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ATTORNEYS FOR PLAINTIFF  
FEDERAL TRADE COMMISSION

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

Federal Trade Commission,  Plaintiff,  v.  HCG Diet Direct, LLC; and Clint Ethington,  Defendants.
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CASE NO.

COMPLAINT FOR PERMANENT  
INJUNCTION AND OTHER  
EQUITABLE RELIEF

Plaintiff, the Federal Trade Commission (“FTC” or “Commission”), for its  
Complaint alleges:

1. The FTC brings this action pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b), to obtain a permanent injunction, rescission or reformation of contracts, restitution, the refund of monies paid, the disgorgement of ill-gotten monies, and other equitable relief for Defendants’ acts or practices in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and

52, in connection with the labeling, advertising, marketing, distribution, and sale of purported hCG weight-loss products.

### JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction pursuant to 15 U.S.C. §§ 45(a), 52, and 53(b) and 28 U.S.C. §§ 1331, 1337(a), and 1345.

3. Venue in the United States District Court for the District of Arizona is proper under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b) and (c).

### THE PARTIES

4. Plaintiff FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52, which prohibit, respectively, unfair or deceptive acts or practices, and false advertisements for food, drugs, devices, services, or cosmetics, in or affecting commerce. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), authorizes the Commission to initiate federal district court proceedings to enjoin violations of the FTC Act, and to secure such equitable relief as may be appropriate in each case, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies.

5. Defendant HCG Diet Direct, LLC (“Diet Direct”) is an Arizona corporation that lists its principal place of business as 2753 East Broadway, Suite 101-205, Mesa, Arizona 85204. Diet Direct markets homeopathic human chorionic gonadotropin (“hCG”) as HCG Diet Direct Drops in the following quantities: 7-Day

Ultimate Weight Loss & Metabolism Formula; 15-Day Ultimate Weight Loss & Metabolism Formula; 26-Day Ultimate Metabolism & Weight Loss Formula; and 40-Day Ultimate Weight Loss & Metabolism Formula in this District and across the United States. At all times material to this Complaint, acting alone or in concert with others, Diet Direct has labeled, advertised, marketed, distributed, or sold homeopathic hCG weight-loss products to consumers throughout the United States.

6. Defendant Clint Ethington (“Ethington”) is the manager and chief executive officer of Diet Direct. His principal place of business is at 2753 East Broadway, Suite 101-205, Mesa, Arizona 85204. At all times material to this Complaint, acting alone or in concert with others, Ethington has formulated, directed, controlled, had the authority to control, or participated in the acts and practices of Diet Direct, including the acts and practices set forth in this Complaint. In connection with the matters alleged herein, he transacts or has transacted business in this District and throughout the United States.

#### COMMERCE

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

#### DEFENDANTS’ COURSE OF CONDUCT

8. Defendants have labeled, advertised, marketed, distributed, and sold HCG Diet Direct homeopathic hCG weight-loss products to retailers and consumers

throughout the United States since at least January 1, 2009. Advertisements for this product have appeared on the websites [hcgdietdirect.com](http://hcgdietdirect.com), [youtube.com/hcgdietdirect](http://youtube.com/hcgdietdirect), [facebook.com/hcgdietdirect](http://facebook.com/hcgdietdirect), [drugstore.com](http://drugstore.com), and [overstock.com](http://overstock.com).

### **Defendants' Product Ingredients**

9. Defendants' product ingredients are homeopathic formulations. These are commonly denoted as the stated ingredient diluted by a factor of ten, or Roman numeral (X). A "1X" dilution contains one part of the listed ingredient diluted by nine parts of water. However, a "2X" dilution takes the result of the first dilution, further diluting it by a factor of ten. For example, a "6X" formulation has been diluted six times by a factor of ten, ultimately producing one part per million of the original ingredient. The ingredient panels for homeopathic drugs indicate the quantities of active ingredients by these dilution designations. Some ingredients are designated as present in several dilutions.

10. According to the product labels, HCG Diet Direct Drops contain the following ingredients: HCG (Human Chorionic Gonadotropin) 12x, 30x, 60x; Arginine 4x, 12x, 30x; L-Carnitine 4x, 12x, 30x; and Omithine 3x, 12x, 30x; Foeniculim vulgare 2x; Antimonium crudum 8x; Galium aparine 6x; Rubus idaeus 6x; Calcarea carbonica 6x; Lac defloratum 6x; Manganum metallicum 6x; and Phosphorous 6x. The instructions are to ingest these drops sublingually before meals in conjunction with the very low calorie diet popularized by Dr. A.T.W. Simeons. Defendants claim that this diet program, consisting of a 500 to 800 calorie per day

diet, is safe.

11. Defendants offered free products and, in some cases, cash, to customers for their weight-loss stories attributable to HCG Diet Direct Drops. Several family members of Ethington posted YouTube videos or contributed weight loss testimonials that were posted on Defendants' website. Defendants did not disclose that a number of customers whose testimonials were used had received free products, had been paid, or were related to Ethington.

### **Warning Letter**

12. On November 28, 2011, the U.S. Food and Drug Administration ("FDA") and the FTC issued a joint warning letter to Defendants advising them that HCG Diet Direct Drops "is not considered a homeopathic drug product" under FDA's Compliance Policy Guide entitled "Conditions Under Which Homeopathic Drugs May be Marketed" (CPG 7132.15) and was an unapproved new drug in violation of Sections 301 and 505 of the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. Sections 331 and 355, and was misbranded in violation of Sections 503 and 301 of the Act. The letter further advised Defendants that their claims were unlawful under the FTC Act, 15 U.S.C. Sections 41, *et seq.*, unless Defendants possessed competent and reliable evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims were true at the time they were made.

### **Defendants' Product Sales**

13. These products were marketed and sold online for prices ranging

between approximately \$35 for a 7-day supply and \$200 for a 40-day supply.

14. Sales of HCG Diet Direct Drops and related diet products from January 1, 2009 through the present have exceeded \$3.2 million.


**Defendants' Product Representations**

15. To induce consumers to purchase HCG Diet Direct Drops, Defendants have disseminated, or caused to be disseminated, advertisements, including, but not limited to, the attached Exhibits A through G. Among other things, the advertisements contained the following statements or depictions:

- a. Four Package Faces for HCG Diet Direct Drops (7, 15, 26, and 40 Day Supplies)



HOMEOPATHIC




**HCG**  **Diet**  
*DIRECT™*

**26 Day Diet**  
Lose  
**26 pounds**  
in 26 days®


*America's Leading Brand  
of HCG Diet Products*

**HDD000004**

60 ml (2 fl oz)

HOMEOPATHIC




**HCG**  **Diet**  
*DIRECT™*

**40 Day Diet**  
Lose  
**40 pounds**  
in 40 days®

*America's Leading Brand  
of HCG Diet Products*

**HDD000006**

120 ml (4 fl oz)


  



b. Package Sides and Back for HCG Diet Direct Drops (7, 15, 26, and 40 Day Supplies)


**Ideal for Both Men and Women**

- No Prescription Necessary
- \*Up to 1 Pound Per Day Weight Loss
- Physician Developed and Scientifically Formulated
- Heavy Exercise Discouraged During Diet Phase
- Eat Whatever You Want For 1st Two Days of Diet
- Easy To Use Liquid Drops Under Tongue
- Promotes Fat Burning, Energy, Appetite Control & Much More




**Meet Jessica Monize**  
She lost 110 pounds with the HCG Diet Direct™ plan

*"At HCG Diet Direct™ we have revolutionized the weight loss industry by providing a faster and safer weight loss system."*



Dr. Willis



Approved

**Novus<sup>OP</sup>**

**www.HcgDietDirect.com**  
Science...Meets Nature™

<b>Drugs Facts - HCG Diet Direct™ Drops (.6oz)</b>
<b>Active Ingredients</b> HCG (Human Chorionic Gonadotropin) 12x, 30x, 60x, Arginine 4x, 12x, 30x, L-Carnitine 4x, 12x, 30x, and Ornithine 4x, 12x, 30x, Foeniculum vulgare 4x, Antimonium crudum 8x, Gallium asperine 6x, Rubus idaeus 6x, Calcarea carbonica 6x, Lac defloratum 6x, Manganum metallicum 6x and Phosphorus 6x
<b>Uses and Indications</b> Provides homeopathic support for managing weight along with proper dieting, detox and appetite control.
<b>Warnings</b> Before starting any weight loss program consult with your health care professional. Tamper resistant seal. If seal is broken, do not use. If you are pregnant or breast feeding, ask a health care professional before using this product. <b>KEEP OUT OF REACH OF CHILDREN</b> If conditions worsen or persist for more than 7 days, consult with a physician.
<b>Directions</b> Follow detailed instructions in pamphlet accompanying this product. Adults 18 and over take 12-14 drops 3 times per day under tongue before meals or as directed by your health care professional along with recommended low calorie diet. Ages 17 and under, consult your health care professional. Store in a cool dark place out of direct sunlight.
<b>Inactive ingredients:</b> Base of 20% USP alcohol

**24/7 Call Customer Service**  
888-994-2434  
We are here for you 365 days a year!

**\*Disclaimer:** HCG Diet Direct™ is a health and research distribution company and offers no direct medical advice. This diet is based off the original finding and research of Dr. A.T.W. Simeons original protocol called "Pounds and Inches". The Phrase "7 Pounds in 7 Days™", "15 Pounds in 15 Days™", "26 Pounds in 26 Days™", and "40 Pounds in 40 Days™" are trademarks of HCG Diet Direct™ and are only a likely and common result when sticking strictly to the instructions in our provided protocol. actual average weight loss is from a half a pound to one pound per day. This homeopathic HCG weight loss formula is manufactured in an FDA inspected facility in the USA under Good Manufacturing Practices (GMP). The products and claims contained on these products inside have not been evaluated by the United States Food and Drug Administration (FDA) and should not be used to diagnose, treat, cure or prevent disease. As with any diet we recommend that you consult a doctor before starting this diet. If you have any swelling, shortness of breath, dizziness or heavy redness, consult a doctor or medical professional immediately. The Guarantee provided on this product entitles you to a full refund of your purchase price if you are dissatisfied with your results. Simply return the unused product back to the store of purchase in its original box with original receipt with in 30 days of original purchase.

c. HCG Diet Direct Website October 6, 2010, excerpts.  
[www.hcgdietdirect.com archived through www.archive.org]  
(Ex. A)

100% Guaranteed!

"26 pounds in 26 days"™

\* \* \*



Established

- Our exclusive weight loss formula is FDA established to give piece [sic] of mind.

- d. HCG Diet Direct Website January 1, 2011, excerpts.  
[www.hcgdietdirect.com archived through www.archive.org] (Ex. B)

26 pounds  
in 26 days™

Jessica  
110 lbs later  
with HCG Diet Direct™

About The Diet

Lose 26 lbs in 26 days if you follow the diet as directed. Note that this is the average weight loss we have recorded from our clients. Some people lose more, some people lose less. But the fact is, you will definitely lose weight on this regimen without heavy exercise or without frozen or prepared foods to buy.

\* \* \*



Established

100%  
Guaranteed !

- e. HCG Diet Direct Website October 10, 2010, excerpts.  
[www.hcgdietdirect.com archived through www.archive.org] (Ex. C)

[Frequently Asked Questions]

\* \* \*

Why are some people calling HCG the “Weight Loss Cure”?

\* \* \*

HCG is also being called the “Weight Loss Cure” because after taking it for weight loss, it reprograms your body to use stored fat for energy when calories are reduced for a period of time. It helps you maintain your weight and not regain the pounds you lost.

How much weight can I expect to lose on the program?

\* \* \*

Most people will lose 26 pounds on the 26 day program. Everyone is different. It depends on many factors including how much excess weight you have and how much needs to be lost. Often, people lost 7 - 14 lbs in the first week. You need to have at least 12 lbs to lose in order to do the 26 day program.

\* \* \*

- f. HCG Diet Direct Website November 8, 2012, excerpts.  
[www.hcgdietdirect.com] (Ex. D1 - D2)

D1

The Next Chapter in Weight Loss Success

\* \* \*

HCG Diet Direct prepares for publication of recent clinical trials on HCG Hormone dieting. The recent 30 day trial has reached its conclusion and data is being compiled for online publication to the HCG Diet Direct website. The 30-day trial showed positive results regarding the HCG Diet Direct Ultimate Weight Loss Program. The HCG Diet Direct program is based on the use of their homeopathic oral formula administered three times per day in combination with a very detailed doctor-designed dieting protocol. Participants in the program who underwent the HCG Diet Direct homeopathic weight loss plan had a positive experience.

\* \* \*

HCG Diet Direct's Homeopathic HCG weight loss formula is the basis for a weight loss plan. It can be used to achieve weight reduction without invasive procedures, and with no known HCG diet side effects. It is one of the healthiest weight loss plans available.

\* \* \*

D2

[Frequently Asked Questions]

\* \* \*

What sets HCG Diet Direct's product apart from the rest?

The HCG Diet Direct® weight loss plan is a proprietary formula, physician developed and scientifically formulated with specific amounts of nutrition and ingredients to encourage weight loss. Our unique formula has many advantages like natural appetite suppressants, energy supplements and more to help optimize weight loss. Customers report daily that they really do feel better and have little or no hunger on this formula compared to some prescription and homeopathic formulas available on the market.

\* \* \*

- g. HCG Diet Direct Website September 28, 2010, excerpts.  
[www.hcgdietdirect.com archived through www.archive.org]  
(Ex. E1 - E6)

E1

[Before and after pictures and testimonials appear as you scroll down the web page]

\* \* \*

Congratulations Jessica!

Before	After
280 lbs	173 lbs

E2

\* \* \*

I ordered the 23-26 day program of the HCG Diet Direct drops.  
... I lost 17 pounds and am now in the maintenance program .... I  
have lost 10.5 inches of stored fat. ...

E3

\* \* \*

At 35 days on the drops, I lost a total of 29 lbs. Never thought in a million  
years that I could ever do that in such a short amount of time. ...  
- Briana M., Age 28

I started at 325 and know [sic] am at 271 .. I lost 54 pounds in 40 days!

[Before and after pictures]

“I feel so much better and am extremely happy. My before and after  
pictures are amazing. I lost over 8 inches in my waist. Thank you”

- Justin D. – Pinedale, Wy

E4

[Before and after pictures]

“I went from 279 lbs to 229 lbs in 40 days – I haven’t been at that weight  
since high school.

I feel and look great! My wife will be starting the diet soon and [I’m] sure  
she will have great results also.”

– John G – Frewsburg, NY

E5

\* \* \*

Summer lost a total of 30 pounds in 38 days:

\* \* \*

[Before and after pictures]

It's Fantastic, I went from 275 to 242 in 28 days on your drops and plan....

E6

\* \* \*

WOW! I'm on day 7 and have lost 7 pounds!!!

And ... I'm not hungry. Watched my kids eat ice[-]cream cheesecake, frito pie and [M]c[D]onalds [f]rench fries and was able to restrain!! So far, so good. Thanks!

\* \* \*

I have lost 20 pounds and 30 ¼ inches overall in just 18 days!

\* \* \*

- h. HCG Diet Direct Website July 17, 2011, excerpts.  
[www.hcgdietdirect.com archived through www.archive.org] (Ex. F)

The HCG Diet Direct™ formulas provide 2x the dosage than most brands and has been formulated to keep your body from entering starvation mode. Your body entering starvation mode has proven to not only harm your body but will drastically decrease your final weight loss.

Most other HCG products call for only ½ the dosage that you need to get through this diet safely and successfully with out [sic] going into starvation mode.

The HCG Diet Direct™ Drops are Physician Developed & Scientifically Formulated for the HCG Diet.

These weight loss Drops are produced in the USA under strict guidelines in our FDA certified lab from superior ingredients and quality controlled to insure [sic] optimum potency and safety. All Formulas are FDA Established.

\* \* \*

- i. HCG Diet Direct Website, February 17, 2011, excerpts. [www.hcgdietdirect.com archived through www.archive.org] (Ex. G )

\* \* \*

Testimonials

\* \* \*

“I was taking blood pressure meds among other prescriptions and I lost 30 lbs in the 26 days. My blood pressure came way down and now my doctor is lowering the dosage in order to get me off of them.”

– Donnie E.

\* \* \*

### **DEFENDANTS’ VIOLATIONS OF THE FTC ACT**

16. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits unfair or deceptive acts or practices in or affecting commerce.

17. Section 12(a) of the FTC Act, 15 U.S.C. § 52(a), prohibits the dissemination of any false advertisement in or affecting commerce for the purpose of inducing, or which is likely to induce, the purchase of food, drugs, devices, services, or cosmetics. For the purposes of Section 12 of the FTC Act, 15 U.S.C. § 52, HCG Diet Direct weight loss products are “foods” or “drugs” as “foods” and “drugs” are defined in Section 15(b) and (c) of the FTC Act, 15 U.S.C. § 55(b) and (c).

## COUNT ONE

### **False or Unsubstantiated Claims**

18. Through the means described in Paragraph 15, including, but not limited to, the statements and depictions contained in the advertisements attached as Exhibits A through G, Defendants have represented, expressly or by implication, that:

- a. HCG Diet Direct Drops causes, or assists in causing, rapid weight loss, including one pound per day;
- b. HCG Diet Direct Drops causes, or assists in causing, users to lose substantial amounts of weight, including as much as 110 pounds;
- c. Consumers who use HCG Diet Direct Drops are likely to obtain the rapid and substantial weight loss reported by consumers who appear in Defendants' advertisements;
- d. The HCG Diet Direct weight loss program is safe;
- e. The HCG Diet Direct weight loss program has been shown effective in a 30-day clinical trial; and
- f. HCG Diet Direct Drops are FDA approved for weight loss.

19. The representations set forth in Paragraph 18 were false or not substantiated at the time the representations were made. Therefore, the making of the representations in Paragraph 18 constitutes deceptive acts or practices and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.



## **COUNT TWO**

### **Failure to Disclose Material Connections**

20. Through the means described in Paragraph 15, including but not limited to the statements and depictions contained in the advertisements attached as Exhibits A through G, Defendants have represented, expressly or by implication, that the people appearing in advertisements for HCG Diet Direct Drops are ordinary consumers and independent endorsers of Defendants' products.

21. In numerous instances in which Defendants have made the representation set forth in Paragraph 20, they have failed to disclose or disclose adequately that certain of the endorsers were compensated or provided free products in connection with their endorsement of HCG Diet Direct Drops, or are related to a company employee or officer. These facts would have been material to consumers in deciding whether to purchase HCG Diet Direct Drops.

22. Defendants' failure to disclose or disclose adequately the material information described in Paragraph 21 constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

### **CONSUMER INJURY**

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

### **THIS COURT'S POWER TO GRANT RELIEF**

24. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt and redress violations of any provision of law enforced by the FTC. The Court, in the exercise of its equitable jurisdiction, may award ancillary relief, including, but not limited to, rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies, to prevent and remedy any violation of any provision of law enforced by the FTC.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, Federal Trade Commission, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and the Court's own equitable powers, requests that the Court:

- a. Enter a permanent injunction to prevent future violations of the FTC Act by Defendants;
- b. Award such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the FTC Act, including, but not limited to, rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies; and

c. Award Plaintiff the costs of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper.

Dated:

Respectfully submitted,

JONATHAN E. NUECHTERLEIN  
General Counsel

/s/ James A. Prunty  
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Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

# **EXHIBIT A**

<http://www.hcgdietdirect.com/aboutus.html>

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Science... Meets Nature™

Start Losing Weight ▶



"Americas Leading Authority For HCG Diet Products"

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- ▶ Dr. Simeons Protocol - PDF
- ▶ About HCG Diet Direct

Real Life HCG Diet Stories



**Our mission is simple:**

To provide the best products and service to our customers at the lowest prices possible with out compromising the quality. We take great pride in our company, our commitment to customer service and in the products we sell. Our online store is designed to provide you with a safe and secure environment to browse our product catalog along with a l brary of tips and information to provide you with the education necessary. We are an Arizona Corporation that has been distributing the highest of quality health foods and supplements for over a decade. We have manufactured and/or distributed everything from our own in house all natural dairy products to disease specific Nutri-ceuticals.

Our Exclusive Homeopathic HCG Weight Loss Formula is one of our favorite products that we are selling in our affiliate weight loss clinic in Mesa, Arizona and online to create a larger awareness of this great weight loss miracle product. We are currently one of the top HCG weight loss providers and one of the top searched companies on the net for HCG. We are dedicated to serving the weight loss industry with only the best products because we are just l ke you, we want to be healthy and stay healthy.

**We have gone through rigorous certifications so that we may:**

1. Put your mind at ease about our company.
2. Stop fraud where it starts and provide safety and security.



- Our exclusive weight loss formula is FDA established to give piece of mind.



- HCG Diet Direct is 3rd party validated by Trust Gauge and Validated Site and is rated #1 in our category by Ranking.com. Please see our validated logo for specifics on our home page or shopping cart.



**HCG Diet Direct**

2753 East Broadway  
 Suite 101-205  
 Mesa, Az 85204

**Customer Service:**

**888-994-2434**  
**480-281-7594**  
*Call Today. HCG Diet Direct™ Certified representatives are standing by.*

**Business Hours:**

**Monday - Thursday:**

7:00 a.m. - 7:00 p.m.

**Friday:**

7:00 a.m. - 6:00 p.m.

**Saturday:**

9:00 a.m. - 5:00 p.m.

\*All Times Arizona Time Zone

# **EXHIBIT B**

www.hcgdietdirect.com/about/hcgdiet.html

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24/7 Call Customer Service  
888-994-2434  
We are here for you 365 days a year!

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- About HCG Diet
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- Sample HCG Diet
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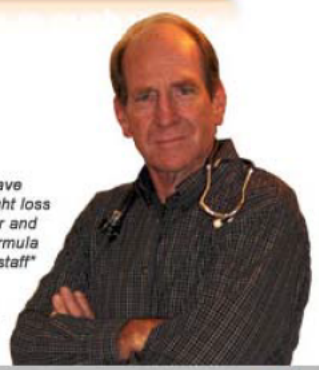


Jessica  
110 lbs later  
with HCG Diet Direct™

26 pounds  
in 26 days™

"At HCG Diet Direct™, we have revolutionized the HCG weight loss industry by providing a faster and more effective weight loss formula with licensed physicians on staff"

*Dr. Ron Willis*  
Dr. Ron Willis



Click Here to Shop Now

AMERICAS'S LEADING BRAND OF HCG DIET PRODUCTS

Novus<sup>OP</sup>

- > HCG Diet News
- > HCG Diet FAQ
- > HCG Diet Tips and L brary
- > Dr. Simeons Protocol - PDF
- > About HCG Diet Direct
- > HCG Diet Direct In The News

Real Life HCG Diet Stories



About The Diet

Lose 26 lbs in 26 days if you follow the diet as directed. Note that this is the average weight loss we have recorded from our clients. Some people lose more, some people lose less. But the fact is, you will definitely lose weight on this regimen without heavy exercise or without frozen or prepared foods to buy.

The HCG Diet is based off Dr. Simeons "Pounds & Inches - A New Approach to Obesity" and was previously only available in spas and weight loss clinics which made access to the diet unaffordable for most. As the diet proved wildly successful and something that could easily be done at home with the proper instructions, HCG Diet Direct was formed so that you could obtain the same supplements and instructions that the clinics provide.

HCG = Human Chorionic Gonadotropin

HCG works directly with the Hypothalamus gland. This gland actually controls body fat, emotions, and helps to develop the reproductive organs during puberty. Each and every person is given HCG at birth. Unfortunately most of the food these days has been overloaded with chemicals. These chemicals are designed to remove HCG from your body.

Candida yeast overgrowth can be another common reason people lose HCG. This overgrowth is a result of an imbalance in the digestive system. If you have ever, in your life, taken antibiotics there is a high chance you have an imbalance.

**The weight registered by the scale...** is determined by two processes not necessarily synchronized. Under the influence of HCG, fat is being extracted from the cells, in which it is stored in the fatty tissue. When these cells are empty and therefore serve no purpose, the body breaks down the cellular structure and absorbs it. But the breaking up of useless cells, connective tissue, blood vessels, etc., at times follow the fat-extraction process. When this happens the body replaces some of the extracted fat with water which is retained for this purpose. Because water is heavier than fat, the weight scale may show no loss of weight even though fat has actually been consumed to make up for the deficit in the 500- calorie diet. When such tissue is finally

Search



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Get HCG Drops & Support ing Supplements

See What Makes Our HCG Diet Direct Formula Different

Go

Get More HCG Info

# **EXHIBIT C**



have a menstrual cycle, you can maintain the diet and continue taking HCG.

#### What about pregnancy and taking HCG?

[View Video](#)

If you are pregnant or become pregnant during the HCG diet, stop taking HCG and consult your physician.

#### Why are some people calling HCG the "Weight Loss Cure"?

[View Video](#)

HCG is also being called the "Weight Loss Cure" because after taking it for weight loss, it reprograms your body to use stored fat for energy when calories are reduced for a period of time. It helps you maintain your weight and not regain the pounds you lost.

#### How much weight can I expect to lose on the program?

[View Video](#)

Most people will lose 26 pounds on the 26 day program. Everyone is different. It depends on many factors including how much excess weight you have and how much needs to be lost. Often, people lose 7-14 lbs in the first week. You need to have at least 12 lbs to lose in order to do the 26 day program.

#### Does the weight loss slow down after the first two weeks?

[View Video](#)

Many times there is a large amount of weight loss in the first week, then a plateau or leveling off of weight loss. This does not mean that your weight loss has stopped. Typically, inches are being lost continuously while on the program, and after a period of time, patients will experience another large drop on the scale. Weight loss is thus achieved in this stair-step fashion.

#### Is it ok to skip a meal or protein at one of my meals?

[View Video](#)

No you don't ever want to skip any of your meals. Its important to eat all of your 500 calories and especially your protein so that you only lose fat and not muscle.

#### Can I exercise daily?

[View Video](#)

No exercise! Or if you must exercise, low key exercise only. You can do about 20 min. of walking a day and a few sit ups or push-ups if you feel that is needed. Exercise burns calories and therefore causes your hunger to increase. The combination of low calorie intake and exercise could cause your body to go into starvation mode. This can negatively impact your stamina and commitment to the diet. So take it easy. And remember, you will be losing fat. So when you do go back to the gym, it's a skinner, more energetic you!

#### Do I have to take vitamins while doing this diet?


[View Video](#)

You must take B12 everyday. The [B TOTAL Sublingual](#) is the recommended B supplement because it is in liquid form and is absorbed right in your system. This supplement is as potent as a B12 shot from the doctor's office. This will increase with energy and increase your metabolism. Also a good [Multi Vitamin](#) helps, make sure it is sugar free and has no fat soluble ingredients like fish oils or vitamin D. Potassium is also good especially if you experience leg cramps (which can be common while on this diet). Calcium/magnesium combo is also a good one to take if needed. Our [HCG Diet Metabolizer and Energy](#) product works extremely well as an HCG Diet Multi vitamin supplement

# **EXHIBIT D**

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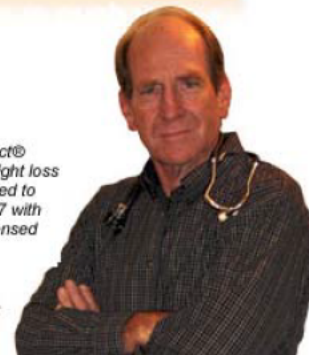
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We are dedicated to the weight loss industry and we are dedicated to helping you. Please call 24/7 with any questions at all with licensed physicians on staff"

*Dr. Ron Willis*  
Dr. Ron Willis



## The Next Chapter in Weight Loss Success

- > HCG Diet FAQ
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- > HCG Plan
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- > HCG Weight Loss Drops
- > Weight Loss on HCG

 <p><b>HCG Diet Drops and Kits</b></p>	 <p><b>Supplements and Detox</b></p>	 <p><b>HCG Diet Approved Food</b></p>	 <p><b>Hormone Therapy</b></p>	 <p><b>HCG Diet Approved Cosmetics</b></p>
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« [How to Lose Weight With Homeopathy](#)    [HCG Drops Mean No Injections](#) »

### HCG Diet Direct Prepares for Publication of Recent Clinical Trials on HCG Hormone Dieting

HCG Diet Direct prepares for publication of recent clinical trials on HCG Hormone dieting. The recent 30 day trial has reached its conclusion and data is being compiled for online publication to the HCG Diet Direct website.

The 30-day trial showed positive results regarding the HCG Diet Direct Ultimate [Weight Loss](#) Program. The HCG Diet Direct program is based on the use of their homeopathic oral formula administered three times per day in combination with a very detailed doctor-designed dieting protocol. Participants in the program who underwent the HCG Diet Direct homeopathic weight loss plan had a positive experience.

Dr. J. Ronald Willis of HCG Diet Direct said, "We are very happy with the results of the clinical trials. Individuals interested in HCG Hormone dieting in general will find that they now have support to indicate that their dieting experience through HCG Diet Direct would not only be a success, but a resounding success."

HCG Diet Direct's Homeopathic HCG weight loss formula is the basis for a weight loss plan. It can be used to achieve weight reduction without invasive procedures, and with no known HCG diet side effects. It is one of the healthiest weight loss plans available. When dieters buy HCG, they follow the included doctor approved protocol. Oral HCG drops are taken three times daily and paired with a careful eating plan. The results of the standard 26-30 day program can provide an average of weight of weight loss per day.

### Archives

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EXHIBIT D 1

adverse affects. Our homeopathic HCG Diet Direct plans are formulated and designed to use the science of both homeopathy and a low calorie diet to mimic the hCG hormone action and thus shedding weight. Additionally you learn how to eat right and have proper portion control during the diet and beyond. Currently there are no known established clinical side effects to homeopathic remedies and medicines but as with any diet we recommend that you consult with a doctor before starting this diet. Some patients have complained of headaches in the 1st week of the plan but as their body adjusts they usually go away. This is theorized to be part of the detox (when weight loss occurs) stage and we have found that by loading up more in the first [2 load days](#) of the diet, the chances of headaches decrease. If you have any swelling, shortness of breath, dizziness or heavy redness consult a doctor or medical professional immediately.

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#### [Where is the actual HCG manufactured and what are the quality control guidelines?](#)

Our exclusive HCG Diet Direct® weight loss formula is manufactured by our laboratory that has been producing [homeopathic](#) formulas for more than 20 years. Our lab is registered with the FDA and inspections by the FDA ensure compliance with current Good Manufacturing Practices (cGMPs) and the Code of Federal Regulations (CFRs) for your safety.

#### [What sets HCG Diet Direct's product apart from the rest?](#)

The HCG Diet Direct® weight loss plan is a proprietary formula, physician developed and scientifically formulated with specific amounts of nutrition and ingredients to encourage weight loss. Our unique formula has many advantages like natural appetite suppressants, energy supplements and more to help optimize weight loss. Customers report daily that they really do feel better and have little or no hunger on this formula compared to some prescription and homeopathic formulas available on the market. Our goal is to provide the highest quality, homeopathic ingredients available.

#### [Why doesn't a pregnancy test show positive when I test the drops on it?](#)

Our exclusive HCG Diet Direct® weight loss plan is [homeopathic](#). Homeopathically derived hCG usually will not show up in a pregnancy test due to the homeopathic *potentization* process. But it can be tested in a lab for efficacy.

Homeopathy is based on both physical ingredients that you can see and resonance/frequencies that you cannot see. It is a very labor intensive process. It is very important that you deal with an experienced, reputable lab. The manufacturer we use for our products is a federally registered laboratory in full compliance with FDA and HPUS regulations governing manufacturing facilities. See FAQ number 3 for more information on FDA Establishment and manufacturing practices.

#### [What is the difference between prescription and non-prescription HCG?](#)

Prescription hCG is usually pure pharmaceutical grade hCG with no supporting elements added. Prescription hCG can be very effective but must be obtained and monitored only by a licensed medical physician, as with any prescription. Pure hCG is usually administered by injection only.

Our non-prescription homeopathic HCG Diet Direct® weight loss formula is homeopathically derived and blended with other natural ingredients to support weight loss. All of our HCG Diet Direct® homeopathic products are available with out a prescription and therefore are a more affordable option than prescription hCG.

EXHIBIT D 2

# **EXHIBIT E**

<http://www.hcgdietdirect.com/hcgdiestimonials.html>

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Real Life HCG Diet Stories



Testimonials

From Our Clients...

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Congratulations Jessica!



CW- New Mexico




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Get HCG drops and other supplements recommended on the HCG Diet.

[Order HCG Now ▶](#)

EXHIBIT E 1



[View More HCG Diet Testimonials](#)



[The HCG Diet Documentary](#)



To Whom It May Concern:

I ordered the 23-26 day program of the HCG Diet Direct drops. **It is a miracle for weight loss! I have told countless friends and close relatives about the program.** Everyone at work asked daily about my loss-everyone was involved! I lost 17 pounds and am now in the maintenance program. I have another 15 pounds to lose and can't wait to order my 2nd regimen...I know I'll be right where I want to be after my second round. This is amazing. Also, if anyone wonders about the science: I have lost 10.5 inches of stored fat. I will tell anyone that this is the only way to lose weight. I've tried NutriSystem, diet pills, green tea, starving, all along with a gym routine and never lost what I wanted to. Do this. Do this for yourself... even with periodic cheating I did what I wanted to do.

CW-New Mexico

.....

EXHIBIT E 2

family. I was so strong and had so much determination and strength that I completed my plan. At 35 days on the drops, I lost a total of 29 lbs. Never thought in a million years that I could ever do that in such a short amount of time. I'm in maintenance now and I have kept the weight off. I can't wait to do my 2ND phase and lose those last 10-15 lbs that I believed would haunt me forever.

~ Briana M., Age 28

.....  
I started at 325 and now am at 271 .. I lost 54 lbs in 40 days!

*Before*

*After*



"I feel so much better and am extremely happy. My before and after pictures are amazing. I lost over 8 inches in my waist. Thank you"

~ Justin D. - Pinedale, Wy

.....  
EXHIBIT E 3



~ Kara

.....  
Here are some great pics of my results.

*Before*

*After*



"I went from 279 lbs to 229lbs in 40 days - I havent been at that weight since high school.

I feel and look great! My wife will be starting the diet soon and im sure she will have great results also."

~ John G - Frewsburg, NY

.....  
EXHIBIT E 4

Before

After



~ Jan H.

Summer lost a total of 30 pounds in 38 days:

Thank you so much for turning me on to these drops. They are amazing. I have never had results like these with anything else. Once I started the diet the fat just fell off. Everyday I weighed less. I did the diet for 26 days the first time, then waited a few weeks and did it again for fourteen days. I lost a total of 20 lbs, but the inches I lost from everywhere was the best part about it. I am so happy with my new body. I have told all my friends about HCG and they are all losing a ton of weight. Thanks again.

Before

After



~ Summer

Before

After



It's Fantastic, I went from 275 to 242 in 28 days on your drops and plan....

EXHIBIT E 5

all up in 100 gram burgers. Same goes for the chicken! Freeze them & it is easy to take for lunches or make a quick dinner. It makes your life EASY!!! Thank you for this wonderful product!! Sent Via Email

~ Mary M. - Lake Worth, Florida

.....

Wow! I went on the HCG diet or as my husband and I call it 'an AEP (Alternate Eating Plan)' and lost 19 pounds in 26 days!

The best part about this diet is the lack of hunger, weakness, shakiness, headache and any other ill effects from a strick diet I have experienced before. I am on my way to a new shape, I am astounded by the inches/fat I have lost! I am going to Cabo soon and that was my initial reason for trying this diet. But now I am ready for the second round after Cabo to continue the re-shaping of my body. As some of the other women have said, I have always tried to eat right (most of the time) and I am a regular exerciser but sometime around my late 40's I couldn't keep myself from constant weight gain no matter how little I ate. I too have tried every known fad diet just to gain weight back. Now I am a believer. This diet is the true answer especially for women in their 50's and menopause when your metabolism is sooooo slow! Thank you HCG Diet Direct for helping me change my body for good!

~ Suzanne R- Sebastopol, California

.....

I just wanted to let the company know that they have a wonderful customer response team.

Apparently when I filled out my address, it was incomplete, therefore UPS could not deliver it. I was asked to call UPS with my full address so that they could deliver it. I did so, and I called and gave UPS all the information they needed. They still have yet to give me the package. So I turned to HCG and emailed you all wondering where the package was. The Customer Response Team emailed me back within 24 hours and called me in addition. Your company is now shipping me a new package. When I spoke to one of your customer service representatives, she told me, "UPS is sending the package back to us, but we're not worried about that. We just want you to get your package, so we're sending you a new one." Your team went above and beyond!

I thought you should know that even before receiving your product, I am pleased with your company.

~ Jessica R.

.....

WOW! I'm on day 7 and have lost 7 pounds!!!

And.... I'm not hungry. Watched my kids eat icecream cheesecake, frito pie and mcdonalds French fries and was able to restrain!! So far, so good. Thanks!

~ Stacey  
Sent from my iPhone

.....

I have lost 20 pounds and 30 1/4 inches overall in just 18 days!

I am so extremely happy!!

EXHIBIT E 6

# **EXHIBIT F**



The HCG Diet Direct™ formulas provide 2x the dosage than most brands and has been formulated to keep your body from entering starvation mode. Your body entering starvation mode has proven to not only harm your body but will drastically decrease your final weight loss.

Most other HCG products call for only ½ the dosage that you need to get through this diet safely and successfully with out going into starvation mode.

## **The HCG Diet Direct™ Drops are Physician Developed & Scientifically Formulated for the HCG Diet.**

These weight loss Drops are produced in the USA under strict guidelines in our FDA certified lab from superior ingredients and quality controlled to insure optimum potency and safety. All Formulas are FDA Established.

## **Our Ultimate Weight Loss Formula Is All In One.**



*Click to play video*

Typically other brands have homeopathic HCG along with a few amino acids, which can be good, but with only ½ the dosage and other important missing ingredients your chances of going into starvation mode are very high.

## **Our Exclusive Homeopathic Formulas Include:**

Human Chorionic Gonadotropin (HCG):

# **EXHIBIT G**



or prevent disease. Some side effects to our homeopathic weight loss formulas may consist of swelling, shortness of breath, dizziness or heavy redness and you should contact professional medical care immediately if you experience any possible side effects.

## Testimonials

“I am a regular exerciser but sometime around my late 40's I couldn't keep myself from constant weight gain no matter how little I ate... This diet is the true answer especially for women in their 50's and menopause when your metabolism is sooooo slow! Thank you HCG Diet Direct for helping me change my body for good!”

~ Suzanne R.

“I have tried every diet out there to lose the last 10 lbs of baby weight and with kids and a job its way to hard to exercise enough. I finished the HCG diet about 2 mo ago and I lost 12 lbs and have kept it off since then, thank you.”

~ Melissa F.

“I was taking blood pressure meds among other prescriptions and I lost 30 lbs in the 26 days. My blood pressure came way down and now my doctor is lowering the dosage in order to get me off of them.”

~ Donnie E.

[More Testimonials](#)



## HCG Diet Industry News

### Experts, dieters weight benefits of HCG diet

Losing weight can be difficult without help. Calorie restriction, junk food reduction and the consumption of fruits and vegetables may not always lead to the ...[Full Story](#)

### ‘HCG diet’ fastest rising Google health query in the world

Google Zeitgeist, a service that tracks its fastest rising and falling search term trends, reports that the phrase “HCG diet” was the world’s fastest rising ...[Full Story](#)

### Diet system upgrades importance of fruit and vegetables

According to the Atlantic Wire, dieters on Weight Watchers have gone into a frenzy over a recent points system overhaul, which has increased the value ...[Full Story](#)

### Nutrition experts say diets don't have to be miserable

In the quest to lose weight, some dieters may find that the transition from processed meals to fresh, healthy eating makes them cranky or irritable. ...[Full Story](#)

### Mixed results for citywide weight loss programs

Obesity affects nearly 27 percent of Americans, according to the Centers for Disease Control and Prevention. This statistic alone has prompted many states and cities ...[Full Story](#)

### Dietitian says soup may help dieters shed pounds

Sometimes, the odds of keeping up with a resolution to slim down can seem pretty slim. To feel full without consuming excess calories, health experts ...[Full Story](#)

### Calorie labels have little effect on what people purchase, study finds

High-calorie meals and fast food can each take a negative toll on a healthy diet, and the two categories are not mutually exclusive. Now, researchers ...[Full Story](#)

### Study finds that chocolate may contain more antioxidants than fruit

Recent research published in the Chemistry Central Journal reveals that chocolate may be a rich source of antioxidants. Furthermore, the food was found to contain ...[Full Story](#)

### Sugar-laden diets during pregnancy may lead to obesity in children

Research from the University of Auckland's Liggins Institute shows that pregnant women who consume sugary food may hinder their baby's development, the New Zealand

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