



1 formulas, cure packages and herbal cure packages, which include, *inter alia*, BLACK WALNUT  
2 TINCTURE, WORMWOOD TINCTURE, CLOVES TINCTURE and various other substances.

3  
4 **JURISDICTION and VENUE**

5 2. This Court has subject matter jurisdiction over this matter pursuant to 15 U.S.C.  
6 §§ 45(a), 52, 53(b) and 55, and 28 U.S.C. §§ 1331, 1337(a) and 1345.

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

9  
10 **PARTIES**

11 4. Plaintiff Federal Trade Commission is an independent agency of the United States  
12 government created by statute. 15 U.S.C. §§ 41–58. The Commission enforces Sections 5(a), 52,  
13 and 55 of the FTC Act, which prohibit unfair or deceptive acts or practices, including false  
14 advertising, in or affecting commerce. The Commission may initiate federal district court  
15 proceedings to enjoin violations of the FTC Act and to secure such equitable relief as may be  
16 appropriate in each case, including restitution for injured consumers. 15 U.S.C. § 53(b).

17 5. Defendant **Western Dietary Products Co. (Skookum) d/b/a Western Herb &**  
18 **Dietary Products, Inc.** (hereinafter “WHD”) is a Washington corporation with its principal office  
19 or place of business at 8346 Blaine Road, Blaine, Washington 98230-9238. WHD transacts or has  
20 transacted business in the Western District of Washington.

21 6. Defendant **Marvin Beckwith** is an owner and officer of the defendant corporation,  
22 WHD. At all times material to this Complaint, acting alone or in concert with others, defendant

1 Marvin Beckwith has formulated, directed, controlled or participated in the acts and practices of  
2 WHD, including the acts and practices set forth in this Complaint. Marvin Beckwith transacts or has  
3 transacted business in the Western District of Washington.

4 7. Defendant **Miguelina Beckwith** is an owner and officer of the defendant corporation,  
5 WHD. At all times material to this Complaint, acting alone or in concert with others, defendant  
6 Miguelina Beckwith has formulated, directed, controlled or participated in the acts and practices of  
7 WHD, including the acts and practices set forth in this Complaint. Miguelina Beckwith transacts  
8 or has transacted business in the Western District of Washington.

## 10 COMMERCE

11 8. At all times material to this Complaint, defendants WHD, Marvin Beckwith and  
12 Miguelina Beckwith (hereinafter collectively referred to as “defendants”) have maintained a  
13 substantial course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the  
14 FTC Act, 15 U.S.C. § 44.

## 16 DEFENDANTS’ BUSINESS ACTIVITIES

17 9. Since at least 1999, defendants have engaged in a plan, program or campaign to sell  
18 herbal formulas, cure packages and herbal cure packages, which include, *inter alia*, BLACK WALNUT  
19 TINCTURE, WORMWOOD TINCTURE, CLOVES TINCTURE and various other substances—“foods or  
20 drugs” within the meaning of Sections 12 and 15 of the FTC Act, 15 U.S.C. §§ 52 and 55—and the  
21 ZAPPER ELECTRICAL UNIT—a “device” within the meaning of Sections 12 and 15 of the FTC Act,  
22 15 U.S.C. §§ 52 and 55.

1 10. To induce consumers to purchase the products named in paragraph 9 above,  
2 defendants have disseminated or caused to be disseminated, via the Internet and other means,  
3 advertisements and ordering information for the above-described products, including, but not  
4 necessarily limited to, the attached Plaintiff's Exhibits ("PXs") 1 through 9. These advertisements  
5 contain the following statements that were found at defendants' Internet website, which they name  
6 "www.curecancer.com:"

### 7 THE CURE FORMULA FOR ORGAN CANCERS

8 We are not accustomed to thinking about a cure for cancer. We think of remission as the only  
9 possibility. But this web site shows you exactly which herbs are used to actually cure cancer.  
Our formulas have cured many people of cancer worldwide.

10 Cancer is caused by a certain parasite, for which evidence has been found in every form of  
11 cancer. So lung cancer is *NOT* caused by smoking, Colon cancer is *NOT* caused by a low  
roughage diet, Breast Cancer is *NOT* caused by a fatty diet, Retinal Blastoma is *NOT* caused  
12 by a rare gene, and Pancreatic cancer is *NOT* caused by alcohol consumption. Although  
these are all *CONTRIBUTING FACTORS*, they are not *THE* cause. Once the true cause was  
found, the cure became obvious. But would it work?

13  
14 100 cancer cases were cured through this method before the book was published. That was  
in December, 1992. The discovery of the cause and cure of *ALL* cancer has stood the test  
of time and here it is!

#### 15 Curing Organ Cancers In 60 Days

16 It takes 60 days to kill the parasites that cause organ cancer. The cancer is then killed and  
17 it's time to work on recovering normal health. It may take as long as 180 days to fully regain  
normal health.

18 Included with your order are full instructions on how to take these herbs to cure the organ  
19 cancer. These instructions differ from our other cure formulas. A repeat purchase may be  
necessary if you have had the cancer for a long time. . . .

20  
21 PX 1 — page from www.curecancer.com, at  
www.curecancer.com/Disease\_Cures/Cancer/Organ\_Cancer/organ\_cancer.html

1 . . . Does this mean you can cancel your date for surgery, radiation or chemotherapy? YES!  
2 After curing your cancer with this recipe it cannot come back. THIS IS NOT A TREATMENT  
3 FOR CANCER: IT IS A CURE! But if you do not wish to make your doctor angry, you could  
follow her or his wishes, too. Be careful not to lose ANY VITAL ANATOMICAL PARTS in  
surgery though, because you may need them later when you are healthy! . . .

4 PX 2 — page from [www.curecancer.com](http://www.curecancer.com), at  
[www.curecancer.com/Disease\\_Cures/Cancer/cancer.html](http://www.curecancer.com/Disease_Cures/Cancer/cancer.html)

### 6 . . . Curing Intestinal Cancers In 5 Days

7 It takes 5 days to kill the parasites that cause intestinal cancer. The cancer is then killed and  
8 it's time to work on recovering normal health. It may take as long as 180 days to fully regain  
normal health.

9 Included with your order are full instructions on how to take these herbs to cure the intestinal  
10 cancer. These instructions differ from our other cure formulas. A repeat purchase may be  
necessary if you have had the cancer for a long time. . . .

11 PX 3 — page from [www.curecancer.com](http://www.curecancer.com), at  
[www.curecancer.com/Disease\\_Cures/Cancer/Intestinal\\_Cancer/intestinal\\_cancer.html](http://www.curecancer.com/Disease_Cures/Cancer/Intestinal_Cancer/intestinal_cancer.html)

### 13 ALZHEIMER'S

14 What was once a rare disease has become a household word because it now affects so  
15 many. Two new pollutants of the brain, inviting an old parasite to a location it would not  
normally be, is the explanation. The new pollutants are solvents that seek the brain. . . .

16 . . . Kill the four common flukes with the first frequency generator or zapper you can get your  
17 hands on. . . .

18 PX 4 — page from [www.curecancer.com](http://www.curecancer.com), at  
[www.curecancer.com/Disease\\_Cures/Alsziemers/alsziemers.html](http://www.curecancer.com/Disease_Cures/Alsziemers/alsziemers.html)

### 19 THE CURE FORMULA FOR ARTHRITIS

20 Our claim that arthritis is caused by parasites is well founded through many years of research.  
21 More information on this research can be found in the book "The Cure for All Diseases" by  
22 Hulda Regehr Clark, Ph.D., N.D.

1 According to research parasites are the actual cause to all diseases, including arthritis. The  
2 genetic and non-genetic causes that most doctors claim to be real are actually only  
3 contributing factors. Even though a healthy body is able to rid itself of many parasites  
4 automatically, certain conditions will allow these parasites to start their destructive processes  
5 anyway. These conditions give the parasites a chance - the conditions do not cause the  
6 disease - the parasites do.

#### 7 **Curing Arthritis With Herbs**

8 Included with your order are precise instructions on how to take these herbs to cure the  
9 arthritis. These instructions differ from our other cure formulas. It also matters how long you  
10 have had arthritis. A repeat purchase may be necessary if you have had arthritis for a long  
11 time. . . .

12 PX 5— page from [www.curecancer.com](http://www.curecancer.com), at  
13 [www.curecancer.com/Disease\\_Cures/Arthritis/arthritis.html](http://www.curecancer.com/Disease_Cures/Arthritis/arthritis.html)

#### 14 **THE CURE FORMULA FOR DIABETES**

15 Our claim that diabetes is caused by parasites is well founded through many years of  
16 research. More information on this research can be found in the book "The Cure for All  
17 Diseases" by Hulda Regehr Clark, Ph.D., N.D. For more information on this and other books  
18 plus other herbal cures please visit the Cure Cancer pages.

19 According to research parasites are the actual cause to all diseases, including diabetes. The  
20 genetic and non-genetic causes that most doctors claim to be real are actually only  
21 contributing factors. Even though a healthy body is able to rid itself of some parasites  
22 automatically, certain conditions will allow those parasites to start their destructive processes  
23 anyway. These conditions accelerate the normal reproductive cycle of many different  
24 parasites within a human. The conditions do not cause the disease - the parasites do.

#### 25 **Curing Diabetes With Herbs**

Included with your order are precise instructions on how to take these herbs to cure diabetes.  
These instructions differ from our other cure formulas. It also matters how long you have had  
diabetes. A repeat purchase may be necessary if you have had diabetes as a child or for a  
long time. . . .

PX 6 — page from [www.curecancer.com](http://www.curecancer.com),  
at [www.curecancer.com/Disease\\_Cures/Diabetis/diabetis.html](http://www.curecancer.com/Disease_Cures/Diabetis/diabetis.html)

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... 9-5-98

Dear Marvin,

I want to thank you so very much for giving me my life back. =

When I was diagnosed with my cancerous tumor, I had no idea what to do, all I did know was that I would not be cut on.

The day after I had found out, a friend told me about you and I immediately got ahold of you.

I knew I could lick this thing after speaking with you. I followed all your instructions down to the Teas and within two days I was feeling so much better. I couldn't believe the energy I had, and still have.

With your program, fresh fruit in the mornings, raw vegies at noon and steamed vegies and choices of chicken or fish (steamed) at night was an amazing program. I didn't know for sure if I could do it, but I gave it a try and I couldn't believe how satisfying that diet was. I could eat as much as I wanted to and never did crave anything else. In fact, I still haven't had any coffee since April. I plan on doing this program at least three times a week and sometimes I just take a whole week and do it, makes me feel much better.

So, to whom ever reads this, please have the courage to contact Marvin and follow whatever program he gives you to the letter! This program does work and I am living proof!

Sincerely,

Charles Richardson

PX 7 — page from [www.curecancer.com](http://www.curecancer.com),  
at [www.curecancer.com/Testimonials/testimonials.html](http://www.curecancer.com/Testimonials/testimonials.html)

### Order Form

In order to best serve those in need we supply only the highest quality herbs. We carefully select the herbs with potency levels well within the range specified by Hulda Clark's cure formula specifications.

Phone consultations are provided free of charge to those ordering our herbs. To simplify your order you may send an email to Marvin Beckwith explaining your situation in full. He will respond with his recommendation and a total price for you to get started. . . .

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Contact Us

We will help you get all the information you need to begin the healing process today!

PX 8 — p. 1 — from [www.curecancer.com](http://www.curecancer.com),  
at [http://www.curecancer.com/Products/Order\\_Form/order\\_form.html](http://www.curecancer.com/Products/Order_Form/order_form.html)

*Examples of Prices*

<b>Herbs</b>	<b>Price</b>
Advance Defense System	\$53.95 ...
Cloves Tincture	\$34.95 ...
Q-10 Anti-Oxidant	\$108.95 ...

PX 8 — p. 2 — from [www.curecancer.com](http://www.curecancer.com),  
at [http://www.curecancer.com/Products/Order\\_Form/order\\_form.html](http://www.curecancer.com/Products/Order_Form/order_form.html)

<b>Herbal Packages</b>	<b>Price</b>
Cancer Cure Organ Package	\$997.90 ...
All Heart Disease Formula	\$878.90 ...
Hepatitis A, B, C Formula	\$890.70 ...

PX 8 — p. 4 — from [www.curecancer.com](http://www.curecancer.com),  
at [http://www.curecancer.com/Products/Order\\_Form/order\\_form.html](http://www.curecancer.com/Products/Order_Form/order_form.html)

AIDS & HIV Formula	\$1176.90 ...
Diabetes Cure	\$1089.95 ...

PX 8 — p. 5 — from [www.curecancer.com](http://www.curecancer.com),  
at [http://www.curecancer.com/Products/Order\\_Form/order\\_form.html](http://www.curecancer.com/Products/Order_Form/order_form.html)



1 Multiple Sclerosis Formula \$1296.75 . . .

2 PX 8 — p. 6 — from [www.curecancer.com](http://www.curecancer.com),  
3 at [http://www.curecancer.com/Products/Order\\_Form/order\\_form.html](http://www.curecancer.com/Products/Order_Form/order_form.html)  
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5 **DEFENDANTS' VIOLATIONS OF THE FTC ACT**

6 11. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits deceptive acts or practices  
7 in or affecting commerce. Section 12(a) of the FTC Act, 15 U.S.C. § 52(a), prohibits the  
8 dissemination of any false advertisement in or affecting commerce for the purpose of inducing, or  
9 which is likely to induce, the purchase of food, drugs, devices or cosmetics. As set forth below,  
10 defendants have engaged and are continuing to engage in such unlawful practices in connection with  
11 the marketing and sale of various products, including the ZAPPER ELECTRICAL UNIT, herbal  
12 formulas, cure packages and herbal cure packages, which include, *inter alia*, BLACK WALNUT  
13 TINCTURE, WORMWOOD TINCTURE, CLOVES TINCTURE, and various other substances.

14 12. Through their advertising and promotional materials, including, but not limited to,  
15 the representations set forth in paragraph 10, above, and through the use of their Internet website,  
16 “[www.curecancer.com](http://www.curecancer.com),” defendants have represented expressly or by implication that:

- 17 a. defendants’ herbal formulas, cure packages and herbal cure  
18 packages are effective in treating and curing cancer;
- 19 b. defendants’ herbal formulas, cure packages, herbal cure  
20 packages and the Zapper Electrical Unit are effective in  
21 treating and curing Alzheimer’s Disease;
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- c. defendants' herbal formulas, cure packages and herbal cure packages are effective in treating and curing diabetes;
- d. defendants' herbal formulas, cure packages and herbal-cure packages are effective in treating and curing arthritis;
- e. defendants' herbal formulas, cure packages and herbal cure packages and the Zapper Electrical Unit are effective in treating and curing AIDS and HIV infection;
- f. defendants' herbal formulas, cure packages and herbal cure packages, when used by persons with cancer, make surgery and chemotherapy unnecessary.

13. Defendants did not possess and rely upon a reasonable basis that substantiated the representations set forth in paragraph 12, above, at the time the representations were made. Therefore, the making of the representations set forth in paragraph 12, above, is deceptive and constitutes false advertising for a food, drug or device, in violation of the FTC Act, 15 U.S.C. §§ 45(a), 52 and 55. -

**CONSUMER INJURY**

14. As a result of defendants' unlawful acts or practices, consumers throughout the United States have suffered and continue to suffer monetary loss and possible injuries to their health. Defendants also have been unjustly enriched as a result of their unlawful practices. Absent

1 injunctive relief by this Court, the defendants are likely to continue to injure consumers, reap unjust  
2 enrichment and harm the public interest.

3  
4 **THIS COURT'S POWER TO GRANT RELIEF**

5 15. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), authorizes this Court to grant  
6 injunctive and other equitable relief, including consumer redress, disgorgement and restitution, to  
7 prevent and remedy any violations of any provision of law enforced by the Commission.

8  
9 **PRAYER FOR RELIEF**

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

12 1. Award plaintiff such temporary preliminary injunctive and ancillary relief as may be  
13 necessary to avert the likelihood of consumer injury during the pendency of this action, and to  
14 preserve the possibility of effective final relief;

15 2. Permanently enjoin defendants from violating the Federal Trade Commission Act as  
16 herein alleged;

17 3. Award such relief as the Court finds necessary to redress injury to consumers  
18 resulting from defendants' violations of the FTC Act, including the refund of monies paid and the  
19 disgorgement of ill-gotten monies; and

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