMISSION | OFFICE OF THE SECRETARY | FILED 2/24/2021 | OSCAR NO. 600771 | PUBLIC



YES! I'm sick and tired of being limited in what I can do, and the constant pain, numbness, coldness, tingling and burning. I'm ready to make a change with this symptom-relieving formula! I understand it is doctor-formulated and guaranteed to give my legs and feet new life and energy. I understand I'm covered by your 60-day money back guarantee... Either Neupathic works for me, or I can get a full and fast refund.

SUPER-INTENSIVE: I get a 5 month supply, plus a 7 month bonus supply absolutely FREE! **I pay only \$199.95 and get FREE SHIPPING!**



\$199.95
SAVE \$350.85!
Only 55 cents/day

MEGA-INTENSIVE: I get a 3 month supply, plus a 3 month bonus supply absolutely FREE! **I pay only \$129.95 and get FREE SHIPPING!**



\$129.95
SAVE \$145.45!
Only 66 cents/day

ULTRA-INTENSIVE: I get a 2 month supply, plus a 1 month bonus supply absolutely FREE! **I pay only \$79.95 and get FREE SHIPPING!**



\$79.95

INTENSIVE: I get a 1 month supply for only **\$39.95 + \$5.95 S&H!**

Quantities are limited! Please order by next Tuesday!
CALL NOW TOLL FREE: 888-761-5495

TOTAL PACKAGE: I get everything in the Mega-Intensive Package plus buy 3 months of Regimen for only \$119.95 and get another 3 months FREE! **All of this with FREE SHIPPING!**



\$239.95
SAVE \$310.85!

Please send me my **FREE** tube of soothing Glucophene Cream.

RUSH PROCESSING: Add \$4.95 for the fastest way to receive your order.

ORDERED BY: (PLEASE PRINT)

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

E-mail: _____

SELECT YOUR PREFERRED METHOD OF PAYMENT:

I have enclosed my check or money order payable to "HRL" for the amount of: \$ _____

Please charge the full amount to my credit card:



□□□□ □□□□ □□□□ □□□□ □□□□

Credit Card Account Number

Exp. Date (MO/YR)

Signature: _____ Daytime Phone: _____

3 Ways to Place Your Order:

1. By Mail: Use the enclosed envelope or mail to:

Health Research Labs,
165 Pleasant Ave.,
South Portland, ME 04106

2. By Phone: CALL TOLL-FREE
888-761-5495

3. Online:
www.HRLsupplements.com

Subtotal _____

S&H _____

*RUSH Processing + 4.95

TOTAL _____

Health Research Labs,
165 Pleasant Avenue,
South Portland, ME 04106

Please remove my name from future mailings. **15**

HRL005050

Our Iron-Clad Guarantee: Try Neupathic Risk-Free For 60 Days.

If You Don't Feel 100% Better — Day and Night — YOU'LL GET YOUR MONEY BACK!

YOU will be the only judge. You've read about the symptom-improving and invigorating power of Neupathic. For up to 60 days, you can use it completely risk free in your own home and see your results. If you are not 100% satisfied, you can request a full refund. No questions asked. —Dr. Cohen

NATURAL NERVE PAIN RELIEF • SPECIAL EDITION

You Need Healthy Legs to Enjoy Life.

Don't Let Poor Lower Leg Health or Nerve Pain Drag You Down!



“I have the answer to put the ‘*spunk*’ back in your legs!”

If you feel trapped by your legs... If you are in pain, no matter whether you are sitting, standing, sleeping, or doing nothing, you need to read what is inside.”

“You will read about a **doctor-formulated nerve pain and lower leg health formula** that can help you be comfortable, stable and pain free on your feet again.”



Richard Cohen, M.D.
Scientific Advisor

See Inside Now...

FEDERAL TRADE COMMISSION | OFFICE OF THE SECRETARY | FILED 2/24/2021 | OSCAR NO. 600771 PUBLIC

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Health
Research Labs



Health Research Labs
165 Pleasant Ave.
South Portland, ME 04106

HRL005051

NUP-D1-US

~~X180007~~

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: ~~Joseph J. Simons, Chairman~~ Rebecca Kelly Slaughter, Acting Chair

Noah Joshua Phillips
Rohit Chopra
~~Rebecca Kelly Slaughter~~
Christine S. Wilson

In the Matter of

HEALTH RESEARCH LABORATORIES, LLC,
a limited liability company,

WHOLE BODY SUPPLEMENTS, LLC,
a limited liability company, and

KRAMER DUHON,
individually and as an officer of
HEALTH RESEARCH LABORATORIES, LLC
and WHOLE BODY SUPPLEMENTS, LLC.

DOCKET NO. 9397

COMPLAINT

The Federal Trade Commission, having reason to believe that Health Research Laboratories (“HRL”), a limited liability company, Whole Body Supplements (“WBS”), a limited liability company, and Kramer Duhon, individually and as an owner and officer of HRL and WBS (collectively, “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 HRL is a Nevada limited liability company with its principal office or place of business at 16250 Knoll Trail Drive, Dallas, TX 75248.
2. Respondent WBS is a Nevada limited liability company with its principal office or place of business at 16250 Knoll Trail Drive, Dallas, TX 75248.
3. Respondent Kramer Duhon is the Chief Operating Officer and managing member of HRL and the Chief Operating Officer and managing member of WBS. Individually or in concert with others, he controlled or had the authority to control the acts and practices of HRL and WBS,

including the acts and practices alleged in this complaint. His principal office or place of business is 16250 Knoll Trail Drive, Dallas, TX 75248.

Respondents have

4. The FTC and Respondents HRL and Kramer Duhon signed a Stipulated Final Judgment and Order (“Order”) entered by U.S. District Judge Jon D. Levy on January 16, 2018 in *FTC and State of Maine v. Health Research Laboratories, et al.*, 2:17-cv-00467 (Dkt. 15). Section III of the Order prohibits Respondents from making “any representation about the health benefits, safety, performance, or efficacy” of a dietary supplement, food, or drug “unless the representation is non-misleading, and, at the time of making such representation, they possess and rely upon competent and reliable scientific evidence that is sufficient in quality and quantity based on standards generally accepted by experts in the relevant disease, condition, or function to which the representation relates, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that the representation is true.” Section III further provides that “competent and reliable scientific evidence means tests, analyses, research, or studies (1) that have been conducted and evaluated in an objective manner by experts in the relevant disease, condition, or function to which the representation relates; (2) that are generally accepted by such experts to yield accurate and reliable results; and (3) that are randomized, double-blind, and placebo-controlled human clinical testing of the Covered Product, or of an Essentially Equivalent Product, when such experts would generally require such human clinical testing to substantiate that the representation is true.”

~~4.5.~~ Following entry of the Order, Respondents advertised, labeled, offered for sale, sold, and distributed, or caused to be distributed a number of dietary supplement products to consumers. HRL sold, among other products, Black Garlic Botanicals, The Ultimate Heart Formula, and Neupathic. WBS sold BG18, among other products. Black Garlic Botanicals, BG18, The Ultimate Heart Formula, and Neupathic are “food” and/or “drugs” within the meaning of Sections 12 and 15 of the Federal Trade Commission Act.

6. Respondents’ advertisements for Black Garlic Botanicals, BG18, The Ultimate Heart Formula, and Neupathic included representations that the products would effectively prevent, reduce the risk of, cure, treat, or mitigate cardiovascular disease, atherosclerosis, hypertension, or diabetic neuropathy without adequate substantiation to support the representations.

~~5.7.~~ 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.

Black Garlic Botanicals

8. HRL began selling Black Garlic Botanicals in November 2016— and continued to sell it following entry of the Order and after the filing of a contempt motion against Respondents in *FTC and State of Maine v. Health Research Laboratories, LLC, et al.*, 2:17-cv-00467-JDL. HRL continued to sell the product to consumers through at least January 2021, despite the filing of the contempt motion and the Complaint in this administrative proceeding.

6-9. Each capsule of Black Garlic Botanicals contains 600 mg of the active ingredient black garlic, and the recommended dosage is two capsules a day. HRL sells a one-month supply of Black Garlic Botanicals for \$39.95, plus shipping and handling. -HRL also sold the product to consumers in other quantities and at different prices.

10. HRL has disseminated or has caused to be disseminated advertising and promotional materials for Black Garlic Botanicals in multi-page mailers sent to consumer residences and on company websites. Following entry of the Order, HRL disseminated or has caused to be disseminated more than 800,000 mailers to consumer residences in the United States and Canada. HRL continued to disseminate these mailers as late as August 2019 despite Respondents' awareness that the FTC was investigating whether advertising for Black Garlic Botanicals violated the Order.

11. The Black Garlic Botanicals mailer attached as Exhibit A opens with the following representations and depictions:

Every 90 seconds, someone dies from heart disease in the U.S. – are you next?

1 in 7 people die from heart disease.

Only 10% of people survive cardiac arrest if treated by emergency medical services. What are you waiting for?

GOOD NEWS: Everything you need to know about your heart health is in this issue!

In This Heart Health Breaking News Issue:

Cardiovascular disease — #1 cause of death in the world!	2
Diabetes & venous insufficiency are additional risks	6
Overweight? Belly fat creates new risk factors	7
Why don't people suffer from high cholesterol in Japan?	8
One Man's Personal Journey Created an Empire of Good Health	10
Black Garlic all over the news!	12

HEALTH RESEARCH LABS - Breaking News Cardiovascular Issue

Exhibit A (Black Garlic Botanicals mailer)

This front-page content is followed by additional descriptions of the dangers of cardiovascular disease. For example, the second and third pages display a banner across the top, which states, “Cardiovascular Disease: #1 cause of Death in the world, especially the U.S.!” A banner at the bottom states, “There’s a miraculous natural solution that can help – find out what it is!!”

The mailer continues with the following statements about the efficacy of black garlic in reducing arterial plaque, blood pressure, and cholesterol:

- **BLACK GARLIC WORKS WITH YOUR BODY**
 - Cholesterol: Black Garlic helps maintain healthy cholesterol levels.
 - Clotting: Black Garlic supports healthy platelet aggregation, which can help to keep blood circulating and works against clotting.
 - Supports and helps maintain healthy blood pressure levels to combat risks.
- **Healthy Arteries**

Plaque build-up in arteries can lead to unhealthy heart conditions. Black Garlic helps keep blood vessels barrier-free to create smooth flow, which could address symptoms of fatigue. It may also inhibit calcium binding, which is responsible for arterial plaque formation.
- **Want Healthy Blood Pressure & Cholesterol? Black Garlic helps maintain healthy blood pressure, cholesterol and triglyceride levels.**
- **BLACK GARLIC**
A BREAKTHROUGH FOR
 - ✓ Cholesterol
 - ✓ Blood Sugar
 - ✓ Blood Pressure
 - ✓ The Heart
 - ✓ The Brain
- “I made the switch to Black Garlic Botanicals and within the span of 3 months my LDL levels have reduced from 300 to 150. This product works!” ~ Gerald W.
- “I now have my blood pressure under control with Black Garlic Botanicals. This is a quality product!” ~ Rolf M.

BG18

12. WBS began selling BG18 in August 2017. ~~The product and continued to sell it after entry of the Order and after the filing of a contempt motion against Respondents in *FTC and State of Maine v. Health Research Laboratories, LLC, et al.*, 2:17-cv-00467-JDL in December 2019.~~

~~7.13.~~ BG18 has identical ingredients to Black Garlic Botanicals. Each capsule contains 600 mg of the active ingredient black garlic, and the recommended dosage is two capsules a day. WBS sells a one-month supply of BG18 for \$44.95, plus shipping and handling. WBS also sold the product to consumers in other quantities and at different prices.

14. WBS has disseminated or has caused to be disseminated advertising and promotional materials for BG18, including multi-page mailers and content on company websites. Following entry of the Order, WBS disseminated or caused to be disseminated more than 400,000 mailers to consumer residences in the United States and Canada. WBS continued to disseminate these mailers as late as June 2019 despite Respondents' awareness that the FTC was investigating whether advertising for BG18 violated the Order.

~~8.15.~~ An example of a mailer for BG18 is attached as Exhibit B.

The front page of the attached BG18 mailer features an image of a caduceus and, a photograph of a doctor in a white coat, and states "Black Garlic has shown an amazing power to improve heart and cardiovascular health, maintain normal cholesterol levels, boost your immune system. And MUCH MORE!" The mailer continues with the following representations:

- Black Garlic is a proven miracle for . . . Cholesterol . . . Hypertension . . . Your Heart.
- [Black Garlic] can help reverse plaque build-up in arteries – not just slow it down. Black Garlic keeps blood vessels barrier-free to create a smooth blood flow and alleviates symptoms of fatigue. It also strongly inhibits calcium binding, which is responsible for plaque build-up.
- Reduces Blood Pressure and Cholesterol. . . Black Garlic helps reduce high blood pressure and lowers high levels of bad cholesterol and triglycerides.
- "My blood pressure has also been lowered. I recommend this product because IT WORKS!" ~ Lorraine T.
- On the following page, the brochure poses this question and answer:

Could Black Garlic be the Japanese Secret
to Significantly Reducing Heart Attack Risk? For all
natural, safe, effective heart health, nothing even
compares to Black Garlic!

That's why, for many people across the U.S., Black Garlic has been the answer to reducing their risk of America's #1 killer..

Each year, 635,000 people in the U.S. have their first heart attack! And cardio-vascular disease is the leading cause of global death, causing 17.3 million deaths a year – a number that's expected to grow to more than 23.6 million by 2030.

Exhibit B (BG18 mailer).

- Yes, Black Garlic is a true miracle for cardiovascular health! Just 1 capsule knocks down cholesterol and high blood pressure within days. It can also unblock, clean, and strengthen your arteries.
- The cardio-protective effect of black garlic. . . Black garlic can also improve your lipid profile, an important factor in protecting against cardiovascular problems.

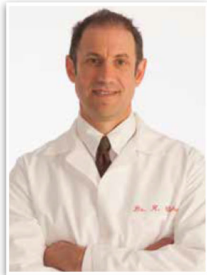
The Ultimate Heart Formula

16. ~~HRL has been selling The Ultimate Heart Formula (“UHF”) since November 2008. HRL began selling The Ultimate Heart Formula (“UHF”) in November 2008 and continued to sell it following entry of the Order and after the filing of a contempt motion against Respondents in FTC and State of Maine v. Health Research Laboratories, LLC, et al., 2:17-cv-00467-JDL. HRL continued to sell the product to consumers through at least January 2021, despite the filing of the contempt motion and the Complaint in this administrative proceeding.~~

9.17. UHF contains Vitamins C, E, and B12 as well as garlic extract (25 mg), Tetrasodium EDTA (40 mg), Ubiquinol (CoEnzyme Q-10) (5 mg), and Nattokinase (10 mg). ~~The recommended dosage is 20 drops or 1ml, twice per day.~~ HRL sold a one-month's supply of UHF for \$39.95, plus shipping and handling. ~~The recommended dosage is 20 drops or 1ml, twice per day.~~ HRL also sold the product to consumers in other quantities and at different prices.

18. HRL disseminated or caused to be disseminated advertisements for UHF, including multipage mailers and company websites. ~~Following entry of the Order, HRL disseminated or caused to be disseminated more than 200,000 mailers to consumer residences in the United States and Canada.~~

10.19. An example of a mailer for UHF is attached as Exhibit C, which contains the following statements and depictions on its first and second pages:



Richard Cohen, M.D.
Scientific Advisor

**“When it comes to a sudden heart attack...
What You Don’t Know
CAN Hurt You!”**

Do you **KNOW** what **YOUR** arteries look like right now?



All Clear!



Uh Oh!



DANGER!

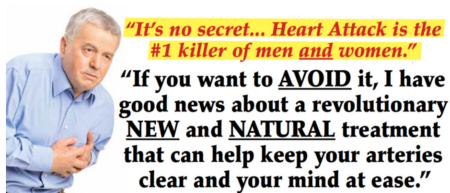


Keeping your risk low and your **HEART** healthy is all about keeping your arteries **CLEAR!** See inside for help from a revolutionary, new, heart-helping liquid drop formula...

SEE INSIDE to discover a natural nutrient that is up to **95% EFFECTIVE** at maintaining clear arteries and reducing risk of a heart problem!



Exhibit C (The Ultimate Heart Formula mailer).



Avoiding a heart attack is all about keeping your arteries clear, your cholesterol in check, your blood pressure low and your risk of a blood clot low... so accumulated plaque does not close off an artery or break off and cause a stroke.



Now there's a new, improved twist on our most effective natural, heart-helping treatment.

Exhibit C (The Ultimate Heart Formula mailer, p.2)

These depictions and representations are followed by a number of additional claims, including:

- Instead, right before you is a simple, safe, inexpensive, non-painful and preventative option that could help you say goodbye to your heart surgeon and avoid an angioplasty.
- Our Ultimate Heart Formula can help support a healthy heart, healthy cholesterol and healthy blood pressure. As blockages in your veins and arteries become clear, you can experience better blood circulation – resulting in more energy, better sleep, sharper mental clarity and better health.
- The Ultimate Heart Formula also contains a powerful, clot-busting agent!
- The Ultimate Heart Formula is an all-natural combination of 19 powerful herbs and essential nutrients that counter the causes of poor cardio health. The Ultimate Heart Formula's unique "Senior Formula" is made with ingredients specifically shown to help improve the effects of a weakened heart, clogged arteries, high blood pressure and high cholesterol for older people!
- With our Ultimate Heart Formula ...You get it ALL ... Amazing heart and artery protection ... without side effects!

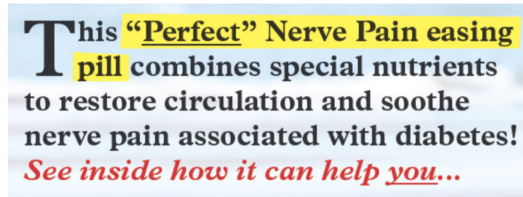
- Yes, with the Ultimate Heart Formula, a lifetime of plaque build up could disappear before you know it! The artery-flushing power of this formula does not even require a doctor's visit or stay in the hospital!

Neupathic

~~11.20.~~ Beginning in August 2016, HRL also sold a dietary supplement called Neupathic. HRL continued to sell the product following entry of the Order and after the filing of a contempt motion against Respondents in *FTC and State of Maine v. Health Research Laboratories, LLC, et al.*, 2:17-cv-00467-JDL. Neupathic contains the following active ingredients: Vitamins E (30 IU), B1 (33.3 mg), B6 (33.3 mg), B12 (16.7 mcg), and folate (266.7 mcg), and Evening Primrose Oil (666.7 mg). The recommended dosage is two capsules per day. HRL sold a one-month's supply of Neupathic for \$39.95, plus shipping and handling. ~~The recommended dosage is two capsules per day.~~ HRL also sold the product to consumers in other quantities and at different prices.

21. HRL has disseminated or caused to be disseminated advertising and promotional materials for Neupathic, including multi-page mailers and content on company websites. Following entry of the Order, HRL disseminated or caused to be disseminated more than 400,000 mailers to consumer residences in the United States and Canada. HRL continued to disseminate these mailers as late as June 2019 despite Respondents' awareness that the FTC was investigating whether their advertising for Neupathic violated the Order.

~~12.22.~~ An example of a mailer is attached as Exhibit D, which contains the following depictions and statements on the first page:



This "Perfect" Nerve Pain easing pill combines special nutrients to restore circulation and soothe nerve pain associated with diabetes!
See inside how it can help you...



Exhibit D (Neupathic mailer).

The mailer continues inside with additional claims:

- If you have diabetic nerve pain, you could suffer with any or all of the symptoms below.
 - ✓ Shooting pain
 - ✓ Burning
 - ✓ Pins and needles
 - ✓ Electric shock-like pain
 - ✓ Extra sensitivity
 - ✓ Numbness
 - ✓ Throbbing
 - ✓ Tingling
 - ✓ Stinging
 - ✓ Stabbing
 - ✓ RadiatingNeupathic was specifically formulated with 6 distinct nutrients to help address ALL these issues and more.
- A “perfect” nerve pain supplement that was formulated from the ground up to improve your circulation and ease the numbness, tingling, itching, burning and swelling from excess fluid trapped in your legs.
- Take this easy step towards normal, pain free legs and feet again! Non-drug ... proven ingredients.

It can also help address the direct cause of nerve pain and neuropathy, damaged nerves, excess fluid — and poor circulation.

Allowing you to:

- ...**Increase** your mobility
- ...**Relieve** nerve pain
- ...**Reduce** swelling and tightness
- ...**Gain back** your freedom to move easily and enjoy your favorite activities again

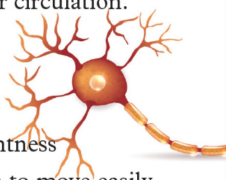


Exhibit D (Neupathic mailer, p. 11).

- Respond now if your nerve pain is driving you crazy! You'll get completely natural, real relief from your discomfort. All natural Neupathic is 100% effective and safe to use every day! Remember, it has [*sic*] shown to help reverse damaged nerves to help you feel great all day and all night.
- "Great reduction of pain. No more nerve pain in my feet. I also hardly notice any leg cramps. This product is great!" — Ruth J.
- "Neupathic is a great 'miracle-like product' which starts working the very first day you use it. Then it continues to control your pain every day. My feet have began [*sic*] to feel normal. Neupathic has improved my life. My nerve pain is gone and I will continue to take Neupathic until my numbness is gone too!" — Gloria R. *Id.*

23. Respondents did not have competent and reliable scientific evidence to support the representations in their advertisements. Further, they relied in part on advice from consultants and/or advisors who did not have appropriate qualifications or expertise to evaluate substantiation for the representations.

Count I
Respondents' Unsubstantiated Claims Related to Black Garlic Botanicals
(HRL and Duhon)

13-24. -In connection with the advertising, promotion, offering for sale, or sale of Black Garlic Botanicals, HRL and Kramer Duhon have represented, directly or indirectly, expressly or by implication, that Black Garlic Botanicals:

- a. Prevents or reduces the risk of cardiovascular disease including by lowering blood pressure, improving blood flow, reducing cholesterol, or decreasing arterial plaque;

- b. Treats cardiovascular disease including by lowering blood pressure, improving blood flow, reducing cholesterol, or decreasing arterial plaque;
- c. Prevents or reduces the risk of atherosclerosis including by reducing cholesterol or decreasing arterial plaque;
- d. Treats atherosclerosis including by reducing cholesterol or decreasing arterial plaque; and
- e. Cures, treats, or mitigates hypertension including by decreasing arterial plaque or lowering blood pressure.

~~14.25.~~ The representations set forth in Paragraph ~~14.24~~ were not substantiated at the time the representations were made.

Count II
Respondents' Unsubstantiated Claims Related to BG18
(WBS and Duhon)

~~15.26.~~ In connection with the advertising, promotion, offering for sale, or sale of BG18, WBS and Kramer Duhon have represented, directly or indirectly, expressly or by implication, that BG18:

- a. Prevents or reduces the risk of cardiovascular disease including by lowering blood pressure, improving blood flow, reducing cholesterol, or decreasing arterial plaque;
- b. Treats cardiovascular disease including by lowering blood pressure, improving blood flow, reducing cholesterol, or decreasing arterial plaque.
- c. Prevents or reduces the risk of atherosclerosis including by reducing cholesterol or decreasing arterial plaque;
- d. Treats atherosclerosis including by reducing cholesterol or decreasing arterial plaque; and
- e. Cures, treats, or mitigates hypertension including by decreasing arterial plaque or lowering blood pressure.

~~16.27.~~ The representations set forth in Paragraph ~~16.26~~ were not substantiated at the time the representations were made.

Count III
Respondents' Unsubstantiated Claims Related to UHF
(HRL and Duhon)

~~17.28.~~ In connection with the advertising, promotion, offering for sale, or sale of UHF, HRL and Kramer Duhon have represented, directly or indirectly, expressly or by implication, that UHF

- a. Prevents or reduces the risk of cardiovascular disease including by lowering blood pressure, improving blood flow, reducing cholesterol, or decreasing arterial plaque;
- b. Treats cardiovascular disease including by lowering blood pressure, improving blood flow, reducing cholesterol, or decreasing arterial plaque.
- c. Prevents or reduces the risk of atherosclerosis including by reducing cholesterol or decreasing arterial plaque;
- d. Treats atherosclerosis including by reducing cholesterol or decreasing arterial plaque; and
- e. Cures, treats, or mitigates hypertension including by decreasing arterial plaque or lowering blood pressure.

~~18.29.~~ The representations set forth in Paragraph ~~18.28~~ were not substantiated at the time the representations were made.

Count IV
Respondents' Unsubstantiated Claims Related to Neupathic
(HRL and Duhon)

~~19.30.~~ In connection with the advertising, promotion, offering for sale, or sale of Neupathic, HRL and Kramer Duhon have represented, directly or indirectly, expressly or by implication, that Neupathic:

- a. Cures, treats, or mitigates diabetic neuropathy including by improving blood circulation, or eliminating or alleviating diabetic nerve pain and discomfort.

~~31.~~ The representations set forth in Paragraph ~~20.30~~ were not substantiated at the time the representations were made.

~~20.~~

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Violations of Sections 5 and 12

~~21.32.~~ The acts and practices of Respondents as alleged in this complaint constitute unfair or deceptive acts or practices, and the making of false advertisements, in or affecting commerce in violation of Sections 5(a) and 12 of the Federal Trade Commission Act.

NOTICE

You are notified that on ~~_____~~, ~~20__~~, July 13, 2021, at ~~_____~~ 10:00 a.m., at the Federal Trade Commission offices, 600 Pennsylvania Avenue, NW, Room 532-H, Washington, DC 20580, an Administrative Law Judge of the Federal Trade Commission will hold a hearing on the charges set forth in this Complaint. At that time and place, you will have the right under the Federal Trade Commission Act to appear and show cause why an order should not be entered requiring you to cease and desist from the violations of law charged in this Complaint.

You are notified that you are afforded the opportunity to file with the Federal Trade Commission (“Commission”) an answer to this Complaint on or before the 14th day after service of the Complaint upon you. An answer in which the allegations of the Complaint are contested must contain a concise statement of the facts constituting each ground of defense; and specific admission, denial, or explanation of each fact alleged in the Complaint or, if you are without knowledge thereof, a statement to that effect. Allegations of the Complaint not thus answered will be deemed to have been admitted.

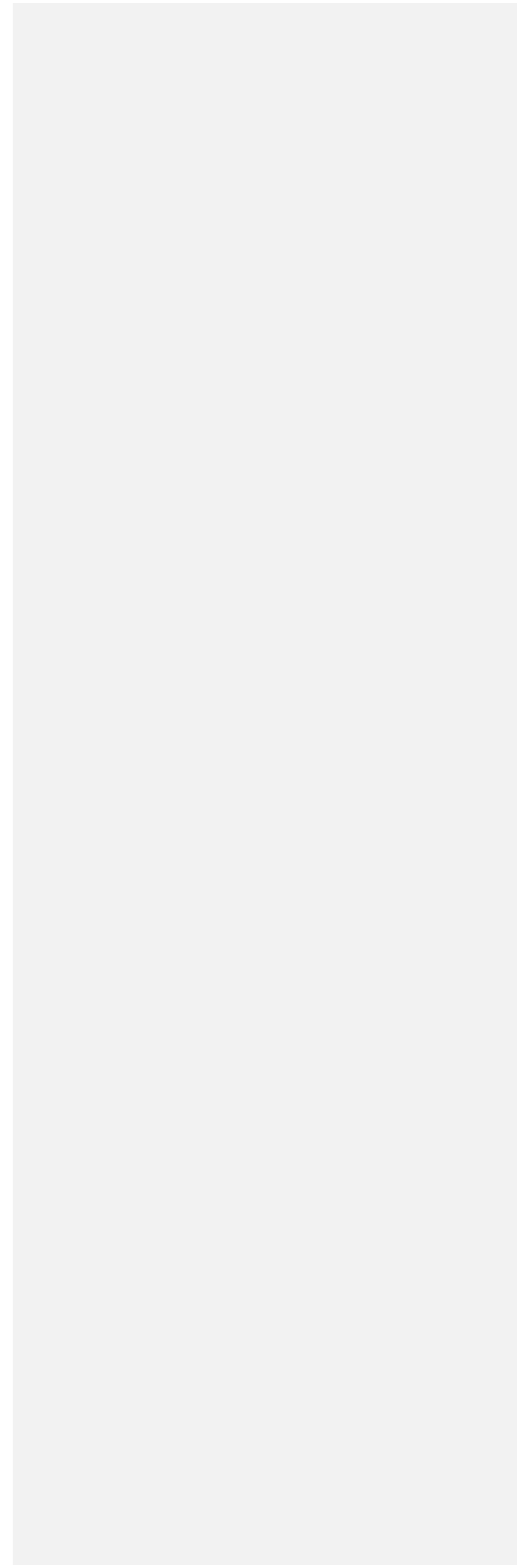
If you elect not to contest the allegations of fact set forth in the Complaint, the answer should consist of a statement that you admit all of the material facts to be true. Such an answer will constitute a waiver of hearings as to the facts alleged in the Complaint and, together with the Complaint, will provide a record basis on which the Commission may issue a final decision containing appropriate findings and conclusions and a final order disposing of the proceeding. In such answer, you may, however, reserve the right to submit proposed findings of fact and conclusions of law under FTC Rule § 3.46.

Failure to answer timely will be deemed to constitute a waiver of your right to appear and contest the allegations of the Complaint. It will also authorize the Commission, without further notice to you, to find the facts to be as alleged in the Complaint and to enter a final decision containing appropriate findings and conclusions and a final order disposing of the proceeding.

The Administrative Law Judge will hold an initial prehearing scheduling conference not later than 10 days after the answer is filed by the last answering Respondent. Unless otherwise directed by the Administrative Law Judge, the scheduling conference and further proceedings will take place at the Federal Trade Commission, 600 Pennsylvania Avenue, NW, Room 532-H, Washington, DC 20580. Rule 3.21(a) requires a meeting of the parties’ counsel as early as practicable before the prehearing scheduling conference, but in any event no later than 5 days

after the answer is filed by the last answering Respondent. Rule 3.31(b) obligates counsel for each party, within 5 days of receiving a Respondent's answer, to make certain initial disclosures without awaiting a formal discovery request.

Moreover, the Commission has reason to believe that, if the facts are found as alleged in the Complaint, it may be necessary and appropriate for the Commission to seek relief to redress injury to consumers. Such relief could be in the form of restitution for past, present, and future consumers and such other types of relief as are set forth in Section 19(b) of the Federal Trade Commission Act. The Commission will determine whether to apply to a court for such relief on the basis of the adjudicative proceedings in this matter and such other factors as are relevant to consider the necessity and appropriateness of such action.



NOTICE OF CONTEMPLATED RELIEF

Should the Commission conclude from the record developed in any adjudicative proceedings in this matter that Respondents have violated or are violating Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52, the Commission may order such relief against Respondents as is supported by the record and is necessary and appropriate, including but not limited to:

- a. A prohibition on any representation that Respondents' products cure, treat, mitigate, prevent, or reduce the risk of any disease.
- b. A prohibition on representations about the health benefits, safety, efficacy, or the performance of Respondents' products unless those representations are supported by competent and reliable scientific evidence.
- c. A prohibition on misrepresentations regarding tests, studies, or other research.
- d. A requirement that Respondents preserve records relating to competent and reliable clinical tests or studies.
- e. A requirement that Respondents send appropriate notification of the order to all affected customers.
- f. A requirement that Respondents cancel any automatically recurring orders for Black Garlic Botanicals, BG18, UHF, or Neupathic for any existing customer who was first charged before the issuance of the Complaint.
- g. A requirement that Respondents will not use, sell, rent, lease, or transfer any identifying information related to any customer who paid money to any Respondent for Black Garlic Botanicals, BG18, UHF, or Neupathic prior to the issuance of the Complaint.
- h. A requirement that, for a period of time, Respondents send acknowledgments of the order to the Commission.
- i. A requirement that, for a period of time, Respondents create and preserve certain records demonstrating compliance with the order.
- j. A requirement that, for a period of time, Respondents provide notice of all new business activity to the Commission.
- k. A requirement that Respondents file periodic compliance reports with the Commission.

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l. A requirement that Respondents' compliance with the order be monitored for a term to be determined by the Commission.

m. Any other relief appropriate to correct or remedy the effects of Respondents' deceptive practices or of any or all of the conduct alleged in the complaint.

IN WITNESS WHEREOF, the Federal Trade Commission has caused this complaint to be signed by its Secretary and its official seal to be hereto affixed at Washington, DC, this ~~24th~~ day of ~~2020~~February 2021.

By the Commission.

April J. Tabor
Acting Secretary

SEAL:

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**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES**

In the Matter of

**HEALTH RESEARCH LABORATORIES, LLC,
a limited liability company,**

**WHOLE BODY SUPPLEMENTS, LLC,
a limited liability company, and**

**KRAMER DUHON,
individually and as an officer of
HEALTH RESEARCH LABORATORIES, LLC
and WHOLE BODY SUPPLEMENTS, LLC.**

DOCKET NO. 9397

COMPLAINT COUNSEL'S EXHIBIT B (CCX-B)

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES**

In the Matter of

**HEALTH RESEARCH LABORATORIES, LLC,
a limited liability company,**

**WHOLE BODY SUPPLEMENTS, LLC,
a limited liability company, and**

**KRAMER DUHON,
individually and as an officer of
HEALTH RESEARCH LABORATORIES, LLC
and WHOLE BODY SUPPLEMENTS, LLC.**

DOCKET NO. 9397

DECLARATION OF JONATHAN COHEN

I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify as follows:

1. I am a United States citizen and am over eighteen years of age. I am employed by the Federal Trade Commission (“FTC”) as an attorney in the Division of Enforcement, Bureau of Consumer Protection. I am acting as Complaint Counsel in the above-captioned matter.
2. The allegations in the proposed Amended Complaint derive substantially from limited information that Respondents have disclosed within the past month.
3. Respondents have served no discovery to Complaint Counsel or third parties.
4. At 1:20 PM on Friday, February 12, before President’s Day weekend, Respondents asked to confer about this motion. Complaint Counsel offered to confer

immediately after the holiday, on the next business day, but Respondents filed their motion on February 12 anyway.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: February 24, 2021

/s/ Jonathan Cohen

Washington, D.C.