

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL TRADE COMMISSION,
600 Pennsylvania Avenue, NW
Washington, DC 20580,

Plaintiff,

v.

VISIONTEL COMMUNICATIONS, LLC,
also d/b/a Vision Laboratories,
MICHAEL McNABOE,
DAVID AMATO, and
ROBERT DALL,
51 Dow Highway, Suite 11
Eliot, Maine 03903,

MJ MANAGEMENT,
13 Cliff Street
Scarborough, Maine 04074,

MAD MARKETING, INC.,
46 Woodland Road
Cape Elizabeth, Maine 04107,

and

LLAD MANAGEMENT, INC.,
532 Mitchell Road
Cape Elizabeth, Maine 04107,

Defendants.

CIVIL ACTION NO.

**COMPLAINT FOR
PERMANENT INJUNCTION
AND OTHER EQUITABLE
RELIEF PURSUANT TO
SECTION 13(b) OF THE
FEDERAL TRADE
COMMISSION ACT**

Plaintiff, the Federal Trade Commission ("Commission"), through its undersigned attorneys, alleges as follows:

1. Plaintiff FTC brings this action under Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), to secure a permanent injunction, rescission of

contracts and restitution, disgorgement of ill-gotten gains, and other equitable relief against the Defendants for engaging in deceptive acts or practices and false advertisements for dietary supplements marketed for weight loss and sexual dysfunction, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter 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 Maine is proper under 15 U.S.C. § 53(b) and 28 U.S.C. §§ 1391(b) and (c).

THE PARTIES

4. Plaintiff, the Federal Trade Commission, is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The Commission is charged, *inter alia*, with enforcement of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. § 45(a) and 52, which respectively prohibit unfair or deceptive acts or practices in or affecting commerce, and false advertisements for food, drugs, devices, services, or cosmetics in or affecting commerce. The Commission may initiate federal district court proceedings, through its attorneys, to enjoin violations of the FTC Act and to secure such other equitable relief, including rescission of contracts and restitution, and disgorgement of ill-gotten gains, as may be appropriate in each case. 15 U.S.C. § 53(b).
5. Defendant VisionTel Communications, LLC ("VisionTel"), which also does business as Vision Laboratories, is a Maine limited liability corporation with its principal office or

place of business at 51 Dow Highway, Suite 11, Eliot, Maine 03903. VisionTel transacts or has transacted business in this district.

6. Defendant Michael McNaboe (“McNaboe”) is the President of VisionTel and the sole owner of MJ Mgmt. At all times relevant to this Complaint, acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control or participated in the acts and practices of VisionTel, including the acts or practices set forth herein. His principal office or place of business is the same as that of VisionTel. McNaboe transacts or has transacted business in this district.

7. Defendant David Amato (“Amato”) is a Vice-President of VisionTel and the sole owner of MAD Marketing. At all times relevant to this Complaint, acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control or participated in the acts and practices of VisionTel, including the acts or practices set forth herein. His principal office or place of business is the same as that of VisionTel. Amato transacts or has transacted business in this district.

8. Defendant Robert Dall (“Dall”) is a Vice-President of VisionTel and the sole owner of LLAD Mgmt. At all times relevant to this Complaint, acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control or participated in the acts and practices of VisionTel, including the acts or practices set forth herein. His principal office or place of business is the same as that of VisionTel. Dall transacts or has transacted business in this district.

9. Defendant MJ Management (“MJ Mgmt.”) is a Maine corporation with its principal office or place of business at 13 Cliff Street, Scarborough, Maine 04074. MJ Mgmt.

owns 23.5% of VisionTel. At all times relevant to this Complaint, acting alone or in concert with others, MJ Mgmt. has formulated, directed, controlled or participated in the acts and practices of VisionTel, including the various acts and practices set forth herein.

MJ Mgmt. transacts or has transacted business in this district.

10. Defendant MAD Marketing, Inc. ("MAD Marketing") is a Maine corporation with its principal office or place of business at 46 Woodland Road, Cape Elizabeth, Maine 04107. MAD Marketing owns 23.5% of VisionTel. At all times relevant to this Complaint, acting alone or in concert with others, MAD Marketing has formulated, directed, controlled or participated in the acts and practices of VisionTel, including the various acts and practices set forth herein. MAD Marketing transacts or has transacted business in this district.
11. Defendant LLAD Management, Inc. ("LLAD Mgmt.") is a Maine corporation with its principal office or place of business at 532 Mitchell Road, Cape Elizabeth, Maine 04107. LLAD Mgmt. owns 23.5% of VisionTel. At all times relevant to this Complaint, acting alone or in concert with others, LLAD Mgmt. has formulated, directed, controlled or participated in the acts and practices of VisionTel, including the various acts and practices set forth herein. LLAD Mgmt. transacts or has transacted business in this district.

COMMERCE

12. The acts and practices of Defendants alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

DEFENDANTS' COURSE OF BUSINESS

13. Since 1999, Defendants VisionTel, MJ Mgmt., MAD Marketing, LLAD Mgmt, McNaboe, Amato, and Dall (collectively, the "VisionTel Defendants") have engaged in the labeling, advertising, offering for sale, sale, and distribution of products to the public. The VisionTel Defendants have promoted dietary supplements, including Chito-Trim, TurboTone, Impulse Female Herbal Blend, and Maximus Male Herbal Blend, through print, radio, and television advertisements, program-length television commercials ("infomercials"), the Internet, and other means. Consumers have ordered these products by calling a toll-free telephone number and by ordering over the Internet.

Chito-Trim

14. Starting in or about January 2000, and continuing at least until in or about 2002, the VisionTel Defendants marketed and sold Chito-Trim, a purported weight loss dietary supplement consisting primarily of chitosan and vitamin C.
15. The VisionTel Defendants have offered a one-month supply of Chito-Trim for \$59.95. Since January 2000, gross sales of Chito-Trim have exceeded \$3 million.
16. To induce consumers to purchase Chito-Trim, the VisionTel Defendants have disseminated, or caused to be disseminated, television and radio advertisements and telemarketing scripts, including but not limited to the attached Exhibits A through D. These advertisements contain, among other things, the following statements and representations:
- a. Chito-Trim is the drug free dietary supplement containing high potency natural ingredients proven to trap unwanted fat, guaranteeing safe effective weight loss. Studies suggest that the active ingredients in Chito-Trim work to attract fat like a magnet, forcing your body to pass it out of your system naturally, giving you the

benefits of dieting without the hassle of calorie counting. Thousands of people have already experienced fast effective weight loss without restrictive dieting or strenuous exercise. You can too! If you want to lose weight and have a lean, sexy body call now!

-Exhibit A, radio ad.

- b. **MALE ANNOUNCER:** Are you having a hard time shedding those unwanted pounds? If you'd like to lose three to four pounds a week without setting foot in a health club --

ON SCREEN: Tedious workouts with a "No" symbol

MALE ANNOUNCER: -- or changing your diet every week --

ON SCREEN: Boring Diets with a "No" symbol

MALE ANNOUNCER: -- the next 60 seconds could change your life, thanks to the miracle of Chito-Trim.

ON SCREEN: Drug-Free

All Natural

Fat Grabber

MALE ANNOUNCER: Chito-Trim is a drug-free, all-natural fat grabber that works by soaking up fat in the stomach before it ever gets digested, giving you safe, immediate weight loss.

Simply take Chito-Trim before a meal and stop worrying about the fat. Eat what you want when you want and still lose the weight.

ON SCREEN: Absolutely Free!

Limited Time Only

Call toll free:

(excludes \$9.95 s&h)

MALE ANNOUNCER: And today, you can try Chito-Trim absolutely free. This offer is for a limited time only, so listen carefully. If you want to experience the effortless sensation of weight loss, call the toll-free number on your screen right now and your first order of Chito-Trim is free.

Stop suffering through exercise. Stop starving yourself. With Chito-Trim, you'll lose the weight, look sexier and feel better. The results are guaranteed.

ON SCREEN: Free 30 day supply!

Call toll free:

(excludes \$9.95 s&h)

MALE ANNOUNCER: And if you call right now, you'll also receive a special free gift. Lose weight with Chito-Trim. It's free.

-Exhibit B, pp. 3-4, television commercial transcript and Exhibit C, television commercial videotape.

- c. **You are going to love Chito-Trim!** It is an all natural product that is helping thousands of people just like yourself achieve their weight loss goals. Your Chito-Trim works just like a sponge. It absorbs and collects unwanted fat in your daily diet and passes it out of your system by making the fat indigestible. Chito-

Trim is all natural. It contains only Chitosan fiber (shellfish shell extract) and Vitamin C. It's safe and easy to use. The best part is you won't have to change your daily diet to lose that unwanted weight

-Exhibit D, Chito-Trim telemarketing script.

TurboTone

17. Starting in or about January 2002, and continuing at least until in or about early 2003, the VisionTel Defendants marketed and sold TurboTone, a purported weight loss dietary supplement containing vitamin E, magnesium, chromium, vanadium, glucosol, gymnema sylvestre leaf, garcinia cambogia fruit extract, phaseolamin, citrus aurantium extract, Korean ginseng root extract, caffeine, and various herbs.
18. The VisionTel Defendants have offered a one-month supply of TurboTone for \$59.95. Since January 2002, gross sales of TurboTone have exceeded \$469,000.
19. To induce consumers to purchase TurboTone, the VisionTel Defendants have disseminated, or caused to be disseminated, print and radio advertisements, and telemarketing scripts, including but not limited to the attached Exhibits E through J. These advertisements contain, among other things, the following statements and representations:
 - a. **Cindy:** . . . It's all because of TurboTone, this amazing new weight loss supplement that's burned off my excess body fat and gotten me lean, without me having to kill myself at the gym or starve! I can eat cheesecake, fries, doughnuts, lasagna . . . all my favorites! With TurboTone, it's almost like I'm working out and burning off fat 24 hours a day – even when I'm sleeping!
-Exhibit E, :60 radio ad.
 - b. The powerful, all-natural ingredients in TurboTone work with your body to naturally boost your metabolism, giving you the benefits of exercise without the time-consuming hassle or the unhealthy strain! And with your boosted metabolism you'll be burning fat and calories 24 hours a day!
-Exhibit F, :60 radio ad.

- c. Just a few tablets of TurboTone a day will give you the weight loss results you want safely and naturally, while at the same time help sculpt and tone your body. TurboTone is perfect for you if you want to be able to eat what you want and lose weight and get firm without calorie-counting or long strenuous workouts.
-Exhibit F, :60 radio ad.
- d. If you want to lose weight and have a lean, sculpted, sexy body without having to exercise all day or give up your favorite foods, TurboTone is perfect for you.
-Exhibit G, print advertisement.
- e. Wish you could lose up to 5 pounds per week without feeling hungry all the time? Now you can with TurboTone, the revolutionary new highest potency weight loss dietary supplement clinically proven to make you feel full while it burns off body fat, so you get the slim, sexy, sculpted body you've always wanted.
-Exhibit H, :60 radio ad.
- f. . . . TurboTone, the revolutionary new highest potency all-natural weight loss pill clinically proven to burn off body fat and sculpt your body without strict diets or exhausting exercise!
-Exhibit I, :60 radio ad.
- g. It's safe and easy to use, all-natural, and clinically proven to be effective.
-Exhibit J, TurboTone telemarketing script.
- h. Lose weight easily, quickly, and safely, *and without the hassles, frustrations and suffering of diets or special foods.*
-Exhibit J, TurboTone telemarketing script.

Impulse Female Herbal Blend

20. Starting in or about January 2000, and continuing at least until in or about July 2003, the VisionTel Defendants have marketed and sold Impulse Female Herbal Blend, a purported treatment for female sexual dysfunction. Impulse Female Herbal Blend has contained androstenediol, l-arginine, tribulus terrestris extract, dong quai extract, muira puama, and other ingredients. In or about January 2003, the product formulation was changed to omit androstenediol. Androstenediol is an androgen that can convert to testosterone or estrogen in the human body.

21. The VisionTel Defendants have offered a one-month supply of Impulse Female Herbal Blend for \$59.95. Since January 2000, gross sales of Impulse Female Herbal Blend have exceeded \$3 million.
22. To induce consumers to purchase Impulse Female Herbal Blend, the VisionTel Defendants have disseminated, or caused to be disseminated, radio, print, infomercial and Internet advertisements, and telemarketing scripts, including but not limited to the attached Exhibits K through Q. These advertisements contain, among other things, the following statements and representations:
- a. Introducing Impulse, the revolutionary new all-natural formula for adult women that helps boost your level of arousal, replenish your natural moisture, and intensify sexual pleasure.
-Exhibit K, :60 radio ad.
 - b. Working as an aphrodisiac, Impulse helps heighten sensitivity and replenish your body's natural moisture. So you become easily aroused [and amply lubricated], making sex pleasurable, passionate, and pain-free.
-Exhibit K, :60 radio ad.
 - c. Countless women suffer in silence with their lack of desire and satisfaction, and that's what makes Impulse such an amazing breakthrough. Its powerful blend of all-natural ingredients works as an aphrodisiac, helping to heighten sensitivity and enhance your body's response to touch. That means, with Impulse you become aroused more easily and experience heightened sexual intensity and enjoyment. If you're looking for a safe, effective, private solution, Impulse is perfect for you.
-Exhibit L, :60 radio ad.
 - d. Quickly, safely, and without a doctor's visit, you'll get the libido-enhancing results you want with Impulse . . . guaranteed.
-Exhibit M, print advertisement.
 - e. MALE ANNOUNCER: Introducing Impulse, an all-natural, non-prescription supplement uniquely designed for a woman's body to safely and effectively restore your sexual urge and enjoyment, guaranteed. . . .
-Exhibit N, pp. 4 and 23, infomercial transcript and Exhibit O, infomercial videotape.

f. **Impulse works by increasing the blood flow to the genital area improving sensitivity and lubrication. It also increases desire and urge by allowing your body to maintain the correct hormonal balance naturally.**

-Exhibit P, website <http://www.allnaturalsex.com>.

g. **Impulse is a unique blend of herbs, vitamins and minerals specifically designed for women to release certain hormones to help increase sexual urge. . . . It is completely safe and effective.**

-Exhibit Q, Impulse telemarketing script.

Maximus Male Herbal Blend

23. Starting in or about January 2000, and continuing at least until in or about July 2003, the VisionTel Defendants have marketed and sold Maximus Male Herbal Blend, a purported treatment for male sexual dysfunction containing yohimbine derived from African yohimbe bark extract, tribulus standardized extract, l-arginine, avena sativa, stinging nettle, muira pauma, and other ingredients. The recommended daily dosage for Maximus Male Herbal Blend has contained 4 mg. of yohimbine.

24. The VisionTel Defendants have offered a one-month supply of Maximus Male Herbal Blend for \$59.95. Since January 2000, gross sales of Maximus Male Herbal Blend have exceeded \$23 million.

25. To induce consumers to purchase Maximus Male Herbal Blend, the VisionTel Defendants have disseminated, or caused to be disseminated, radio, print, infomercial, and Internet advertisements, including but not limited to the attached Exhibits P and R through W. These advertisements contain, among other things, the following statements and representations:

a. In the past, sexual dysfunction treatments have been limited to injections, surgery, drugs, and other painful and expensive procedures. But now there's a better, safer, drug-free option! Introducing Maximus, an all-natural blend of vitamins and herbs scientifically-formulated to help promote testosterone and heighten

sexual performance. Maximus is not a drug. It's all-natural and there are no side effects. The results men get are incredible! Maximus will dramatically improve your stamina, urge, and ability, guaranteed!

-Exhibit R, :60 radio ad.

- b. Whether you suffer from stamina problems, a lack of sexual desire, or problems with performance, Maximus is the answer you've been waiting for!

-Exhibit S, :60 radio ad.

- c. With Maximus, you'll heighten your libido, sexual ability, and stamina quickly, safely, and without a doctor's visit.

-Exhibit T :60 radio ad.

- d. Maximus users say they not only increase their stamina and performance level, they also achieve stronger, longer-lasting erections, maximizing sexual pleasure and satisfaction.

-Exhibit U, print advertisement.

- e. If you're a man whose sex drive is weaker than it used to be, or if you've ever suffered from soft or weak erections, or if you ever worry that you won't be able to perform and you wish that you could regain your youthful sexual ability, now there's good news! Introducing **Maximus**, the all-natural supplement for men that helps restore sexual performance, boost the male sex drive, and increase sexual stamina.

-Exhibit V, print advertisement.

- f. Maximus is unlike anything else because it's not a drug that can cause dangerous, unhealthy side effects.

-Exhibit W, print advertisement.

- g. Maximus is safe, it's fast, and it works for any adult man who wants to experience more satisfaction and enjoyment in his sex life.

-Exhibit W, print advertisement.

- h. Maximus is safe, extremely easy to use, and is created from natural ingredients found around the globe.

-Exhibit P, website <http://www.allnaturalsex.com>.

DEFENDANTS' VIOLATIONS OF THE FTC ACT

26. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits unfair or deceptive acts or practices in or affecting commerce. 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, Chito-Trim, TurboTone, Impulse Female Herbal Blend, and Maximus Male Herbal Blend are each either a “food” or a “drug” pursuant to Sections 15(b) and (c) of the FTC Act, 15 U.S.C. §§ 55(b) and (c). As set forth below, the VisionTel Defendants have engaged in violations of Sections 5(a) and 12(a) of the FTC Act in connection with the marketing and sale of Chito-Trim, TurboTone, Impulse Female Herbal Blend, and Maximus Male Herbal Blend.

COUNT I
Chito-Trim False Claims

27. Through their advertising and promotional materials, including but not limited to the representations set forth in Paragraph 16 above, the VisionTel Defendants have represented, expressly or by implication, that:
- a. Chito-Trim causes users to lose a substantial amount of weight without reducing their caloric intake and/or increasing their physical activity; and
 - b. Chito-Trim causes users to lose a substantial amount of weight by blocking the absorption of fat or calories.
28. In truth and in fact:
- a. Chito-Trim does not cause users to lose a substantial amount of weight without reducing their caloric intake and/or increasing their physical activity; and
 - b. Chito-Trim does not cause users to lose a substantial amount of weight by blocking the absorption of fat or calories.

Therefore, the VisionTel Defendants' representations set forth in Paragraph 27 are false or misleading and constitute a deceptive act or practice, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

COUNT II
Chito-Trim Unsubstantiated Claims

29. The VisionTel Defendants did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 27 at the time the representations were made. Therefore, the making of the representations set forth in Paragraph 27 constitutes a deceptive act or practice, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

COUNT III
TurboTone False Claims

30. Through their advertising and promotional materials, including but not limited to the representations set forth in Paragraph 19 above, the VisionTel Defendants have represented, expressly or by implication, that:
- a. TurboTone causes users to lose a substantial amount of weight without reducing their caloric intake and/or increasing their physical activity; and
 - b. TurboTone is clinically proven to cause users to lose a substantial amount of weight without reducing their caloric intake and/or increasing their physical activity.

31. In truth and in fact:

- a. TurboTone does not cause users to lose a substantial amount of weight without reducing their caloric intake and/or increasing their physical activity; and
- b. TurboTone is not clinically proven to cause users to lose a substantial amount of weight without reducing their caloric intake and/or increasing their physical activity.

Therefore, the VisionTel Defendants' representations as set forth in Paragraph 30 are false or misleading and constitute a deceptive act or practice, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

COUNT IV

TurboTone Unsubstantiated Efficacy Claim

32. The VisionTel Defendants did not possess and rely upon a reasonable basis that substantiated the representation set forth in Paragraph 30.a at the time the representation was made. Therefore, the making of the representation set forth in Paragraph 30.a constitutes a deceptive act or practice, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

COUNT V

Impulse Female Herbal Blend Unsubstantiated Efficacy Claim

33. Through their advertising and promotional materials, including but not limited to the representations set forth in Paragraph 22 above, the VisionTel Defendants have represented, expressly or by implication, that Impulse Female Herbal Blend is effective in

treating female sexual dysfunction.

34. The VisionTel Defendants did not possess and rely upon a reasonable basis that substantiated the representation set forth in Paragraph 33 at the time the representation was made. Therefore, the making of the representation set forth in Paragraph 33 constitutes a deceptive act or practice, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

COUNT VI

Impulse Female Herbal Blend Unsubstantiated Safety Claim

35. Through their advertising and promotional materials, including but not limited to the representations set forth in Paragraph 22 above, the VisionTel Defendants have represented, expressly or by implication, that Impulse Female Herbal Blend is and has been safe.
36. The VisionTel Defendants did not possess and rely upon a reasonable basis that substantiated the representation set forth in Paragraph 35 at the time the representation was made. To date, no reliable scientific data or studies have demonstrated that products containing androstenediol are safe for use by women. Further, endocrinologists and other health professionals have raised concerns regarding the lack of safety testing on androgen supplements and the potential health risks and negative side effects of using such products. Therefore, the making of the representation set forth in Paragraph 35 constitutes a deceptive act or practice, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

COUNT VII

Maximus Male Herbal Blend Unsubstantiated Efficacy Claim

37. Through their advertising and promotional materials, including but not limited to the representations set forth in Paragraph 25 above, the VisionTel Defendants have represented, expressly or by implication, that Maximus Male Herbal Blend is effective in treating male sexual dysfunction.
38. The VisionTel Defendants did not possess and rely upon a reasonable basis that substantiated the representation set forth in Paragraph 37 at the time the representation was made. Studies that have tested the efficacy of yohimbine for sexual dysfunction have had contradictory results; however, to the extent some studies have found yohimbine to be efficacious for this purpose, those studies used daily dosage levels of yohimbine at 15 mg. or higher. Therefore, the making of the representation set forth in Paragraph 37 constitutes a deceptive act or practice, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

COUNT VIII

Maximus Male Herbal Blend Unsubstantiated Safety and No Side Effects Claims

39. Through their advertising and promotional materials, including but not limited to the representations set forth in Paragraph 25 above, the VisionTel Defendants have represented, expressly or by implication, that:
- a. Maximus Male Herbal Blend is safe; and
 - b. Maximus Male Herbal Blend has no harmful side effects.
40. The VisionTel Defendants did not possess and rely upon a reasonable basis that

substantiated the representations set forth in Paragraph 39. Maximus Male Herbal Blend contains yohimbine and one or more other ingredients that may substantially increase blood pressure and interact adversely with other drugs that may be taken by men with conditions that cause erectile dysfunction. Therefore, the making of the representations set forth in Paragraph 39 constitutes a deceptive act or practice, and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

CONSUMER INJURY

41. Consumers throughout the United States have suffered substantial monetary loss as a result of Defendants' unlawful acts or practices. In addition, Defendants have been unjustly enriched as a result of their unlawful 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

42. 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 the FTC Act. The Court, in the exercise of its equitable jurisdiction, may award other ancillary relief, including rescission of contracts and restitution, and the disgorgement of ill-gotten gains, to prevent and remedy injury caused by Defendants' law violations.

PRAYER FOR RELIEF

Wherefore, Plaintiff requests that this Court, as authorized by Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and pursuant to its own equitable powers:

(1) Enjoin Defendants permanently from violating Sections 5 and 12 of the FTC Act in connection with the advertising or sale of food, drugs, dietary supplements, devices, cosmetics or other products, services or programs;

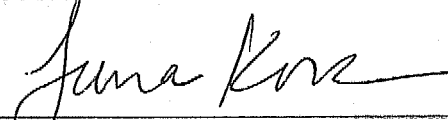
(2) Award such equitable relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the FTC Act, including but not limited to rescission of contracts and restitution, and the disgorgement of ill-gotten gains by the Defendants; and

(3) Award the Plaintiff the costs of bringing this action and any such other equitable relief as the Court may determine to be just and proper.

Dated: August 19, 2004

Respectfully submitted,

WILLIAM E. KOVACIC
General Counsel
Federal Trade Commission



LAURA KOSS

Attorney
DC Bar No. 441848
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A

CHITO-TRIM

"Body You Want"

3-29-99

How would you like to turn your body in to a lean mean sexy machine? Now it's easy thanks to all new Chito-Trim! Chito-Trim is the drug free dietary supplement containing high potency natural ingredients proven to trap unwanted fat, guaranteeing safe effective weight loss. Studies suggest that the active ingredients in Chito-Trim work to attract fat like a magnet, forcing your body to pass it out of your system naturally, giving you the benefits of dieting without the hassle of calorie counting. Thousands of people have already experienced fast effective weight loss without restrictive dieting or strenuous exercise. You can too! If you want to lose weight and have a lean, sexy body call now! Don't miss out on this offer...

"Body You Want Tag"/

Call now for your **completely free** supply! That's right, call today and receive a month's supply of Chito-Trim **absolutely free**, a \$60 value. Call 1-800-xxx-xxxx, pay only shipping and handling and start losing the weight you want. That's 1-800-xxx-xxxx again 1-800-xxx-xxxx call now while supplies last.

1-800-xxx-xxxx

B

OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 0223009

TITLE VISIONTEL COMMUNICATIONS

**DATE RECORDED: DATE UNKNOWN
TRANSCRIBED: JUNE 25, 2002**

PAGES 1 THROUGH 5

VIDEOTAPE - CHITO-TRIM COMMERCIAL

**FOR THE RECORD, INC.
603 POST OFFICE ROAD, SUITE 309
WALDORF, MARYLAND 20602
(301)870-8025**

FEDERAL TRADE COMMISSION

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In the Matter of:)
VisionTel Communications) Matter No. 0223009
)
-----)

Date Unknown

The following transcript was produced from a
live tape provided to For The Record, Inc. on June 19,
2002.

P R O C E E D I N G S

- - - - -
CHITO-TRIM COMMERCIAL

MALE ANNOUNCER: Are you having a hard time shedding those unwanted pounds? If you'd like to lose three to four pounds a week without setting foot in a health club --

ON SCREEN: Tedious workouts with a "No" symbol

MALE ANNOUNCER: -- or changing your diet every week --

ON SCREEN: Boring Diets with a "No" symbol

MALE ANNOUNCER: -- the next 60 seconds could change your life, thanks to the miracle of Chito-Trim.

ON SCREEN: Drug-Free

All Natural

Fat Grabber

MALE ANNOUNCER: Chito-Trim is a drug-free, all-natural fat grabber that works by soaking up fat in the stomach before it ever gets digested, giving you safe, immediate weight loss.

Simply take Chito-Trim before a meal and stop worrying about the fat. Eat what you want when you want and still lose the weight.

ON SCREEN: Absolutely Free!

Limited Time Only

For The Record, Inc.
Waldorf, Maryland
(301) 870-8025

C E R T I F I C A T I O N O F T Y P I S T

MATTER NUMBER: 0223009

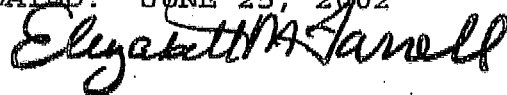
CASE TITLE: VISIONTEL COMMUNICATIONS

TAPING DATE: DATE UNKNOWN

TRANSCRIPTION DATE: JUNE 25, 2002

I HEREBY CERTIFY that the transcript contained herein is a full and accurate transcript of the tapes transcribed by me on the above cause before the FEDERAL TRADE COMMISSION to the best of my knowledge and belief.

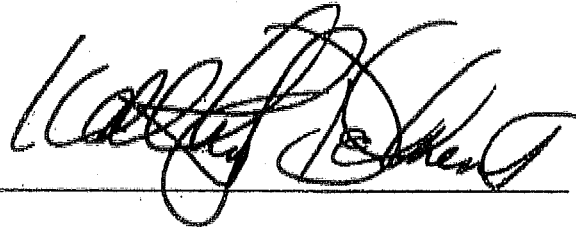
DATED: JUNE 25, 2002



ELIZABETH M. FARRELL

C E R T I F I C A T I O N O F P R O O F R E A D E R

I HEREBY CERTIFY that I proofread the transcript for accuracy in spelling, hyphenation, punctuation and format.



KATHY J. DE MENT



C

Exhibit C to the Plaintiff's Complaint, **Videotape of Television Commercial for Chito-Trim**, is in videotape form only and is being maintained in the case file in the Clerk's Office. This videotape will be available for public viewing and copying between the hours of 9:00 a.m. to 4:00 p.m., Monday through Friday.

D

Chito-Trim

9/6/01

Do Not Take If you are:

- Allergic to shellfish
- Pregnant or lactating
- Child under 14

Contains per Capsule:

- 500 mg of Chitosan Fiber
- 60 mg of Vitamin C

Never Discourage Customer from talking to his or her doctor.

Chito-Trim is all-Natural!

Delivery Times

Regular: 7 to 10 days

Rush: 3 to 5 days

[days = business days]

All Rushes add

\$5.00

Thank you for calling Chito-Trim, my name is _____, I'm glad you called, and your name is? _____, how are you today?

Are you calling to reorder, or is this your first time calling?

How did you hear about Chito-Trim, from your doctor, radio or TV?

How much weight do you NEED to lose?

What have you tried?

What was frustrating about other things you have tried in the past?

You are going to love Chito-Trim! It is an all natural product that is helping thousands of people just like yourself achieve their weight loss goals. Your Chito-Trim works just like a sponge. It absorbs and collects unwanted fat in your daily diet and passes it out of your system by making the fat indigestible. Chito-Trim is all natural. It contains only Chitosan fiber (shellfish shel. extract) and Vitamin C. It's safe and easy to use. The best part is you won't have to change your daily diet to lose that unwanted weight, and when you do you will look good and feel GREAT and That is why you called, right?

There are 120 capsules in each bottle, that's about a 1 month supply. Based on people calling to reorder, men and women are losing about 3-5 lbs a week using just the Chito-Trim.

Today, when you buy 2 bottles for just 119.95, we give you a third bottle absolutely free! That saves you almost 60 dollars. The best part is that we offer a 30 day money back guarantee. We guarantee your results and satisfaction, or your money back.

Bottom line is that it works, and you'll love the results. We can get you started using any major credit card. Which works best for you?

Prices for Chito-Trim:

Supply	Price	S&H Prices	TOTALS
1 Bottle	\$59.95	\$14.95 Reg - \$19.95 Rush	(74.90 Reg - 79.90 Rush)
2 Bottles	\$89.95	\$14.95 Reg - \$19.95 Rush	(104.90 Reg - 109.90 Rush)
3 Bottles	\$119.95	\$14.95 Reg - \$19.95 Rush	(134.90 Reg - 139.90 Rush)
6 Bottles	\$169.95	\$14.95 Reg - \$19.95 Rush	(184.90 Reg - 189.90 Rush)
9 Bottles	\$219.95	\$14.95 Reg - \$19.95 Rush	(234.90 Reg - 239.90 Rush)
12 Bottles	\$249.95	\$14.95 Reg - \$19.95 Rush	(264.90 Reg - 269.90 Rush)

FTC2-0000189

E

TurboTone – 2/01/02
Radio :60
TT217 Bikini

1-888-XXX-XXXX VDN XXXX

Allison: Cindy, you're so brave to be trying on a bikini! Come out and show me.

Cindy: (Squeak of door opening) Ta-da!

Allison:! Cindy, your body looks amazing! You've lost weight! Your thighs, your stomach, your butt... Your whole body's so slim and tone and sculpted now! Not to sound kinky, but you look really hot!

Cindy: (Laughs) Thanks, Allison. It's all because of TurboTone, this amazing new weight loss supplement that's burned off my excess body fat and gotten me lean, without me having to kill myself at the gym or starve! I can eat cheesecake, fries, doughnuts, lasagna...all my favorites! With TurboTone, it's almost like I'm working out and burning off fat 24 hours a day—even when I'm sleeping! Want to try it?

Allison: You bet I do...you little hottie!

(They both laugh)

ANNCR: Call now for your risk-free trial of TurboTone! Call 1-888-XXX-XXXX. It's safe, all-natural, and it'll work for you! Guaranteed! Call 1-888-XXX-XXXX! That's 1-888-XXX-XXXX! Call now! 1-888-XXX-XXXX.

F

TurboTone – 1/25/02
Radio :60
TT 202 - New body

1-800-XXX-XXXX VDN XXXX

ANNCR: How'd you like a sexy new body? Good news! Now you can with TurboTone, the revolutionary new highest potency all-natural weight loss pill scientifically formulated to burn off body fat and sculpt your body!

The powerful, all-natural ingredients in TurboTone work with your body to naturally boost your metabolism, giving you the benefits of exercise without the time-consuming hassle or the unhealthy strain! And with your boosted metabolism you'll be burning fat and calories 24 hours a day!

Just a few tablets of TurboTone a day will give you the weight loss results you want safely and naturally, while at the same time help sculpt and tone your body. TurboTone is perfect for you if you want to be able to eat what you want and lose weight and get firm without calorie-counting or long strenuous workouts.

ANNCR TAG: Call now for your risk-free trial of TurboTone! Call 1-888-XXX-XXXX. It's safe, all-natural, and it'll work for you! Guaranteed! Call 1-888-XXX-XXXX! That's 1-888-XXX-XXXX! 1-888-XXX-XXXX!

G



“Burn fat 24 hours a day”

Potent new all-natural formula helps sculpt your body without strict diets or long, strenuous workouts

How would you like to have a fit, firm, fabulous body that's lean, sculpted, and sexy? Good news! Now you can with TurboTone, the revolutionary new highest potency weight loss supplement that's scientifically formulated to burn off body fat without strict diets or exhausting workouts!

Powerful new formula helps to naturally burn off body fat

The unique and powerful TurboTone formula works with your body to naturally boost your metabolism, giving you the benefits of exercise without the sweat or strain! And the best part is, TurboTone keeps your metabolism boosted so you'll burn fat and calories 24 hours a day!

Have the lean, sculpted, sexy body you've always wanted

TurboTone is helping countless men and women of all ages lose weight and get the tight, toned, sexy body they've always wanted. Listen to what just a few of our satisfied customers have to say about TurboTone:

“With TurboTone I lost 30 pounds, and now I've got washboard abs and awesome muscle definition. And without strict diets or exercise.”

-C. Perry

“TurboTone burned off my excess body fat so now I've got the tight, toned little body I've always wanted! No more flab at all! I love it and my boyfriend says I look so sexy. I feel sexy!”

-L. Huff

If you want to lose weight and have a lean, sculpted; sexy body without having to exercise all day or give up your favorite foods, TurboTone is perfect for you.

Risk-Free Trial

Call toll-free now for your risk-free trial of TurboTone!

Call now and we'll send you a risk-free trial of TurboTone so you can see for yourself how powerful this amazing new all-natural supplement really is!

Call toll-free for your risk-free trial at 1-888-XXX-XXXX. TurboTone is safe, all-natural, and it'll work for you, guaranteed! So call toll-free now at 1-888-XXX-XXXX.

Call now for your risk-free trial:

1-888-XXX-XXXX

FTC2-0000097

H

TurboTone – 12/10/01
Radio :60
TT212 – 5 pounds

1-888-XXX-XXXX VDN XXXX

ANNCR: Wish you could lose up to 5 pounds per week without feeling hungry all the time? Now you can with TurboTone, the revolutionary new highest potency weight loss dietary supplement clinically proven to make you feel full while it burns off body fat, so you get the slim, sexy, sculpted body you've always wanted.

TurboTone is different because it's scientifically formulated to not only suppress your appetite and eliminate cravings so it's easy to eat less, it also works as a metabolism booster, burning off body fat and building lean underlying muscle tone. That means, with TurboTone you won't get hungry or experience cravings, you'll lose weight fast, and your body will automatically get lean, tight, and toned.

ANNCR TAG: Call now for your risk-free trial of TurboTone! Call 1-888-XXX-XXXX. It's safe, all-natural, and it'll work for you! Guaranteed! Call 1-888-XXX-XXXX! That's 1-888-XXX-XXXX! 1-888-XXX-XXXX!

I

TurboTone – 2/27/02
Radio :60
TT215 – Naked pills CP

1-888-XXX-XXXX VDN XXXX

ANNCR: Do you wish you looked better naked? Good news! Now you can with TurboTone, the revolutionary new highest potency all-natural weight loss pill clinically proven to burn off body fat and sculpt your body without strict diets or exhausting exercise!

TurboTone works with your body to naturally boost your metabolism, giving you the benefits of exercise without the sweat or strain! And your metabolism will stay boosted so you'll burn fat and calories 24 hours a day—even while you sleep!

If you want to lose weight and have a slim, sculpted, sexy body without having to exercise all day or give up your favorite foods, TurboTone is perfect for you.

ANNCR TAG: Call now for your risk-free trial of TurboTone! Call 1-888-XXX-XXXX. It's safe, all-natural, and it'll work for you! Guaranteed! Call 1-888-XXX-XXXX! That's 1-888-XXX-XXXX! 1-888-XXX-XXXX!

J

TURBO TONE

Updated 1/3/02

MAIN INGREDIENTS

Vitamin E
Magnesium
Chromium
Vanadium
Glucosol (1% Corosolic Acid)

Carb Blend

Gymnema sylvestre leaf,
Bitter melon fruit extract,
Garcinia cambogia fruit extract, Phaseolamin

Thermogenic Blend

Korean ginseng root extract, Guarana seed extract (providing 30 mg caffeine), ginger root, lecithin, nettle leaf, gotu kola leaf, sarsaparilla root, white willow bark, peppermint leaf, cinnamon bark, lemon verbena, Citrus aurantium extract, chamomile flower, licorice root, tangerine peel, chicory root

Delivery Times

Regular 7 to 10 days
Rush 3 to 5 days
[days=business days]

All Rushes add \$5.00

Thank you for calling TurboTone, my name is _____. I'm glad you called, and your name is? _____, How are you today?

Are you calling to reorder, or is this your first time calling?

How did you hear about TurboTone, radio or TV?

How much weight do you NEED to lose?

What have you tried?

What was frustrating about other things you have tried in the past?

You are going to love TurboTone! It is an all natural product that is helping thousands of people just like yourself achieve their weight loss goals. Your TurboTone works on two levels at the same time. First, it will help increase your metabolism, turning up the fat-burning oven in your body. Second, it is a carb blocker, helping your body burn carbohydrates and sugars for energy rather than getting stored as fat. What this means to you is, TurboTone lets you eat all of your favorite foods and still lose weight. It's safe and easy to use, all-natural, and clinically proven to be effective. Lose weight easily, quickly, and safely, **and without the hassles, frustrations and suffering of diets or special foods.** You'll feel and look GREAT!! **That is why you called, right?**

TurboTone is unlike anything you've tried because it does work on two levels at the same time. There are 60 tablets in each bottle, and you take just 2 a day. Typically, you can expect to lose about 2-3 lbs. a week using TurboTone. The best part is that we offer a 30 day money back guarantee. We guarantee your results and satisfaction, or your money back. Today, when you buy a 2 month supply for just 119.95, we **give you a third month's supply absolutely free, saving you \$60!** *That works out to just \$1.33 a day, less than your daily coffee!*

Bottom line is that it works, and you'll love the results. We can get you started using any major credit card. Which works best for you?

Prices for TurboTone:

Supply	Price	S&H Prices	TOTALS
1 Month	\$59.95	\$14.95 Reg - \$19.95 Rush	(74.90 Reg - 79.90 Rush)
2 Months	\$89.95	\$14.95 Reg - \$19.95 Rush	(104.90 Reg - 109.90 Rush)
3 Months	\$119.95	\$14.95 Reg - \$19.95 Rush	(134.90 Reg - 139.90 Rush)
6 Months	\$169.95	\$14.95 Reg - \$19.95 Rush	(184.90 Reg - 189.90 Rush)
9 Months	\$219.95	\$14.95 Reg - \$19.95 Rush	(234.90 Reg - 239.90 Rush)
12 Months	\$249.95	\$14.95 Reg - \$19.95 Rush	(264.90 Reg - 269.90 Rush)

K

Impulse – 8/10/01
Radio :60
In the mood

FEMALE ANNCR: If you're a woman who wishes you were "in the mood" more often and if you want your lovemaking to feel more pleasurable, now there's good news! Introducing Impulse, the revolutionary new all-natural formula for adult women that helps boost your level of arousal, replenish your natural moisture, and intensify sexual pleasure.* -

Female hormones, changes of life, and medical procedures or conditions can weaken a woman's level of desire and make intercourse unenjoyable or painful, which is why Impulse is such an amazing breakthrough. Working as an aphrodisiac, Impulse helps heighten sensitivity and replenish your body's natural moisture. So you become easily aroused [and amply lubricated], making sex pleasurable, passionate, and pain-free.

TAG: Call now for your risk-free trial of Impulse! Call 1-888-XXX-XXXX. It's safe, completely confidential, and it works! Guaranteed! Call 1-888-XXX-XXXX! That's 1-888-XXX-XXXX! 1-888-XXX-XXXX.

L

Impulse – 7/18/01
Radio :60
Unhappy she's lacking

ANNCR: If you're a woman who's unhappy with your lack of desire and you wish you had a strong, powerful, energetic sexual appetite, now there's good news! Introducing Impulse, the revolutionary new all-natural formula that boosts the female sex drive and intensifies sexual pleasure.

Countless women suffer in silence with their lack of desire and satisfaction, and that's what makes Impulse such an amazing breakthrough. Its powerful blend of all-natural ingredients works as an aphrodisiac, helping to heighten sensitivity and enhance your body's response to touch. That means, with Impulse you become aroused more easily and experience heightened sexual intensity and enjoyment. If you're looking for a safe, effective, private solution, Impulse is perfect for you.

Call now for your risk-free trial of Impulse! Call 1-888-XXX-XXXX. It's safe, completely confidential, and it works! Guaranteed! Call 1-888-XXX-XXXX! That's 1-888-XXX-XXXX! 1-888-XXX-XXXX.

M



“Women: Boost your libido!”

Revolutionary new all-natural formula for women helps dramatically boost your desire

Are you a woman who's unhappy with your lack of sexual desire? Do you (and also your partner) wish you could get “in the mood” more easily? Don't give up hope because if your libido is weaker than it used to be and you want a strong, powerful, energetic sexual appetite, now you can with Impulse, the revolutionary new all-natural supplement scientifically formulated for women to help boost the female sex drive!

Finally, an all-natural solution for adult women

Countless women of all ages have suffered in silence with their lack of desire and satisfaction, and that's what makes Impulse such an amazing breakthrough. Its specialized blend of powerful, high-potency, all-natural herbs is scientifically formulated to work with your female biochemistry to provide an aphrodisiac effect, boosting your libido and making you much more desirous of sex much more often.

Quickly and safely, Impulse helps calm and relax you while at the same time helps heighten your body's sensitivity and response to touch. This enhanced sensitivity coupled with the calm state of relaxation is what makes Impulse so effective in helping arouse you and enhance the sexual intensity and enjoyment you and your partner experience during lovemaking.

“Wet” your sexual appetite and achieve the ultimate in sexual satisfaction

With Impulse, you'll not only boost your desire for sex, you'll also enhance the sexual satisfaction and sexual energy between you and your lover.

Quickly, safely, and without a doctor's visit, you'll get the libido-enhancing results you want with Impulse...guaranteed. If you want the youthful sexual energy that will enhance sexual pleasure and strengthen the intimacy in your relationship, Impulse is perfect for you. Just listen to the results other women are getting with Impulse:

“I was frustrated (and my boyfriend was, too) because I was just never in the mood for sex. But with Impulse, now it's like I can't keep my hands off him! He calls me his 'little sex kitten' and we're both loving the new me!”

—Christine, Albany, GA

“I gradually got less and less interested in sex, but I did not want my husband to stray so I just sort of went through the motions. But thanks to Impulse, our sex life is so wonderful now! I get aroused so easily and my sex drive is stronger than it's ever been! We're like newlyweds! Thank you Impulse!”

—Elizabeth, Eugene, OR

RISK-FREE TRIAL!

Call toll-free now and get a risk-free trial of Impulse!

When you call now you can get your own risk-free trial of Impulse (sent to you in discreet, plain packaging). Call toll-free now at 1-888-XXX-XXXX. With Impulse, your satisfaction is guaranteed.

Call now for your risk-free trial:

1-888-XXX-XXXX

IM005-XXXX

N

OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 0223009

TITLE VISIONTEL COMMUNICATIONS

**DATE RECORDED: MARCH 26, 2001
TRANSCRIBED: JUNE 25, 2002**

PAGES 1 THROUGH 33

VIDEOTAPE - IMPULSE LONG FORM

**FOR THE RECORD, INC.
603 POST OFFICE ROAD, SUITE 309
WALDORF, MARYLAND 20602
(301)870-8025**

FEDERAL TRADE COMMISSION

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Impulse Long Form

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In the Matter of:)
VisionTel Communications) Matter No. 0223009
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March 26, 2001

The following transcript was produced from a
live tape provided to For The Record, Inc. on June 19,
2002.

P R O C E E D I N G S

- - - - -
IMPULSE LONG FORM

ON SCREEN:

Client: VisionTel
Title: "Impulse Long Form"
Font: Palatino
Agency: Energy Visual Media
Length: 28:30
Date: 3/26/01
Audio: Mono 1&2

MALE ANNOUNCER: The following program is made possible by Vision Laboratories.

ON SCREEN: The following program is made possible by Vision Laboratories

(Music playing.)

MALE ANNOUNCER: Ladies, are desire, romance and passionate love-making just a fantasy of yours? Well, you're not alone. Let's face it, you're probably under a lot of stress these days. Between the daily grind of caring for the family and trying to compete in the working world, more and more women are finding that getting in the mood for making love is nearly impossible. Add to that the hormonal changes that women experience throughout their lives and it's no wonder that over 40

1 million American women are suffering from a lack of
2 sexual desire and satisfaction.

3 Finally, there's help.

4 **ON SCREEN: Impulse Female Herbal Blend**

5 **Call now for your 30 day risk-free trial:**

6 **This product is not intended to diagnose,**
7 **treat, cure or prevent any disease**

8 **MALE ANNOUNCER:** Introducing Impulse, an all-
9 natural, non-prescription supplement uniquely designed
10 for a woman's body to safely and effectively restore your
11 sexual urge and enjoyment, guaranteed. It's already
12 helping women from all ages reclaim their sexual passion
13 and vitality, and it can help you, too.

14 **ON SCREEN: Jennifer B.**

15 **New York**

16 **Call now for your 30 day risk-free trial:**

17 **Actor portrayal is to protect privacy.**

18 **JENNIFER B.:** I'm a 29-year old woman and I've
19 been in a committed relationship for over four years. I
20 have an extremely demanding professional life and a very
21 active lifestyle. Finding the time to make love was
22 difficult enough, and combine that with the stress and
23 sheer exhaustion of my lifestyle, it made it even less
24 frequent.

25 I heard about Impulse and I decided to give it

1 a try. And I am very happy to say that after only just a
2 few weeks, my urge is back. Now I'm rushing home from
3 work and our sex life is better than ever. Impulse has
4 put the spark back into my relationship and now we
5 definitely find the time.

6 **ON SCREEN: Celia P.**

7 **Florida**

8 **Call now for your 30 day risk-free trial:**

9 **CELIA P.:** Thank you for a wonderful product.
10 I'm an older woman in my early sixties and I've been
11 through menopause, but I haven't felt this sexually alive
12 in years. Impulse has increased my desire for intimacy
13 and truly it helps me to enjoy sex now as I did in my
14 twenties.

15 **ON SCREEN: Robyn & John G.**

16 **Massachusetts**

17 **Call now for your 30 day risk-free trial:**

18 **ROBYN G.:** Ever since our second child, I had
19 absolutely no sex drive. I mean, John and I, we have a
20 great marriage, but I just didn't feel like making love.

21 **JOHN G.:** Her doctor said it was normal to feel
22 this way. But after a while, what were we supposed to
23 do?

24 **ROBYN G.:** When a girlfriend told me that the
25 Impulse had worked for her, I thought, well, what do we

1 have to lose? So, I tried it and the Impulse really
2 worked. Within a month, my drive was back. My husband
3 was happy and I started to feel like myself again.

4 JOHN G.: Thanks to Impulse our marriage has
5 never been better.

6 ON SCREEN: Annette J.

7 Texas

8 Call now for your 30 day risk-free trial:

9 ANNETTE J.: I just placed my second order for
10 Impulse. I am very pleased with the results. After just
11 two weeks with Impulse, I noticed a great increase in my
12 libido. I have talked to women who have used other
13 products and I'm glad to say that I have not had any side
14 effects. I am very happy with Impulse.

15 ON SCREEN: Dr. Sarah S.

16 Texas

17 Call now for your 30 day risk-free trial:

18 DR. SARAH S.: I was so frustrated with my lack
19 of desire that I seriously considered taking a
20 prescription medication, but it goes against all my
21 beliefs as a chiropractor. Then I heard a radio
22 advertisement for Impulse and I placed an order. I tried
23 the product, and to my surprise, experienced immediate
24 results.

25 Impulse really works. I even recommend it to

1 my patients.

2 ON SCREEN: Call now for your 30 day risk-free
3 trial:

4 MALE ANNOUNCER: Get ready, ladies, because in
5 the next 30 minutes, you'll learn how you, too, can
6 restore your desire, reclaim your romance and make
7 passionate love-making a reality. Live the fantasy right
8 now with Impulse, finally the wait is over.

9 (Music playing.)

10 ON SCREEN: Woman To Woman

11 LIZ CALDWELL: Hello, and welcome to Woman to
12 Woman. I'm Liz Caldwell. Today, we're discussing a
13 growing problem in this country, the sexual
14 dissatisfaction of women. A recent survey found that one
15 in three sexually active American women were unhappy with
16 their love lives.

17 Now, don't worry, men, we're not blaming you
18 just yet. There seems to be a variety of reasons that
19 women are reporting a lack of sexual desire and
20 fulfillment.

21 My guest today is noted sex therapist, Deborah
22 Fox, who is here to share her insight into why these
23 numbers are increasing so dramatically and what, if
24 anything, can be done to change all of that. Welcome to
25 our show, Deborah.

1 DEBORAH FOX: Thanks.

2 LIZ CALDWELL: Well, tell us, why are so many
3 women dissatisfied with their love lives and why has it
4 taken so long for women to speak out about their sexual
5 needs?

6 ON SCREEN: Deborah Fox, L.C.S.W.

7 Certified Sex Therapist

8 DEBORAH FOX: Well, these are really changing
9 times. Fortunately, women speak out about a lot of
10 things that are not right with their lives, including
11 sexuality. So, we really now know that a lot of women
12 are not very happy with their sex lives, and there's a
13 number of different reasons.

14 One is certainly fatigue. We are too busy.
15 Women have families to take care of, they're going to
16 work or school, some are single parents. So, really once
17 the basic priorities are met, there's not a whole lot of
18 time or energy left for sex and romance. And we know
19 that there's a statistic now that one in three women are
20 not happy with their sex lives. That is 40 million
21 American women and that's a lot of women. And certainly,
22 fatigue is big there. You know, our 21st Century crazy,
23 hectic lifestyles are not helpful in feeling real sexy at
24 the end of the day.

25 And then there's also women who have claimed

1 that they never really felt very intensely about sex.
2 They've just thought that sex was for everybody but them
3 or it was a guy thing or just not meant to be. But now
4 there's a lot of research going on that is really very
5 encouraging. There's a lot of good news to report.

6 LIZ CALDWELL: And before we talk about some of
7 that research, Deborah, what are you hearing from women
8 about their sexual needs?

9 DEBORAH FOX: Well, sexuality for women is
10 really complex. Women want to feel sexually alive. They
11 want to feel loved, both emotionally and physically, and
12 they want their partners to be happy.

13 LIZ CALDWELL: So, is the women's desire more
14 about the body or the mind?

15 DEBORAH FOX: Well, it's really both. For
16 example, a common problem is depression, and what we know
17 about depression is that it also depresses one's sexual
18 desire. Also, many women don't have a psychological
19 background in which it's really been acceptable to feel
20 very sexual.

21 In addition, women often don't know about their
22 bodies, that they really haven't felt comfortable
23 exploring themselves and finding out what it is that
24 turns them on.

25 LIZ CALDWELL: Um-hum. What would be possibly

1 some of the physical factors that might inhibit a women's
2 sexual desire?

3 DEBORAH FOX: Well, there's certainly a lot of
4 changes that women go through in their lives and hormones
5 often accompany these changes. We've got pregnancy,
6 childbirth, nursing, getting older, menopause and as well
7 as even more temporary things that a woman could go
8 through; illnesses, surgeries, taking medications from
9 time to time, and many of these things pass and they're
10 temporary.

11 And so, what we found is that a woman's sexual
12 desire can certainly return once these transitions or
13 problems have passed.

14 LIZ CALDWELL: So, what would be some of the
15 first steps for a woman who wants to increase her desire,
16 her urge and even the mood?

17 DEBORAH FOX: Well, certainly being healthy is
18 the bottom line. As in many things, it's important to
19 eat properly, to get exercise, to get sleep. You know,
20 exhaustion is not, you know, very -- it doesn't make a
21 woman very interested in sex before. And not being
22 stressed is really important.

23 LIZ CALDWELL: Now, what type of medications
24 are available to women who want to increase their sexual
25 desire?

1 DEBORAH FOX: Well, there are certain
2 prescription medications as well as over-the-counter
3 supplements that are designed to increase the
4 concentrations of certain hormones in a woman's body and
5 these hormones can often help a woman with both her
6 desire and her sensitivity. However, some of these
7 prescription medications also can have some potentially
8 dangerous side effects.

9 LIZ CALDWELL: I see. So, are there safer,
10 more natural alternatives for those women who are wanting
11 to increase the sexual desire and intimacy?

12 DEBORAH FOX: Yes. There's a non-prescription
13 alternative available called Impulse.

14 ON SCREEN: Impulse Female Herbal Blend
15 Call now for your 30 day risk-free trial
16 This product is not intended to diagnose,
17 treat, cure or prevent any disease

18 DEBORAH FOX: That's a safe way to increase
19 one's own sexual desire, as well as experience greater
20 sensitivity during times of sexual intimacy.

21 LIZ CALDWELL: For those of our viewers who
22 have never heard of it, what kind of product is Impulse?

23 DEBORAH FOX: Well, Impulse is a balanced
24 combination of all-natural ingredients that's really
25 designed to enhance a woman's sexual experience, both in

1 terms of desire and sensitivity.

2 LIZ CALDWELL: Now, how do the ingredients in
3 Impulse affect a woman's hormones?

4 DEBORAH FOX: Well, according to the research
5 that's being done at Vision Laboratories, Impulse can
6 help a woman's body balance itself hormonally and with
7 two very critical hormones, one being estrogen and the
8 other, testosterone.

9 LIZ CALDWELL: I've heard a lot lately about
10 testosterone and it's received quite a bit of press in
11 terms of its effects on both men and women.

12 DEBORAH FOX: Right. We think of testosterone
13 as being, essentially, a male hormone. But it really
14 naturally occurs in both men's and women's bodies, and
15 men and women have responded to testosterone therapy with
16 an apparent increase in their sexual interest.

17 However, there are some problems associated
18 with it. There can be some very unwanted and potentially
19 dangerous side effects. For women, it could be unwanted
20 hair, a deeper voice and acne, also. The other problem
21 with it is that researchers and gynecologists really
22 haven't figured out a way to take testosterone that's
23 very reliable or effective.

24 So, a much better alternative is something like
25 Impulse, which is safe, which is a dietary supplement

1 that can help the body create its own balance of hormones
2 such that a woman's sexual experience can be enhanced.

3 LIZ CALDWELL: So, Impulse, essentially, is a
4 safer natural alternative for those women who not only
5 want to increase their sexual satisfaction, but also
6 their desire as well.

7 DEBORAH FOX: That's right. Many women are
8 having a lot of success with this product. They say that
9 it puts their heads in a better mood for sex, as well as
10 their bodies.

11 LIZ CALDWELL: Are there any negative side
12 effects from using Impulse?

13 DEBORAH FOX: Not to my knowledge, there
14 haven't been any reported. But of course, it should be
15 taken as directed, and I think it's always a good idea,
16 when you're taking something new, to consult a health
17 care professional, especially if a woman has any serious
18 health problems or she's taking prescription medication
19 or some other supplements.

20 LIZ CALDWELL: Now, Impulse sounds like a great
21 option for many women, because I know if I was taking the
22 prescription alternative, I'd be worried about its
23 interaction with other prescription drugs that I was
24 taking.

25 DEBORAH FOX: Definitely. Impulse is a great

1 option for a couple of reasons. Impulse is safe. There
2 are no known drug interactions, and women who are trying
3 Impulse are reporting some positive mood changes, a
4 greater sense of well-being, more energy and some have
5 even reported losing weight.

6 Now, some of these changes may be because their
7 sex lives are better and they're enjoying sex more, but
8 these are really positive changes that, you know, we
9 should note.

10 LIZ CALDWELL: So, there are side effects from
11 Impulse, but from the sounds of things, they appear to be
12 positive.

13 DEBORAH FOX: So it appears. And, of course,
14 it can vary from person to person, as with any herbal
15 product.

16 LIZ CALDWELL: So, how long after taking
17 Impulse should one expect to see results?

18 DEBORAH FOX: Well, again, that varies from
19 woman to woman. Some people are experiencing immediate
20 effects, and then for other women, it takes a few weeks
21 to see some results. So, it's recommended that Impulse
22 be tried for like a month before a woman would decide if
23 she's going to continue to take it.

24 LIZ CALDWELL: And is Impulse having any
25 success?

1 DEBORAH FOX: Yes, it is. In fact, it appears
2 to be fulfilling a need that's been overlooked for some
3 time.

4 LIZ CALDWELL: If the numbers are true, 40
5 million American women are dissatisfied with their love
6 lives. It seems like there's a great need for a product
7 like Impulse.

8 DEBORAH FOX: Absolutely.

9 ON SCREEN: Call now for your 30 day risk-free
10 trial:

11 LIZ CALDWELL: Well, for those of you who are
12 curious about trying Impulse, I've got some good news.
13 Vision Laboratories is making a special offer. If you
14 call during our show today, you can try Impulse
15 absolutely risk-free for 30 days. Just call the toll-
16 free number on your screen right now. If, during the
17 first 30 days, you're not absolutely happy with the
18 product, your money will be completely refunded.

19 While you're making that call, we're going to
20 take a short break, and when we come back, Deborah will
21 share with us some interesting differences between male
22 and female sexual urges. Stay tuned.

23 (Music playing.)

24 MALE ANNOUNCER: Have you ever wondered why
25 you're just not in the mood for making love anymore? Are

1 other people in your life noticing, too? Well, why don't
2 you do something about it? All it takes is a phone call.

3 **ON SCREEN: Impulse Female Herbal Blend**
4 **Call now for your 30 day risk-free trial**
5 **This product is not intended to diagnose,**
6 **treat, cure or prevent any disease**

7 **MALE ANNOUNCER: Introducing Impulse, a safe,**
8 **non-prescription supplement made just for a woman that**
9 **can actually turn back the clock on your passion and**
10 **reawaken those powerful feelings for intimacy.**

11 Impulse works by stimulating the development of
12 vital hormones in a woman's body, and not only heightens
13 your sensitivity and physical pleasure, but it can
14 actually increase your arousal, your urge and your desire
15 for making love. Women of all ages are experiencing the
16 benefits of Impulse and you can, too.

17 **ON SCREEN: Jennifer B.**
18 **New York**

19 **Call now for your 30 day risk-free trial:**
20 **Actor portrayal is to protect privacy.**

21 **JENNIFER B.: I have an extremely demanding**
22 **professional life and a very active lifestyle. Finding**
23 **the time to make love was difficult enough, and combine**
24 **that with the stress and sheer exhaustion of my**
25 **lifestyle, it made it even less frequent.**

1 I heard about Impulse and I decided to give it
2 a try. And I am very happy to say that after only just a
3 few weeks, my urge is back.

4 ON SCREEN: Celia P.

5 Florida

6 Call now for your 30 day risk-free trial:

7 CELIA P.: I'm an older woman in my early
8 sixties and I've been through menopause, but I haven't
9 felt this sexually alive in years.

10 ON SCREEN: Robyn & John G.

11 Massachusetts

12 Call now for your 30 day risk-free trial:

13 ROBYN G.: Ever since our second child, I had
14 absolutely no sex drive. I mean, John and I, we have a
15 great marriage, but I just didn't feel like making love.

16 JOHN G.: Her doctor said it was normal to feel
17 this way. But after a while, what were we supposed to
18 do?

19 ROBYN G.: When a girlfriend told me that the
20 Impulse had worked for her, I thought, well, what do we
21 have to lose? So, I tried it and the Impulse really
22 worked.

23 ON SCREEN: Annette J.

24 Texas

25 Call now for your 30 day risk-free trial:

1 ANNETTE J.: I have talked to women who have
2 used other products and I'm glad to say that I have not
3 had any side effects. I am very happy with Impulse.

4 ON SCREEN: Dr. Sarah S.

5 Texas

6 Call now for your 30 day risk-free trial:

7 DR. SARAH S.: Impulse really works. I even
8 recommend it to my patients.

9 ON SCREEN: Call now for your 30 day risk-free
10 trial:

11 MALE ANNOUNCER: So, what are you waiting for?
12 Pick up the phone and try Impulse risk-free for 30 days.
13 Reawaken your desire and experience the pleasure again
14 with Impulse. Do it today.

15 LIZ CALDWELL: Welcome back to our show. If
16 you're just joining us, we're talking with sex therapist,
17 Deborah Fox, about an exciting new product that is
18 helping women of all ages bring back the passion and
19 reignite the spark that was missing in their love lives.
20 The product is called Impulse and it's an all-natural
21 supplement designed to help women increase their sexual
22 desire and sensitivity.

23 Deborah, we haven't heard a lot about the
24 successful efforts in improving a woman's sexual libido.
25 It seems that the men have gotten all the attention. But

1: are women's sexual desires that different from men's?

2 DEBORAH FOX: They're really very similar.
3 We're all after the same thing. Of course, we do have
4 different sexual needs and we certainly have different
5 anatomy. There are similar statistics out there for men
6 in terms of sexual dissatisfaction, and men have
7 certainly been getting a lot of attention lately with the
8 introduction of new medications that have really helped
9 with these performance issues really by increasing blood
10 flow.

11 Also, it's been easier to study men's
12 sexuality. Are they getting erections or are they having
13 premature ejaculations?

14 Understanding a woman's sexual response is a
15 lot more difficult because women can still perform, per
16 se, but that doesn't mean she's becoming aroused, and
17 understanding women's sexual intimacy is really more than
18 a chemical reaction. It's often tied to emotion and how
19 she feels about herself and about the relationship.

20 LIZ CALDWELL: Now, what are some of the things
21 that can impact a woman's sexual response?

22 DEBORAH FOX: Well, as I mentioned earlier,
23 fatigue is certainly a big one with the demands of work
24 and family and stress. Those are pretty obvious. But
25 also how a woman feels about herself, the quality of the

1 relationship that she's in and feeling she's loved is
2 really, really important.

3 LIZ CALDWELL: Now, menopause, I'm sure, plays
4 a factor at some point.

5 DEBORAH FOX: Absolutely. Menopause is very
6 important because a lot of women find that their desire
7 just isn't what it used to be after menopause, and we
8 know a lot more about that than we used to. And thanks
9 to the research that's being done with men, we're
10 starting to understand a lot more and learn a lot more
11 about women's sexual response.

12 LIZ CALDWELL: So, are women also taking the
13 prescription drug that's so popular with men these days?

14 DEBORAH FOX: Well, some studies were done in
15 that area. But like the potential problems that there
16 were associated with hormonal therapies, there can be
17 some dangerous side effects, so they were discontinued.
18 So, research began at places like Vision Laboratories on
19 men and women to find a way to increase sexual desire and
20 enhance arousal by using a combination of naturally
21 occurring ingredients, ingredients to help the body
22 stimulate its own sexual hormones.

23 LIZ CALDWELL: So, that sounds more natural
24 and, therefore, much safer.

25 DEBORAH FOX: Well, it is. And now that

1 there's a non-prescription alternative available, like
2 Impulse, which can do -- increase your sexual desire as
3 well as enhance love-making, who wouldn't want to try
4 Impulse?

5 LIZ CALDWELL: Now, how do the benefits of
6 Impulse compare to those of the prescription treatments?

7 DEBORAH FOX: Well, the prescription
8 medications work by increasing blood flow to certain
9 areas, and so that can help with certain performance
10 issues. But it doesn't really seem to do much for
11 desire, whereas with a supplement like Impulse, it seems
12 to be able to do both of these things.

13 According to customer feedback, Impulse
14 increases sexual desire and helps create additional
15 sexual stimulation, lubrication and also some women are
16 reporting better orgasms.

17 LIZ CALDWELL: Better orgasms from Impulse?

18 DEBORAH FOX: Yeah. But ultimately, this
19 ability of Impulse to create greater desire for sex and
20 greater sexual stimulation, this is what really makes
21 Impulse a great option for many women with little or no
22 libido.

23 LIZ CALDWELL: So, Impulse is safer. You don't
24 need a doctor's prescription for it.

25 DEBORAH FOX: Yeah, that's right. And I also

1 understand it's less expensive than prescription
2 medication. And for many women who might be embarrassed
3 about seeking help, it's very private.

4 **ON SCREEN:** Call now for your 30 day risk-free
5 **trial:**

6 **DEBORAH FOX:** You call the 800 number from your
7 own home, you speak to a phone representative. It's very
8 private, very confidential. It's a wonderful alternative
9 for many women that can have a great impact on their sex
10 lives.

11 **LIZ CALDWELL:** It sounds great.

12 Well, speaking of that 800 number, for those of
13 you who would like to try Impulse right now completely
14 risk-free for 30 days, and experience the positive
15 changes that we've been talking about, that can happen in
16 your love life, call the toll-free number on your screen
17 right now. As Deborah said, it's safe, it's affordable,
18 it's confidential and it's helping women renew the
19 passion in their love lives.

20 Make the call right now and we'll be back to
21 talk more about this exciting product with Deborah Fox.
22 Don't go away.

23 **(Music playing.)**

24 **MALE ANNOUNCER:** Ladies, are desire, romance
25 and passionate love-making just a fantasy of yours?

1 Well, you're not alone. Let's face it, you're probably
2 under a lot of stress these days.

3 ON SCREEN: Call now for your 30 day risk-free
4 trial:

5 MALE ANNOUNCER: Between the daily grind of
6 caring for the family and trying to compete in the
7 working world, more and more women are finding that
8 getting in the mood for making love is nearly impossible.
9 Add to that the hormonal changes that women experience
10 throughout their lives and it's no wonder that over 40
11 million American women are suffering from a lack of
12 sexual desire and satisfaction. Finally, there's help.

13 ON SCREEN: Impulse Female Herbal Blend
14 Call now for your 30 day risk-free trial
15 This product is not intended to diagnose,
16 treat, cure or prevent any disease

17 MALE ANNOUNCER: Introducing Impulse, an all-
18 natural, non-prescription supplement uniquely designed
19 for a woman's body to safely and effectively restore your
20 sexual urge and enjoyment, guaranteed. It's already
21 helping women from all ages reclaim their sexual passion
22 and vitality, and it can help you, too.

23 ON SCREEN: Jennifer B.

24 New York

25 Call now for your 30 day risk-free trial:

1 Actor portrayal is to protect privacy.

2 JENNIFER B.: I'm a 29-year old woman and I've
3 been in a committed relationship for over four years. I
4 have an extremely demanding professional life and a very
5 active lifestyle. Finding the time to make love was
6 difficult enough, and combine that with the stress and
7 sheer exhaustion of my lifestyle, it made it even less
8 frequent.

9 I heard about Impulse and I decided to give it
10 a try. And I am very happy to say that after only just a
11 few weeks, my urge is back. Now I'm rushing home from
12 work and our sex life is better than ever. Impulse has
13 put the spark back into my relationship and now we
14 definitely find the time.

15 ON SCREEN: Celia P.

16 Florida

17 Call now for your 30 day risk-free trial:

18 CELIA P.: Thank you for a wonderful product.

19 I'm an older woman in my early sixties and I've been
20 through menopause, but I haven't felt this sexually alive
21 in years. Impulse has increased my desire for intimacy
22 and truly it helps me to enjoy sex now as I did in my
23 twenties.

24 ON SCREEN: Robyn & John G.

25 Massachusetts

1 Call now for your 30 day risk-free trial:

2 ROBYN G.: Ever since our second child, I had
3 absolutely no sex drive. I mean, John and I, we have a
4 great marriage, but I just didn't feel like making love.

5 JOHN G.: Her doctor said it was normal to feel
6 this way. But after a while, what were we supposed to
7 do?

8 ROBYN G.: When a girlfriend told me that the
9 Impulse had worked for her, I thought, well, what do we
10 have to lose? So, I tried it and the Impulse really
11 worked. Within a month, my drive was back. My husband
12 was happy and I started to feel like myself again.

13 JOHN G.: Thanks to Impulse our marriage has
14 never been better.

15 ON SCREEN: Annette J.

16 Texas

17 Call now for your 30 day risk-free trial:

18 ANNETTE J.: I just placed my second order for
19 Impulse. I am very pleased with the results. After just
20 two weeks with Impulse, I noticed a great increase in my
21 libido. I have talked to women who have used other
22 products and I'm glad to say that I have not had any side
23 effects. I am very happy with Impulse.

24 ON SCREEN: Dr. Sarah S.

25 Texas

1 Call now for your 30 day risk-free trial:

2 DR. SARAH S.: I was so frustrated with my lack
3 of desire that I seriously considered taking a
4 prescription medication, but it goes against all my
5 beliefs as a chiropractor. Then I heard a radio
6 advertisement for Impulse and I placed an order. I tried
7 the product, and to my surprise, experienced immediate
8 results.

9 Impulse really works. I even recommend it to
10 my patients.

11 ON SCREEN: Impulse Female Herbal Blend

12 Call now for your 30 day risk-free trial

13 This product is not intended to diagnose,
14 treat, cure or prevent any disease

15 MALE ANNOUNCER: Call the toll-free number on
16 your screen right now and try Impulse risk-free for 30
17 days. If you're not completely satisfied with your
18 results, you'll receive a full refund, guaranteed. So,
19 call now to restore your desire, to reclaim your romance
20 and to make passionate love-making a reality. Live the
21 fantasy right now with Impulse. Finally, the wait is
22 over.

23 ON SCREEN: Call now for your 30 day risk-free
24 trial

25 LIZ CALDWELL: Hello, we're back with Woman to

1 Woman. I'm Liz Caldwell. And we're talking with sex
2 therapist, Deborah Fox, about a growing problem in this
3 country, a woman's lack of sexual desire and stimulation,
4 due to a combination of forces acting on women today,
5 both physical and psychological.

6 In fact, surveys estimate that one in three
7 sexually active women are dissatisfied with their sex
8 lives.

9 **ON SCREEN: Impulse Female Herbal Blend**
10 **Call now for your 30 day risk-free trial**
11 **This product is not intended to diagnose,**
12 **treat, cure or prevent any disease**

13 **LIZ CALDWELL:** But with the help of an exciting
14 new product called Impulse, a safe, all-natural, non-
15 prescription supplement, women of all ages are
16 experiencing a renewal of sexual passion and desire, as
17 well as heightened stimulation and sensitivity.

18 Too good to be true? Not necessarily. It's
19 one of the fastest growing supplements for treating women
20 who are sexually dissatisfied.

21 Deborah, you're on the front lines, so to
22 speak, with women who are seeking help for their sex
23 lives. Are these tough times for a women sexually
24 speaking?

25 **DEBORAH FOX:** Well, I think they're wonderful

1 times really because we can talk about sexuality. I
2 think women are feeling freer than they ever have before.
3 But when sex is not so wonderful for a particular woman,
4 we know how to address that in a positive way.

5 LIZ CALDWELL: So, when a woman is having
6 trouble with sexual arousal and might benefit from
7 something in addition to counseling, do you think it
8 makes sense for them to try Impulse?

9 DEBORAH FOX: Yes, it would. Again, if medical
10 research is pointing women toward hormones, like
11 testosterone, I think it's great that there's an all-
12 natural alternative like Impulse. Remember, hormone
13 therapy can be a tricky business with many potentially
14 dangerous side effects. So, now there's a safe way to
15 increase one's own sexual desire, as well as experience
16 greater sensitivity during times of sexual intimacy.
17 Impulse can be a great option for many women.

18 LIZ CALDWELL: I would think that just knowing
19 that it's a safer alternative would be a very good reason
20 for women to want to try the product.

21 DEBORAH FOX: Yes. And also because it seems
22 to be helping so many people.

23 LIZ CALDWELL: With such a high number of women
24 experiencing sexual dissatisfaction, it's amazing to me
25 that just now a natural remedy like Impulse has come

1 along.

2 DEBORAH FOX: Well, sex is a subject that women
3 haven't really felt comfortable talking about. It's been
4 embarrassing for them many times, and women have often
5 felt that sex is great for everyone but them. But now
6 that we're gaining such a better understanding of what
7 sexuality is all about for women, women don't have to be
8 satisfied with poor sex lives anymore. They can be
9 empowered. There's help available and Impulse is a great
10 way to increase a woman's sexual desire and response.

11 LIZ CALDWELL: And women who may be a little
12 self-conscious can be reassured by knowing that with
13 Impulse, you don't need a doctor's prescription for it,
14 right?

15 DEBORAH FOX: That's right. And the whole
16 process of ordering Impulse is very confidential.
17 There's no prescription. You can order it from the
18 privacy of your own home. When the package arrives in
19 the mail, it's completely discreet.

20 LIZ CALDWELL: Well, Deborah, I want to thank
21 you for being here with us and sharing your experience
22 and your knowledge. It's been a very interesting half-
23 hour. I know that I have learned a lot and I hope that
24 our viewers have as well.

25 Well, the statistics we heard suggest an

1 increasing number of women are frustrated with their
2 sexual lives these days. There is hope after all. A
3 great deal of research is underway in understanding the
4 lack of sexual desire in women, and many women are
5 finding great success with an all-natural dietary
6 supplement called Impulse.

7 As we've just heard, it's safe, it's proven
8 effective, it's affordable and it's non-prescription.

9 **ON SCREEN: Impulse Female Herbal Blend**

10 **Call now for your 30 day risk-free trial**

11 **This product is not intended to diagnose,**
12 **treat, cure or prevent any disease**

13 **LIZ CALDWELL:** If you or someone you know would
14 like to try Impulse, Vision Laboratories is offering a
15 special 30-day risk-free guarantee for those of our
16 viewers today.

17 **ON SCREEN: Call now for your 30 day risk-free**
18 **trial**

19 **LIZ CALDWELL:** Call the toll-free number on
20 your screen right now and you can try Impulse risk-free
21 for 30 days. If you're not absolutely happy with your
22 results from Impulse, you'll receive a full refund,
23 guaranteed.

24 Deborah, any last words?

25 **DEBORAH FOX:** Well, I'd just like to add for

1 you women out there who would really like to restore the
2 sexual passion to your love lives and increase your
3 enjoyment for both you and your partner, giving Impulse a
4 try makes a lot of sense. So, call now and give Impulse
5 a try.

6 LIZ CALDWELL: Well, Deborah, thank you so much
7 for coming. Thank you to those of you at home for
8 watching. On behalf of all of us here at Woman to Woman,
9 I'm Liz Caldwell. Good-bye.

10 (Music playing.)

11 DEBORAH FOX: If you're a woman who wants to
12 put back the desire and enjoyment missing in your sex
13 life, I've got good news. Hi, I'm Deborah Fox. As a
14 certified sex therapist, I'd like to recommend an
15 exciting new product called Impulse. It's helping women
16 all over the country reawaken their sexual passion and
17 sensitivity. Just listen.

18 ON SCREEN: Jennifer B.

19 New York

20 Call now for your 30 day risk-free trial:

21 Actor portrayal is to protect privacy.

22 JENNIFER B.: Impulse has put the spark back
23 into my relationship and now we definitely find the time.

24 ON SCREEN: Dr. Sarah S.

25 Texas

1 **Call now for your 30 day risk-free trial:**

2 DR. SARAH S.: I love this product and I'm
3 comfortable knowing that it's an all-natural supplement
4 without the dangerous side effects of a prescription
5 medication.

6 **ON SCREEN: Celia P.**

7 **Florida**

8 **Call now for your 30 day risk-free trial:**

9 CELIA P.: I'm an older woman in my early
10 sixties and I've been through menopause, but I haven't
11 felt this sexually alive in years.

12 **ON SCREEN: Robyn and John G.**

13 **Massachusetts**

14 **Call now for your 30 day risk-free trial:**

15 ROBYN G.: With Impulse, I started to feel like
16 myself again.

17 **ON SCREEN: Call now for your 30 day risk-free**
18 **trial:**

19 DEBORAH FOX: Impulse is safe. It's not a
20 drug, so you don't need a prescription for it, but it's
21 not available in stores. So, call the number on your
22 screen right now and try Impulse risk-free for 30 days.
23 Reclaim your sexual vitality with Impulse. Call now.

24 **(The infomercial was concluded.)**

25

C E R T I F I C A T I O N O F T Y P I S T

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MATTER NUMBER: 0223009

CASE TITLE: VISIONTEL COMMUNICATIONS

TAPING DATE: MARCH 26, 2001

TRANSCRIPTION DATE: JUNE 25, 2002

I HEREBY CERTIFY that the transcript contained herein is a full and accurate transcript of the tapes transcribed by me on the above cause before the FEDERAL TRADE COMMISSION to the best of my knowledge and belief.

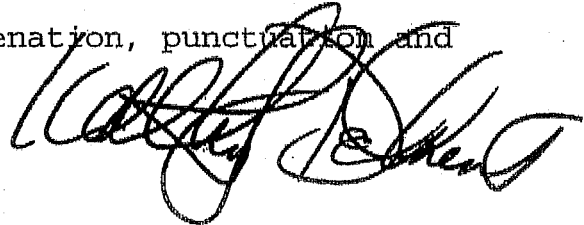
DATED: JUNE 25, 2002



ELIZABETH M. FARRELL

C E R T I F I C A T I O N O F P R O O F R E A D E R

I HEREBY CERTIFY that I proofread the transcript for accuracy in spelling, hyphenation, punctuation and format.



KATHY J. DE MENT

O

Exhibit O to the Plaintiff's Complaint, **Videotape of Infomercial for Impulse**, is in videotape form only and is being maintained in the case file in the Clerk's Office. This videotape will be available for public viewing and copying between the hours of 9:00 a.m. to 4:00 p.m., Monday through Friday.

P

Impulse

FEMALE HERBAL BLEND

AllNaturalSex.com

Call to Order: 1-888-805-6763

[Home](#) [FAQ](#) [Ingredients](#) [Instructions](#) [Order](#)

Impulse - Frequently Asked Questions about Impulse



"I am a 29 year old woman and have been in a committed relationship for over 4 years. I have a very demanding professional life and an extremely active lifestyle. Finding the time to make love was difficult enough an combining that with the stress and sheer exhaustion of my lifestyle made it even less frequent. I heard about Impulse and decided to give it a try. I am so happy to say that after only a few weeks my urge is back! Work and our sex life is better then ever. Impulse has put the spark back in my relationship and now we definitely find the time!"

Jennifer B. - New York

Q: How long will it take to work?

A: Impulse usually takes effect within the first 2-4 weeks of use. Body type and personal results can vary so if you don't see results right away you should continue using the product. If you have questions you can contact our customer support line.

Q: What does Impulse Do? How does it work?

A: Impulse works by increasing the blood flow to the genital area improving sensitivity and lubrication. It also increases desire and urge by allowing your body to maintain the correct hormonal balance naturally.

Q: Does impulse improve orgasms?

A: Impulse increases sensitivity and arousal and can improve orgasms.

Q: Can I take Impulse if I'm pregnant?

A: As with any supplement, if you are pregnant or nursing, you should consult your health care professional prior to use.

Q: Can I take Impulse if I'm on Estrogen or other hormones?

A: There are no known drug interation issues with Impulse. But, if you are currently under a doctor's care and taking supplemental hormones you should inform your health care professional that you are using Impulse.

Q: Will it interfere with other drugs that I take?

A: Impulse has no reported drug interaction issues.

Q: Are there other benefits besides sexual?

A: Yes. Impulse contains a blend of herbal ingredients that assist a woman in maintaining a healthy hormonal balance as well as essential vitamins and minerals such as Magnesium, Calcium and B6. Impulse can also add to quality of life by creating a healthier love life.

Q: Will Impulse show up on a routine drug test?

A: No.

Q: Are there any side effects?

Maximus

MALE HERBAL BLEND

AllNaturalSex.com

Call to Order: 1-888-805-6762

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Maximus - A special blend of herbs to help restore male potency and vitality



"My husband and I just placed our second order for Maximus. We've been together for three years but married only 3 months. He always had a low sex drive and we couldn't find anything to help... we even tried Viagra. Then we heard about Maximus. One week after taking two pills a day things started to change. He would come home from working 14 hours and wanted to make love instead of eating dinner. If we didn't have sex before we fell asleep, then he would wake me up in the middle of the night! I have lost count of how many times we've made love since starting use Maximus. The only thing keeping our marriage from being perfect was this problem and thanks to Maximus we are acting like newlyweds. Thank you so much"

Sarah S. Virginia

Maximus is an all natural herbal supplement, guaranteed to enhance sexual performance. Maximus increases your strength, libido, stamina levels, and over all sexual performance. Maximus does not contain any drugs, and no harmful side effects have been reported.

Are you concerned about your fading potency? Do you want the same sexual vigor and zest that you had when you were 20 years old? Do you want to feel younger, more energetic, and improve your energy and stamina levels? If so, Maximus is just what you are looking for!

In every man, the male hormone, testosterone is produced by the testicles and distributed to the body. Testosterone is the hormone that gives men strong sexual desire and stamina. By the time the average male reaches the age of 72, he has only 2 % of the testosterone he produces available to his body. The lowered availability of testosterone causes a man's sex drive to be significantly lowered from the maximum potential which he had when he was 20 years old. Restricted blood flow can also contribute to these problems as men get older. Restricted blood flow can cause a man's erection to be weaker and last a shorter amount of time.

Effects and Benefits of Maximus Dietary Supplement

- Frees-up testosterone trapped in your system.
- Gives men more sexual energy.
- Produces stronger erections.
- Restores male potency and vitality.
- Contains a special blend of herbs to boost male vigor.
- Increases and improves sexual stimulation and sensitivity.
- Boosts sexual stamina.
- Helps increase vitality, stamina, and endurance.
- Increases Nitric Oxide levels in the blood which promotes sexual function.

Effects and Benefits of Maximus Cream

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BONUS VIDEO **Impulse & Bonus Video** BONUS VIDEO

Updated 2/5/02

WHAT OUR CUSTOMERS ARE SAYING:

- Heighten Sensitivity
- Help Restore Sexual Urge
- Help Restore Sexual Desire
- Help Improve Relationship
- Help Restore Self-Esteem & Confidence
- 100% Safe & All Natural
- Guaranteed / Peace of Mind
- Convenient / Easy To Use

Dosage Suggestions:

Take 2 a Day

Ingredients—Per Serving:

- Calcium 250 mg
 - Magnesium 200 mg
 - Vitamin B6 25 mg
 - Androstenediol 25 mg
 - Arginine HCL 250 mg
 - Tribulus 250 mg
 - Female Potentiator Blend 350 mg
 - Inositol 25 mg
- Never Discourage Customer from talking to his or her doctor. Impulse is all-Natural!*

to 10 business days for delivery.

\$5 additional for Rush
3 to 5 business days

Prices for Impulse:

Supply	Price	S&H Prices	Totals
1 Box	\$59.95	\$14.95 Reg - \$19.95 Rush	(74.90 Reg - 79.90 Rush)
2 Boxes	\$89.95	\$14.95 Reg - \$19.95 Rush	(104.90 Reg - 109.90 Rush)
3 Boxes	\$119.95	\$14.95 Reg - \$19.95 Rush	(134.90 Reg - 139.90 Rush)
4 Boxes	\$169.95	\$14.95 Reg - \$19.95 Rush	(184.90 Reg - 189.90 Rush)
5 Boxes	\$219.95	\$14.95 Reg - \$19.95 Rush	(234.90 Reg - 239.90 Rush)
6 Boxes	\$249.95	\$14.95 Reg - \$19.95 Rush	(264.90 Reg - 269.90 Rush)

(Upsell) - Is saving money important to you? What most people are doing today is doubling their order for only \$50 more, with no additional S&H. That's just \$169.95 for a 6 month supply. (Less than \$1 a day!!!)

Thank you for calling **Impulse**, my name is _____. I'm glad you called, and your name is? _____. How are you today?

Where are you calling from?

Are you calling to place a reorder or is this your first time calling?

Are you calling for yourself or somebody else?

Now _____, Are you calling about a particular problem or are you just trying to improve things? O.K. **Great!**

Impulse is a unique blend of herbs, vitamins and minerals specifically designed for women to release certain hormones to help increase sexual urge. Most of our customers see an array of benefits within the first 1 to 2 weeks which will allow you to have a natural, healthy, sex life. It is completely safe and effective. **And that's what you're looking for, right? Great!!**

All we want you to do is feel comfortable trying it for 2 to 3 weeks and see for yourself how well it works. That is pretty reasonable isn't it?

Also, as a special bonus with your Impulse today, I will include a bonus educational video called "Great Sex 7 Days A Week."

Now _____, you're calling during a very good promotion, and everything is covered with our 30 day money back guarantee. This allows you to try the product worry free and with peace of mind. Normally one box sells for \$59.95, **but today when you buy 2 for just \$119.95, we give you the 3rd month absolutely free.** That's works out to just \$1.33 a day, less than your daily coffee. Whatever you try is guaranteed for thirty days so you can't lose. I just want you to feel comfortable trying it. You will know if it is working for you within a couple of weeks, and if you're not completely delighted, we'll give you a full refund of the product price.

Bottom line, you're going to love the results. And we can get you started using any major credit card. Which do you prefer?

Use this to help overcome objections!

*Again, you're not alone. Oprah did a show on this subject a couple of weeks ago. The numbers are actually staggering. According to the Journal of the American Medical Association, 43% of women currently suffer from a lack of sexual desire and satisfaction. And unlike men, who can turn to prescription drugs, women have had no other options, **until now!** That's why **Impulse** has become so popular!*

Downsell to \$89.95 for 2 - Buy 1 and get the 2nd at half price!
Downsell to \$59.95 for 1

R

Maximus – 10/17/01
Radio :60
Better Sex #2

ANNCR: Men, how'd you like to have a better sex life and no longer have to live with the fear of embarrassing sexual dysfunction? Nearly every adult male has experienced it. In fact, most men over the age of 25 have a major decrease in testosterone.

In the past, sexual dysfunction treatments have been limited to injections, surgery, drugs, and other painful and expensive procedures. But now there's a better, safer, drug-free option! Introducing Maximus, an all-natural blend of vitamins and herbs scientifically-formulated to help promote testosterone and heighten sexual performance. Maximus is not a drug. It's all-natural and there are no side effects. The results men get are incredible! Maximus will dramatically improve your stamina, urge, and ability, guaranteed!

ANNCR TAG: Call now for your risk-free 30-day trial of Maximus plus get a secret bonus video free with your order! Call 1-888-XXX-XXXX. You're not alone so don't miss out! Call 1-888-XXX-XXXX! That's 1-888-XXX-XXXX! 1-888-XXX-XXXX.

S

Maximus – 10/17/01

Radio :60

Men over 25: New Rock/Classic Rock #2

ANNCR: Men, if you're over the age of 25 and would like to enhance your sexual performance—that's right...longer, stronger, spine tingling sex—stay tuned because the next minute will change your life! Introducing all-new Maximus!

Whether you suffer from stamina problems, a lack of sexual desire, or problems with performance, Maximus is the answer you've been waiting for! Scientifically-formulated to help promote testosterone in your system, Maximus allows you to instantly enhance your performance for more pleasurable sex for you and your lover. Maximus is not a drug. It's a special blend of herbs that naturally helps strengthen your sex drive and increase your stamina. Be the sex machine your lover wants you to be and maximize your performance with Maximus. It's guaranteed to work for you!

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T

Maximus – 9/24/01

Radio :60

Supercharge – female read

FEMALE ANNCR: Guys, how'd you like to supercharge your sex life, boost your sex drive sky high, and regain your youthful, energetic staying power? Now you can with Maximus, the hottest new all-natural supplement for men that helps heighten arousal and restore your youthful sexual ability.

Scientifically formulated with a special blend of all-natural, highest potency ingredients, Maximus will help boost your sexual performance to an explosive new level, making sex more intense, more satisfying, and longer-lasting. With Maximus, you'll heighten your libido, sexual ability, and stamina quickly, safely, and without a doctor's visit. You'll see that with Maximus you'll regain your youthful sexual prowess and become the legendary lover women brag about.

Call now for your risk-free trial of Maximus! Call 1-888-XXX-XXXX. It's safe, completely confidential, and it'll work for you! Guaranteed! Call 1-888-XXX-XXXX! That's 1-888-XXX-XXXX!

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Is she quakin' or is she fakin'?

Potent new all-natural formula helps you get back your youthful sexual ability

If you're a man whose sex drive is weaker than it used to be, or if you've ever suffered from soft or weak erections, or if you ever worry that you won't be able to perform and you wish you could regain your youthful sexual ability, now there's good news! Introducing Maximus, the all-natural supplement for men that helps restore sexual performance, boost the male sex drive, and increase sexual stamina.

Powerful, all-natural formula helps restore sexual ability

Maximus is unlike anything else because it's not a drug that can cause dangerous, unhealthy side effects. It's an all-natural, scientifically-formulated blend of the highest potency herbs that work with the male biochemistry to help heighten your sex drive and give you back your youthful sexual stamina and sexual ability. Maximus users say they not only increase their stamina and performance level, they also achieve stronger, longer-lasting erections, maximizing sexual pleasure and satisfaction.

Perfect for adult men of all ages

Maximus is safe, it's fast, and it works for any adult man who wants to experience more satisfaction and enjoyment in his sex life. Men of all ages (from early 20's to late 70's, and beyond) use Maximus to maximize their performance, pleasure, and staying power. Just listen to what some of our satisfied customers have to say about Maximus:

"I'm 53, so I didn't think there was anything I could do about my weak sex drive. But I was

wrong. Maximus has given me back my desire for sex and has really increased my stamina! I haven't felt like this in years! I'm like a young man again!"

-Vernon, Juniper, CA

"I just wanted a 'safety-net,' but what I got with Maximus was so much more! My sex drive is sky high and I can last longer now, too. I love it! (And the ladies do, too!)"

-Chris, Philadelphia, PA

If you want to boost your level of sexual arousal, achieve stronger, longer-lasting erections, and increase your sexual stamina and satisfaction, Maximus is perfect for you.

FREE BONUS VIDEO

with your order!

Call for your risk-free trial and FREE BONUS VIDEO!

Call now and you'll receive an explicit, adult-only bonus video* free with your order. (Hurry! Supplies are limited!) Call toll-free for your risk-free trial at 1-888-837-5990. With Maximus, you'll boost your sex drive and sexual stamina, guaranteed! So call toll-free now: 1-888-837-5990.

Call toll-free now for your risk-free trial:

1-888-837-5990

***VIDEO WARNING:**

The bonus video you get with your order of Maximus is sexually explicit and is intended for **ADULTS ONLY.**

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helps rev up your sex drive and
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Call now and you'll get a risk-free trial of Maximus plus an explicit, **ADULT-ONLY BONUS VIDEO*** free with your order. Call toll-free for your risk-free trial at 1-888-256-2953. With Maximus, you'll boost your sex drive and sexual stamina, guaranteed!

**FREE
BONUS VIDEO**

with your order!

Maximus
MALE SEXUAL STAMINA

Call toll-free now for your risk-free trial of Maximus:

1-888-256-2953

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-T. Herbert

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-R. Brey

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Maximus

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