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11  
12 UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

13 FEDERAL TRADE COMMISSION

14 Plaintiff,

15 v.

16 ROSARIO PARTNERSHIP,

17 FUNES, INC.,

18 LEONARDO SPELZINI,

19 MAITE DE NEGRIS, and

20 HECTOR DE NIGRIS,

21 Defendants.  
22

Case No.

COMPLAINT FOR PERMANENT  
INJUNCTION AND OTHER  
EQUITABLE RELIEF

23 Plaintiff, the Federal Trade Commission ("FTC" or  
24 "Commission"), through its undersigned attorneys, alleges as  
25 follows:



1 initiate federal district court proceedings, through its  
2 attorneys, to enjoin violations of the FTC Act and to secure such  
3 other equitable relief, including rescission of contracts,  
4 restitution, and disgorgement of ill-gotten gains, as may be  
5 appropriate in each case. 15 U.S.C. § 53(b).

6 5. Defendant Rosario Partnership ("Rosario") is a  
7 California general partnership with its principal office or place  
8 of business at 8880 Benson Avenue, Suite 120, Montclair,  
9 California 91763. At all times material to this Complaint,  
10 acting alone or in concert with others, Rosario has advertised,  
11 marketed, sold and distributed Celu-Fat Reductor, a purported  
12 weight loss product. Rosario transacts or has transacted  
13 business in the Central District of California.

14 6. Defendant Funes, Inc. ("Funes") is a California  
15 corporation with its principal office or place of business at  
16 8880 Benson Avenue, Suite 110, Montclair, California 91763. At  
17 all times material to this Complaint, acting alone or in concert  
18 with others, Funes has advertised, marketed, sold and distributed  
19 Celu-Fat Reductor. Funes transacts or has transacted business in  
20 the Central District of California.

21 7. Defendant Leonardo Spelzini ("Spelzini") is a general  
22 partner of Rosario. At all times material to this Complaint,  
23 acting individually or in concert with others, he has formulated,  
24 directed, controlled, or participated in the acts and practices  
25 of Rosario, including the various acts or practices set forth in

1 this Complaint. His principal office is 8880 Benson Avenue,  
2 Suite 120, Montclair, California 91763. Spelzini transacts or  
3 has transacted business in the Central District of California.

4 8. Defendant Maite De Negrís ("De Negrís") is a general  
5 partner of Rosario. At all times material to this Complaint,  
6 acting individually or in concert with others, she has  
7 formulated, directed, controlled, or participated in the acts and  
8 practices of Rosario, including the acts or practices set forth  
9 in this Complaint. Her principal office is 8880 Benson Avenue,  
10 Suite 120, Montclair, California 91763. De Negrís transacts or  
11 has transacted business in the Central District of California.

12 9. Defendant Hector De Nigrís ("De Nigrís") is president  
13 of Funes. At all times material to this Complaint, acting  
14 individually or in concert with others, he has formulated,  
15 directed, controlled, or participated in the acts and practices  
16 of Funes, including the acts or practices set forth in this  
17 Complaint. His principal office is 8880 Benson Avenue, Suite  
18 110, Montclair, California 91763. De Nigrís transacts or has  
19 transacted business in the Central District of California.

20 **COMMERCE**

21 10. The acts and practices of the defendants, as alleged  
22 herein, have been in or affecting commerce, as "commerce" is  
23 defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

24 **DEFENDANTS' COURSE OF CONDUCT**

25 11. Since 2003, defendants have advertised, promoted,

1 offered for sale, sold, and distributed a purported weight loss  
2 product called Celu-Fat Reductor to consumers throughout the  
3 United States. According to defendants, Celu-Fat Reductor is a  
4 weight loss program that consists of a massage gel, a herbal  
5 wrapping lotion, and a thermal belt or girdle. The massage gel  
6 is a cream that consumers rub into their skin once a day. The  
7 massage gel contains, among other ingredients, carrot extract,  
8 hydrolyzed glycosaminoglycans, and guarana extract. The herbal  
9 wrapping lotion is a liquid substance that consumers apply to  
10 terry cloth bandages and wrap around their mid-section. The  
11 herbal wrapping lotion contains, among other ingredients, witch  
12 hazel extracts, aloe vera gel, ginger extract, and cellulose gum.  
13 The thermal belt is a heated belt that consumers wrap around  
14 parts of their body. The plaster girdle is a device that  
15 encircles the body's mid-section and is tightened in the back.

16 12. Defendants have advertised Celu-Fat Reductor throughout  
17 the United States through 60-second, Spanish-language television  
18 commercials. Consumers purchased Celu-Fat Reductor by calling a  
19 toll-free telephone number that appeared in the television  
20 commercial. Defendants sold Celu-Fat Reductor for \$129.50.

21 13. To induce consumers to purchase Celu-Fat Reductor,  
22 defendants have disseminated or have caused to be disseminated  
23 advertisements for Celu-Fat Reductor, including but not  
24 necessarily limited to the attached Exhibits A through D. These  
25 advertisements contain the following statements and depictions,

1 among others:

2 a. "Déjese ya de incómodas dietas, de pesado ejercicios,  
3 basta de engaños, gordura y celulitis. Adelgaze  
4 sanamente con Celu-Fat Reductor. Celu-Fat Reductor no  
5 es otro programa más, No, Es el único programa  
6 confiable que le hará perder tallas y la horrenda  
7 celulitis. Aquí está lo mejor en solo 10 días,  
8 comprobado. Esta es la loción herbal que le acelera la  
9 presión sanguínea, quemando la grasa de una manera  
10 sorprendente, el gel moldea su figura y reafirma esas  
11 partes del cuerpo que han quedado colgando,  
12 consecuencia de la pérdida de peso y moldea una bella  
13 figura y aún hay más! Si llama ahorita, recibirá de  
14 regalo, sí, ésto es gratis - una faja de yeso. Celu-  
15 Fat Reductor, combinado con la faja de yeso da un  
16 resultado efectivo y sorprendente. Llame ahorita y  
17 ordene Celu-Fat Reductor y la faja es gratis, sí, ésto  
18 es gratis, otros se la venden nosotros se la regalamos,  
19 pierda dos tallas en solo 10 días pero, llame ahorita,  
20 llame ya!"

21  
22 [Translation: "Leave right now those troublesome diets,  
23 those heavy exercises, enough of deceptions, fatness,  
24 and cellulite. Lose weight only with Celu-Fat  
25 Reductor. Celu-Fat Reductor is not another program, no,

1 it is the only trustworthy program that will make you  
2 shrink sizes and lose horrendous cellulite. (Onscreen:  
3 depiction of a woman losing weight in her abdomen and  
4 backside). Here is the best thing, in only 10 days,  
5 proven. This is the herbal lotion that speeds up blood  
6 pressure, burning fat in a surprising way. (Onscreen:  
7 depiction of fat burning on a woman's abdomen). The  
8 gel molds your figure and firms up those parts of the  
9 body that have been left hanging from weight loss. It  
10 shapes a beautiful figure. And there's more. If you  
11 call right now, you will receive as a gift - yes, this  
12 is free - a plaster girdle. Celu-Fat Reductor,  
13 combined with the plaster girdle, gives effective and  
14 surprising results. Call right now and order Celu-Fat  
15 Reductor and the girdle is free. Yes, this is free.  
16 Others sell it. We give it to you as a gift. Shrink  
17 two sizes in only 10 days. Call right away, call right  
18 now."

19  
20 - Exhibit A, Celu-Fat Reductor commercial featuring  
21 plaster girdle. Exhibit A is attached in both  
22 storyboard and video format.

23  
24 b. "Déjese ya de incómodas dietas, de pesados ejercicios,  
25 basta de engaños, gordura y celulitis. Adelgaze

1 sanamente con Celu-Fat Reductor. Celu-Fat Reductor no  
2 es otro programa más, No, Es el único programa  
3 confiable que le hará perder tallas y la horrenda  
4 celulitis. Aquí está lo mejor en solo 10 días,  
5 comprobado. Esta es la loción herbal que le acelera la  
6 presión sanguínea, quemando la grasa de una manera  
7 sorprendente, el gel moldea su figura y reafirma esas  
8 partes del cuerpo que han quedado colgando,  
9 consecuencia de la pérdida de peso y moldea una bella  
10 figura y aún hay más! Si llama ahorita, recibirá de  
11 regalo una faja reductora con termo regulador térmico.  
12 Termo Twin. Efectivísimo quemador de grasa. Celu-Fat  
13 Reductor, combinado con Termo Twin, da un resultado  
14 efectivo y sorprendente. Otros se la venden, nosotros  
15 se lo regalamos. Ordene Celu-Fat Reductor y le  
16 regalamos Termo Twin. Llame ahorita."

17  
18 [Translation: "Leave right now those troublesome diets,  
19 those heavy exercises, enough of deceptions, fatness,  
20 and cellulite. Lose weight only with Celu-Fat  
21 Reductor. Celu-Fat Reductor is not another program,  
22 no, it is the only trustworthy program that will make  
23 you lose shrink sizes and lose horrendous cellulite.  
24 (Onscreen: depiction of a woman losing weight in her  
25 abdomen and backside). Here is the best thing, in only

1 10 days, proven. This is the herbal lotion that speeds  
2 up blood pressure, burning fat in a surprising way.

3 (Onscreen: depiction of fat burning on a woman's  
4 abdomen). The gel molds your figure and firms up those  
5 parts of the body that have been left hanging from  
6 weight loss. It shapes a beautiful figure. And  
7 there's more. If you call right now, you will receive,  
8 as a gift, a reductor girdle with the thermal  
9 regulator, Thermo Twin. A very effective fat burner.  
10 Celu-Fat Reductor, combined with Thermo Twin, gives an  
11 effective and surprising result. Others sell it to  
12 you, we give it to you. Order Celu-Fat Reductor and  
13 we'll give you Termo Twin as a gift. Call right now." ]

14  
15 - Exhibit B, Celu-Fat Reductor commercial featuring  
16 thermal belt. Exhibit B is attached in both storyboard  
17 and video format.

18  
19 c. "Herbal Wrapping Lotion is the most advanced product  
20 that works on shrinking the adipose tissue of fat and  
21 cellulite. The herbs and minerals in this formula  
22 penetrate the walls of the cells helping the fat cells  
23 to be released and eliminated through the normal  
24 elimination channels of the body along with other  
25 wastes. When used as indicated, will tighten and

1           nourish the skin."

2  
3           - Exhibit C, Herbal Wrapping Lotion product label

4  
5           d.    "Nuestro programa consta básicamente de dos productos:  
6           Massage Gel y Herbal Wrapping Lotion. Ambos tienen un  
7           efecto similar y una causa en común: La eliminación de  
8           la celulitis y la reducción del exceso de grasa."

9  
10           [Translation: "Our program consists of two products:  
11           Massage Gel and Herbal Wrapping Lotion. Both produce  
12           similar effects and results: The elimination of  
13           cellulite and the reduction of excess fat."]

14  
15           - Exhibit D, brochure that consumers received with  
16           Celu-Fat Reductor.

17  
18                           **DEFENDANTS' VIOLATIONS OF THE FTC ACT**

19           14.   Section 5(a) of the FTC Act, 15 U.S.C. § 45(a),  
20           prohibits unfair or deceptive acts or practices in or affecting  
21           commerce. Section 12(a) of the FTC Act, 15 U.S.C. § 52(a),  
22           prohibits the dissemination of any false advertisement in or  
23           affecting commerce for the purpose of inducing, or which is  
24           likely to induce, the purchase of food, drugs, devices, services,  
25           or cosmetics. For the purposes of Section 12 of the FTC Act, 15

1 U.S.C. § 52, Celu-Fat Reductor is either a "cosmetic," "drug" or  
2 "device" as defined in Section 15 of the FTC Act, 15 U.S.C. § 55.  
3 As set forth below, the defendants have engaged in such unlawful  
4 practices in connection with the marketing and sale of Celu-Fat  
5 Reductor.

6 **COUNT ONE: False Claims**

7 15. Through the means described in Paragraph 13 above,  
8 defendants have represented, expressly or by implication, that:

- 9 a. Celu-Fat Reductor causes rapid and substantial weight  
10 loss without the need to increase exercise or reduce  
11 caloric intake;
- 12 b. Celu-Fat Reductor causes rapid and substantial weight  
13 loss in all users;
- 14 c. Celu-Fat Reductor reduces body fat; and
- 15 d. Celu-Fat Reductor substantially reduces or eliminates  
16 cellulite.

17 16. In truth and in fact:

- 18 a. Celu-Fat Reductor does not cause rapid and substantial  
19 weight loss without the need to increase exercise or  
20 reduce caloric intake;
- 21 b. Celu-Fat Reductor does not cause rapid and substantial  
22 weight loss in all users;
- 23 c. Celu-Fat Reductor does not reduce body fat; and
- 24 d. Celu-Fat Reductor does not substantially reduce or  
25 eliminate cellulite.

1 Therefore, the making of the representations set forth in  
2 Paragraph 15 above constitutes a deceptive act or practice, and  
3 the making of false advertisements, in or affecting commerce, in  
4 violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§  
5 45(a) and 52.

6 **COUNT TWO: Unsubstantiated Claim**

7 17. Defendants did not possess and rely upon a reasonable  
8 basis that substantiated the representations set forth in  
9 Paragraph 15 above at the time the representations were made.  
10 Therefore, the making of the representations set forth in  
11 Paragraph 15 above constitutes a deceptive act or practice, and  
12 the making of false advertisements, in or affecting commerce, in  
13 violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§  
14 45(a) and 52.

15 **CONSUMER INJURY**

16 18. Consumers throughout the United States have suffered  
17 substantial monetary loss as a result of defendants' unlawful  
18 acts or practices. In addition, defendants have been unjustly  
19 enriched as a result of their unlawful practices. Absent  
20 injunctive relief by this Court, defendants are likely to  
21 continue to injure consumers, reap unjust enrichment, and harm  
22 the public interest.

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

24 19. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b),  
25 empowers this Court to grant injunctive and such other relief as

1 the Court may deem appropriate to halt and redress violations of  
2 the FTC Act. The Court, in the exercise of its equitable  
3 jurisdiction, may award other ancillary relief, including but not  
4 limited to, rescission of contracts, restitution, and the  
5 disgorgement of ill-gotten gains, to prevent and remedy injury  
6 caused by defendants' law violations.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, plaintiff requests that this Court, pursuant to  
9 Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and the Court's  
10 equitable powers:

11 (1) Permanently enjoin defendants from violating Sections 5  
12 and 12 of the FTC Act in connection with the advertising or sale  
13 of food, drugs, dietary supplements, devices, cosmetics or other  
14 products, services or programs;

15 (2) Award such equitable relief as the Court finds  
16 necessary to redress injury to consumers resulting from the  
17 defendants' violations of Sections 5(a) and 12 of the FTC Act,  
18 including but not limited to, rescission of contracts,  
19 restitution, and the disgorgement of ill-gotten gains by the  
20 defendants; and

21 (3) Award plaintiff such other equitable relief as the  
22 Court may determine to be just and proper.

23  
24 Respectfully submitted,

25 WILLIAM E. KOVACIC

1 General Counsel

2 JEFFREY A. KLURFELD  
3 Regional Director

4 DATED: October 4, 2004

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13 DATED: October 4, 2004

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21  
22  
23  
24  
25

**EXHIBIT A**  
**Celu-Fat Reductor Advertisement Featuring Plaster Girdle**

MALE ANNOUNCER:

Leave right now those troublesome diets, those heavy exercises, enough of deceptions, fatness, and cellulite. [Photos of egg rolls, diet pills, a person walking in slow motion, and of skin with a cellulite problem appear onscreen].

Lose weight only with Celu-Fat Reductor. [The product appears, along with a toll-free number that stays at the bottom of the screen for the remainder of the advertisement].

Celu-Fat Reductor is not another program, no, it is the only trustworthy program that will make you shrink sizes and lose horrendous cellulite. [A very thin woman in a bikini stands by a mirror, smiling and applying the herbal wrapping lotion. Then a graphic appears that depicts fat disappearing from a person's abdomen and backside].

Here is the best thing, in only 10 days, proven! This is the herbal lotion that speeds up blood pressure, burning fat in a surprising way. [Another thin, although slightly larger, woman applies the massage gel to her abdomen. Then two graphics appear: one that depicts skin smoothing and another that depicts fat burning on a woman's abdomen].

The gel molds your figure and firms up those parts of the body that have been left hanging from weight loss. It shapes a beautiful figure. [The thin woman in the bikini is standing in front of a mirror admiring her figure. For a few seconds, an image of an overweight person flashes onscreen. Then it flashes back to the thin woman, who is now wearing a tight black dress and admiring her figure].

And there's more. If you call right now, you will receive as a gift – yes, this is free – a plaster girdle. [A woman with a plaster girdle around her midsection slowly turns to model the front and back of the girdle].

Celu-Fat Reductor, combined with the plaster girdle, gives effective and surprising results. [The slightly larger woman rubs the massage gel on her abdomen and then it flashes to the very thin woman in the black dress preparing to go out and admiring her figure].

Call right now and order Celu-Fat Reductor and the girdle is free. Yes, this is free. Other sell it. We give it to you as a gift. Shrink two sizes in only 10 days. Call right away, call right now. [A woman holds the product and information about how to order Celu-Fat Reductor appears onscreen].

Exhibit A

## EXHIBIT B

### Celu-Fat Reductor Advertisement Featuring Thermal Belt

MALE ANNOUNCER:

Leave right now those troublesome diets, those heavy exercises, enough of deceptions, fatness, and cellulite. [Photos of egg rolls, diet pills, a person walking in slow motion, and of skin with a cellulite problem appear onscreen].

Lose weight only with Celu-Fat Reductor. [The product appears, along with a toll-free number that stays at the bottom of the screen for the remainder of the advertisement.]

Celu-Fat Reductor is not another program, no, it is the only trustworthy program that will make you shrink sizes and lose horrendous cellulite. [A very thin woman in a bikini stands by a mirror, smiling and applying the herbal wrapping lotion. Then a graphic appears that depicts fat disappearing from a person's abdomen and backside].

Here is the best thing, in only 10 days, proven! This is the herbal lotion that speeds up blood pressure, burning fat in a surprising way. [Another thin, although slightly larger, woman applies the massage gel to her abdomen. Then two graphics appear: one that depicts skin smoothing and another that depicts fat burning on a woman's abdomen].

The gel molds your figure and firms up those parts of the body that have been left hanging from weight loss. It shapes a beautiful figure. [The thin woman in the bikini is standing in front of a mirror admiring her figure. For a few seconds, an image of an overweight person flashes onscreen. Then it flashes back to the thin woman, who is now wearing a tight black dress and admiring her figure].

And there's more. If you call right now, you will receive, as a gift, a reductor girdle with the thermal regulator, Thermo Twin. [A very fit young man holds up two thermal twin belts].

A very effective fat burner. Celu-Fat Reductor, combined with Thermo Twin, gives an effective and surprising result. Other sell it to you, we give it to you. [Several fit men and women model the thermal belt].

Order Celu-Fat Reductor and we'll give you Thermo Twin as a gift. Call right now. [Several earlier images are repeated as information about how to order Celu-Fat Reductor appears onscreen].

**Fat Reductor Herbal Wrapping Lotion** is the most advanced product that works on shrinking the adipose tissue of fat and cellulite. The herbs and minerals in this formula penetrates the walls of the cells helping the fat cells to be released and eliminated through the normal elimination channels of the body along with other wastes. When used as indicated will firm and nourish the skin.

**Directions:** Apply it once a week. Step 1: Massage first a small amount to the area to be treated. Work into circular motion on abdomen, hips and buttocks and in upward direction on legs and thighs. Step 2: Mix 3 ounces (90 ml) of Herbal Wrapping Lotion with 16 ounces of hot water in a small pot and submerge the terry cloth bandages (towels); then twist the towels until there is no water dripping from bandages. Then suck in abdomen and wrap larger bandages starting from bottom to waist and then cover bandage with cellophane (plastic wrap). Do the same with the thighs and hips using the smaller bandages. Then lay down and cover your body with a blanket for 30 minutes and then remove wraps.

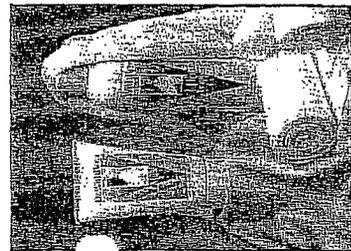
**CAUTION:** For External Use Only. Do Not use if you are pregnant or have wounds that are not healed, if you have eczema or skin disease or if you are pregnant or during lactation.

**INGREDIENTS:** Deionized Water, Magnesium Sulfate, Propylene Glycol, Extracts of: Clematis, Licorice, Seaweed, Ivy, and Queen of the Meadow, Hazelnut Extracts, Aloe Vera Gel, Nettle Extract, Methylparaben, Methylparaben, Methylparaben.

*Distributed by:*  
**ROSARIO**  
P.O. Box 3120  
Montclair, CA 91763

## How to use Dr. Withrow's Cellulite Program

**C**ongratulations! You have taken an important step in choosing Dr. Withrow's Cellulite Program, one of the most advanced programs that will help you combat cellulite or "orange-peel skin" and accumulated fat on the stomach, arms and legs.



The finest natural ingredients have been selected in the formulation of our products and the highest technology is applied in its elaboration and control, assuring quality and constancy.

Our program consists of two products: Massage Gel and Herbal Wrapping Lotion. Both produce similar effects and results: *The elimination of cellulite and the reduction of excess fat.*

Its active ingredients penetrate the cells and cause these to break up the lipids and fat. These are then absorbed into the blood stream and are later eliminated with the rest of the body's wastes through the natural channels of elimination.

Men and women of any age can benefit with the Dr. Withrow's Cellulite Program. It's easy to use. You can use in the comfort of your own home, simply by following the indicated instructions. This program should not be used during the following circumstances:

- If you have wounds that have not healed.
- If you have any skin problems.
- If you are allergic to herbal products.
- If you are pregnant or nursing.

### Massage Gel:

Apply daily after bathing or showering.

Massage a small quantity until completely absorbed. Use circular motions on abdomen, hips and buttocks (Fig. 1 - 2) and in upward direction on legs and thighs. (Fig. 3).

### Herbal Wrapping Lotion:

Apply once a week after bathing or showering.

Step 1.- Massage a small quantity on areas to be treated until the product is completely absorbed. Use circular motions on abdomen, hips and buttocks (Fig. 1 - 2) and in upward direction on legs and thighs. (Fig. 3).

Step 2.- Mix 3 oz. (90 mL) of Herbal Wrapping Lotion with 16 oz. (473 mL) of semi-hot water in an appropriate container.

*Caution: Make sure that the temperature of the solution can be tolerated without burning your skin.*

Soak the larger terry cloth. Gently wring out excess lotion. Start at the hips and wrap around until the stomach and waist are covered (Fig. 4). Next, using plastic wrap, completely wrap over the terry cloth until covered.

Repeat the same procedure on the arms and legs using the smaller terry cloths (Fig. 5).

Once you have finished wrapping the terry cloths and plastic wrap, lay down and cover yourself with a blanket. (treated area must be kept as warm as possible) Remain covered for 15-20 minutes (Fig. 6). After this time has elapsed, remove the terry cloths and wash thoroughly for later use.

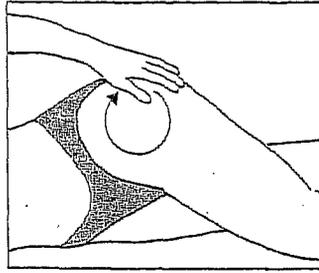


Fig. 1 - Apply with circular motions on hips and buttocks.

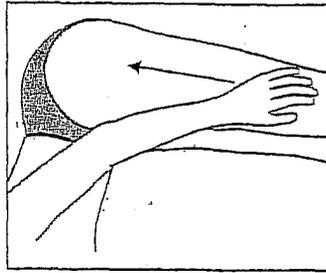


Fig. 3 - Apply using upward strokes on legs and thighs.

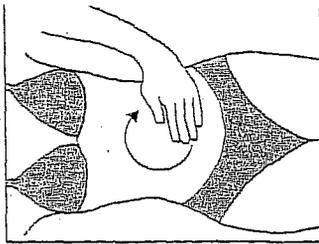


Fig. 2 - Apply with circular motions on abdomen.

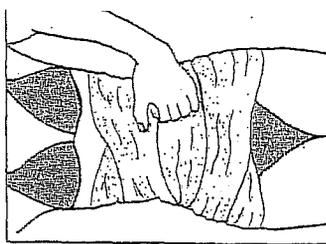


Fig. 4 - Wrap the stomach area with the larger piece of terry cloth

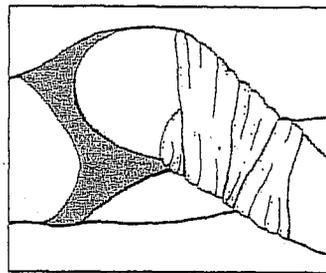


Fig. 5 - Wrap the legs and thighs with the smaller terry cloths.

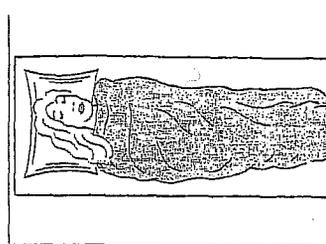


Fig. 6 - Lay down and cover wrapped areas with a blanket.