

IN THE MATTER OF

MID-SOUTH PCM GROUP, P.C., ET AL.

CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATION OF
SECS. 5 AND 12 OF THE FEDERAL TRADE COMMISSION ACT

Docket C-3773. Complaint, November 5, 1997--Decision, November 5, 1997

This consent order prohibits, among other things, the Tennessee-based corporations and its officer from claiming that PCM ortho-k or any substantially similar service provides a cure for vision deficiencies; that all people can achieve normal vision without eyeglasses or contact lenses on a permanent basis if they wear devices used with such services occasionally or at night; that the four academic studies prove PCM ortho-k is safe and effective in correcting nearsightedness, farsightedness, and astigmatism; and that PCM ortho-k has been approved by the FAA and all branches of the military. In addition, the consent order requires reliable scientific evidence for any future success or efficacy claims.

Appearances

For the Commission: *Christa Vecchi, Matthew Daynard and Dean Graybill.*

For the respondents: *John L. Ryder, Apperson, Grump, Duzane & Maxwell, Memphis, TN. and Michael Evangelisti, Black, Babango & Morgan, Memphis, TN.*

COMPLAINT

The Federal Trade Commission, having reason to believe that Mid-South PCM Group, P.C., Eye and Vision Clinic, P.C., and International Computerized Orthokeratology Society, Inc., corporations, and J. Mason Hurt, O.D., individually and as an officer of the corporations ("respondents"), have violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

1. Respondent Mid-South PCM Group, P.C. ("Mid-South") is a corporation formed under the laws of the state of Tennessee, with its principal office or place of business located at 2865 Summer Oaks Drive, Bartlett, TN.

2. Respondent Eye and Vision Clinic, P.C. ("Vision Clinic") is a corporation formed under the laws of the state of Tennessee, with its principal office or place of business located at 2865 Summer Oaks Drive, Bartlett, TN.

3. Respondent International Computerized Orthokeratology Society, Inc. ("ICOKS") is a corporation formed under the laws of the state of Tennessee, with its principal office or place of business located at 2865 Summer Oaks Drive, Bartlett, TN.

4. Respondent J. Mason Hurt, O.D., is the sole owner and President of the corporate respondents. He formulates, directs, and controls the acts and practices of the corporate respondents, including the acts and practices alleged in this complaint. His principal office or place of business is the same as that of the corporate respondents.

5. Respondents are engaged, and have been engaged, in the promotion, offering for sale, sale, and distribution to the public of ophthalmic services, including orthokeratology ("ortho-k") or "Precise Corneal Molding" ("PCM") services, which involve the use of a series of contact lenses purportedly to reshape the cornea gradually for the treatment of myopia (or "nearsightedness"), hyperopia (or "farsightedness"), and astigmatism. The contact lenses used in these PCM ortho-k services are "devices," within the meaning of Sections 12 and 15 of the Federal Trade Commission Act.

6. The acts and practices of respondents alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.

7. In the course and conduct of their business, respondents have disseminated or have caused to be disseminated advertisements or promotional materials for the purpose of promoting the sale of PCM ortho-k services. Respondents advertise and promote their services through the use of print advertisements, radio and television advertisements, internet advertisements, free consultations, videos, brochures, and pamphlets, which are provided to patients and prospective patients, and some of which are provided to other optometrists for distribution under their own name to patients and prospective patients. Respondents' advertisements and promotional materials include, but are not necessarily limited to, attached Exhibits A through H.

8. The advertisements and promotional materials referred to above, including but not necessarily limited to attached Exhibits A-H, contain the following statements:

A. "21st Century Eyecare"

"Saturday 10 a.m. - 12 p.m. ET

It sounds too good to be true -- a safe, non-surgical alternative to restore clear vision safely, gently, and permanently.

In a modest departure from ordinary talk radio, Talk America will air a new program featuring an emerging national network of eye doctors who are performing a new, non-evasive (sic), non-surgical corrective vision procedure that reshapes the cornea, much like (sic) braces straighten teeth. It's called 21st Century Eyecare....

Dr. J. Mason Hurt, a Memphis-based optometrist, has developed a revolutionary new corrective eye procedure called Precise Corneal Molding (PCM for short), that will soon render glasses and contact lens (sic) obsolete....

Precise Corneal Molding is the result of merging technology and physiology. PCM evolved from a procedure called 'orthokeratology,' clinically practiced for over thirty years. Orthokeratology involves reshaping the cornea by fitting patients with a series of special hard contact lenses, each having a slightly different curve. Orthokeratology was limited by the older technology of the lenses and the difficulty in precisely monitoring and controlling the reshaping process.

Send Email Directly to Dr. Hurt and Sam Cooper." (Exhibit A) (Internet Ad)

B. "Precise Corneal Molding (PCM):

Your Clearest Choice, Your Greatest Freedom"

"....In many cases, just a matter of days to weeks frees the majority of the patients from their dependence upon eyeglasses or contacts during daytime hours.

....By slight modification in the shape of the cornea, clear functional vision may be restored to the individual.

Recently several surgical procedures have been developed to attempt to accomplish the same purpose. However, their limited success has been due to the effects of (sic) scarring, irregular healing and most importantly, its temporary effect....In addition, the surgical scars cause surface irregularities on the cornea, resulting in permanent blurring that even glasses or contacts cannot eliminate. Molding avoids those complications since there is no injury to any eye tissue. The soft cornea simply reshapes itself to fill the mold. The mold is similar to a contact lens in its appearance and sensations upon wearing. The mold is worn while sleeping and/or while awake. The procedure takes just hours in mild cases to a few months in very difficult cases to reach good functional vision. The mold is worn regularly until the best vision is achieved and the cornea is allowed to stiffen in its new shape. At that point the mold wearing is gradually reduced until a minimal wear time is established that maintains that shape and good functional vision. This guarantees continued clarity without the gradual blurring that usually accompanies the surgery. Therefore, the cornea can easily be fine tuned the rest of one's (sic) life by minor modification in the retainer mold.

....PCM opens new horizons to everyone regardless of age, occupation, or ability to wear contact lenses in the past.

PCM is safe, reliable and inexpensive. PCM gives you a cure, not a maintenance of your visual handicap...." (Exhibit B) (Patient Handout)

C. "Precise Corneal Molding"

"....I shifted from soft contact lenses to PCM and I can see 20/20 when I take them off!" -- T.K

'I have been through the program and I am very happy with the results. I'm taking my daughter in for Precise Corneal Molding, too!' -- A.S.

COMPARE

PCM is a safe, gentle, affordable, non-surgical alternative for wearers of glasses.

	Surgery	PCM
Age as a limiting factor	Yes	No
Reversibility	No	Yes
Loss of work time	Yes	No
Worsening of night vision	Yes	No
FAA and military approval	No	Yes

What is PCM?

Imagine being able to easily read an alarm clock without your glasses, see street signs clearly, or participate in sports without lenses of any kind....

...Because the procedure is non-invasive, PCM has provided thousands of patients with better vision without the risks or complications of surgery.

...PCM utilizes a series of prescription eye molds to reshape the cornea much like orthodontists use braces to straighten teeth....

...The benefits are realized in weeks or months, depending on the severity of vision problems. Retainer molds will be used on a limited basis to maintain the new shape of the cornea.

Since 1962, PCM and its predecessor, Orthokeratology, have been used to help pilots, athletes and others requiring unaided vision. Now, new research developments such as computerized corneal topography and new mold designs and materials have established PCM as the eye care trend of the future.

The Safest Option

In contrast to Radial Keratotomy and laser surgery, PCM does not require injury to the eye, resulting in glare-inducing scars. There is also no disruption of vision as eyesight improves.

PCM for Children

One of the most exciting uses for PCM is controlling nearsightedness in children....PCM prevents deteriorating vision and even reverses it.

Proven Safe Results

PCM is highly effective in correcting nearsightedness, farsightedness and astigmatism....University research studies have shown corneal molding to be safe and effective. These studies include The University of Houston College of Optometry (5 years), University of California at San Diego Medical School (7 years), University of California at Berkeley College of Optometry (3 years), and Pacific University College of Optometry (5 years)." (Exhibit C) (Patient Handout)

D. "Precise Corneal Molding"

JIM LINDSEY speaks as the words scroll down the screen: "Over 190 million men, women and children in America are lifetime victims of poor vision. Millions of Americans are chained to the use of glasses and contact lenses.... There is a solution today. If you are one of the 190 million Americans, this show is for you. Precise Corneal Molding, three words that will change the way you see the world, without glasses or contact lenses.

In the next 30 minutes, you will be introduced to a gentle, non-surgical, affordable procedure that will make glasses and contact lenses a thing of the past

in your life....From 8 to 80, Precise Corneal Molding clearly is the medical eye care breakthrough of the century.

The gift of sight, a sense given to all human beings [spoken while the following is printed on screen: a gift given to nearly every human being at birth], yet more than 75 percent of Americans have vision disorders that require prescription glasses or contact lenses to correct. They do bring improved vision, but with every prescription change, the vision grows weaker and weaker, not stronger.

To eliminate vision disorders, surgical procedures have been developed and introduced but with limited results. In the 1960's, before the popularity of soft contact lenses, an ortho-keratology procedure was developed that could actually reshape the cornea of the eye and caused improved vision for a limited time.

The procedure was accepted by the FAA, a department of the Federal Government that regulates the airline industry....

In 1992, Dr. J. Mason Hurt, an optometrist, perfected a process called Precise Corneal Molding or PCM. With PCM, patients who had previously worn glasses or contact lenses were able to see without the use of either and without surgery. Here is why."

DR. J. MASON HURT, O.D. (perfected P.C.M. process): "Corneal molding is very safe and effective, and I would like to show you why (standing in front of diagram of the eye). The cornea or the clear window that we see through is very soft and is subject to change. It changes its shape on a very regular basis....

The cornea wants to change shape. Now we just guide it to the shape we would like for it to have, and we do that by building a mold which will rest (draws on diagram) in the zone where we are having our shape problems, and we can reshape this cornea in a fashion very similar to wearing of contact lenses in a safe, nonsurgical, noninvasive technique that we call Precise Corneal Molding."

STEVEN FENSLER, Computer Programmer: "....And for the past two years, I had been wearing reading glasses along with my contacts so that I could read pages, and then I was getting very tired. Been on molds for seven months, and I don't use my reading glasses anymore at all, either with my contacts or without them. I can see everything at work I want to see...."

PEGGY COLLINS, College Coordinator: "You can see. It does correct your vision....There is no surgery, there is no blood....Just little contacts in your eyes, you sleep with them at night....I recommend it."....

CONNIE BRADEN, Homemaker: "Scott [her son] had broken his glasses at school, and we came to get his eyes checked, and his eyes had gotten so bad in just a few months that I was told that he would have to have glasses changed every six months. So we started with the contacts, and within one week, he could see 20/20."

CRAIG JARRELL, Oriental Rug Sales: "For anyone that has problems seeing, I would recommend it to all my friends that wear glasses; they need to come up here and get this done. It's just great to be able to take contacts out and still be able to see."....

ANN POSEY, School Teacher: "....my vision had just gotten so bad, and I couldn't wear contacts any more, didn't like wearing glasses, wasn't wanting to have any type of surgery....Knowing that my vision is going to be 20/20 all the time is just really exciting...."

....JACKIE GREENE, Sales Manager: "I heard about this procedure and it really sounded too good to be true. But I am so excited about it now because I've

probably had the procedure maybe six weeks, and already, within six weeks, I can drive my van without any corrective lenses whatsoever...."

....DR. HURT: [explains the PCM procedure to a patient by using the map of her cornea] "....As we keep it centered, all of these [pointing to various parts of the cornea] will mold away. So we are going to be able to mold away your astigmatism as well as your nearsightedness. And as we end up with this pink, what I call smiley face down here, then you will have your bifocal as well...."

....ANN POSEY, School Teacher: "Number one, it is wonderful to be able to wake up in the morning and to open my eyes and to see everything around me with no contacts in, nothing in, just to be able to open them up and to see....Number two, there is such security knowing financially that later in life I am not going to have to buy more glasses, change my prescriptions, get more prescription sun glasses. I am not going to have to lose a contact and find it or anything like that. I know that my vision, I am going to be able to see. And that is just wonderful."....

NARRATOR: "....Now, through Precise Corneal Molding you can see clearly day or night and continue to see clearly for the rest of your life without depending on glasses or contact lenses...."

....JACKIE GREENE, Sales Manager: "I am very excited about this procedure, because it will work for children and I have four kids of my own. And for them not to have to go through what I went through in the third grade, if any of them for any reason has a vision problem and needs corrective lenses, they will definitely get this procedure."....

ELLYN BENGAL, Bookkeeper: "I have been doing this about a year now....If for some reason I need my glasses, I have to hunt for them up now....But mostly, I don't wear, you know, anything. I use the molds at night and a little bit during the day but not much."

DR. HURT: "Precise Corneal Molding is becoming the procedure of choice all across the country. No longer do you have to be satisfied with just getting by or being visually handicapped. It is now the best that science has to offer....YOU can enjoy the freedom of seeing again without the use of glasses or contact lenses. No more wearing glasses, no more wearing contacts. The opportunity of seeing well all the time without being dependent upon these is now a reality and not a dream...." (Exhibit D) (Infomercial)

E. "60 Sec Radio Commercial"

"You were not born to wear glasses or contacts. All of us were designed to have clear vision. And now, when the design needs correction, there's Precise Corneal Molding. Precise Corneal Molding is safe, gentle, non-surgical method of correcting nearsightedness and farsightedness that works!! It can also eliminate astigmatism and restore good functional vision without the use of glasses. The P-C-M practitioner in your area is offering a free corneal topography consultation so you can see how P-C-M can work for you! All you have to do is call 1-800-846-2-0-2-0 that's 1-800-846-TWENTY-TWENTY!! The call is free and the improved vision without glasses is....well....priceless...." (Exhibit E)

F. NARRATOR: "Thousands of men, women and children all over the country are experiencing the gift of improved vision without glasses or contact lenses. Precise Corneal Molding, three words that will change the way you see the world. Precise Corneal Molding is a safe, gentle, nonsurgical, affordable procedure that corrects nearsightedness and farsightedness.

PCM eliminates the need for glasses and contact lenses forever. The PCM practitioner in your area is offering you a free Precise Corneal Molding consultation. All you have to do is call 1-800-305-5030. The call is free, and the improved vision without glasses or contact lenses is well, priceless...." (Exhibit F) (Short Video Promotion)

G. "Precise Corneal Molding Success Stories:

From the offices of J. Mason Hurt, O.D."

"PCM is wonderful! I can see clearly now, even when Scuba Diving. Before PCM, I had Poor Vision. Yet with PCM, I went back to 20-20, without surgery. I am so excited that I tell everyone about the benefits of PCM.' Peggy Collins, College Co-Ordinator.

'PCM is like a Miracle. It's hard to believe I can see so well without glasses and without Surgery. I would recommend PCM to anyone who is Near-Sighted, Far-Sighted or has Astigmatism.' Sara Ann Nichols, Systems Analyst.

'Before PCM, my son Scott had to change glasses every six months. Yet after PCM, he could see 20-20 within one month.' Connie Braden, Housewife.

'Before PCM, I could hardly see my computer monitor, and for the last two years, I wore both contacts and glasses. After PCM, I can see clearly and I am very happy.' Steven Fensler, Computer Programmer."

(Exhibit G)

H. "Welcome to the PCM Team"

"PCM is virtually problem free, and there is no risk. It is safer than contact lens wear. Unlike surgery, there is no such thing as mistakes. Nothing that may be induced by molding cannot be undone and fixed. If illness or extenuating circumstances occur, this only delays for a short time the final success of PCM....

A safe alternative to RK surgery

In contrast to radial keratotomy surgery, which involves making incisions on the eye, PCM does not leave scar tissue which may cause vision glare at night or other side effects. PCM is also free of surgical complications or pain, and there is no disruption of vision as eyesight improves.

Saving children's vision

One of the most exciting uses for PCM is controlling myopia (nearsightedness) in children.

....PCM prevents this deteriorating vision in children by actually halting myopia in its tracks and even reversing it.

Results

Myopia (nearsightedness): PCM is highly effective in improving myopia. Mild to moderate degrees of myopia are corrected and higher degrees of myopia can be controlled to allow functional vision without lenses as well.

Astigmatism: PCM usually either eliminates or greatly reduces astigmatism to great functional clarity.

Hyperopia (farsightedness): Mild to moderate cases may be improved as well.

Natural vision improvement

...The procedure, which is also known as PCM, has provided corrective eye care to thousands of patients without the risks or complications associated with surgery.

...PCM utilizes a series of molds prescribed in progressive stages to gently reshape the cornea, similar to the way braces are used to straighten teeth.

The PCM procedure involves thorough examinations, lens changes and/or lens modifications as needed until desired results are achieved. The process can take from a few weeks to a few months or longer to complete, depending on the severity of the problem. The result is dramatically improved vision with retainer molds being worn on a limited basis, sometimes only a few nights a week while you are sleeping, to maintain the new shape of the cornea.

Safety

Four University research studies have shown corneal molding to be safe and effective, with no harmful side effects. These studies include:

University of Houston College of Optometry (5 years)
University of California at San Diego Medical School (7 years)
University of California at Berkeley College of Optometry (3 years)
Pacific University College of Optometry (5 years)....."
(Exhibit H) (Patient Handout)

9. Through the means described in paragraph eight, respondents have represented, expressly or by implication, that:

A. PCM ortho-k provides a cure for any refractive vision deficiency thereby permanently eliminating the need for all corrective eyewear, including eyeglasses and contact lenses.

B. All people can achieve normal vision without eyeglasses or contact lenses on a permanent basis if they wear PCM ortho-k devices occasionally or at night.

C. PCM ortho-k has been approved by the Federal Aviation Administration and all branches of the United States military for use in correcting refractive vision deficiencies.

D. Studies at the University of Houston College of Optometry (1976-77), University of California at San Diego Medical School (1980), University of California at Berkeley College of Optometry (1982-83), and Pacific University College of Optometry (1984), prove that PCM ortho-k is safe and effective in correcting nearsightedness, farsightedness, and astigmatism.

E. Testimonials from consumers appearing in the advertisements for respondents' PCM ortho-k services reflect the typical or ordinary experience of members of the public who receive those services, which experience is that respondents' PCM patients typically achieve 20/20 vision and no longer need corrective eyewear.

10. In truth and in fact,

A. PCM ortho-k does not provide a cure for any refractive vision deficiency thereby permanently eliminating the need for all corrective eyewear, including eyeglasses and contact lenses.

B. All people cannot achieve normal vision without eyeglasses or contact lenses on a permanent basis if they wear PCM ortho-k devices occasionally or at night.

C. PCM ortho-k has not been approved by the Federal Aviation Administration and all branches of the United States military for use in correcting refractive vision deficiencies.

D. Studies at the University of Houston College of Optometry (1976-77), University of California at San Diego Medical School (1980), University of California at Berkeley College of Optometry (1982-83), and Pacific University College of Optometry (1984), do not prove that PCM ortho-k is safe and effective in correcting nearsightedness, farsightedness, and astigmatism.

E. Testimonials from consumers appearing in the advertisements for respondents' PCM ortho-k services do not reflect the typical or ordinary experience of members of the public who receive those services, which experience is that respondents' PCM patients typically achieve 20/20 vision and no longer need corrective eyewear.

Therefore, the representations set forth in paragraph nine were, and are, false or misleading.

11. Through the means described in paragraph eight, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representations set forth in paragraph nine A - B, at the time the representations were made.

12. In truth and in fact, respondents did not possess and rely upon a reasonable basis that substantiated the representations set forth in paragraph nine A - B, at the time the representations were made. Therefore, the representation set forth in paragraph eleven was, and is, false or misleading.

13. Through the means described in paragraph eight, respondents have represented, expressly or by implication, that:

A. A significant number of people can achieve normal vision without eyeglasses or contact lenses on a permanent basis if they wear PCM ortho-k devices occasionally or at night.

B. All or most people will experience stabilized vision after only a few weeks or months of PCM ortho-k treatments.

C. PCM ortho-k prevents and reverses deteriorating nearsightedness in children.

D. PCM ortho-k is safer than contact lenswear.

E. PCM ortho-k is more effective than refractive surgical methods in eliminating nearsightedness, farsightedness, and all forms of astigmatism.

F. PCM ortho-k has helped thousands of people achieve normal vision.

14. Through the means described in paragraph eight, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representations set forth in paragraph thirteen, at the time the representations were made.

15. In truth and in fact, respondents did not possess and rely upon a reasonable basis that substantiated the representations set forth in paragraph thirteen, at the time the representations were made. Therefore, the representation set forth in paragraph fourteen was, and is, false or misleading.

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

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Complaint

EXHIBIT A

TALK AMERICA

http://www.talkamerica.com

TALK AMERICA

Radio Network

21st Century Eyecare

Saturday 10 a.m. - 12 p.m. ET

It sounds too good to be true -- a safe, non-surgical alternative to restore clear vision safely, gently and permanently.

In a modest departure from ordinary talk radio, Talk America will air a new program featuring an emerging national network of eye doctors who are performing a new, non-invasive, non-surgical corrective vision procedure that reshapes the cornea, much like braces straighten teeth. It's called 21st Century Eyecare.

Over the past eight months, Dr. Hurt and co-host, Sam Cooper have produced *21st Century Eyecare*, a live call-in program airing on Memphis talk station, WMC. The phone lines have been jammed ever since. Why? Over 70% of their listeners are interested in eye care -- and no one else is talking about it like they are.

Dr. J. Mason Hurt, a Memphis-based optometrist, has developed a revolutionary new corrective eye procedure called Precise Corneal Molding (PCM for short), that will soon render glasses and contact lens obsolete.

Sam Cooper is a veteran broadcaster, having done over 1,000 radio and 600 TV interviews over the past two decades. Sam stumbled onto this procedure last summer and has been helping radio listeners discover the joy of visual freedom by co-hosting the program ever since.

Precise Corneal Molding is the result of merging technology and physiology. PCM evolved from a procedure called "orthokeratology," clinically practiced for over thirty years. Orthokeratology involves reshaping the cornea by fitting patients with a series of special hard contact lenses, each having a slightly different curve. Orthokeratology was limited by the older technology of the lenses and the difficulty in precisely monitoring and controlling the reshaping process.

[Send Email Directly to Dr. Hurt and Sam Cooper](#)

[Home | How To Contact Us](#)

WebMaster@TalkAmerica.com

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Complaint

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EXHIBIT B

PRECISE CORNEAL MOLDING
(PCM)

YOUR CLEAREST CHOICE

YOUR GREATEST FREEDOM

EXHIBIT B

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Complaint

EXHIBIT B

J. MASON HURT, O.D
PRECISE CORNEAL MOLDING
2865 SUMMER OAKS DRIVE
BARTLETT, TN 38134
(901) 382-7803

September 20, 1994

Dear Dr.

I have been Dr. Hurt's office and Business Manager since 1988. Since he began what is now called the I.C.O.K. procedure of Precise Corneal Molding (PCM) in November of 1992, I have helped Dr. Hurt develop the I.C.O.K. Office Management System to convert the highest percentage of PCM consultations into PCM patients for Precise Corneal Molding. Media Fund began doing our marketing three months ago and our sales have increased dramatically from \$37,000.00 in June, \$65,000.00 in July to \$126,000.00 in August and we should exceed \$150,000.00 in September.

I will be conducting a seminar for I.C.O.K. Business Managers and/or I.C.O.K. Doctor's Clinical Assistants in Memphis September 24th and 25th in conjunction with I.C.O.K. Society's Symposium. The \$495.00 Seminar fee will include Video and I.C.O.K. Office Procedures Manual. I believe I can teach your Office Manager to get the same results that we helped Dr. Hurt achieve in August and I am sure you both would be proud to duplicate our \$126,000.00 August income.

If you have a staff member who should attend please fax their reservation to me at (901) 385-1581.

Thanks,

Millie C. Middleton
Dr. Hurt's I.C.O.K. Business Manager

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EXHIBIT B

PRECISE CORNEAL MOLDING

PRECISE CORNEAL MOLDING IS A PROCESS WHICH RESHAPES THE CORNEA OF THE EYE AND THEREBY REDUCES THE DEPENDENCE UPON EYE WEAR. THE PROCEDURE STARTED OVER THIRTY-EIGHT YEARS AGO AND HAS HAD REMARKABLE SUCCESS SINCE. EARLY ON ONLY OLD FASHIONED HARD CONTACT LENS MATERIAL WAS USED. THE INHERENT PROBLEMS ASSOCIATED WITH THAT PLASTIC PROLONGED THE PROCEDURE FOR UP TO TWO YEARS. BUT WITH THE ADVENT OF SPACE AGE POLYMERS AND COMPUTER ASSISTED LATHES, MOLDS AVAILABLE NOW CAN RESHAPE THE CORNEA IN ONLY A FRACTION OF THE TIME. IN MANY CASES, JUST A MATTER OF DAYS TO WEEKS FREES THE MAJORITY OF THE PATIENTS FROM THEIR DEPENDENCE UPON EYEGLASSES OR CONTACTS DURING DAYTIME HOURS.

THERE IS NO HOCUS-POCUS, SLIGHT OF HAND OR EXAGGERATION. THE PRINCIPAL UPON WHICH PRECISE CORNEAL MOLDING (PCM) IS BASED, IS QUITE SOUND AND SIMPLE. BASICALLY AN INDIVIDUAL REQUIRES SPECTACLES TO SEE IF THEIR CORNEA IS TOO FLAT, TOO STEEP OR OUT OF ROUND IN RELATION TO THE OTHER ELEMENTS OR PARTS OF THE EYE. THE CORNEA IS THE SOFT CLEAR WINDOW WHICH PASSES LIGHT INTO THE EYE. IT MAKES UP ABOUT TWO-THIRDS OF THE EYE'S TOTAL POWER TO FOCUS THE LIGHT PRECISELY ON THE RETINA (RECEIVING SCREEN) IN THE BACK OF THE EYE. BY SLIGHT MODIFICATION IN THE SHAPE OF THE CORNEA, CLEAR FUNCTIONAL VISION MAY BE RESTORED TO THE INDIVIDUAL.

RECENTLY SEVERAL SURGICAL PROCEDURES HAVE BEEN DEVELOPED TO ATTEMPT TO ACCOMPLISH THE SAME PURPOSE. HOWEVER THEIR LIMITED SUCCESS HAS BEEN DUE TO THE EFFECTS OF SCARRING, IRREGULAR HEALING AND MOST IMPORTANTLY, ITS TEMPORARY EFFECT. SINCE THE CORNEA IS SOFT IT CONTINUES TO CHANGE SHAPE AS TIME GOES BY AND THE INDIVIDUAL PRESCRIPTION CONTINUES TO VARY LEADING TO MORE DEPENDENCE UPON EYE WEAR WITHIN MONTHS TO JUST A FEW YEARS. IN ADDITION, THE SURGICAL SCARS CAUSE SURFACE IRREGULARITIES ON THE CORNEA, RESULTING IN PERMANENT BLURRING THAT EVEN GLASSES OR CONTACTS CANNOT ELIMINATE. MOLDING AVOIDS THOSE COMPLICATIONS SINCE THERE IS NOT INJURY TO ANY EYE TISSUE. THE SOFT CORNEA SIMPLY RESHAPES ITSELF TO FILL THE MOLD. THE MOLD IS SIMILAR TO A CONTACT LENS IN ITS APPEARANCE AND SENSATIONS UPON WEARING. THE MOLD IS WORN WHILE SLEEPING AND/OR WHILE AWAKE. THE PROCEDURE TAKES JUST HOURS IN MILD CASES TO A FEW MONTHS IN VERY DIFFICULT CASES TO REACH GOOD FUNCTIONAL VISION. THE MOLD IS WORN REGULARLY UNTIL THE BEST VISION

JMH 000303

EXHIBIT B

IS ACHIEVED AND THE CORNEA IS ALLOWED TO STIFFEN IN ITS NEW SHAPE. AT THAT POINT THE MOLD WEARING IS GRADUALLY REDUCED UNTIL A MINIMAL WEAR TIME IS ESTABLISHED THAT MAINTAINS THAT SHAPE AND GOOD FUNCTIONAL VISION. THIS GUARANTEES CONTINUED CLARITY WITHOUT THE GRADUAL BLURRING THAT USUALLY ACCOMPANIES THE SURGERY. THEREFORE, THE CORNEA CAN EASILY BE FINE TUNED THE REST OF ONES LIFE BY MINOR MODIFICATION IN THE RETAINER MOLD.

PCM IS NOT ONLY A GREAT ALTERNATIVE TO THE WEARING OF SPECTACLES OR CONTACT LENSES, BUT IT ALSO FREES THE INDIVIDUAL FROM THE DISTRACTIONS CAUSED BY PERSPIRATION, DUST, WIND, WEATHER, AND TEMPERATURE. THERE ARE NO MORE BLIND SPOTS CAUSED BY FRAME OR LENS EDGES. IT IS GREAT TO WEAR REGULAR FASHION SUNGLASSES, TO GET UP AT NIGHT OR IN THE MORNING AND SEE. TO GO SWIMMING AND SKIING. TO DRIVE IN A CONVERTIBLE WITH THE TOP DOWN, TO WORK IN THE DUST, GRASS, OR IN THE GARDEN, AND TO BE ABLE TO SEE IN CASES OF EMERGENCY. PCM OPENS NEW HORIZONS TO EVERYONE REGARDLESS OF AGE, OCCUPATION, OR ABILITY TO WEAR CONTACT LENSES IN THE PAST.

PCM IS SAFE, RELIABLE, AND INEXPENSIVE. PCM GIVES YOU A CURE NOT A MAINTENANCE OF YOUR VISUAL HANDICAP. PCM IS THE BEST INVESTMENT OF YOUR TIME AND RESOURCES. YOU DESERVE SUCH FREEDOM AND CONVENIENCE. YOU ARE WORTH IT. CONSIDER PCM, TRY IT AND THEN STAND BY AND MARVEL AT THE SPLENDID RESULTS.

Complaint

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EXHIBIT C

EXHIBIT C

Precise Corneal Molding™ (PCM™)

Safe
Affordable
Gentle
Non-Surgical

Visual Freedom
from glasses.

Mid-South PCM™ Group, P.C.
J. Mason Hurt, O.D.
2865 Summer Oaks Drive
Bartlett, TN 38134
901/382-7803
800-947-4257

JMII 000018

Find Out If PCM™ Is Right For You

Call for a *free* PCM™ consultation. Come in and view an informational video to help determine if you are a candidate for this procedure.

If PCM™ is determined to be an option for you, you too may be one of the many who are no longer dependent on glasses.

Mid-South PCM™ Group, P.C.
J. Mason Hurt, O.D.
2865 Summer Oaks Drive
Bartlett, TN 38134
901/382-7803
800-947-4257

Patients See The Difference

"I shifted from soft contact lenses to PCM™ and I can see 20/20 when I take them off!" -- T.K.

"I have been through the program and I am very happy with the results. I'm taking my daughter in for Precise Corneal Molding™, too!" -- A.S.

"I am very happy with PCM™ and would recommend it with no reservation." -- D.M.

"I never realized how precious the gift of sight was until I underwent the PCM™ procedure." -- A.S.

Compare!

PCM™ is a safe, gentle, affordable, non-surgical alternative for wearers of glasses.

	Surgey	PCM™
Age as a limiting factor	Yes	No
Reversibility	No	Yes
Loss of work time	Yes	No
Worsening of night vision	Yes	No
FAA and military approval	No	Yes

EXHIBIT C

What is PCM™?

Imagine being able to easily read an alarm clock without your glasses, see street signs clearly, or participate in sports without lenses of any kind . . . These are just a few of the freedoms people are enjoying through Precise Corneal Molding™ (PCM™).

PCM™ is a safe, gentle, affordable, and non-surgical procedure that dramatically improves natural vision by reshaping the front of the eye, the cornea, with scientifically shaped molds. Because the procedure is non-invasive, PCM™ has provided thousands of patients with better vision without the risks or complications of surgery.

Nearsightedness, farsightedness and astigmatism occur when light rays entering the eye through the cornea focus incorrectly. PCM™ utilizes a series of prescription eye molds to reshape the cornea much like ophthalmologists use braces to straighten teeth. The result is a gradual correction of vision, enabling patients to see clearly throughout the procedure.

The PCM™ procedure involves a series of thorough examinations by Dr. J. Mason Hurt, recognized in the medical community as an expert in PCM™, and a series of mold modifications. The benefits are realized in weeks or months, depending on the severity of vision problems. Retainer molds will be used on a limited basis to maintain the new shape of the cornea.

Since 1962, PCM™ and its predecessor, Orthokeratology, have been used to help pilots, athletes and others requiring unaided vision. Now, new research developments such as computerized corneal topography and new mold designs and materials have established PCM™ as the eye care trend of the future.

The Safest Option

In contrast to Radial Keratotomy and laser surgery, PCM™ does not require injury to the eye, resulting in glare-inducing scars. There is also no disruption of vision as eyesight improves.

JMH 000019

PCM™ for Children

One of the most exciting uses for PCM™ is controlling nearsightedness in children. Unfortunately, nearsightedness is a progressive condition, which is why 75% of patients who are nearsighted must periodically increase their prescription. For example, only 4% of 8-year-olds are nearsighted, while over 30% of the general population is nearsighted. PCM™ prevents deteriorating vision and even reverses it.

Proven Safe Results

PCM™ is highly effective in correcting nearsightedness, farsightedness and astigmatism. Even severe cases find great benefit from PCM™.

University research studies have shown corneal molding to be safe and effective. These studies include the: University of Houston College of Optometry (5 years), University of California at San Diego Medical School (7 years), University of California at Berkeley College of Optometry (3 years), and Pacific University College of Optometry (5 years).

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OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 9623279

TITLE MID-SOUTH PCM GROUP, et al.

DATE RECORDED: APRIL 26, 1995
TRANSCRIBED: NOVEMBER 28, 1996
CORRECTED: JANUARY 7, 1997

PAGES 1 THROUGH 23

PRECISE CORNEAL MOLDING INFOMERCIAL

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

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FEDERAL TRADE COMMISSION

In the Matter of:)
Mid-South PCM Group, et al.) Matter No. 9623279
-----)

VIDEOTAPE TRANSCRIPTION

RECORDED: APRIL 26, 1995

TRANSCRIBED: NOVEMBER 28, 1996

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P R O C E E D I N G S

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MR. LINDSEY: Over 190 million men, women and children in America are lifetime victims of poor vision. Millions of Americans are chained to the use of glasses and contact lenses. It alters life-styles, is expensive, and vision only gets worse.

There is a solution today. If you are one of the 190 million Americans, this show is for you. Precise corneal molding, three words that will change the way you see the world without glasses or contact lenses.

In the next 30 minutes, you will be introduced to a gentle, nonsurgical, affordable procedure that will make glasses and contact lenses a thing of the past in your life. Precise corneal molding, three words that will literally change your life.

Thousands of people all over America are experiencing the gift of improved vision. From 8 to 80, precise corneal molding truly is the medical eyecare breakthrough of the century.

NARRATOR: The gift of sight, a sense given to all human beings, yet more than 75 percent of Americans have vision disorders that require prescription glasses or contact lenses to correct. They do bring improved vision, but with every prescription change, the vision grows weaker and

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111 171-1115

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1 weaker, not stronger.

2 To eliminate vision disorders, surgical procedures
3 have been developed and introduced but with limited results.
4 In the 1960's, before the popularity of soft contact lenses,
5 an ortho-keratology procedure was developed that could
6 actually reshape the cornea of the eye and caused improved
7 vision for a limited time.

8 The procedure was accepted by the FAA, a department
9 of the Federal Government that regulates the airline
10 industry. The process required pilots to wear contact lenses
11 that allowed the eye to focus properly for several hours.
12 Pilots were only required to have functional vision during
13 flight time, but the results of the procedure proved very
14 promising.

15 In 1992, Dr. J. Mason Hurt, an optometrist, perfected
16 a process called precise corneal molding or PCM. With PCM,
17 patients who had previously worn glasses or contact lenses
18 were able to see without the use of either and without
19 surgery. Here is why:

20 DR. HURT: Corneal molding is very safe and
21 effective, and I would like to show you why. The cornea, the
22 clear window that we see through, is very soft and is subject
23 to change. It changes its shape on a very regular basis.

24 A person is nearsighted when the distance from here
25 to here is too long for the type of lens they've got inside

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EXHIBIT D

5

1 their eye. A person is farsighted, conversely, when the
2 distance is too short for the size of lens they have inside
3 the eye. A person has astigmatism when one of these curves
4 isn't perfectly round. In our molding procedure, we can
5 counter these problems in a safe and effective way simply by
6 reshaping the curve on this cornea in a very safe and natural
7 way.

8 The cornea wants to change in shape. Now we just
9 guide it to the shape we would like for it to have, and we do
10 that by building a mold which will rest in the zone where we
11 are having our shape problems, and we can reshape this cornea
12 in a fashion very similar to wearing of contact lenses in a
13 safe, nonsurgical, noninvasive technique that we call precise
14 corneal molding.

15 MR. FENSLER: It really does. I was getting to the
16 place where I could hardly see my monitor anymore, where if I
17 had to stand back and use someone else's monitor, I couldn't
18 see it at all. And for the past two years I had been wearing
19 reading glasses along with my contacts so that I could read
20 pages, and then I was getting very tired.

21 I've been on molds for seven months, and I don't use
22 my reading glasses anymore at all, either with my contacts or
23 without them. I can see everything at work I want to see.
24 It just makes life easier, makes it go smoother.

25 MS. COLLINS: You can see. It does correct your

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201 874-1011

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1 vision. If for some reason you get sick and you are not able
2 to wear your contacts, then it's no problem, you can start
3 the procedure over again, there is no hassle, there is no
4 surgery, there is no blood, there is no nothing like that.
5 Just little contacts in your eyes, you sleep with them at
6 night, and it's a great insomnia pill. I recommend it.

7 DR. SHUM: I am very enthusiastic about the
8 procedure. I recommend it to my patients daily, many, many
9 times a day. I hand out pamphlets on the subject. I
10 explain, I take time, I talk to the patients about this, and
11 it is a wonderful procedure, and it works very well.

12 MS. NICHOLS: The one day that I really realized that
13 this was doing some good, my son came in and had a T-shirt
14 on. I didn't have my glasses on, and I could read his
15 T-shirt, and it was like a miracle. I couldn't believe I
16 could read his T-shirt. So, I just went around reading
17 things. Now I can watch TV without my lenses in, without the
18 molds in, and before I couldn't even find the TV.

19 MS. BRADEN: Scott had broken his glasses at school,
20 and we came to get his eyes checked, and his eyes had gotten
21 so bad in just a few months that I was told that he would
22 have to have glasses changed every six months. So, we
23 started with the contacts, and within one week, he could see
24 20/20.

25 MR. JARBELL: For anyone who has problems seeing, I

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1 would recommend it to all my friends that wear glasses. They
2 need to come here and get this done. It's just great to be
3 able to take contacts out and still be able to see.

4 NARRATOR: You were not born to wear glasses and
5 contact lenses. We were all designed to have clear vision.
6 When the design needs correction, now there is precise
7 corneal molding, a safe, gentle, nonsurgical method of
8 correcting nearsightedness and farsightedness. PCM can also
9 eliminate astigmatism and restore good, functional vision
10 without the use of contacts or glasses.

11 The PCM practitioner in your area is offering you a
12 free precise corneal molding consultation. All you have to
13 do is call 1-800-846-2020. The call is free, and the
14 improved vision without glasses or contact lenses is, well,
15 priceless.

16 Call now, 1-800-846-2020, and schedule your PCM
17 consultation with a PCM practitioner in your area. That's
18 1-800-846-2020. Precise corneal molding, the clear choice
19 for the 21st century.

20 MS. RICHARDS: I come from a long line of four-eyes.
21 We all have glasses. I got my little blue-pointed glasses
22 when I was in the fifth grade. I hated them then, and I have
23 hated glasses ever since. So, I opted for contacts as soon
24 as they were available, but they were the hard ones. They
25 were torture. And I wore them just out of pure vanity.

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8

1 because I hated them, too, but I didn't want to wear
2 glasses.

3 Certainly like most people, I would never want my
4 eyes to be touched in a surgical way, and this gives you an
5 option that you don't have to do that. Don't be afraid to
6 give up your soft lenses, and don't be afraid to try hard
7 lenses, which is what these molds are, or gas-permeable
8 lenses, because they are not uncomfortable at all, they are
9 very comfortable, and you will be able to see much better.

10 MS. ROBBINS: I would highly recommend it to anyone
11 who is considering it. I have a brother who is almost
12 legally blind, and he was like, yeah, okay, I am going to
13 wait to see what happens to you first, because you know, if I
14 am going to have to wear contacts, I would just assume wear,
15 you know, what I have got, but he doesn't realize that when
16 he gets up in the morning, if he doesn't put his glasses on,
17 he can't see, and with this, it wouldn't -- I have just been
18 trying to talk him into going in and checking it out, because
19 it would make a big impact with him, and it is so wonderful
20 not having to wear glasses.

21 MS. POSEY: Dr. Hurt told me about it the end of
22 February, and I immediately signed up. It has been almost
23 like a miracle, really, because my vision had just gotten so
24 bad, and I couldn't wear contacts anymore, didn't like
25 wearing glasses, wasn't wanting to have any type of surgery.

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1 and I found out about this, and I thought, Oh, sign me up.

2 The contacts were nice. This is going to be a
3 wonderful day, not having to wear anything at all. Knowing
4 that my vision is going to be 20/20 all the time is just
5 really exciting.

6 I wore the molds, started really wearing them on
7 Saturday morning, and within 24 hours, I could tell that my
8 vision had changed. It was amazing. There was a big jump
9 after wearing them for about three weeks, to take the molds
10 out, and all of a sudden, to see that there was writing on
11 the television or to be able to see outside the window, the
12 cars, and know that there were things out there. I had never
13 dreamed of not having glasses or contacts in my life, and now
14 I can.

15 NARRATOR: You were not born to wear glasses or
16 contact lenses. We were all designed to have clear vision.
17 When the design needs correction, now there is precise
18 corneal molding, a safe, gentle, nonsurgical method of
19 correcting nearsightedness and farsightedness. PCM can also
20 eliminate astigmatism and restore good, functional vision
21 without the use of contacts or glasses.

22 The PCM practitioner in your area is offering you a
23 free precise corneal molding consultation. All you have to
24 do is call 1-800-846-2000. The call is free, and the
25 improved vision without glasses or contact lenses is, well,

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PIL 87-14113

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1 priceless.

2 Call now, 1-800-846-2020, and schedule your PCM
3 consultation with a PCM practitioner in your area. That's
4 1-800-846-2020. Precise corneal molding, the clear choice
5 for the 21st Century.

6 MS. GREENE: I heard about this procedure, and it
7 really sounded too good to be true. But I am so excited
8 about it now, because I've probably had the procedure maybe
9 six weeks, and already, within six weeks, I can drive my van
10 without any corrective lenses whatsoever, and it's going to
11 be so exciting to water ski this summer and be able to see
12 the people in the boat, and there are just so many things I
13 have to look forward to.

14 NARRATOR: As a precise corneal molding patient, you
15 will receive the advantage of the most modern equipment in
16 the eyecare industry. The corneal topography system used by
17 PCM practitioners produces a computerized map of your cornea
18 that allows your doctor to prescribe the perfect mold for
19 you, a mold that will be comfortable and very effective in
20 reshaping your cornea and allowing you good, functional
21 vision without glasses or contact lenses.

22 DR. HURT: This is all a map of your eye. I know it
23 looks like the moon to you, but this is a picture of the
24 eye. If you look at this map, the darker red, imagine that
25 being a mountain. That's the tallest peak. This is why you

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1 are nearsighted, if you can see those areas of red and pink.

2 What we are going to do with this molding process is
3 flatten this portion of the eye, and as we do, we are going
4 to tend to see the red, the oranges move down this way, and
5 this is where we are going to find that you will end up with
6 that bifocal benefit. The colors are going to gradually
7 change as your eye flattens out up and through here to more
8 the greens and the blues, and you will see this as the
9 process continues over the coming months.

10 This is our starting place. This little X right here
11 is your line of sight. That's what you're seeing through.
12 If you notice on this map, you will notice that figure 8
13 where you have got a green bowtie this way and an orange
14 bowtie this way, this is your astigmatism. And so you
15 notice, it's all in the center, so if you allow this mold to
16 rest where we want it to and as we keep it centered, all of
17 this will mold away.

18 So, we are going to be able to mold away your
19 astigmatism as well as your nearsightedness and as we end up
20 with this pink what I call a smiley face down here, then you
21 will have your bifocal, as well, okay? So, we'll start
22 wearing the lenses, and I will have them designed this week,
23 and it usually takes five business days to get them in, and
24 then you'll start wearing them, and then in one week, we will
25 check you, and then we will map you out again, so we can

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12

1 start plotting out the changes that have taken place. Great,
2 you did wonderful.

3 NARRATOR: PCM is being heralded as the greatest
4 scientific breakthrough in the eyecare industry this
5 century. By simply wearing the prescribed corneal molds only
6 a few hours a day, you can eliminate the need to wear glasses
7 or contact lenses and actually correct nearsightedness,
8 farsightedness and astigmatism without surgery.

9 You were not born to wear glasses or contact lenses.
10 We were all designed to have clear vision. When the design
11 needs correction, now there is precise corneal molding, a
12 safe, gentle, nonsurgical method of correcting
13 nearsightedness and farsightedness. PCM can also eliminate
14 astigmatism and restore good, functional vision without the
15 use of contacts or glasses.

16 The PCM practitioner in your area is offering you a
17 free precise corneal molding consultation. All you have to
18 do is call 1-800-846-2020. The call is free, and the
19 improved vision without glasses or contact lenses is, well,
20 priceless. Call now, 1-800-846-2020, and schedule your PCM
21 consultation with a PCM practitioner in your area. That's
22 1-800-846-2020. Precise corneal molding, the clear choice
23 for the 21st century.

24 MS. ABERNATHY: It's great. It includes every area
25 of your life. You can see better. There is no -- you know,

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1 no mess involved with it, and just the thought of not having
2 to wear contacts or glasses or anything by the time I get
3 done with this is just absolutely wonderful.

4 MS. POSEY: Number one, it is wonderful to be able to
5 wake up in the morning and open my eyes and to see everything
6 around me, with no contacts in, nothing in, just to be able
7 to open them up and to see, or to read things without looking
8 for my glasses or looking for things.

9 Number two, there is such security knowing
10 financially that later in life I am not going to have to buy
11 more glasses, change my prescriptions, get more prescription
12 sunglasses, I am not going to have to lose a contact and find
13 it or anything like that. I know that my vision, I'm going
14 to be able to see. And that is just wonderful.

15 NARRATOR: PCM is not a wonder drug or a surgical
16 procedure. It is a high-tech scientific procedure that can
17 work for most people who require glasses or contact lenses.
18 By gently reshaping the cornea of your eye, the PCM process
19 can restore even difficult cases to good, functional vision,
20 even if you've worn glasses all your life.

21 MRS. FENSLER: Actually Dan was the first to use it.
22 He even got to do it before his dad, and then his dad
23 started, and then I was the last, but we were really happy
24 with it, and -- and I'm real impressed with the -- the way I
25 can see now compared to, you know, even a month ago.

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101 871-8000

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1 MS. ROBBINS: It's definitely worth the money that
2 you spend on it. It will change your life. You won't have
3 to deal with glasses, you won't have to deal with contacts,
4 you won't have to deal with not being able to see. It's just
5 -- it's so nice not to be able to have to put those glasses
6 on at all.

7 MS. MIDDLETON: For me to be able to be a small part
8 of what has taken -- what this process has done for just the
9 basic general public of Bartlett. So, I -- there is over --
10 Dr. Hurt has done over three hundred and sixty something
11 patients, and each and every one of those lives have been
12 changed tremendously.

13 MS. STREEFF: The biggest benefit of CKR is being
14 able to see, is getting out of bed and you can see, is
15 getting in the car, and you can see everything, is walking in
16 the rain, and your glasses don't get wet. That's the biggest
17 benefit, that freedom of not having to remember your glasses,
18 not having to remember your contacts, not having to remember
19 your solution, not having your eyes irritated. So -- and
20 it's amazing. I can't get over it.

21 MR. GARNER: I started with the procedure in March,
22 and I noticed very quickly that this procedure was going to
23 work for me and work well. On a scale of 1 to 10, as far as
24 satisfaction, I'm way above 10, probably 15 to 20. I'm very
25 -- I have been very pleased with the results that I have had

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1 and the -- and the success that will continue.

2 I have still got a way to go, but at this point,
3 there is no comparison from where I started to where I am now
4 only after about four and a half months.

5 MS. BENGAL: This is great. I think I was around
6 20/1000 when I started. I am down to 20/70. If I -- if I
7 never get any better than I am now, I'm happy, but I know
8 that I will.

9 NARRATOR: Don't suffer through the agony of wearing
10 contact lenses that may cause irritation to your eyes. No
11 longer do you have to be dependent on glasses that become
12 thicker and stronger with each new prescription.

13 Now, through precise corneal molding, you can see
14 clearly day or night and continue to see clearly for the rest
15 of your life, without depending on glasses or contact
16 lenses.

17 You were not born to wear glasses or contact lenses.
18 We were all designed to have clear vision. When the design
19 needs correction, now there is precise corneal molding, a
20 safe, gentle, nonsurgical method of correcting
21 nearsightedness and farsightedness. PCM can also eliminate
22 astigmatism and restore good, functional vision without the
23 use of contacts or glasses.

24 The PCM practitioner in your area is offering you a
25 free precise corneal molding consultation. All you have to

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1 do is call 1-800-846-2020. The call is free, and the
2 improved vision without glasses and contact lenses is, well,
3 priceless.

4 Call now, 1-800-846-2020, and schedule your PCM
5 consultation with the PCM practitioner in your area. That's
6 1-800-846-2020. Precise corneal molding, the clear choice
7 for the 21st century.

8 MS. STRANY: I started wearing my molds January 11th,
9 and by the end of the first eight hours of wear, my vision
10 had improved that quickly. I could not even wear my glasses
11 after eight hours.

12 MS. GREENE: I am very excited about this procedure,
13 because it will work for children, and I have four kids of my
14 own. And for them to not have to go through what I went
15 through in the third grade, if any of them for any reason has
16 a problem and needs corrective lenses, they will definitely
17 get this procedure.

18 MS. GRAMMER: I recommend it to everyone. Nellie,
19 his office manager gave me brochures, and I keep it in our
20 office, and I tell everybody, because even with small
21 children that wear their glasses, people don't know how bad
22 or how embarrassing it is to wear glasses that are like coke
23 bottles and can't see, and until you experience it, you don't
24 know, and anyone I see that has to wear contacts and has
25 trouble because of their allergies or have thick glasses. I

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1 really want to talk about it.

2 MR. GARNER: My recommendation is I wish that there
3 had been a procedure like this when I was a child and could
4 have prevented my vision from ever getting as bad as it did,
5 and I think that's -- I think it's a wonderful opportunity
6 for children, especially children who are active, play
7 sports. Because I unfortunately had to wear the glasses
8 throughout all that, and it was terribly unpleasant at
9 times.

10 MS. BENGAL: I have been doing this for about a year
11 now, and I drive -- one of my hobbies is cooking. I cook
12 without glasses, which was never a possibility before. I do
13 everything. If for some reason I need my glasses, I have to
14 hunt them up now. They are either in the car, because I
15 leave them in the car sometimes, just in case, but mostly, I
16 don't wear, you know, anything. I use the molds at night and
17 a little bit during the day, but not much.

18 MS. COLLINS: About six years ago, my husband and I
19 started scuba diving, and you can't wear glasses underneath
20 your scuba diving mask, and you can wear contacts, but if
21 your mask floods, then the contacts wash out, and you have
22 lost them. And you can get prescription masks, but you
23 couldn't for my model of mask.

24 So, after so many years of him saying, Gee, didn't
25 you see that fish down there, and I didn't, I decided

For The Record, Inc.
Waldorf, Maryland
301-870-8000

EXHIBIT D

18

1 something needed to be done, and Dr. Hurt had a solution.

2 NARRATOR: You were not born to wear glasses or
3 contact lenses. We were all designed to have clear vision.
4 When the design needs correction, now there is precise
5 corneal molding, a safe, gentle, nonsurgical method of
6 correcting nearsightedness and farsightedness. PCM can also
7 eliminate astigmatism and restore good, functional vision
8 without the use of contacts or glasses.

9 The PCM practitioner in your area is offering a free
10 precise corneal molding consultation. All you have to do is
11 call 1-800-846-2020. The call is free, and the improved
12 vision without glasses or contact lenses is, well,
13 priceless.

14 Call now, 1-800-846-2020, and schedule your PCM
15 consultation with the PCM practitioner in your area. That's
16 1-800-846-2020. Precise corneal molding, the clear choice
17 for the 21st Century.

18 MS. BRADEN: It's nice to know that he can go to
19 school and I don't have to worry about him forgetting his
20 glasses or anything, because I know that he can see when he
21 gets up in the morning.

22 MR. FENSLER: I would definitely recommend this to
23 other people. This is a great way to go. There is no worry
24 about -- it's so invasive that maybe I'll never see again.
25 There is no worry about if I get hit upside the eye, it is

Complaint

124 F.T.C.

EXHIBIT D

19

1 going to pop my eyeball kind of thing, as somebody --
2 somebody said as so many stories have been about laser
3 surgery. I'm really anxious to see that it works for me all
4 the time, and I would always recommend it to anybody. There
5 is just no doubt in my mind, it's the way to go. It's well
6 worth it.

7 MS. ROBBINS: It is definitely worth the money that
8 you spend on it. It -- it will change your life, and you
9 won't have to deal with glasses, you won't have to deal with
10 contacts, you won't have to deal with not being able to see.
11 It's just -- it's so nice not to be able to have to put those
12 glasses on at all.

13 NARRATOR: The optometrists in your area have
14 undergone specialized training for prescribing and treating
15 your vision disorder through precise corneal molding. There
16 are trained PCM practitioners all over America, and through
17 the International COK Society, a network of doctors confer
18 with each other to ensure you, the PCM patient, a complete
19 bank of professional knowledge and experience in the PCM
20 process is available.

21 The precise corneal molding procedure is designed to
22 become the procedure of choice for people who want to
23 eliminate the need to wear glasses or contact lenses. It is
24 the choice of the 21st Century. Safe, gentle, nonsurgical
25 PCM is also an affordable procedure, and financing is

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301-261-1111

EXHIBIT D

20

1 available in most cases.

2 If you hate the daily dependency of glasses or
3 contacts, just to see to read a newspaper or a street sign,
4 if you're tired of spending hours with messy contact
5 solutions, and if you want the experience of a nonsurgical
6 correcting procedure that will continue to allow you
7 functional vision for the rest of your life, precise corneal
8 molding is the answer, and now is the time.

9 DR. HURT: Precise corneal molding is becoming the
10 procedure of choice all across the country. No longer do you
11 have to be satisfied with just getting by or being visually
12 handicapped. It is now the best that science has to offer.
13 You do not have to be content with the things the way they
14 are. This is the closest thing to a cure that science has to
15 offer.

16 You can enjoy the freedom of seeing again without the
17 use of glasses or contact lenses. No more wearing glasses,
18 no more wearing contacts. The opportunity of seeing well all
19 the time without being dependent upon these is now a reality
20 and not a dream. This is the best that science can offer,
21 and we're here to help you do that.

22 And our pledge to you is that you will have the best
23 that we can give you, the best care, the best service and the
24 best vision. It will give you the opportunity to enjoy the
25 freedom that you deserve, and we will work hard to see that

For The Record, Inc.
Waldborf, Maryland
301 570-8125

Complaint

124 F.T.C.

EXHIBIT D

21

1 you get that freedom and that you enjoy the quality of life
2 that you should have.

3 MR. LINDSEY: Precise corneal molding, truly three
4 words that will change the way you see the world today. The
5 doctor and I both invite you to pick up the phone and call
6 the 800 number on the screen. Your eyesight is one of your
7 most important possessions. Precise corneal molding is
8 nonsurgical, safe, gentle and affordable.

9 The call is free, the evaluation is free, and you,
10 too, can enjoy the freedom from glasses and contact lenses
11 forever. Make this important call now. Our operators are
12 standing by.

13 Thank you.

14 MS. STRANY: I was astounded. I was so happy, and
15 now, I'm not quite through with the process, but for me to be
16 able to function in my home and be able to see, to get up in
17 the middle of the night and be able to see and walk around
18 the house and not have to reach for my glasses.

19 MS. RICHARDS: Don't be afraid to give up your soft
20 lenses, and don't be afraid to try hard lenses, which is what
21 these molds are, or gas-permeable lenses, because they are
22 not uncomfortable at all, they are very comfortable, and you
23 will be able to see much better.

24 MS. STREEFF: There are so many good things that
25 happen to you because of CKR. I would recommend it to

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Waldorf, Maryland
301 470-8111

503

Complaint

EXHIBIT D

22

1 anybody who needs glasses.

2 MS. POSEY: Oh, I would definitely rate this a 10 on
3 a scale of 1 to 10, 10-plus, because it has been so easy, it
4 has happened so quick, the change. It just -- it happens
5 overnight. All I did was wear them and see it happen
6 tonight, to my body, to my eyes, and my eyes -- my vision is
7 here to stay for the rest of my life. It is worth
8 everything.

9 "ICOKS, International Cooperative Ortho-Keratectomy
10 Society, 1-800-846-2020, ICOKS, Inc., Memphis, Tennessee,
11 1994."

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Complaint

124 F.T.C.

EXHIBIT D

23

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

2

3 MATTER NUMBER: 96232794 CASE TITLE: MID-SOUTH PCM GROUP, et al.5 TRANSCRIPTION DATE: 11/28/96

6

7 I HEREBY CERTIFY that the transcript contained herein
8 is a full and accurate transcript of the notes taken by me at
9 the hearing on the above cause before the FEDERAL TRADE
10 COMMISSION to the best of my knowledge and belief.

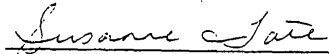
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DATED: 1/7/97

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Susanne Q. Tate

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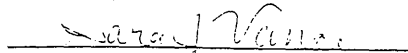
19 C E R T I F I C A T I O N O F P R O O F R E A D E R

20

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

23

24



25

SARA J. VANCE

For The Record, Inc.
Waldorf, Maryland
301 870-8100

EXHIBIT E

**60 Sec Radio Commercial
(Use High Energy Enthusiastic Voice)
One Spot Female and One Spot Male (Rotate)**

YOU WERE NOT BORN TO WEAR GLASSES OR CONTACTS. ALL OF US WERE DESIGNED TO HAVE CLEAR VISION. AND NOW, WHEN THE DESIGN NEEDS CORRECTION, THERE'S *PRECISE CORNEAL MOLDING*. *PRECISE CORNEAL MOLDING* IS A SAFE, GENTLE, NON-SURGICAL METHOD OF CORRECTING NEARSIGHTEDNESS AND FARSIGHTEDNESS THAT WORKS !! IT CAN ALSO ELMINATE ASTIGMATISM AND RESTORE GOOD FUNCTIONAL VISION WITHOUT THE USE OF GLASSES. THE P-C-M- PRACTIONER IN YOUR AREA IS OFFERING A FREE CORNEAL TOPOGRAPHY CONSULTATION SO YOU CAN SEE HOW P-C-M CAN WORK FOR YOU! ALL YOU HAVE TO DO IS CALL 1-800-846-2-0-2-0 THAT'S 1-800-846-TWENTY-TWENTY!! THE CALL IS FREE AND THE IMPROVED VISION WITHOUT GLASSES IS. . . . WELL . . . PRICELESS CALL NOW . . . 1-800-846-2-0-2-0 . . . AND SCHEDULE YOUR CORNEAL TOPOGRAPHY CONSULTATION WITH THE P-C-M PRACTITIONER IN YOUR AREA. THAT'S 1-800-846-2-0-2-0 . . . THAT'S 1-800-846-TWENTY-TWENTY
PRECISE CORNEAL MOLDING. THE CLEAR CHOICE,
FOR THE TWENTY-FIRST CENTURY. CALL FOR THE P-C-M PRACTITIONER IN YOUR AREA . . . 1-800-846-TWENTY-TWENTY.

EXHIBIT E

JMS 000035

544

FEDERAL TRADE COMMISSION DECISIONS

Complaint

124 F.T.C.

EXHIBIT F

OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 9623279

TITLE MID-SOUTH PCM GROUP, et al.

**DATE RECORDED: UNKNOWN
TRANSCRIBED: NOVEMBER 28, 1996
CORRECTED: JANUARY 7, 1997**

PAGES 1 THROUGH 7

PRECISE CORNEAL MOLDING INFOMERCIAL

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

EXHIBIT F

503

Complaint

EXHIBIT F

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FEDERAL TRADE COMMISSION

In the Matter of:)
Mid-South PCM Group, et al.) Matter No. 9623279
-----)

VIDEOTAPE TRANSCRIPTION

RECORDED: UNKNOWN

TRANSCRIBED: NOVEMBER 28, 1996

For The Record, Inc.
Waldorf, Maryland
301 870-8100

Complaint

124 F.T.C.

EXHIBIT F

3

1 PROCEEDINGS

2 - - - - -

3 NARRATOR: Thousands of men, women and children all
4 over the country are experiencing the gift of improved vision
5 without glasses or contact lenses. Precise corneal molding,
6 three words that will change the way you see the world.
7 Precise corneal molding is a safe, gentle, nonsurgical,
8 affordable procedure that corrects nearsightedness and
9 farsightedness.

10 PCM eliminates the need for glasses and contact
11 lenses forever. The PCM practitioner in your area is
12 offering you a free precise corneal molding consultation.
13 All you have to do is call 1-800-305-5030. The call is free,
14 and the improved vision without glasses or contact lenses is,
15 well, priceless.

16 Call 1-800-305-5030 and schedule your free PCM
17 consultation with the PCM practitioner in your area. That's
18 1-800-305-5030. Three words that will literally change the
19 way you see the world, precise corneal molding, the clear
20 choice for the 21st Century.

21 "Client, L-3 Media Marketing; title, Precise Corneal
22 Molding; date, 10/8/94; agency, Direct PROMO; length 90;
23 Creative Resources, Inc., (615) 899-6942."

24 MR. LINDSEY: Precise corneal molding, three words
25 that will literally change your life. Thousands of people

For The Record, Inc.
Waldorf, Maryland
101-870-8108

503

Complaint

EXHIBIT F

4

1 all over America are experiencing the gift of improved
2 vision. From 8 to 80, precise corneal molding truly is the
3 medical eyecare breakthrough of the century.

4 NARRATOR: You were not born to wear glasses or
5 contact lenses. We were all designed to have clear vision.
6 When the design needs correction, now there is precise
7 corneal molding, a safe, gentle, nonsurgical method of
8 correcting nearsightedness and farsightedness. PCM can also
9 eliminate astigmatism and restore good, functional vision
10 without the use of contacts or glasses.

11 A PCM practitioner in your area is offering a free
12 precise corneal molding consultation. All you have to do is
13 call 1-800-305-5030. The call is free, and the improved
14 vision without glasses or contact lenses is, well,
15 priceless. Call now, 1-800-305-5030, and schedule your PCM
16 consultation with the PCM practitioner in your area. That's
17 1-800-305-5030. Precise corneal molding, the clear choice
18 for the 21st Century.

19 MR. LINDSEY: Precise corneal molding, truly three
20 words that will change the way you see the world today. Your
21 eyesight is one of your most important possessions.

22 "Client, L-3 Media Marketing; title, Precise Corneal
23 Molding; date, 10/8/94; agency, Direct PROMO; length 120;
24 Creative Resources, Inc., (615) 899-6940."

25 NARRATOR: Precise corneal molding. Three words that

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Waldorf, Maryland
301 877-6115

Complaint

124 F.T.C.

EXHIBIT F

5

1 will literally change your life. Thousands of people all
2 over America are experiencing the gift of improved vision.
3 From 8 to 80, precise corneal molding truly is the medical
4 eyecare breakthrough of this century.

5 Thousands of men, women and children all over the
6 country are experiencing the gift of improved vision without
7 glasses or contact lenses. Precise corneal molding, three
8 words that will change the way you see the world. Precise
9 corneal molding is a safe, gentle, nonsurgical, affordable
10 procedure that corrects nearsightedness and farsightedness.

11 PCM eliminates the need for glasses and contact
12 lenses forever. The PCM practitioner in your area is
13 offering you a free precise corneal molding consultation.
14 All you have to do is call 1-800-305-5030. The call is free,
15 and the improved vision without glasses or contact lenses is,
16 well, priceless.

17 Call now, 1-800-305-5030, and schedule your free PCM
18 consultation with the PCM practitioner in your area. That's
19 1-800-305-5030. Three words that will literally change the
20 way you see the world, precise corneal molding, the clear
21 choice for the 21st Century.

22 MR. LINDSEY: Precise corneal molding, truly three
23 words that will change the way you see the world today. The
24 doctor and I both invite you to pick up the phone and call
25 the 800 number on the screen. Your eyesight is one of your

For The Record, Inc.
Waldorf, Maryland
1-800-305-5030

503

Complaint

EXHIBIT F

6

1 most important possessions. Precise corneal molding is
2 nonsurgical, safe, gentle and affordable.

3 The call is free, the evaluation is free, and you,
4 too, can enjoy the freedom from glasses and contact lenses
5 forever. Make this important call now. Our operators are
6 standing by.

7 Thank you.

8 (Whereupon, the videotape was concluded.)

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Complaint

124 F.T.C.

EXHIBIT F

7

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

2

3 MATTER NUMBER: 96232794 CASE TITLE: MID-SOUTH PCM GROUP, et al.5 TRANSCRIPTION DATE: NOVEMBER 28, 1996

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10 COMMISSION to the best of my knowledge and belief.

11

12

DATED: 1/7/97

13

14

Susanne Q. Tate

15

Susanne Q. Tate

16

17

18

19 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

20

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23

24

Sara Vance

25

Sara Vance

For The Record, Inc.
Waldorf, Maryland
301 871-8116

PRECISE CORNEAL MOLDING SUCCESS STORIES

From the office of J. Mason Hurt, O.D.

2865 Summer Oaks Drive
Memphis, Tennessee 38134
(901) 382-7803

"PCM is Wonderful! I can see clearly now, even when Scuba Diving. Before PCM, I had Poor Vision. Yet with PCM, I went back to 20-20, without surgery. I am so excited that I tell everyone about the benefits of PCM."

Peggy Collins, College Co-Ordinator

"PCM is like a Miracle. It's hard to believe I can see so well without glasses and without Surgery. I would recommend PCM to anyone who is Near-Sighted, Far-Sighted or has Astigmatism"

Sara Ann Nichols, Systems Analyst

"Before PCM, my son Scott had to change glasses every six months. Yet after PCM, he could see 20-20 within one month."

Connie Braden, Housewife

"Before PCM, I could hardly see my computer monitor, and for the last two years, I wore both Contacts and Glasses. After PCM, I can see clearly and I am very happy."

Steven Fensler, Computer Programmer

Complaint

124 F.T.C.

EXHIBIT H



MID SOUTH PCM GROUP, P.C.

J. Mason Hurt, O.D.
2865 Summer Oaks Drive
Bartlett, TN 38134
901/382-7803

EXHIBIT H

JMH 000279

ATTACHMENT 9 (a)(2)



Member of the ICOKS
Dedicated to the training of PCMSM practitioners

EXHIBIT H

WELCOME TO THE PCM TEAM!

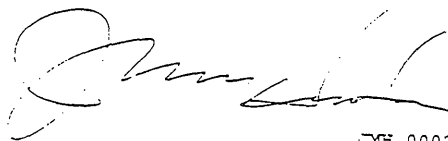
You have made one of the most important decisions of your life, and you will see great improvement in your ability to see unaided and in your visual freedom. Our goal is to provide you with the best vision that is possible for you. Perfection cannot be guaranteed, but we strive for excellence and optimal visual clarity. You are important to us, and so is the success of PCM.

Maximum success depends upon excellent teamwork. My staff and I will utilize the best techniques and materials, along with extensive experience, to bring our patients to the desired goal. It is crucial that you follow all instructions to the letter. You must maintain regular scheduled appointments, a good line of communication, and patience.

Everyone is different and each person responds differently. Do not expect to use a limited number of molds. Our pledge is to accomplish our goal of best functional vision in the shortest time possible, with the least number of molds necessary. It may take one pair or many, but be assured that it will be the least needed for your case.

PCM is virtually problem free, and there is no risk. It is safer than contact lens wear. Unlike surgery, there is no such thing as mistakes. Nothing that may be induced by molding cannot be undone and fixed. If illness or extenuating circumstances occur, this only delays for a short time the final success of PCM.

We are glad that you have joined the PCM team. Now prepare yourself for the results you are soon to see.



J. Mason Hurt, O.D.

JMH 000230

Complaint

124 F.T.C.

EXHIBIT H

A SAFE ALTERNATIVE TO RK SURGERY

In contrast to radial keratotomy surgery, which involves making incisions on the eye, PCM does not leave scar tissue which may cause vision glare at night or other side effects. PCM is also free of surgical complications or pain, and there is no disruption of vision as eyesight improves.

SAVING CHILDREN'S VISION

One of the most exciting uses for PCM is controlling myopia (nearsightedness) in children.

Unfortunately, nearsightedness is a progressive disease, which is why 75% of the nearsighted population have to periodically increase their prescription. As years pass, from elementary school to college and later life, a person's vision gradually worsens. For instance, only 4% of 8 year olds are nearsighted, while over 50% of the general population is nearsighted. PCM prevents this deteriorating vision in children by actually halting myopia in its tracks and even reversing it.

RESULTS

Myopia (nearsightedness): PCM is highly effective in improving myopia. Mild to moderate degrees of myopia are corrected and higher degrees of myopia can be controlled to allow functional vision without lenses as well.

Astigmatism: PCM usually either eliminates or greatly reduces astigmatism to great functional clarity.

Hyperopia (farsightedness): Mild to moderate cases may be improved as well.

EXHIBIT H

NATURAL VISION IMPROVEMENT

Imagine being able to easily read the alarm clock without your glasses, see street signs clearly, or participate in sports without lenses of any kind. These are just a few of the ways people's lives are changing after undergoing the procedure known as PCM.

PCM is a non-invasive procedure that dramatically improves natural vision by reshaping the front curvature of the eye (called the cornea) with specially designed molds. The procedure, which is also known as PCM, has provided corrective eye care to thousands of patients without the risks or complications associated with surgery.

Visual defects known as nearsightedness (myopia), farsightedness (hyperopia), and astigmatism occur when light rays entering the cornea focus incorrectly, producing blurred vision. Often by changing the shape of the cornea the defect can be resolved. PCM utilizes a series of molds prescribed in progressive stages to gently reshape the cornea, similar to the way braces are used to straighten teeth. The molds consist of a highly oxygen permeable material with a special design that encourages the pliable tissue of the cornea to conform to the corrective curvature of the lens. The changes are so gradual that the patient enjoys clear comfortable vision at all times.

The PCM procedure involves thorough examinations, lens changes and/or lens modifications as needed until desired results are achieved. The process can take from a few weeks to a few months or longer to complete, depending on the severity of the problem. The result is dramatically improved vision with retainer molds being worn on a limited basis, sometimes only a few nights a week while you are sleeping, to maintain the new shape of the cornea.

SAFETY

Four University research studies have shown corneal molding to be safe and effective, with no harmful side effects. These studies include:

- University of Houston College of Optometry (5 years)
- University of California at San Diego Medical School (7 years)
- University of California at Berkeley College of Optometry (3 years)
- Pacific University College of Optometry (5 years)

JMS 000282

Complaint

124 F.T.C.

EXHIBIT H

I JUST RECEIVED MY FIRST SET OF MOLDS . . . NOW WHAT!

The first three days will be the most trying of your new journey. Since the molds are likely to move more the first several days, you will find improved comfort when the molds tighten a little. The body will have to adjust to a new appliance, so you will notice that you will not tear as well as you normally do, therefore frequent lubrication will be necessary.

Should you find that the molds displace during waking hours or upon rising, just remove them and reinsert them. Dryness, or molds that you have outgrown, may shift vertically or horizontally and cause some temporary blurriness upon removal of the molds. If this happens to you, reinsert the molds for two hours and then remove.

Upon rising, always allow the eyes to moisten with tears and lubricants before you try to remove them. Should you not be able to remove the molds, you may use the contact lens remover to gently lift an edge up to break the vacuum. Should this fail, feel free to call the number provided. Irritation upon cleaning and lubricating may indicate sensitivity to the chemicals. If this occurs, please call for a change in care regimen.

Pain, excessive redness and discharge are not typical; please call. Even though the molds are not responsible, your eye may not recover properly if the molds are continued. Please call and return to the office for evaluation.

To ensure the greatest opportunity of success, it is essential to maintain the wear schedule that has been recommended, as well as returning to the clinic for your scheduled appointment.

Patience, compliance, time and our professional care will bring you the results you desire.

JMH 000234

EXHIBIT H

A NEW LOOK ON LIFE

PCM enables people to participate in activities that were previously difficult or even impossible without lenses, such as contact sports, swimming and working outdoors. The procedure also provides functional vision without glasses or contacts so that simple tasks such as reading an alarm clock or clearly seeing street signs are not difficult any more.

PATIENT COMMENTS

"I shifted from soft contact lenses to PCM, and I can see 20/20 when I take them off!"

- T.K.

"I have been through the program and I am very happy with it, and I am bringing my daughter in to do it."

- A.S.

"I never realized how precious the gift of sight was until I went through the procedure."

- A.S.

"I am very happy with the program and I would recommend PCM with no reservations."

- D.M.

DECISION AND ORDER

The Federal Trade Commission having initiated an investigation of certain acts and practices of the respondents named in the caption hereof, and the respondents having been furnished thereafter with a copy of a draft of complaint which the Bureau of Consumer Protection proposed to present to the Commission for its consideration and which, if issued by the Commission, would charge respondents with violation of the Federal Trade Commission Act; and

The respondents and counsel for the Commission having thereafter executed an agreement containing a consent order, an admission by the respondents of all the jurisdictional facts set forth in the aforesaid draft of complaint, a statement that the signing of said agreement is for settlement purposes only and does not constitute an admission by respondents that the law has been violated as alleged in such complaint, or that the facts as alleged in such complaint, other than jurisdictional facts, are true, and waivers and other provisions as required by the Commission's Rules; and

The Commission having thereafter considered the matter and having determined that it had reason to believe that the respondents have violated the said Act, and that a complaint should issue stating its charges in that respect, and having thereupon accepted the executed consent agreement and placed such agreement on the public record for a period of sixty (60) days, now in further conformity with the procedure prescribed in Section 2.34 of its Rules, the Commission hereby issues its complaint, makes the following jurisdictional findings and enters the following order:

1.a. Respondent Mid-South PCM Group, P.C. ("Mid South"), is a Tennessee corporation, with its principal office or place of business at 2865 Summer Oaks Drive, Bartlett, TN.

1.b. Respondent Eye and Vision Clinic, P.C. ("Vision Clinic"), is a Tennessee corporation, with its principal office or place of business at 2865 Summer Oaks Drive, Bartlett, TN.

1.c. Respondent International Computerized Orthokeratology Society, Inc. ("ICOKS"), is a Tennessee corporation, with its principal office or place of business located at 2865 Summer Oaks Drive, Bartlett, TN.

1.d. Respondent J. Mason Hurt, O.D., is the sole owner and President of the corporate respondents. He formulates, directs, and controls the policies, acts or practices of the corporate respondents.

His principal office or place of business is the same as that of the corporate respondents.

2. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the respondents, and the proceeding is in the public interest.

ORDER

DEFINITIONS

For the purposes of this order, the following definitions shall apply:

1. "*Competent and reliable scientific evidence*" shall mean tests, analyses, research, studies, or other evidence based on the expertise of professionals in the relevant area, that has been conducted and evaluated in an objective manner by persons qualified to do so, using procedures generally accepted in the profession to yield accurate and reliable results.

2. "*Clearly and prominently*" shall mean:

A. In a television or video advertisement, the disclosure shall be presented simultaneously in both the audio and video portions of the advertisement. The audio disclosure shall be delivered in a volume and cadence sufficient for an ordinary consumer to hear and comprehend it. The video disclosure shall be of a size and shade, and shall appear on the screen for a duration, sufficient for an ordinary consumer to read and comprehend it.

B. In a radio advertisement, the disclosure shall be delivered in a volume and cadence sufficient for an ordinary consumer to hear and comprehend it.

C. In a print advertisement, the disclosure shall be in a type size, and in a location, that are sufficiently noticeable so that an ordinary consumer will see and read it, in print that contrasts with the background against which it appears. In multipage documents, the disclosure shall appear on the cover or first page.

D. In an advertisement on any electronic media received by consumers via computer, such as the Internet's World Wide Web or commercial on-line computer services, the disclosure shall be in a type size, and in a location, that are sufficiently noticeable so that an ordinary consumer will see and read it, in print that contrasts with the background against which it appears. In multi-screen documents, the

disclosure shall appear on the first screen and on any screen containing ordering information.

Nothing contrary to, inconsistent with, or in mitigation of the disclosure shall be used in any advertisement.

3. "*Refractive vision deficiency*" shall mean any vision deficiency treatable by corrective lenses, including but not limited to nearsightedness (myopia), farsightedness (hyperopia), astigmatism (distorted vision), and presbyopia (aging eyes).

4. "*Substantially similar service*" shall mean any ophthalmic service or procedure using contact lenses or similar devices to modify the shape of the cornea and reduce or eliminate refractive vision deficiencies.

5. Unless otherwise specified, "*respondents*" shall mean Mid-South PCM Group, P.C., Eye and Vision Clinic, P.C., and International Computerized Orthokeratology Society, corporations, their successors and assigns and their officers; J. Mason Hurt, O.D., individually and as an officer of the corporations; and each of the above's agents, representatives and employees.

6. "*Commerce*" shall mean as defined in Section 4 of the Federal Trade Commission Act, 15 U.S.C. 44.

I.

It is ordered, That respondents, directly or through any partnership, corporation, subsidiary, division, or other device, including franchisees or licensees, in connection with the advertising, promotion, offering for sale, sale, or distribution of Precise Corneal Molding ("PCM") services or any substantially similar service, in or affecting commerce, shall not represent, in any manner, expressly or by implication, that:

A. Such service provides a cure for any refractive vision deficiency thereby permanently eliminating the need for all corrective eyewear, including eyeglasses and contact lenses;

B. All people can achieve normal vision without eyeglasses or contact lenses on a permanent basis if they wear devices used with such service occasionally or at night;

C. Such service has been approved by the Federal Aviation Administration and all branches of the United States military for use in correcting refractive vision deficiencies; or

D. Studies at the University of Houston College of Optometry (1976-77), University of California at San Diego Medical School (1980), University of California at Berkeley College of Optometry (1982-83), and Pacific University College of Optometry (1984), prove that such service is safe and effective in correcting nearsightedness, farsightedness, and astigmatism.

II.

It is further ordered, That respondents, directly or through any partnership, corporation, subsidiary, division, or other device, including franchisees or licensees, in connection with the advertising, promotion, offering for sale, sale, or distribution of PCM services or any substantially similar service, in or affecting commerce, shall not make any representation, in any manner, expressly or by implication, about:

A. The number of people who can achieve normal vision without eyeglasses or contact lenses on a permanent basis if they wear devices used with such service occasionally or at night;

B. The number of people who will experience stabilized vision after only a few weeks or months of treatments under such service;

C. The ability of such service to prevent or reverse deteriorating nearsightedness in children;

D. The comparative safety of such service and contact lenswear;

E. The comparative effectiveness of such service and refractive surgical methods in eliminating nearsightedness, farsightedness, or any form of astigmatism; or

F. The number of people whom such service has helped achieve normal vision;

unless, at the time the representation is made, respondents possess and rely upon competent and reliable scientific evidence that substantiates the representation.

III.

It is further ordered, That respondents, directly or through any partnership, corporation, subsidiary, division, or other device, including franchisees or licensees, in connection with the advertising, promotion, offering for sale, sale, or distribution of any service, procedure, or product in or affecting commerce, shall not

misrepresent, in any manner, expressly or by implication, the existence, contents, validity, results, conclusions or interpretations of any test, study, or research.

IV.

It is further ordered, That respondents, directly or through any partnership, corporation, subsidiary, division, or other device, including franchisees or licensees, in connection with the advertising, promotion, offering for sale, sale, or distribution of any service, procedure, or product in or affecting commerce, shall not represent, in any manner, expressly or by implication, that such service, procedure, or product is endorsed or approved by any governmental or professional organization or association, or complies with or meets standards or guidelines for such services, procedures, or products established by any such organization or association, unless such is the case.

V.

It is further ordered, That respondents, directly or through any partnership, corporation, subsidiary, division, or other device, including franchisees or licensees, in connection with the advertising, promotion, offering for sale, sale, or distribution of any service, procedure, or product, in or affecting commerce, shall not represent, in any manner, expressly or by implication, that the experience represented by any user testimonial or endorsement of the service, procedure, or product represents the typical or ordinary experience of members of the public who use the service, procedure, or product, unless:

A. The representation is true and, at the time it is made, respondents possess and rely upon competent and reliable scientific evidence that substantiates the representation; or

B. Respondents disclose, clearly and prominently, and in close proximity to the endorsement or testimonial, either:

1. What the generally expected results would be for users of the service, procedure, or product, or

2. The limited applicability of the endorser's experience to what consumers may generally expect to achieve, that is, that consumers should not expect to experience similar results.

For purposes of this Part, "endorsement" shall mean as defined in 16 CFR 255.0(b).

VI.

It is further ordered, That respondents, directly or through any partnership, corporation, subsidiary, division, or other device, including franchisees or licensees, in connection with the advertising, promotion, offering for sale, sale, or distribution of ophthalmic services, procedures, or products, purporting to treat, mitigate, or cure any refractive vision deficiency, in or affecting commerce, shall not make any representation, in any manner, expressly or by implication, about the relative or absolute efficacy, performance, benefits, safety, or success of any such service, procedure, or product, unless the representation is true and, at the time the representation is made, respondents possess and rely upon competent and reliable scientific evidence that substantiates the representation.

VII.

It is further ordered, That respondents shall:

A. Not disseminate to any optometrist or eye care provider any material containing any representations prohibited by this order;

B. Send by certified mail, return receipt requested, an exact copy of the notice attached hereto as Attachment A to each optometrist or eye care provider with whom respondents have done business since January 1, 1994, within thirty (30) days of the date this order becomes final, to the extent that such persons are known to respondents through a diligent search of their records, including but not limited to computer files, sales records, and inventory lists. The mailing shall not include any other documents; and,

1. In the event that respondents receive any information that subsequent to receipt of Attachment A any optometrist or eye care provider mentioned in subpart B of this part is using or disseminating any advertisement or promotional material that contains any representation prohibited by this order, respondents shall immediately notify the optometrist or eye care provider that respondents will terminate said optometrist or eye care provider's right to market and/or perform PCM ortho-k if he or she continues to use such advertisements or promotional materials; and,

2. Terminate any optometrist or eye care provider mentioned in subpart B of this part about whom respondents receive any information that such person has continued to use advertisements or promotional materials that contain any representation prohibited by this order after receipt of the notice required by subpart B of this part;

C. For a period of three (3) years following service of this order, send by certified mail, return receipt requested, an exact copy of the notice attached hereto as Attachment A to each optometrist or eye care provider with whom respondents do business after the date of service of this order who has not previously received the notice. Such notices shall be sent no later than the earliest of: (1) the execution of a sales or training agreement or contract between respondents and the prospective optometrist or eye care provider; or (2) the receipt and deposit of payment from a prospective optometrist or eye care provider of any consideration in connection with the sale of any service or rights associated with PCM ortho-k. The mailing shall not include any other documents.

VIII.

It is further ordered, That respondents Mid-South, Vision Clinic, and ICOKS, and their successors and assigns, and respondent J. Mason Hurt, O.D., shall, for five (5) years after the last date of dissemination of any representation covered by this order, maintain and upon request make available to the Federal Trade Commission for inspection and copying:

A. All advertisements and promotional materials containing the representation;

B. All materials that were relied upon in disseminating the representation; and

C. All tests, reports, studies, surveys, demonstrations or other evidence in their possession or control that contradict, qualify, or call into question the representation, or the basis relied upon for such representation, including complaints and other communications with consumers or with governmental or consumer protection organizations.

IX.

It is further ordered, That respondents Mid-South, Vision Clinic, and ICOKS, and their successors and assigns, and respondent J. Mason Hurt, O.D., shall deliver a copy of this order to all current and future principals, officers, directors, and managers, and to all current and future employees, agents, independent contractors and representatives having responsibilities with respect to the subject matter of this order. Respondents shall deliver this order to current personnel within thirty (30) days after the date of service of this order, and to future personnel within thirty (30) days after the person assumes such position or responsibilities.

X.

It is further ordered, That respondents Mid-South, Vision Clinic, and ICOKS, and their successors and assigns, shall notify the Commission at least thirty (30) days prior to any change in their legal form of organization, including but not limited to dissolution, assignment, sale or other change that would result in the emergence of a successor partnership(s) or corporation(s), the creation or dissolution of a subsidiary, parent, or affiliate that engages in any acts or practices subject to this order; the proposed filing of a bankruptcy petition; or a change in respondents' name or address. Provided, however, that, with respect to any proposed change in respondents' legal form about which respondents learn less than thirty (30) days prior to the date such action is to take place, respondents shall notify the Commission as soon as is practicable after obtaining such knowledge. All notices required by this Part shall be sent by certified mail to the Associate Director, Division of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, Washington, D.C.

XI.

It is further ordered, That respondent J. Mason Hurt, O.D., for a period of five (5) years after the date of issuance of this order, shall notify the Commission of the discontinuance of his current businesses or employment, or of his affiliation with Mid-South, Vision Clinic, or ICOKS, or of his affiliation with any new business or employment. The notice shall include the respondent's new business address and telephone number and a description of the nature of the business or employment and his duties and responsibilities. All notices required

by this Part shall be sent by certified mail to the Associate Director, Division of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, Washington, D.C.

XII.

It is further ordered, That respondents Mid-South, Vision Clinic, and ICOKS, and their successors and assigns, and respondent J. Mason Hurt, O.D., shall, within sixty (60) days after the date of service of this order, and one year thereafter, file with the Commission a report, in writing, setting forth in detail the manner and form in which they have complied with this order.

XIII.

This order will terminate on November 5, 2017, or twenty (20) years from the most recent date that the United States or the Federal Trade Commission files a complaint (with or without an accompanying consent decree) in federal court alleging any violation of the order, whichever comes later; provided, however, that the filing of such a complaint will not affect the duration of:

A. Any Part in this order that terminates in less than twenty (20) years;

B. This order's application to any respondent that is not named as a defendant in such complaint; and

C. This order if such complaint is filed after the order has terminated pursuant to this Part.

Provided further, that if such complaint is dismissed or a federal court rules that the respondents did not violate any provision of the order, and the dismissal or ruling is either not appealed or upheld on appeal, then the order will terminate according to this Part as though the complaint had never been filed, except that the order will not terminate between the date such complaint is filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

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Decision and Order

ATTACHMENT A

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED
[To Be Printed on International Computerized Orthokeratology Society, Inc.
letterhead]

[date]

Dear [optometrist or eye care provider]:

Mid-South PCM Group, P.C., International Computerized Orthokeratology Society, Inc., Eye and Vision Clinic, P.C., and J. Mason Hurt, O.D., recently settled a civil dispute with the Federal Trade Commission (FTC) and the States of Arizona, Illinois, Missouri, Tennessee, and Texas (the States) involving advertising claims for our Precise Corneal Molding (PCM ortho-k) service. As a part of the settlement, we must make sure that you stop using or distributing advertisements or promotional materials that you may have previously received that include these claims.

Our settlements with the FTC and the States prohibit us from making false or unsubstantiated claims for PCM ortho-k or any "substantially similar service," defined as "any ophthalmic service or procedure using contact lenses or similar devices to modify the shape of the cornea and reduce or eliminate refractive vision deficiencies." Please see the attached FTC Complaint and Agreement Containing Consent Order for detailed information. Although we do not admit that the FTC's allegations are true, we have agreed to send this letter as a part of our settlement with the FTC.

Sincerely yours,

J. Mason Hurt, O.D.
President
International Computerized Orthokeratology Society, Inc.

Complaint

124 F.T.C.

IN THE MATTER OF

BLUE CORAL, INC., ET AL.

CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATION OF
SEC. 5 OF THE FEDERAL TRADE COMMISSION ACT*Docket 9280. Complaint, July 12, 1996--Decision, Dec. 9, 1997*

This consent order prohibits Blue Coral, Inc., Blue Coral - Slick 50, Inc., and Blue Coral - Slick 50, Ltd., successors-in-interest to Quaker State - Slick 50, Inc., Slick 50 Management, Inc., Slick 50 Products Corp. and Slick 50 Corp., among other things, from making any claims about the performance, benefits, efficacy, attributes or use of any engine treatment, oil additive, or Slick 50 engine lubricant, unless the companies possess and rely on competent and reliable evidence to substantiate the claims. In addition, it prohibits the companies from claiming that any other Slick 50 motor vehicle lubricant reduces wear on a part, extends the part's life, lowers engine temperature, reduces toxic emissions, increases gas mileage or increases horsepower, unless they can substantiate the claim. The respondents also will be required to notify resellers of the product about the settlement with the Commission and the restrictions on advertising claims. Finally, the consent order holds open the option that the Commission may seek consumer redress.

Appearances

For the Commission: *Lawrence Hodapp, Robert Frisby, Jonathan Cowen and Laura DeMartino.*

For the respondents: *William MacLeod, Collier, Shannon, Rill & Scott, Washington, D.C.*

COMPLAINT

The Federal Trade Commission, having reason to believe that Quaker State - Slick 50, Inc., a corporation; Slick 50 Management, Inc., a corporation; Slick 50 Products Corp., a corporation; and Slick 50 Corp., a corporation, or their predecessors-in-interest ("respondents"), have violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

PARAGRAPH 1. Respondent Quaker State - Slick 50, Inc. ("Quaker State - Slick 50"), is a Delaware corporation, with its office and principal place of business located at 1187 Brittmoore Road, Houston, Texas 77043. Quaker State - Slick 50 is a holding company for Slick 50 Management, Inc., and is the successor-in-interest to

Slick 50, Inc., which was merged with and into Quaker State - Slick 50 on July 11, 1995.

Respondent Slick 50 Management, Inc. ("Slick 50 Management"), is a Delaware corporation, with its office and principal place of business located at 1187 Brittmoores Road, Houston, Texas. Slick 50 Management is a wholly-owned subsidiary of Quaker State - Slick 50, and is a holding company for Slick 50 Products Corp., Slick 50 Corp., and the "Slick 50" trademark.

Respondent Slick 50 Products Corp. ("Slick 50 Products") is a Delaware corporation, with its office and principal place of business located at 1187 Brittmoores Road, Houston, Texas. Slick 50 Products is a wholly-owned second-tier subsidiary of Quaker State - Slick 50.

Respondent Slick 50 Corp. is a Delaware corporation, with its office and principal place of business located at 1187 Brittmoores Road, Houston, Texas. Slick 50 Corp. is a wholly-owned second-tier subsidiary of Quaker State - Slick 50.

PAR. 2. Respondents have manufactured, advertised, promoted, offered for sale, sold and distributed various aftermarket motor oil additives (sometimes referred to as engine treatments) known by the product name Slick 50 to consumers. These products consist primarily of particles of the polymer polytetrafluoroethylene ("PTFE") suspended in a fully formulated motor oil.

PAR. 3. The acts and practices of respondents alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.

PAR. 4. Respondents have disseminated or have caused to be disseminated advertisements for Slick 50, including, but not necessarily limited to, the attached Exhibits A-I. These advertisements contain the following statements and visual depictions:

A. A television advertisement for Slick 50:

Video: Key starting the ignition followed by metal file and metal rope grinding together.

Announcer: Every time you cold start your car without Slick 50 protection, metal grinds against metal in your engine.

Video: A key turning the ignition accompanied by sound of metal grinding.

Announcer: With each turn of the ignition you do unseen damage, because at cold start-up most of the oil is down in the pan.

Video: Shows a box of Slick 50, and then shows a bottle of Slick 50 being poured into a funnel.

Announcer: But Slick 50's unique chemistry bonds to engine parts. It reduces wear up to 50% for 50,000 miles.

[Super: Proven by Independent Lab Tests.]

Video: A large heavy ball is dropped down onto the car and demolishes it.

Announcer: So get Slick 50, while there's still time.

Video: Shows three different boxes of Slick 50 and then shows the demolished car.

Announcer: Slick 50's engine formula, the world's number one selling engine treatment.

[Super: Advanced Technology/Street Smart Science.] (Exhibit A)

B. A television advertisement for Slick 50:

Video: Family is in a cemetery watching a car fall into a grave.

Announcer: There is nothing quite so tragic as an untimely loss.

Video: A bottle of Slick 50 is poured into a funnel.

Announcer: So protect the life of your car's engine with Slick 50.

[Super: Advanced Technology/Street Smart Science.]

The world's number one selling engine treatment. (Exhibit B)

C. A radio advertisement for Slick 50:

Experts say up to 80% of engine wear takes place at start-up. They explain it this way... when you first start your car, the oil is down in the oil pan. It's a good ten seconds before it starts working again. Ten seconds of harsh, metal-to-metal wear. Slick 50 Engine Formula protects against that wear... by bonding the slipperiest stuff ever invented directly to those wear points. A special chemical package makes it happen... and nobody else has it.

So when you start your engine, Slick 50 is on the job even when your oil isn't. If you're serious about fighting wear, give your engine what it takes. Slick 50 Engine Formula. (Exhibit C)

D. A promotional brochure for Slick 50:

LUBRICATION AND TODAY'S ENGINES

Today's engines are marvels of modern engineering...But there's a downside to this new technology. As operating conditions become more extreme, your motor oil can lose its ability to effectively lubricate the engine...it becomes obvious that under many conditions, even modern motor oil formulations may not provide the anti-wear protection you need.

WHAT IT TAKES IS SLICK 50 AUTOMOTIVE ENGINE FORMULA

Slick 50 Automotive Engine Formula is a technologically advanced automotive engine treatment that protects critical engine parts against wear...at start-up and through thousands of miles of punishing stop-and-go driving. Its unique and effective protection lasts through dozens of oil changes, for 50,000 miles. That's what it takes...and here's what it does.

- * Reduces engine wear up to 50%
- * Provides protection during crucial start-up period
- * Protects during high-temperature, high-stress conditions
- * Protection lasts for 50,000 miles

If you have Slick 50, what you have is a protective coating of PTFE bonded on there. (Expert endorser)

What makes Slick 50 Automotive Engine Formula different is an advanced chemical support package designed to bond a specially activated PTFE to the metal in your engine. (Exhibit D)

E. Slick 50 product packaging:

PROVEN PROTECTION

At Start-Up: Slick 50 Automotive Engine Formula is best known for providing wear protection at start-up. In one tightly controlled sequence of start-stop tests conducted by a renowned independent testing laboratory, engines treated with Slick 50 showed a full 42 percent less wear on the piston rings than identical untreated engines. (See Chart 1)

... Claims for Slick 50 Automotive Engine Formula are verified through these and other independent laboratory tests conducted at nationally recognized facilities monitored by the American Society for Testing and Materials (ASTM).

BENEFITS SHOWN IN INDEPENDENT TEST PROGRAMS

Reduces engine wear up to 50%

Provides protection at start-up

Protects in high temperature, high-stress conditions

Protects for 50,000 miles. (Exhibit E)

F. Slick 50 product packaging:

SLICK 50[.] THE ENGINE LIFE EXTENDER

SLICK 50 ADVANCED FORMULA ENGINE TREATMENT[.] Extends Engine Life . . .

Reduces friction, heat & wear

... Since Slick 50 was first developed more than 15 years ago, it has been tested more than any other engine treatment. It's been proven to work.

WHY SLICK 50 IS BETTER PROTECTS BETTER THAN ORDINARY MOTOR OIL START UP PROTECTION

When you turn off your engine, virtually all your motor oil drains down into the pan, leaving critical parts unprotected. After a few hours, when you turn the key and drive, metal grinds against metal. This is when up to 80 percent of all engine wear occurs. THERE'S ONE SOLUTION. Slick 50's unique formula . . . is proven to bond to vital engine parts, protecting them better than ordinary motor oil.

MAKES ENGINES LAST LONGER

Less heat and wear on critical parts means better long term performance and cooler running. This lowers your risk of costly engine repairs, rebuilds, and expensive breakdowns.

PROVEN THE BEST

50,000 MILE ENGINE WEAR TEST. . .

41% LESS WEAR ON TOP ROD BEARINGS

Industry recognized lab tests in real engines, under real operating conditions, prove Slick 50 significantly reduces wear for 50,000 miles. Slick 50 is the only engine treatment to have tested, passed and published the results of these stringent tests. (Exhibit F)

G. Slick 50 promotional brochure:

Count on Slick 50 to:

- * Reduce engine wear at start-up.
- * Lower engine temperature by reducing friction.
- * Improve horsepower.
- * Increase gas mileage.
- * Reduce toxic emissions.

Military specifications are MIL-L-2104-C MIL-L-46152-A.

TEST RESULTS CONFIRM MORE THAN 50% WEAR REDUCTION

It's performed in U.S. Government vehicles.

(Exhibit G) (English language) and (Exhibit H) (Spanish language)

H. Slick 50 Home Page on Internet

("http://www.slick50.com");

Slick 50 Automotive Engine Formula significantly reduces wear on critical engine parts:

- * Protects the engine at start-up, when substantial engine wear occurs.
 - * Reduces wear on engine parts operating under conditions of boundary lubrication (that is, making metal-to-metal contact), including the first and second piston rings.
 - * Reduces engine wear by up to 50 percent for 50,000 miles.
 - * Long term, by reducing engine wear, Slick 50 Automotive Engine Formula can contribute to lower maintenance and repair costs and to extended engine life. By reducing ring wear, it also has the potential to reduce automotive emissions.
- (Exhibit I)

PAR. 5. Through the use of the statements and visual depictions contained in the advertisements and promotional materials referred to in paragraph four, including, but not necessarily limited to, the advertisements and promotional materials attached as Exhibits A-I, respondents have represented, directly or by implication, that:

A. Automobile engines generally have little or no protection from wear at or just after start-up unless they have been treated with Slick 50.

B. Automobile engines commonly experience premature failure caused by wear unless they are treated with Slick 50.

C. Slick 50 coats engine parts with a layer of PTFE.

D. Slick 50 meets military specifications for aftermarket motor oil additives.

PAR. 6. In truth and in fact:

A. Automobile engines generally do not have little or no protection from wear at or just after start-up, regardless of whether they have been treated with Slick 50. Most automobile engines achieve adequate oil flow soon after start-up. Even prior to full oil flow, most automobile engines using the grade and weight of motor oil recommended in the owner's manual and changed at the recommended intervals are adequately protected against wear.

B. It is uncommon for automobile engines to experience premature failure caused by wear regardless of whether they are treated with Slick 50. Engine wear, including wear at or just after

start-up, is insufficient to cause engine failure within the life of most automobiles, when owners use the grade and weight of motor oil recommended in their owner's manual and change the oil at recommended intervals.

C. Slick 50 does not coat engine parts with a layer of PTFE.

D. Slick 50 does not meet military specifications for aftermarket motor oil additives.

Therefore the representations set forth in paragraph five were, and are, false and misleading.

PAR. 7. Through the use of the statements and visual depictions contained in the advertisements and promotional materials referred to in paragraph four, including, but not necessarily limited to, the advertisements and promotional materials attached as Exhibits A-I, respondents have represented, directly or by implication, that:

A. Compared to motor oil alone, Slick 50:

1. Reduces engine wear.
2. Reduces engine wear by more than 50%.
3. Reduces engine wear by up to 50%.
4. Reduces engine wear at start-up.
5. Extends the duration of engine life.
6. Lowers engine temperatures.
7. Reduces toxic emissions.
8. Increases gas mileage.
9. Increases horsepower.

B. One treatment of Slick 50 continues to reduce engine wear for 50,000 miles.

C. Slick 50 has been used in a significant number of U.S. Government vehicles.

PAR. 8. Through the use of the statements and visual depictions contained in the advertisements and promotional materials referred to in paragraph four, including, but not necessarily limited to, the advertisements and promotional materials attached as Exhibits A-I, respondents have represented, directly or by implication, that at the time they made the representations set forth in paragraphs five and seven, respondents possessed and relied upon a reasonable basis that substantiated such representations.

PAR. 9. In truth and in fact, at the time they made the representations set forth in paragraphs five and seven, respondents did not possess and rely upon a reasonable basis that substantiated such representations. Therefore, the representation set forth in paragraph eight was, and is, false and misleading.

PAR. 10. Through the use of the statements and visual depictions contained in the advertisements and promotional materials referred to in paragraph four, including, but not necessarily limited to, the advertisements and promotional materials attached as Exhibits A-I, respondents have represented, directly or by implication, that:

A. Tests prove that, compared to motor oil alone, Slick 50:

1. Reduces engine wear by more than 50%.
2. Reduces engine wear by up to 50%.
3. Reduces engine wear at start-up.

B. Tests prove that one treatment of Slick 50 continues to reduce engine wear for 50,000 miles.

PAR. 11. In truth and in fact:

A. Tests do not prove that, compared to motor oil alone, Slick 50:

1. Reduces engine wear by more than 50%.
2. Reduces engine wear by up to 50%.
3. Reduces engine wear at start-up.

B. Tests do not prove that one treatment of Slick 50 continues to reduce engine wear for 50,000 miles.

Therefore the representations set forth in paragraph ten were, and are, false and misleading.

PAR. 12. The acts and practices of respondents as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

Complaint

EXHIBIT A

Video: Key starting the ignition followed by metal rod and metal rope grinding together.

Announcer: Every time you cold start your car without Slick 50 protection, metal grinds against metal in your engine.

Video: A key turning the ignition accompanied by sound of metal grinding.

Announcer: With each turn of the ignition you do unseen damage, because at cold start-up most of the oil is down in the pan.

Video: Shows a box of Slick 50, and then shows a bottle of Slick 50 being poured into a funnel.

Announcer: But Slick 50's unique chemistry bonds to engine parts. It reduces wear up to 50% for 50,000 miles.
[Super: Proven by Independent Lab Tests.]

Video: A large heavy ball is dropped down onto the car and demolishes it.

Announcer: So get Slick 50, while there's still time.

Video: Shows three different boxes of Slick 50 and then shows the demolished car.

Announcer: Slick 50's engine formula, the world's number one selling engine treatment.
[Super: Advanced Technology/Street Smart Science.]

Complaint

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EXHIBIT B

Video: Family is in a cemetery watching a car fall into a grave.

Announcer: There is nothing quite so tragic as an untimely loss.

Video: A bottle of Slick 50 is poured into a funnel.

Announcer: So protect the life of your car's engine with Slick 50.
[Super: Advanced Technology/Street Smart Science~~er~~]
The world's number one selling engine treatment.

EXHIBIT C

11/14/93 11:04 PETROLON PERFORMANCE - 102 003 1473 10.876 107

Paul, Harvey #2
:60 Radio
Approved, EM 3/17/93

PAUL HARVEY:

If you're one of the millions of Americans who believe in taking good care of your car, chances are you've heard about a product called Slick 50 Engine Formula. Slick 50 was developed to help reduce wear in automobile engines. Over the past few years, it's become something of a phenomenon.

Why? Because it works. It does just what it says it does. It reduces engine wear, especially during start-up. Experts say up to 80% of engine wear takes place at start-up. They explain it this way... when you first start your car, the oil is down in the oil pan. It's a good ten seconds before it starts working again. Ten seconds of harsh, metal-to-metal wear.

Complaint

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EXHIBIT C

11 24 63

11:05

PETROBRAS TECHNOLOGIES - 102 005 1171

10.876

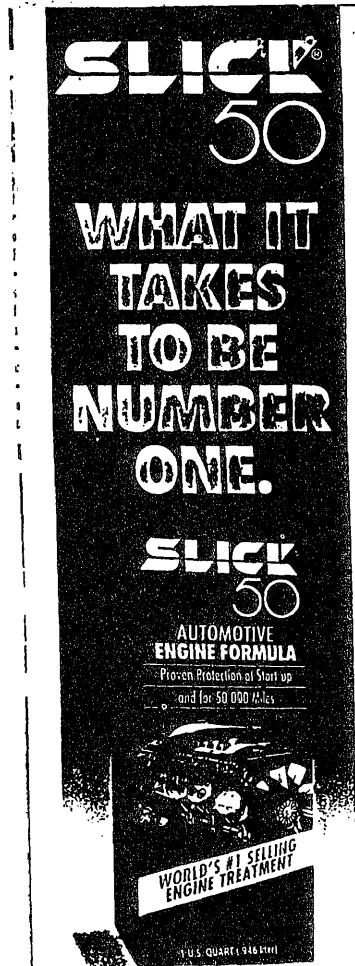
708

Paul Harvey #2 - page 2

Slick 50 Engine Formula protects against that wear... by bonding the slipperiest stuff ever invented directly to those wear points. A special chemical package makes it happen... and nobody else has it.

So when you start your engine, Slick 50 is on the job even when your oil isn't. If you're serious about fighting wear, give your engine what it takes. Slick 50 Engine Formula.

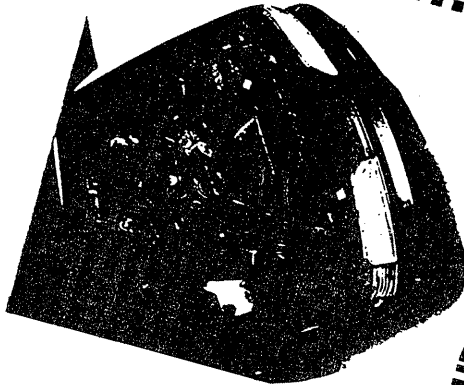
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Complaint

EXHIBIT D

124 F.T.C.



WHAT IT TAKES IS SLICK 50™ AUTOMOTIVE ENGINE FORMULA

It's easy to be number one when you're the only product in your category. But when you've got a market full of competitors, you earn your position every day. Fifteen years ago Slick 50 created the engine treatment category. Since then, store shelves have filled up with look-alikes and imitations. But none has yet been able to reproduce our unique chemistry - or the unique way it protects Shelby combustion engines. That's why Slick 50 Automo Engine Formula is the standard against which all others are measured, and why, after fifteen years, it still the hottest-selling engine treatment in the world. More than 20 million cars in 67 countries are riding on the benefits of Slick 50.

Slick 50 Automotive Engine Formula is a technologically advanced automotive engine treatment that protects critical engine parts against wear... at start-up and through thousands of miles of punishing stop-and-go driving. Its unique and effective protection lasts through dozens of oil changes, for 50,000 miles. That's what it takes... and here's what it does.

- Reduces engine wear up to 50%
- Provides protection during crucial start-up period
- Protection lasts for 50,000 miles
- Treats critical engine parts (Not an oil or oil additive)
- Will not clog oil filters

UNIQUE SLICK 50 CHEMISTRY™ IS THE KEY

PTFE is the slipperiest solid substance ever invented. Lubrication engineers tell us that only wet ice sliding on wet ice has a lower coefficient

"Starting your engine is a terrible thing to do... When your engine is started cold, you have very little oil circulating and little or no oil on the metal parts of your engine. If you have a coating of PTFE bonded on there, so when you start your car cold, you don't get the wear that you normally would."

Bob Siler
Automotive Engineer, Amber & Synthesized Columnist for the New York Times

LUBRICATION AND TODAY'S ENGINES

Today's engines are marvels of modern engineering: they operate under tolerances, temperatures, pressures, and conditions that yesterday's engines simply were not designed for. But there's a downside to this new technology. As operating conditions become more extreme, your motor oil can lose its ability to effectively lubricate the engine. Add to this the problem of dirt, varnish and combustion by-products that build up on critical engine parts, and it becomes obvious that under many conditions, even modern motor oil formulations may not provide the anti-wear protection you need. Simply combining motor oil with a lubrication agent such as PTFE or potentially hazardous heavy metals is not the answer, either.



Fig. 1
Ordinary Engine Treatments

PTFE

BLUE CORAL, INC., ET AL.

Complaint

EXHIBIT D

UNIQUE SLICK 50 CHEMISTRY BENEFITS

FEATURES	
A: Premium multi-viscosity center oil	Ensures a wide variety of lubrication temperatures and driving conditions. Ensures that the oil stays in the engine and does not seep out of the oil pan.
B: Specially sized electron beam activated PTFE particles	PTFE particles are suspended in the oil with special additives. This helps the PTFE particles bond to the metal surfaces of the engine and provides a protective layer that will last for 30,000 miles and more.
C: Colloidal suspension chemistry	Maximizes the efficiency of the bonding process. Ensures that the PTFE particles are evenly distributed throughout the oil.
D: Surface preparation chemistry	Ensures that the PTFE particles are properly prepared for bonding to the metal surfaces of the engine.
E: Process support chemistry	Ensures that the PTFE particles are properly prepared for bonding to the metal surfaces of the engine.

PTFE work like Slick 50. You know the facts. More of friction. So why doesn't every engine run with PTFE? The answer is simple when you know the facts. More of PTFE particles are chemically activated. Because of the PTFE particles are chemically activated, they bond to the metal surfaces of the engine. This is why PTFE is different from other products. Because of the PTFE particles are chemically activated, they bond to the metal surfaces of the engine. This is why PTFE is different from other products. Because of the PTFE particles are chemically activated, they bond to the metal surfaces of the engine. This is why PTFE is different from other products.



Figure Slick 50 Chemistry

Complaint

124 F.T.C.

EXHIBIT D

PROVING AND IMPROVING THROUGH TESTING AND RESEARCH

SLICK 50 ENGINE TREATMENTS aren't what they were 15 years ago. They're better. Since they were first developed, an ongoing program of testing and research has focused exclusively on two goals; to prove what Slick 50 products do and find ways to make them better.

SLICK 50 PRODUCTS CORPORATION has committed millions of dollars to a testing program that's far more extensive than it has to be. To prove that our claims are reliable, the company employs independent testing laboratories as well as our own advanced automotive laboratory, plus top-rated, technology-oriented racing teams. Comprehensive road tests are also conducted in the harshest of real-world conditions, using taxi cab fleets and big rig heavy haulers around the world.



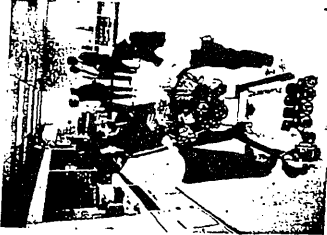
Users' Particle Size Analyzers, part of the laboratory equipment at Slick 50's modern laboratories, assess filter efficiency to measure particles in the sub-micron range.



Slick 50 products undergo a stringent program of laboratory and field testing.

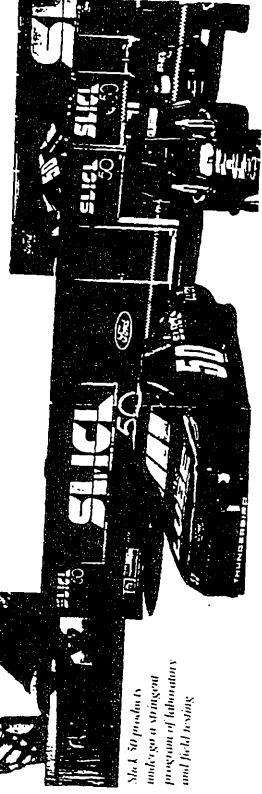
INDEPENDENT LABORATORY TESTS prove that Slick 50 Automotive Engine Formula actually reduces wear at start-up and during 50,000 miles of operation. The laboratories are nationally recognized facilities monitored by the American Society for Testing and Materials (ASTM).

MATERIALS TESTING is devoted to producing new and better products. Slick 50's brand new, well-equipped laboratory in Houston, Texas, is dedicated to the purpose of creating, developing and testing the next generation of Slick 50 products. The company is determined that each new product will earn the number one place in its own category.



Slick 50's brand new, well-equipped laboratory in Houston, Texas.

Motor starts plus a big part in research and testing at Slick 50 Products' ATC-AC Winston Cup, Brock Grand National and ARC 3 events to name a few and their engine specialists, we conduct stringent tests for dynamometer test stands.



PROTECTION FOR 50,000 MILES

Slick 50 is proud to be the leader in the engine treatment category and with that leadership comes a responsibility that we take very seriously—to maintain the highest level of quality and performance in our products, and to stand behind those products with integrity. In you, we offer our guarantee that our products will work as advertised.

Slick 50 Automotive Engine Formula will not void engine manufacturers' warranties.

THE SLICK 50 FAMILY OF PRODUCTS

- Automotive Engine Formula
- High Performance Engine Formula
- RV Engine Formula
- Big Rig Formula
- 4 Cycle Marine Engine Formula
- 2 Cycle Marine Engine Formula
- 4 Cycle Motorcycle Formula
- 4 Cycle Small Engine Formula
- 2 Cycle Small Engine Formula
- Auto Trans*
- Auto Trans†
- One Lube*
- One Grease*

SLICK 50

SLICK 50 PRODUCTS CORPORATION

EXHIBIT D

THE 50,000 MILE MARATHON

While some other products *claim* to protect for 50,000 miles, Slick 50 Automotive Engine Formula is the only product we know of that has actually been tested for 50,000 miles. Identical engines were used - half treated with Slick 50 Automotive Engine Formula and half lubricated only with a premium grade, multi-viscosity motor oil as recommended by the engine manufacturer.

The oil was changed every 3,000 miles in all engines; no additional engine treatment was added. After 50,000 miles, tests confirmed that Slick 50 protection stayed on the job through more than fifteen oil changes, long after the original treatment.

Both the treated and untreated engines were also tested for wear on the rod end bearings. On the engines treated with Slick 50

Chart 1

41% LESS WEAR ON ROD BEARINGS

NET METAL LOSS: 6076 GRAMS (UNTREATED)
NET METAL LOSS: 3473 GRAMS (SLICK 50)



AVERAGE METAL LOSS ON ROD BEARINGS AFTER 50,000 MILES

Automotive Engine Formula, the top half of the bearings - which takes most of the wear-inducing load - showed 41 percent less wear than bearings from the untreated engines! 41 percent less wear is an impressive figure by any standards - even our own.

START-UP TESTING: DON'T TRY THIS AT HOME

Slick 50 Automotive Engine Formula is best known for providing wear protection at start-up, and no claim has been tested more thoroughly or rigorously. As in other tests, identical V-6 engines were used - half treated with Slick 50 Automotive Engine Formula and half not. All engines were started, idled and then run for ten minutes at the equivalent of 50 mph. This was repeated 330 times.

Chart 2

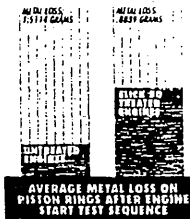
42% LESS WEAR ON PISTON RINGS

Then the oil and oil filter were changed and the engines were run another four hours at 70 mph to flush them out.

The oil was then drained from all engines and the oil filters removed. The engines were then started 500 times - with no oil in them at all! Remember, like the untreated engines, those treated with Slick 50 Automotive Engine Formula had

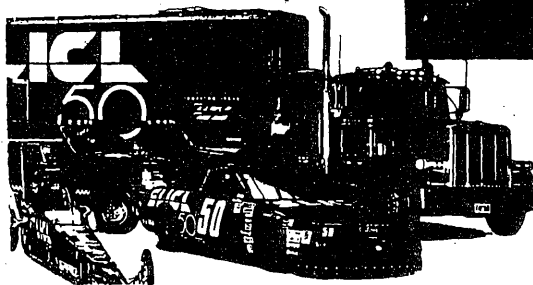
been flushed out with motor oil before the dry-start tests were run.

After the engines had been dry started 500 times, the engines treated with Slick 50 Automotive Engine Formula showed a full 42 percent less wear on the piston rings!



AVERAGE METAL LOSS ON PISTON RINGS AFTER ENGINE START TEST SEQUENCE

ts Corporation. The company's involvement in racing ranges from NHRA, motorcycles and offshore powerboats. Aided by our own th on the track and in the shop, where engines are tested on



The ongoing Slick 50 Product Test Program includes long distance drive under rigorous operating conditions.

Complaint

124 F.T.C.

EXHIBIT E

SLICK
30
ITEM
41301032

PROOF OF PURCHASE

DIRECTIONS

1. Drain oil and change oil filter.
2. Refill 3/4 quart (regular) engines with manufacturer's recommended quality motor oil, just adding one quart of Slick 50[®] Automotive Engine Formula™ for one quart of oil. For higher capacity engines, use 70 percent Slick 50[®] Automotive Engine Formula with 30 percent oil. No need to shake product before use.
3. At manufacturer's recommended intervals, change oil and replace oil filter. Use a good quality oil as recommended in owner's manual.
4. After initial treatment, you may treat your engine again with Slick 50[®] Automotive Engine Formula at any time.

COMPATIBLE WITH ALL MOTOR OILS
 General Use Slick 50[®] Automotive Engine Formula is of SAE 10W-30 viscosity grade and meets API Service Classification SH/CD. Slick 50[®] Automotive Engine Formula will not void engine manufacturer's warranties.

FORMA DE APLICACION

1. Drene el aceite del motor y cambie el filtro de aceite.
2. Añada el aceite nuevo de la calidad recomendada por el fabricante, añadiendo un cuarto de galón de Slick 50[®] Automotive Engine Formula (la cantidad de Slick 50[®] Automotive Engine Formula a utilizar es:

Motores de 3 a 6 litros de aceite	1/4 de Slick 50 [®] Automotive Engine Formula
Motores de mayor capacidad	70% Slick 50 [®] Automotive Engine Formula y 30% aceite normal

3. Cambie el aceite del motor a la recomendada por el fabricante y reemplazue el filtro. Use aceite en la cantidad y de la calidad recomendada por el fabricante.
4. Recupere Slick 50[®] Automotive Engine Formula hasta 80,000 km para obtener los beneficios de protección y lubricación recomendados.

La fórmula que es de Slick 50[®] Automotive Engine Formula es compatible con cualquier tipo de aceite para motor, incluyendo los aceites sintéticos que sean compatibles con sus aditivos de protección.

**ACEITE PORTADOR: SAE 10W-30
 CLASIFICACION DE SERVICIO API: SH/CD**

IN CASE OF REGISTRY CALL 1 800 755 3979

PROTECT YOUR ENVIRONMENT

Pl ease dispose of used motor oil in an EPA approved disposal or recycling facility.
 For information, write Slick 50 Products Corporation, P.O. Box 802347, Houston, TX 77280-2347.

Made In The U.S.A.

SLICK 50 PRODUCTS CORPORATION

Slick 50 is a registered trademark of Protection Management, Inc. and is licensed to Slick 50 Products Corporation. © 1992 Slick 50 Products Corporation

\$3.00

REBATE

\$3.00 off the purchase price of Slick 50[®] Automotive Engine Formula™
 See inside for details. Offer expires March 31, 1995

SLICK[®]

50

AUTOMOTIVE ENGINE FORMULA™

Proven Protection at Start-up and for 50,000 Miles

\$3.00 **REBATE** **\$3.00 OFF THE PRICE OF THE WORLD'S #1 SELLING ENGINE TREATMENT**

1 U.S. QUART (.946 liter)

EXHIBIT E

\$3.00 MAIL-IN REBATE ON SLICK 50[®] AUTOMOTIVE ENGINE FORMULA[™]

Purchase 1 quart of Slick 50 Automotive Engine Formula and receive \$3.00 by mail. To receive a check for your request you must include the following:

1. This original rebate certificate
2. Dated original receipt with Slick 50 Automotive Engine Formula showing the retail price and purchase date circled. Valid only on purchases made between August 15, 1994 and March 31, 1995.
3. Proof of purchase from the inside flap of the Slick 50 Automotive Engine Formula box for which you are requesting a rebate.

Slick 50[®] Automotive Engine Formula is a technologically advanced treatment for cars and light trucks that protects critical engine parts against wear. Unique Slick 50 Protection Chemistry[™] treats oil film engine wear points with specially activated PTFE, the slipperiest solid substance ever invented.

PROTECTS AT START-UP AND DURING OPERATION
Up to 85 percent of all engine wear occurs during start-up, when normally 20% of the oil has been burned into the oil pan. Slick 50 Automotive Engine Formula lubricates and protects the engine during this critical period.

Slick 50 Automotive Engine Formula also provides a 17% engine protection during high temperature, high stress operating conditions such as short trips, stop and go driving and carry, idling during heavy loads. And a single application protects the engine through several oil changes - for 50,000 miles.

PROVEN PROTECTION

- At Start-Up: Slick 50 Automotive Engine Formula tests on a 1000 rpm engine were proven to start up in one-fifth the normal sequence of start steps tests conducted by a research and product testing laboratory and were treated with Slick 50 showed a full 70 percent reduction in the amount of start-up oil consumption (See Chart 1).
- For 50,000 Miles: In a series of tests conducted at one of the foremost independent testing laboratories in the U.S., treated and untreated engines were operated for the equivalent of 50,000 miles. Then the rod end bearings were measured for wear. On the engines treated with Slick 50, the top half of the bearings, which takes most of the wear during load, showed 41 percent less wear than bearings from the untreated engines. (See Chart 2).

Chemical analysis of Slick 50 Automotive Engine Formula revealed that through their and other independent laboratory tests conducted at nationally recognized facilities recognized by the American Society for Testing and Materials (ASTM), Slick 50 products are guaranteed to perform as advertised when used as directed.

BENEFITS SHOWN IN INDEPENDENT TEST PROGRAMS

- Reduces engine wear up to 50%
- Provides protection at start-up
- Protects in high temperature, high-stress conditions
- Protects for 50,000 miles
- Will not clog oil filter

Slick 50[®] Automotive Engine Formula is a proprietary blend of five scientifically formulated chemical compounds. Working together, they help bond a specially processed PTFE to the metal in your engine, which provides maximum protection from oil change to oil change for 50,000 miles.

PTFE is the slipperiest solid substance ever invented. As such, it cannot be "bonded" to any surface by ordinary methods. However, the method used by Slick 50 Automotive Engine Formula is far from ordinary.

Most engine treatments are little more than PTFE and motor oil. (Some don't contain any PTFE at all!) What makes Slick 50 Automotive Engine Formula different is a chemical support package designed to help specially activated PTFE bond to the metal in your engine, so it doesn't drain away with your next oil change. No other product has Slick 50 Automotive Engine Formula's chemistry, and that's why no other product can provide its unique protection. And that's why it's the #1 selling engine treatment in the world.

THE SICK 50 CHEMISTRY[™]

FEATURES	BENEFITS
Premium multi-viscosity carrier oil	Supports a wide variety of motor oils, temperatures and driving conditions.
Specially sized, electron beam activated PTFE particles	Maximizes bonding with the metal. Ensures that the PTFE goes where it's supposed to and stays there.
Colloidal suspension chemistry	Ensures that the PTFE will not settle out in the oil pan, and prevents clumping. No shaking necessary. Just pour it in and you're ready to go.
Surface preparation chemistry	Maximizes the efficiency of the bonding process.
Process support chemistry	Promotes and facilitates interaction between PTFE and metal. Ensures the protection will last for 50,000 miles.

Automotive Engine Formula[™] 41301032 0693
 Synthetic Engine Formula[™]
 High Performance Engine Formula[™]
 Fuel System Formula[™]
 Synthetic Motor Oil
 4-Cycle Marine Engine Formula[™]
 2-Cycle Marine Engine Formula[™]
 4-Cycle Motor Cycle Formula[™]
 2-Cycle Small Engine Formula[™]
 Power Steering Formula[™]
 Main Trans[™] Oil Mist
 Auto Trans[™] One Grease[™]
 One Lube[™] One Lube Formula[™]

THE SICK 50 FAMILY OF PRODUCTS

(Chart 1)

40% LESS WEAR ON PISTON RINGS

(Chart 2)

41% LESS WEAR ON TOP ROD BEARINGS

EXHIBIT F

SLICK 50
ITEM
41301032
PROOF OF PURCHASE

SLICK 50
THE ENGINE LIFE
EXTENDER

**THE ORIGINAL ENGINE TREATMENT.
STILL THE BEST.**

Since Slick 50 was first developed more than 15 years ago, it has been tested more than any other engine treatment. It's been proven to work. Our technology is continually being studied by a joint team of scientists from Slick 50 and Du Pont to ensure the BEST use of Teflon PTFE in engine treatments. We invite you to ask your mechanic, a friend or one of the more than 20 million satisfied customers who continue to use Slick 50. Or write to us for a copy of the official test results and procedures. Also refer to:

Society of Automotive Engineers American Society of Testing Materials
SAE Report #941983 ASTM Test #D4185

Our address: Slick 50 Products Corporation, P.O. Box 802347,
Houston, TX 77280-2347 or call 1-800-547-5425.

 We guarantee that Slick 50 Advanced Formula Engine Treatment will provide added protection against friction and wear as claimed by Slick 50 Products Corporation. If for any reason you are not satisfied with the performance of Slick 50, we will refund the full purchase price.

API Certified
A fully formulated SH-OF 1 quality oil containing Slick 50 has been tested by the American Petroleum Institute (API). No other engine treatment has passed this test.

**Compatible with all Motor Oils.
Will not void manufacturers' warranties.
Will not clog oil filter.
Works in Gasoline or Diesel Engines.**

Directions:
At your next oil change, add one quart of Slick 50 Advanced Formula Engine Treatment for one quart of engine oil. If the engine oil capacity is more than 6 quarts use 20 percent Slick 50 Advanced Formula Engine Treatment with 80 percent oil.

Instrucciones:
En el próximo cambio de aceite, substituya un cuarto de Slick 50 Advanced Formula Engine Treatment por un cuarto de aceite. Si el motor usa más de 6 cuartos de aceite, use el 20 por ciento de Slick 50 Advanced Formula Engine Treatment con el 80 por ciento de aceite.

Slick 50 Advanced Formula Engine Treatment usa un aceite portador de SAE 10W-30 Classification de Servicio SH/CD. El producto no cancela la garantía de manufactura.

 **PROTECT YOUR ENVIRONMENT**
Please dispose of used motor oil at an EPA approved disposal or recycling facility. **Made In The U.S.A.**

SLICK 50

**ADVANCED FORMULA
ENGINE TREATMENT™**

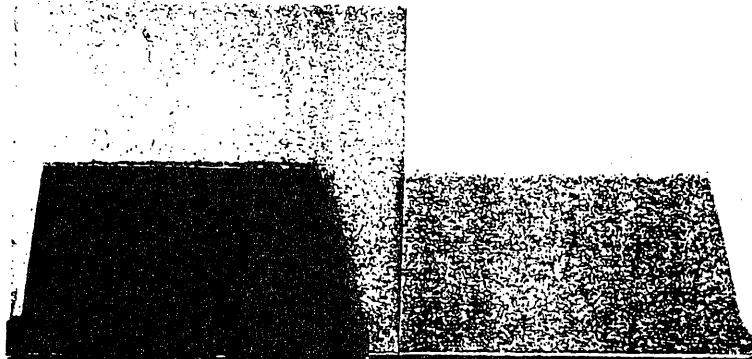
**Extends Engine Life
with Slick 50 Technology
and Du Pont Teflon PTFE**



Reduces friction, heat & wear
#1 The best engine treatment
(See test results on back)

1 U.S. QUART (.946 liter)

EXHIBIT F



WHY SLICK 50® IS BETTER

PROTECTS BETTER THAN ORDINARY MOTOR OIL

When you turn off your engine, virtually all your motor oil drains down into the pan, leaving critical parts unprotected. After a few hours, when you turn the key and drive, metal grinds against metal. This is when up to 80 percent of all engine wear occurs. **THERE'S ONE SOLUTION.** Slick 50's unique formula with Du Pont™ Teflon™ PTFE resins is proven to bond to vital engine parts, protecting them better than ordinary motor oil.



TREATS THE ENGINE, NOT THE OIL

Using Du Pont™ Teflon™ in our own Engine

Strength formula, Slick 50 bonds on an anti-wear surface to your engine that won't drain away with your oil. Other engine treatment products may contain Teflon™, but they haven't proven that they can protect and work for 50,000 miles. **IF IT DOESN'T BOND LIKE SLICK 50, IT DOESN'T WORK LIKE SLICK 50.**



REDUCES DAMAGING FRICTION AND HEAT

By creating an anti-wear surface inside your engine, Slick 50 reduces friction and wear. Less friction means less heat in the critical parts of your engine.



MAKES ENGINES LAST LONGER

Less heat and wear on critical parts means better long term performance and cooler running. This lowers your risk of costly engine repairs, rebuilds, and expensive breakdowns.

ONLY SLICK 50 HAS PASSED ALL FOUR OF THESE CRITICAL ENGINE TESTS:

INDUSTRY RECOGNIZED TESTING			
TEST	SLICK 50	DURA-LUBE	STP
Wear	Pass ✓	Fail ✗	Fail ✗
Friction	Pass ✓	Fail ✗	Fail ✗
Cold Start	Pass ✓	Fail ✗	Fail ✗
50,000 Mile	Pass ✓	Fail ✗	Fail ✗

THEY HAVE NEVER TESTED!

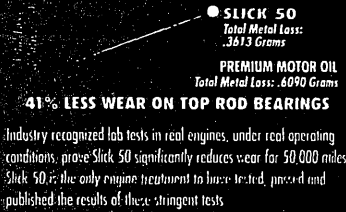
PROVEN THE BEST.

WEAR REDUCTION TEST
Industry Recognized Ball-On-Cylinder Test



In industry recognized tests against premium motor oil and other engine treatments, Slick 50 tested **BEST** at reducing both friction and metal wear together.

50,000 MILE ENGINE WEAR TEST
Total Metal Loss on Top Rod Bearings



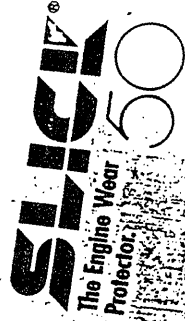
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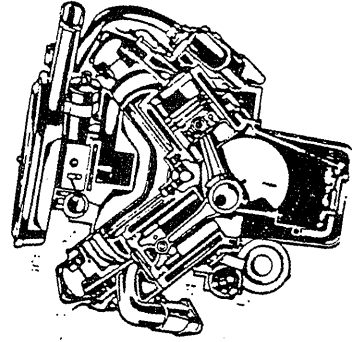


SLICK 50 PRODUCTS CORPORATION

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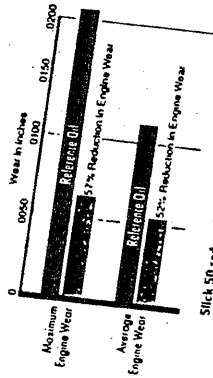
WHY STARTING YOUR ENGINE IS A TERRIBLE THING TO DO



TEST RESULTS CONFIRM
MILITARY

50%

WEAR REDUCTION

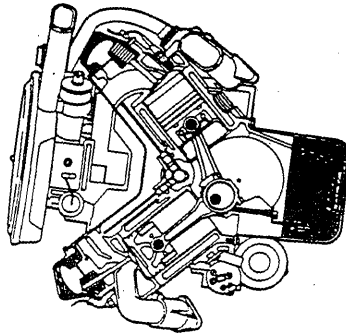


Slick 50 reduced wear by over 50%

Slick 50 Engine Test Results
Tested by an EPA recognized independent laboratory using ASTM procedures showed Slick 50 engine treatment dramatically reduced engine wear up to 57% in maximum wear areas and 52% on average when compared to untreated engine parts using known ASTM reference.

to: _____

- Count on Slick 50 to:**
- Reduce engine wear at start-up.
 - Lower engine temperature by reducing friction.
 - Improve horsepower.
 - Increase gas mileage.
 - Reduce toxic emissions.



Your Petrolon Guarantee:
All Petrolon products are guaranteed to perform as stated when used as directed by manufacturer.
Military specifications are MIL-L-2104-C MIL-L-46152-A.



Slick 50 is a product of
Petrolon, Inc.
Corporate Office:
Petrolon, Inc.
1187 Britannia Road
Houston, TX 77037

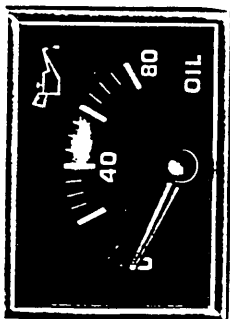
*Assemble
9/91
Contracted*

1-1001-59

568

Complaint

EXHIBIT G



At start-up, there's no oil in your engine, so exposed parts grind together.

**At start-up,
your oil's in the pan,
not in the engine**

In fact, 70% to 80% of all mechanical engine wear happens in those critical seconds after you turn the key

That's because as soon as your car's shut down, gravity begins pulling oil back into the pan. And after about 30 seconds, no protective coating remains to lubricate your engine.

As a result, exposed mechanical engine parts grind together at start-up until oil can begin circulating again. And in those first critical seconds, permanent damage occurs.

Slick 50. Protective treatment for one of life's biggest investments

For most families, buying a new car is a major expense. Plus, modern engines rev higher, run hotter and have closer tolerances than ever. So keeping them performing the way the manufacturer intended is more difficult and more costly than ever.

But not when you treat your car with Slick 50. Within 30 minutes, it begins to bond with metal parts creating a tough super slippery coating. One that can reduce engine wear for over 50,000 miles. Slick 50—the "ONE QUART, ONE TIME" engine treatment treats the engine ... not the oil.

Slick 50 is easy to use

The next time you change your oil and filter, simply substitute one bottle of Slick 50 for the last quart of oil.

That's all there is to it. Unlike additives, Slick 50 does not have to be added every time you change

Run cool even when the outside temperature's hot

Summer driving imposes extra strain on your car's engine. Temperatures are higher, so stop and go conditions take a greater toll. Vacation trips are longer. And pulling trailers and boats also add extra engine strain.

But because Slick 50 helps insulate engine parts from rubbing, there's less friction. As a result, your car runs cooler with far less danger of overheating.

Over a billion miles of proof

So far Slick 50 has been successfully used in more than 15 million cars driven thousands of miles each.

It's performed in U.S. Government vehicles. It's been used by police departments. By commercial fleet owners. And by race car drivers. And tests by an EPA recognized independent laboratory show it can protect your car against engine wear, too.

Slick 50 treats the engine ... not the oil. Slick 50 contains PTFE, the world's most slippery solid substance and the one with the greatest resistance to wear. PTFE also doesn't rust or corrode. It's immune to acids and alkalines. And the more pressure it's under, the more slippery it becomes.



"ONE QUART, ONE TIME" protects and lubricates for more than 50,000 miles.

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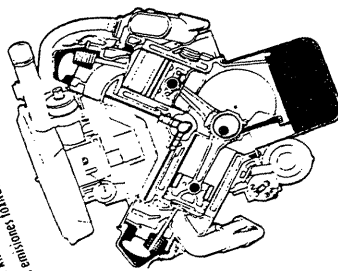
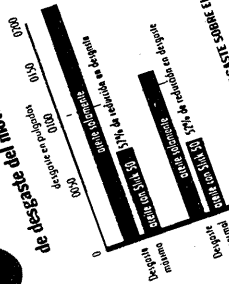
Complaint
EXHIBIT H



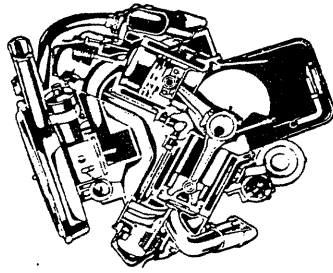
¿PORQUE ES PERJUDICIAL ARRANCAR EL MOTOR?

RESULTADOS DE PRUEBAS
confirman una reducción de salida

de desegesta del motor
50%



- Reducir los empujes laterales
- Aumentar el rendimiento
- Reducir la potencia del motor
- Reducir la temperatura del motor
- Reducir el desgaste del motor
- Reducir el ruido



STICK 50 REDUCE EL DESGASTE SOBRE EL MOTOR...

Se disminuye el ruido...

Su garantía de 1 año...
STICK 50 garantiza un motor...



EXHIBIT I

Product Benefits

Slick 50 Automotive Engine Formula significantly reduces wear on critical engine parts:

- Protects the engine at start-up, when substantial engine wear occurs.
- Reduces wear on engine parts operating under conditions of boundary lubrication (that is, making metal-to-metal contact), including the first and second piston rings.
- Reduces engine wear by up to 50 percent for 50,000 miles.
- Long term, by reducing engine wear, Slick 50 Automotive Engine Formula can contribute to lower

maintenance and repair costs and to extended engine life. By reducing ring wear, it also has the potential to reduce automotive emissions.

Exhibit I

DECISION AND ORDER

The Federal Trade Commission having issued its complaint charging the predecessor corporations of the respondents named in the caption hereof with violation of Section 5(a) of the Federal Trade Commission Act, as amended, and the respondents' predecessors having been served with a copy of that complaint, together with a notice of contemplated relief; and

The respondents, their attorneys, and counsel for the Commission having thereafter executed an agreement containing a consent order, an admission by the respondents of all the jurisdictional facts set forth in the complaint, a statement that the signing of said agreement is for settlement purposes only and does not constitute an admission by respondents of facts, other than jurisdictional facts, or of violations of law as alleged in the complaint issued by the Commission.

The Secretary of the Commission having thereafter withdrawn this matter from adjudication in accordance with Section 3.25(c) of its Rules; and

The Commission having considered the matter and having thereupon accepted the executed consent agreement and placed such agreement on the public record for a period of sixty (60) days, now in further conformity with the procedure prescribed in Section 3.25(f) of its Rules, the Commission hereby makes the following jurisdictional findings and enters the following order:

1. Respondent Blue Coral, Inc. is a corporation organized, existing and doing business under and by virtue of the laws of the State of Delaware, with its office and principal place of business located at 1215 Valley Belt Road, Cleveland, Ohio.

2. Blue Coral-Slick 50, Inc. is a wholly-owned subsidiary of Blue Coral, Inc., organized, existing and doing business under and by virtue of the laws of the State of Delaware, with its office and principal place of business located at 225 E. John Carpenter Freeway, Irving, Texas.

3. Blue Coral, Inc. is the general partner in Blue Coral-Slick 50, Ltd., a limited partnership, with its principal office located at 1385 West 2200 South, Salt Lake City, Utah. Its certificate of limited partnership is filed with the State of Ohio.

4. Blue Coral, Inc., Blue Coral-Slick 50, Inc., and Blue Coral-Slick 50, Ltd. are successors-in-interest to the four corporations named as respondents in the Federal Trade Commission's complaint

against Quaker State - Slick 50, Inc., Slick 50 Management, Inc., Slick 50 Products Corp., and Slick 50 Corp.

5. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the respondents, and the proceeding is in the public interest.

ORDER

DEFINITIONS

For purposes of this order, the following definitions shall apply:

"*Slick 50*" shall mean the aftermarket motor oil additive known as Slick 50 Automotive Engine Formula, Slick 50 Advanced Formula Engine Treatment, or any Slick 50 trademarked product of substantially similar composition.

"*Motor oil product*" shall mean a product for use in conjunction with or in place of fully formulated motor oil.

"*Competent and reliable scientific evidence*" shall mean tests, analyses, research, studies, or other evidence based on the expertise of professionals in the relevant area that has been conducted and evaluated in an objective manner by persons qualified to do so, using procedures generally accepted in the profession to yield accurate and reliable results.

I.

It is ordered, That respondents Blue Coral, Inc. and Blue Coral-Slick 50, Inc., corporations, and Blue Coral-Slick 50, Ltd., a limited partnership, their successors and assigns, and their officers, agents, representatives, and employees, directly or through any corporation, subsidiary, division or other device, in connection with the manufacturing, advertising, labeling, packaging, offering for sale, sale, or distribution of Slick 50, or any substantially similar motor oil product containing polytetrafluoroethylene (hereinafter "PTFE"), in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, do forthwith cease and desist from representing, in any manner, directly or by implication, that:

A. Automobile engines generally have little or no protection from wear at or just after start-up unless they have been treated with such product;

B. Automobile engines commonly experience premature failure caused by wear unless they are treated with such product; or

C. Such product coats engine parts with a layer of PTFE; provided however, that this provision shall not prohibit any claim that relates to chemical or physical reactions between Slick 50 and metal surfaces of engine parts that is substantiated by competent and reliable scientific evidence.

II.

It is further ordered, That respondents Blue Coral, Inc. and Blue Coral-Slick 50, Inc., corporations, and Blue Coral-Slick 50, Ltd., a limited partnership, their successors and assigns, and their officers, agents, representatives, and employees, directly or through any corporation, subsidiary, division or other device, in connection with the manufacturing, advertising, labeling, packaging, offering for sale, sale, or distribution of Slick 50, any other engine lubricating product used in a motor vehicle and sold under the Slick 50 trademark, or any engine treatment or oil additive, in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, do forthwith cease and desist from:

A. Misrepresenting, in any manner, directly or by implication:

1. That such product meets military specifications or the requirements, standards, or specifications of any other governmental or private organization; or

2. The existence, contents, validity, results, conclusions, or interpretations of any test or study.

B. Making any representation, in any manner, directly or by implication:

1. That, compared to motor oil alone, such product:

- a) Reduces engine wear;
- b) Reduces engine wear by more than 50%, by up to 50%, or by any other specific quantity;
- c) Reduces engine wear at start-up;
- d) Extends the duration of engine life; or
- e) Lowers engine temperatures, reduces toxic emissions, increases gas mileage, or increases horsepower;

2. That one or any other number of treatments of such product reduces engine wear for 50,000 or any other number of miles;
3. That such product has been used in a significant number or any other number of U.S. Government vehicles; or
4. Regarding the performance, benefits, efficacy, attributes or use of such product,

unless, at the time of making such representation, respondents possess and rely upon competent and reliable evidence, which when appropriate must be competent and reliable scientific evidence, that substantiates the representation.

III.

It is further ordered, That respondents Blue Coral, Inc. and Blue Coral-Slick 50, Inc., corporations, and Blue Coral-Slick 50, Ltd., a limited partnership, their successors and assigns, and their officers, agents, representatives, and employees, directly or through any corporation, subsidiary, division or other device, in connection with the manufacturing, advertising, labeling, packaging, offering for sale, sale, or distribution of any lubricating product used in a motor vehicle and sold under the Slick 50 trademark, other than any engine lubricating product, including but not limited to any fuel treatment, transmission fluid, or brake fluid, in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, do forthwith cease and desist from making any representation, in any manner, directly or by implication, that such product:

- A. Reduces wear on any motor vehicle part;
- B. Extends the duration of any motor vehicle part's life;
- C. Lowers engine temperatures;
- D. Reduces toxic emissions;
- E. Increases gas mileage; or
- F. Increases horsepower,

unless, at the time of making such representation, respondents possess and rely upon competent and reliable evidence, which when appropriate must be competent and reliable scientific evidence, that substantiates the representation.

IV.

It is further ordered, That, for five (5) years after the last date of dissemination of any representation covered by this order, respondents, their successors and assigns, shall maintain and upon request make available to the Federal Trade Commission for inspection and copying:

A. All labeling, packaging, advertisements and promotional materials setting forth any representation covered by this order;

B. All materials that were relied upon to substantiate any representation covered by this order; and

C. All tests, reports, studies, surveys, demonstrations or other evidence in their possession or control, or of which they have knowledge, that contradict, qualify, or call into question such representation or the basis upon which respondents relied for such representation, including complaints from consumers or governmental entities.

V.

It is further ordered, That respondents, their successors and assigns, shall notify the Federal Trade Commission at least thirty (30) days prior to any proposed change in the respondents such as dissolution, assignment, or sale resulting in the emergence of a successor corporation, the creation or dissolution of subsidiaries or any other change in the corporation which may affect compliance obligations arising under this order.

VI.

It is further ordered, That respondents, their successors and assigns, shall forthwith distribute a copy of this order to each of their operating divisions and to each of their officers, agents, representatives, or employees engaged in the preparation and placement of advertisements, promotional materials, product labels or other such sales materials covered by this order, and shall obtain from each such person or entity a signed statement acknowledging receipt of the order.

VII.

It is further ordered, That respondents, their successors and assigns, shall:

A. Within thirty (30) days after the date of service of this order, send by first class certified mail, return receipt requested, to each purchaser for resale of Slick 50 with which respondents have done business since January 1, 1993, notice of this order in the form attached as Attachment A. The mailing shall not include any other documents; and

B. In the event that respondents receive any information that subsequent to its receipt of notice of this order any purchaser for resale is using or disseminating any advertisement or promotional material specified in Attachment A, respondents shall: (1) immediately send such purchaser for resale a letter requesting that it stop using or disseminating any item specified in Attachment A and notifying it that the respondents will report its use or dissemination of any item specified in Attachment A to the Commission; and (2) within thirty (30) days notify the Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, in writing, of such purchaser for resale's identity and its use or dissemination of any item specified in Attachment A.

VIII.

It is further ordered, That respondents, their successors and assigns, shall, for five (5) years after the last correspondence to which they pertain, maintain and upon request make available to the Federal Trade Commission for inspection and copying:

A. Copies of all signed statements obtained from persons or entities pursuant to part VI of this order;

B. Copies of all notification letters sent to purchasers for resale pursuant to subparagraph A of part VII of this order; and

C. Copies of documents sufficient to show any redress made available to consumers pursuant to any class action lawsuit pending against respondents or any of their affiliates, which challenges conduct similar to that challenged by the Commission in this proceeding.

IX.

It is further ordered, That respondents, their successors and assigns, shall provide notification of all proposed class action settlement terms relating to any class action lawsuits pending against respondents or any of their affiliates, which challenges conduct similar to that challenged by the Commission in this proceeding, to the Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, in writing, at least ten (10) days before any such proposed settlement is submitted to a court for final approval.

X.

It is further ordered, That this order will terminate on December 9, 2017, or twenty years from the most recent date that the United States or the Federal Trade Commission files a complaint (with or without an accompanying consent decree) in federal court alleging any violation of the order, whichever comes later; provided, however, that the filing of such a complaint will not affect the duration of:

A. Any paragraph in this order that terminates in less than twenty years;

B. This order's application to any respondent that is not named as a defendant in such complaint; and

C. This order if such complaint is filed after the order has terminated pursuant to this paragraph.

Provided further, that if such complaint is dismissed or a federal court rules that the respondent did not violate any provision of the order, and the dismissal or ruling is either not appealed or upheld on appeal, then the order will terminate according to this paragraph as though the complaint had never been filed, except that the order will not terminate between the date such complaint is filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

XI.

It is further ordered, That respondents, their successors and assigns, shall, within sixty (60) days after service of this order, file with the Commission a report, in writing, setting forth in detail the manner and form in which they have complied or intend to comply

with this order; and, every ninety (90) days after final court approval of any settlement of a class action lawsuit which challenges conduct similar to that challenged by the Commission in this proceeding, file with the Commission a report, in writing, disclosing the amount of consumer redress made available by the respondents pursuant to such settlement, until such time as the respondents have satisfied their obligation to make available redress pursuant to any such settlement.

Commissioner Anthony not participating.

ATTACHMENT A

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED

[To be printed on respondents' letterhead]

[date]

Dear [purchaser for resale]:

As you may be aware, on July 12, 1996, the Federal Trade Commission ("FTC") issued a complaint against Quaker State - Slick 50, Inc., Slick 50 Management, Inc., Slick 50 Products Corp., and Slick 50 Corp.

In its complaint, the FTC alleged that advertisements for Slick 50 Engine Treatment ("Slick 50") have made false and unsubstantiated claims that: (1) Automobile engines generally have little or no protection from wear at or just after start-up unless they have been treated with Slick 50; (2) Automobile engines commonly experience premature failure caused by wear unless they are treated with Slick 50; (3) Slick 50 coats engine parts with a layer of PTFE; and (4) Slick 50 meets military specifications for aftermarket motor oil additives.

The FTC also alleged that advertisements for Slick 50 have made unsubstantiated claims that, compared to motor oil alone, Slick 50: (1) Reduces engine wear; (2) Reduces engine wear by more than 50%; (3) Reduces engine wear by up to 50%; (4) Reduces engine wear at start-up; (5) Extends the duration of engine life; (6) Lowers engine temperatures; (7) Reduces toxic emissions; (8) Increases gas mileage; and (9) Increases horsepower. In addition, the FTC alleged that Slick 50 advertisements made unsubstantiated claims that: (1) One treatment of Slick 50 continues to reduce engine wear for 50,000 miles; and (2) Slick 50 has been used in a significant number of U.S. Government vehicles.

Finally, the FTC alleged that Slick 50 advertisements falsely claimed that tests prove that, compared to motor oil alone, Slick 50: (1) Reduces engine wear by more than 50%; (2) Reduces engine wear by up to 50%; and (3) Reduces engine wear at start-up; and that tests prove that one treatment of Slick 50 continues to reduce engine wear for 50,000 miles.

On December 9, 1997, the FTC issued a consent order to cease and desist which prohibits certain claims for Slick 50. We consented to the issuance of the order for settlement purposes only and without admitting any of the FTC's allegations that we violated the law. The order requires us to request that our distributors and wholesalers stop using or distributing advertisements or promotional materials containing claims challenged by the FTC. As one of our distributors or wholesalers, we are required to send [purchaser for resale] this letter.

Specifically, the FTC order prohibits us in the future from making claims that (1) Automobile engines generally have little or no protection from wear at or just after start-up unless they have been treated with Slick 50; (2) Automobile engines commonly experience premature failure caused by wear unless they are treated with Slick 50; and (3) Slick 50 coats engine parts with a layer of PTFE. The order also requires that we have a reasonable basis for any performance claims we make for Slick 50 Engine Treatment or other engine lubricating product sold under the Slick 50 trademark, as well as any engine treatment or oil additive. In addition, it requires that we have a reasonable basis for certain specific claims we make for other lubricating products sold under the Slick 50 trademark.

We request your assistance by asking you to discontinue using, distributing, or relying on any of your advertising or promotional material for Slick 50 Engine Treatment received from us prior to July 1, 1997. Please also notify any of your customers who resell these products and who may have such materials to discontinue using those promotional materials. If we receive information that you are continuing to use those materials, we are required to notify the FTC of your failure to comply with this request.

Under separate cover, we will be sending you replacement promotional material that you will be able to use.

Thank you very much for your assistance.

Sincerely,

[name]

President

[respondents]