С¥								
1	WILLIAM E. KOVACIC General Counsel							
2	JOHN JACOBS 04 APR 22 AM 10: 43							
·3	CA Bar No. 134154 Federal Trade Commission							
4 5	10877 Wilshire Boulevard, Suite 700Los Angeles, CA 90024Telephone: (310) 824-4343DEPUTY							
6	Facsimile: (310) 824-4380							
7	ROBIN M. RICHARDSON LAURA KOSS							
8	Attorneys for Plaintiff Federal Trade Commission							
9	600 Pennsylvania Ave, N.W., Room NJ-2122 Washington, DC 20580 Telephone: (202) 326-2798							
10	Facsimile: (202) 326-2558							
11	Attorneys for Plaintiff Federal Trade Commission							
12	UNITED STATES DISTRICT COURT							
13 14	FOR THE SOUTHERN DISTRICT OF CALIFORNIA							
15	FEDERAL TRADE COMMISSION,							
16	Plaintiff,							
17	$\dot{\mathbf{v}} \qquad (\mathbf{RBB})$							
18	LATIN HUT, INC., also d/b/a Maya Sales Corporation,) COMPLAINT FOR PERMANENT INJUNCTIVE							
19) AND OTHER EQUITABLE Defendant.) RELIEF							
20 21)							
21	Plaintiff, the Federal Trade Commission ("FTC" or "Commission"), through its undersigned attorneys, alleges as follows:							
23	 Plaintiff brings this action under Section 13(b) of the Federal Trade Commission Act 							
24	("FTC Act"), 15 U.S.C. § 53(b), to secure a permanent injunction, rescission of contracts,							
25	restitution, disgorgement of ill-gotten gains, and other equitable relief against defendant							
26.	for engaging in deceptive acts or practices and disseminating false advertisements in							
27								
28	1							

Copy

connection with the advertising and sale of purported weight loss and breast enhancement products, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

JURISDICTION AND VENUE

1

2

3

4

5

6

7

8

9

25

26

27

28

6.

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

 Venue in the United States District Court for the Southern District of California is proper under 15 U.S.C. §§ 45(a), 52, and 53(b) and 28 U.S.C. §§ 1391(b) and (c).

THE PARTIES

10 4. Plaintiff, the Federal Trade Commission, is an independent agency of the United States 11 Government created by statute. 15 U.S.C. §§ 41-58. The Commission enforces Section 12 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or 13 practices in or affecting commerce. The Commission also enforces Section 12 of the 14 FTC Act, 15 U.S.C. § 52, which prohibits false advertisements for food, drugs, devices, 15 services, or cosmetics in or affecting commerce. The Commission may initiate federal 16 district court proceedings to enjoin violations of the FTC Act and to secure such equitable 17 relief, including rescission of contracts, restitution, and disgorgement of ill-gotten gains, 18 as may be appropriate in each case. 15 U.S.C. § 53(b).

Defendant Latin Hut, Inc. ("Latin Hut"), which also does business as Maya Sales
Corporation, is a California corporation with its principal office or place of business at
1425 30th Street, Suite A, San Diego, California 92164. At all times relevant to this
complaint, acting individually or in concert with others, defendant Latin Hut has
marketed and sold dietary supplements, devices, and other products to consumers.
Defendant Latin Hut transacts or has transacted business in this district.

COMMERCE

The acts and practices of defendant alleged in this complaint have been in or affecting

---2

commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

23

24

25

26

27

28

DEFENDANT'S COURSE OF CONDUCT

7. Since about 2001, defendant has advertised, offered for sale, sold, and distributed dietary supplements, devices, and other products to consumers nationwide. Defendant's products have included, but are not limited to, the following:

- Parche Para Bajar Peso, a purported weight loss transdermal patch containing fucus vesiculosus (seaweed), garcinia cambogia, and guarana, among other ingredients. Defendant has offered and sold a one-month supply of Parche Para Bajar Peso for \$59.95, plus shipping and handling.
- b. Iman de Grasa/Fat Absorber, a purported weight loss dietary supplement containing chitosan, gota kola, and kelp, among other ingredients. Defendant has offered and sold a one-month supply of Iman de Grasa/Fat Absorber for \$19.95, plus shipping and handling.
- c. Total Bust, a purported breast enhancement dietary supplement containing saw palmetto berry, dong quai root, damiana leaf, and wild yam, among other ingredients. Defendant has offered and sold a one-month supply of Total Bust for \$69.95, plus shipping and handling.

Defendant has advertised its products throughout the United States through Spanish language print advertisements in national Hispanic magazines, such as Cosmopolitan en
 Español, Cristina La Revista, and Vanidades, through catalogs, via the Internet, and
 through other means. Consumers have been able to purchase the products by calling a
 toll-free telephone number or by ordering over the Internet.

Parche Para Bajar Peso

9. Defendant has disseminated, or caused to be disseminated, advertisements for Parche Para Bajar Peso, including, but not necessarily limited to, the catalog advertisements attached as Exhibits A and B. These advertisements contain the following statements

· · · · ·			n en					
1		(transl	ated from the original Spanish to English), among others:					
2		a.	PARCHE ALLOWS YOU TO LOSE WEIGHT NATURALLY!					
3			Proven in a clinical trial of 135 people					
4			-Exhibit A, Maya Catalog					
5		b.	People can lose 3 to 5 pounds a week.					
6			-Exhibit A					
7		c .	Your appetite will be controlled and your metabolism will activate to lose fat.					
8			-Exhibit A					
9	· · ·	d.	People can lose up to 1 to 3 pounds a day.					
10			-Exhibit B, Maya Catalog					
-11			Iman De Grasa/Fat Absorber					
12	10. ·	Defend	lant has disseminated, or caused to be disseminated, advertisements for Iman de					
13		Grasa, including, but not necessarily limited to, the Internet and catalog advertisements						
14		attached as Exhibits C and D. These advertisements contain the following statements						
15		(transla	ated from the original Spanish to English), among others:					
16		а.	The CHITOSAN tablets extract the fat content from your foods and make you avoid absorbing the fat in your body. Take some CHITOSAN tablets before					
17			eating pizza, hamburger or any other fatty food and forget getting fat. -Exhibit C, website <u>http://www.compraloqui.com</u>					
18 19		b.	TABLETS ABSORB THE FAT AND ELIMINATE IT NATURALLY -Exhibit D, Maya Catalog.					
20		с.	Converts all your foods into dietetic foods. -Exhibit D					
21		d.	EAT WHAT YOU WANT AND WHEN YOU WANT!					
22	-		-Exhibit D					
23		e.	FAT ABSORBER tablets have the capacity to absorb fat that you have not digested and allows you to eliminate it naturally. That way you can eat PIZZAS,					
24			HAMBURGERS, or any FRIED FOOD, your body won't assimilate the fat. -Exhibit D					
25			Total Bust					
26	11.	Defend	ant has disseminated, or caused to be disseminated, advertisements for Total Bust,					
27								
28								

including, but not necessarily limited to, the catalog and print advertisements attached as Exhibits E through H. These advertisements contain the following statements (translated from the original Spanish to English), among others: WITHOUT SURGERY OR DRUGS a. 100% natural formula Without side effects Promotes the generation of new tissue in the bust Growth of the bust and Great firmness Permanent results -Exhibit E, Maya Sales Catalog Who is this product for? All women who want to have a bigger and firmer bust b. from puberty to around menopause. Especially those woman who are left with flaccid and drooping breasts after pregnancy, this product is a miracle. It doesn't matter how many children you have had . . . you can recover the freshness, firmness, and roundness that you had and also increase the size of your breasts up to 3 inches. For those women who never had a large bust, this is their opportunity to obtain it. -Exhibit E Who wants bigger and larger breasts? Who wants to recover the firmness and C. roundness that they had before they gave birth and breastfed three children? Well, the answer for the great majority of women is a very strong ME! Unfortunately until recently only surgery could fix the problem, and many women did not want to take that risk. The science has advanced and has given us a new alternative: Total Bust[™]! -Exhibit E d. In our years of clinical experience, we have not seen a product that produces such extraordinary results as Total Bust. This product is totally natural, easy to use, and without side effects and most important it works efficaciously in more than 85% of cases, that's why I recommend it. Dr. Manuel Camafeita Pazos PhD, Doctor in Nutritional Medicine. -Exhibit F. Print Advertisement Total Bust is made from wild herbs that are combined in correct proportions and e. make the body develop the tissues in the bust, newly, as when you were an adolescent. The formula promotes the hormonal balance causing the increase in the measurements of the bust without secondary side effects. This is an 100% natural process without chemical intervention and without dangerous substances in its active ingredients. -Exhibit F f. Sometimes after pregnancy or strenuous diets, the bust hangs and/or softens. In these cases, Total Bust can let you recuperate the original appearance of your breasts and additionally make them bigger. Increases of up to 2 cup sizes have been reported with this formula. -Exhibit F

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

I		
		• •
1 2	 g. I decided not to get implants when a friend told me about Total Bust. I didn't believe her at first but I decided to try it. In only 3 months of treatment my breasts grew 2.5 inches. The firmness is incredible D.B. Carlsbad, California -Exhibit G, Print Advertisement 	
3	DEFENDANT'S VIOLATIONS OF THE FTC ACT	
5 1	2. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits unfair or deceptive acts or	
6	practices in or affecting commerce. Section 12(a) of the FTC Act, 15 U.S.C. § 52(a),	
7	prohibits the dissemination of any false advertisement in or affecting commerce for the	
8	purpose of inducing, or which is likely to induce, the purchase of food, drugs, devices,	
9	services, or cosmetics. For purposes of Section 12 of the FTC Act, 15 U.S.C. § 52, the	•
10 ⁻	Parche Para Bajar Peso is a "drug" or "device" as defined in Section 15 of the FTC Act,	
11	15 U.S.C. § 55, and Total Bust and Iman de Grasa/Fat Absorber are each a "food" or	•
12	"drug" as defined in Section 15 of the FTC Act, 15 U.S.C. § 55.	
13	COUNT I	
14	Parche Para Bajar Peso: False Claims	· .
15 1	5. Through the means described in Paragraph 9 above, defendant has represented, expressly	
16	or by implication, that:	
17	a. The Parche Para Bajar Peso causes substantial weight loss, for example, 3-5	
18	pounds per week; and	
19	b. A clinical trial proves that the Parche Para Bajar Peso causes weight loss.	
20 1	. In truth and in fact:	
21	a. The Parche Para Bajar Peso does not cause substantial weight, for example, 3-5	
22	pounds per week; and	
23	b. A clinical trial does not prove that the Parche Bara Bajar Peso causes weight loss.	•
24	Therefore, defendant's representations set forth in Paragraph 13 above are false or	
25	misleading and constitute deceptive acts or practices, and the making of false	×.
26	advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC	
27		
28		
		•
l		

. 1		Act, 15 U.S.C. §§ 45(a) and 52.	
2		COUNT II	
3		Parche Para Bajar Peso: Unsubstantiated Claims	
· 4	15.	Through the means described in Paragraph 9 above, defendant has represented, expressly	
5	、	or by implication, that:	
6		a. The Parche Para Bajar Peso increases metabolism; and	
7.		b. The Parche Para Bajar Peso suppresses appetite.	
8	16.	Defendant did not possess and rely upon a reasonable basis that substantiated the	
9		representations set forth in Paragraph 15 above at the time the representations were made.	
10		Therefore, defendant's representations set forth in Paragraph 15 above constitute	
11		deceptive acts or practices, and the making of false advertisements, in or affecting	
12		commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and	
13.		52.	
14		COUNT III	
15		Iman de Grasa/Fat Absorber: False Claim	
16	17.	Through the means described in Paragraph 10 above, defendant has represented,	
17		expressly or by implication, that Iman De Grasa causes weight loss by blocking the	
18		absorption of a substantial portion or amount of dietary fat.	
19	18.	In truth and in fact, Iman De Grasa does not cause weight loss by blocking the absorption	
20		of a substantial portion or amount of dietary fat. Therefore, defendant's representation set	· · · ·
21		forth in Paragraph 17 above is false or misleading and constitutes a deceptive act or	
22		practice, and the making of false advertisements, in or affecting commerce, in violation of	
23		Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.	
24		COUNT IV	
25		Iman De Grasa/Fat Absorber: Unsubstantiated Claim	
26	19.	Through the means described in Paragraph 10 above, defendant has represented,	
27			
28		7	
			· · · · ·

expressly or by implication, that Iman De Grasa prevents weight gain. 1 2 20. Defendant did not possess and rely upon a reasonable basis that substantiated the 3 representation set forth in Paragraph 19 above at the time the representation was made. Therefore, defendant's representation set forth in Paragraph 19 above constitutes a 4 5 deceptive act or practice, and the making of false advertisements, in or affecting 6 commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 7 52. 8 COUNT V 9 **Total Bust: Unsubstantiated Claims** 10 21. Through the means described in Paragraph 11 above, defendant has represented, 11 expressly or by implication, that Total Bust: 12 Increases breast size up to 3 inches and/or 2 cup sizes; a. 13 b. Increases breast size in more than 85% of users; 14 Enlarges, firms, and lifts breasts, including post-pregnancy; and c. 15 d. Permanently enlarges and firms the breasts. 16 Defendant did not possess and rely upon a reasonable basis that substantiated the 17 representations set forth in Paragraph 21 above at the time the representations were made. 18 Therefore, defendant's representations set forth in Paragraph 21 above constitute 19 deceptive acts or practices, and the making of false advertisements, in or affecting 20 commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 21 52. 22 **CONSUMER INJURY** 23 22. Consumers throughout the United States have suffered and continue to suffer substantial 24 injury as a result of defendant's unlawful acts or practices. In addition, defendant has 25 been unjustly enriched as a result of its unlawful acts or practices. Absent injunctive 26 relief by this Court, defendant is likely to continue to injure consumers, reap unjust 27 28

enrichment, and harm the public interest.

1

2

3

4

5

6

7

8

21

22

23

24

25

26

27

28

THIS COURT'S POWER TO GRANT RELIEF

23. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt and redress violations of the FTC Act. The Court, in the exercise of its equitable jurisdiction, may award other ancillary relief, including rescission of contracts, restitution, and disgorgement of illgotten gains, to prevent and remedy injury caused by defendant's law violations.

PRAYER FOR RELIEF

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

(1) Permanently enjoin defendant Latin Hut from violating Sections 5(a) and 12 of the
 FTC Act, as alleged herein, including committing violations in connection with the advertising,
 offering for sale, or distribution of food, drugs, dietary supplements, devices, cosmetics, or other
 products, services, or programs;

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

18 (3) Award Plaintiff such other equitable relief as the Court may determine to be just and19 proper.

Dated: april 21, 2004 20

Respectfully submitted,

WILLIAM E. KOVACIC General Counsel

CA Bar No. 134154 Federal Trade Commission 10877 Wilshire Boulevard, Suite 700 Los Angeles, CA 90024 Telephone: (310) 824-4343 Facsimile: (310) 824-4380 LAURA KOSS ROBIN M. RICHARDSON Attorneys Division of Enforcement Bureau of Consumer Protection Federal Trade Commission 600 Pennsylvania Avenue, N.W. Washington, D.C. 20580 (202) 326-2798 (telephone) (202) 326-2558 (facsimile)

Attorneys for Plaintiff Federal Trade Commission

TABLE OF CONTENTS

	<u>Exhibits</u>		<u>Page no.</u>
1.	Exhibit A		1
2.	Exhibit A (translated)	•••••••••••••••••••••••••••••••••••••••	2
3.	Exhibit B	••••••	3
4.	Exhibit B (translated)	· · · · · · · · · · · · · · · · · · ·	4
5.	Exhibit C	•••••••••••••••••••••••••••••••••••••••	5
6.		•••••••••••••••••••••••••••••••••••••••	
7.	Exhibit D	••••••	7
8.	Exhibit D (translated))	8
9.	Exhibit E	•••••••••••••••••••••••••••••••••••••••	9
10.	Exhibit E (translated))	10
11.	Exhibit F		. 11
12.	Exhibit F (translated)	* • • • • • • • • • • • • • • • • • • •	12
13.	Exhibit G	•••••	13
14.	Exhibit G (translated)	14

٩,



Exhibit A

THE PATCH MAKES YOU LOSE WEIGHT NATURALLY!

Supported by clinical trials on 135 people

As seen on t.v., this patch combines 3 natural herbs that are absorbed by your body throughout the day for 24 hours, unlike pills that have to be taken 2 or 3 times a day. This makes it possible for the ingredients to be gradually absorbed, thereby getting the maximum benefit. You will feel energized and fresh all day long.

People can lose 3 to 5 pounds a week. You can bathe or exercise with the patch on without a problem. The active ingredients are completely NATURAL. Your appetite will be controlled and your metabolism will be activated in order to burn fat. You don't have to take special pills or drink special shakes. Just apply the patch in the morning and you're set.

3 to 5 lbs. per week!

Item # 10920 For 1 month.....\$59.95

Exhibit A (translated)

ÌР.

Como visto en la TV, este parche combina 3 hiemas nautrales que su administradas en lu cuerpo durante todo el día, a diferencia de las basilis que se toman 2 o 3 veces al día. Esto te permite absorber los ingredientes gradualmente y así puder aprovecharlos mejor. Te sentirás con energía y fresca todo el día. Personas pueden perder de 1 a 3 libras al día. Te puedes barár o hacer ejercicio con el parche sin problemas. Viene con un instructivo y un plan de dieta balanceado que puedes seguir para ayudarte en la pérdida de peso.

多鼬

d dial

Art # 10920 Para 1 mes...... \$ 59.95

THE PATCH MAKES YOU LOSE WEIGHT NATURALLY!

//image of a model//

As seen on t.v., this patch combines 3 natural herbs that are absorbed by your body throughout the day, unlike pills that have to be taken 2 or 3 times a day.

This makes it possible for the ingredients to be gradually absorbed, thereby getting the maximum benefit. You will feel energized and fresh all day long. People can lose up to 1 to 3 pounds a day. You can bathe or exercise with the patch on without a problem. It comes with an instructional leaflet and a balanced diet plan that you can follow to help you lose weight.

Item # 10920

For 1 month.....\$59.95

1 to 3 lbs. per day!

Exhibit B (translated)

Chitosan Quema Grasa

Page 1 of 1

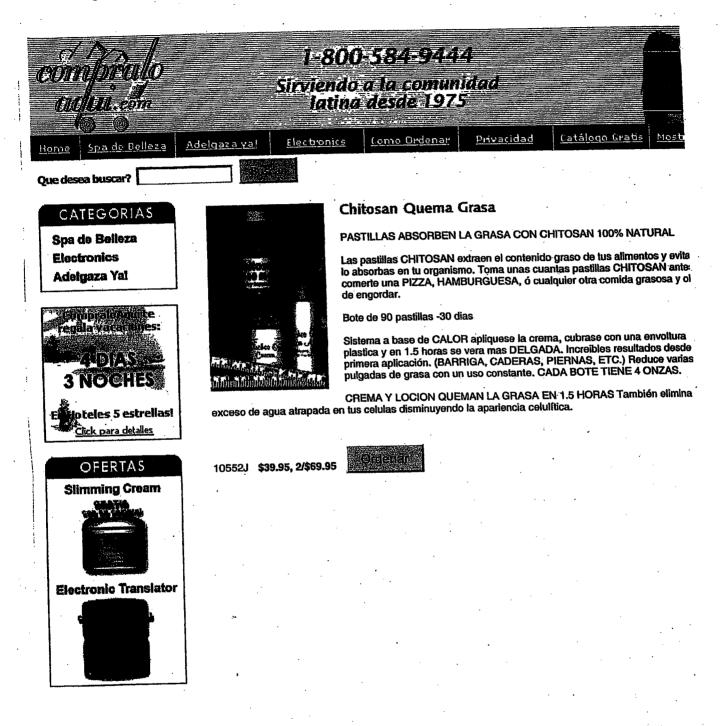


Exhibit C

Chitosan Burns Fat

PILLS ABSORB THE FACT WITH CHITOSAN 100% NATURAL

The CHITOSAN tablets extract fat content from your foods and make you avoid absorbing the fat in your body. Take some CHITOSAN tablets before eating pizza, hamburger, or any other fatty food and forget getting fat.

Bottle containing 90 pills – 30 days

Thermogenic system using HEAT. Apply the cream, wrap yourself in plastic, and you will look SLIMMER in 1.5 hours. Incredible results from the first application. (ABDOMEN, HIPS, LEGS, ETC.) Reduces several inches of fat with regular use. EACH BOTTLE HAS 4 OUNCES.

The CREAM AND LOTION BURN FAT IN 1.5 HOURS. They also eliminate excess water trapped in your cells, reducing the appearance of cellulite.

10552J \$39.95, 2 / \$69.95 ORDER

6

Exhibit C (translated)





Las pastillas FAT ABSORBER lienen la capacidad de absorber la grasa que todavia no digieres y después hacer que la elimines naturalmente. Asi podrás comer PIZZAS. HAMBURGUESAS o cualquier FRITURA, tu cuerpo no asimilará la grasa.

Exhibit D

FAT MAGNET

TABLETS ABSORB THE FAT AND ELIMINATE IT NATURALLY

WITH CHITOSAN

//image of a bottle//

for 1 month

Converts all your foods into dietetic foods

EAT WHATEVER YOU WANT //image// WHEN YOU WANT!

The FAT ABSORBER tablets have the capacity to absorb fat that you have not digested and allows you to eliminate it naturally. That way, you can eat PIZZAS, HAMBURGERS, or any FRIED FOOD. Your body won't assimilate the fat.

Two for \$34.95

One bottle \$19.95

#10663

Exhibit D (translated)

UN BUSTO MAS GRANDE Y BELLO

E

B CS T

Quien no quiere tener senos mas grandes y firmes) (Quien no quiere HACENCRECER EL BUSTO HASTA EN 3 PULGADAS Formula de dembas

cuerpo bello y y sobratodo natural, sin implantes ni molestias. vestidos escotados y usa las prendas que quieras con la confianza de tener un natural para recuperar tu belleza y conflanza en ti misma. Atrevete a usar esos avanzado y nos ha dado una nueva alternativa: Total Bust 🏧 | Una forma problema y muchas muleres no querían tomar ese riesgo. ILa ciencia ha 3 niños! IPues la respuesta en la gran mayoría de mujeres es un YO muy recuperar la firmeza y redondez que tenían antes de dar a luz y dar de lactar luertel Lamentablemente hasta hace poco solo la cirugía podía arregiar el



Firming Creme

estrógeno u otras hormonas, sin embargo sí contienen substancias que imitan los efectos benéficos de las Las hierbas en Total Bust " afectan el telido glandular en los senos. Las hierbas en si no contienen mismas. Están diseñadas para estimular cambios en la concentración de sustancias directamente del crecimientos) que el cuerpo normelmente deja de producir en la adolescencia, evitando el mayor relacionadas con el desarrollo del busto (estrógano, progesterona, proláctina, prostagiandinas y hormona

que le da la forma y redondez al seno mientras que el tejido telido glandular saludable en los senos más no la creación de crecimiento en el busto. El resultado es la creación de nuevo graso hace que se calga y ponga flácido. Con esto, mujeres mantienen su tamaño original. tejido graso. Esto es importante ya que el tejido glandular es lo han reportado que ellas pueden bajar de peso pero sus senos

Saw, Raimett Don-

Qual

Los Efectos

Bust ** es 100% natural y los efectos pueden ser mas rápidos completamente hermosos en poco tiempo. La tórmula Total Total Bust " te puede dar senos mas grandes, mas firmes y efectos secundarios adversos. que con otros productos. Los clientes reportan no tener...

MONIOS DE ALGUNOS USUARIOS SATISFECHOS:

ENNO, le crei D.B.Carlsbac dia pulgadas. La firmeza es increíble, mi esposo pero decidí probario. En solo 3 meses de tratania ë impläntes chando una amiga me comento

CUTE LING ш епсан parto y la lacta rme dio que intentara este producto así que lo hice. No mi resultado fac inceperado, en solo 2 meses el busto se me delayini busto fue el que pago. Quedo flaco, colgado y oulgadasi Tengo energía y me siento bonita otra

inino karalara entimiento tome 1 bole cada 6 meses. ADVIDE 10 ------- ILAME GRATIS AL 1-800-584-9444 ය යුකකාර්ම සූ රහ ගා හස දෙනා ්ෂ රහපර්ශාරහ එස් සොස * Resultados pueden variar en cada persona

ESTE BUSTO PUEDE SER TUYC

SIN CIRUGIAS NI DROGAS

Promueve la generación nuevo tejido en el busto sube de peso ni genera Sin efectos secundarios Resultados permanente Crecimiento del busto Y Formula 100% natural Inneza

para tomar este producto? ¿Quien es la mas indicada

Antes

y mas firme desde la pubertad hasta mas haya de la l odas las mujeres que quieren un bueto mas grande

senos flácidos y colgados despues del embarazo, este En especial aquellas mujeres que se han quedado con manopausla producto es maravilloso.

Despue

9

que antes tenías y además incrementar el tamaño de tu nan tenido un busto grande, esta es su oportunidad de ousto hasta en 3 pulgadas. Para las mujeres que nunca podría hacerte recuperar la frescura, firmeza y redondaz No Importa cuantos hijos hayas tenido, Beauty Bust

GARANTIA DE 3 MESES francesa y efectos maravillosos, te aru olapueluod A. enBlendes enbl Le da mayor elasticidad evitando: afirme y tonifica el telido del busto Fiming Creme. Con denominación Te incluimos Gratis la famosa Breas 191111

Ţ

CON LA COMPRA DE 3 BOTES ESTA GARANTIA ESPECIAL* POR \$179.95 OBTIENE

LA COMPRA DE 3 BOTES POR \$179,95 VIENE CON 3 MESES DE GARANTÍA # 10782 Tres botes (pastillas o liquido) + 3 cremas \$179.95 # 10782 Dos botes (pastillas o liquido) + 2 cremas # 10782 Un bote (elegir pastillas o liquido) + crema \$69.95 \$129.95

> DISPONIBLE Con el líquido, obtiene exactamente los mas rápido es mas facil de tomar y tiene resultados un poco las pastillas. mismos efectos que EN LIQUIDO

ACEPTAMOS PEDIDOS PARA PAGAR AL RECIBIR DE \$29 6 MAS, SOLO SI RECIBIMOS \$40 DE DEPOSITO POR CARTA, NO POR TELEFONO.

A BIGGER AND MORE BEAUTIFUL BUST

Natural Pills TOTAL BUST

//image of doctor//

THEY MAKE THE BUST GROW UP TO 3 INCHES Herbal Formula

//image of bottles// Includes the firming cream "Breast Firming Cream"

Who wants bigger and larger breasts? Who wants to recover the firmness and roundness that they had before they gave birth and breastfed 3 children? Well, the answer for the great majority of women is a very strong ME! Unfortunately until recently only surgery could fix the problem, and many women did not want to take that risk. The science has advanced and has given us a new alternative: Total Bust.TM A natural way to get back the beauty and self confidence. Dare to use dresses with cleavage and wear that apparel if you want with the confidence of having a beautiful body and, above all, a natural one without implants or problems.

THE SCIENCE

The herbs in Total Bust[™] affect the glandular tissue of the breasts. The herbs in and of themselves don't contain estrogen or other hormones; however, they do contain substances that imitate their beneficial effects. They are designed to stimulate changes in the concentration of substances directly related to the bust development (estrogen, progesterone, prolactin, prostaglandins, and growth hormones) that the body normally stops producing during adolescence, preventing additional bust growth. The result is the creation of new glandular tissue in the breasts without creating fatty tissue. This is important because the glandular tissue is what gives breasts the shape and roundness while the fatty tissue causes them to sag and become flabby. With this, women have reported that they can lose weight but their breasts remain their original size.

Saw Palmetto Don Quai Pueraria Mirifica Damiana Fungreek Seed Blessed Thistle Among others

The Effects

Total BustTM can give you bigger, firmer, and completely beautiful breasts in little time. The Total BustTM formula is 100% natural and its effects can be faster than those of other products. Customers have reported no secondary adverse side effects.

TESTIMONIALS FROM SOME SATISFIED CUSTOMERS: "I decided not to get implants when a friend told me about Total Bust. I didn't believe her at first but I decided to try it. In only 3 months of treatment, my breasts grew 2.5 inches. The firmness is incredible. My husband is crazy about it." D.B. Carlsbad, California

. •

"After giving birth and breastfeeding, my bust paid the price. A friend told me to try this product, so I did it. I didn't have anything to lose. The results were unexpected. In only 2 months, my bust became firm and, in 3 months, it grew 2 inches. I have energy and feel attractive once again." R.S. Lauderhill, Florida

CALL 1-800-584-9444 TOLL- FREE WITH YOUR CREDIT CARD THIS BUST COULD BE YOURS

WITHOUT SURGERY OR DRUGS

 100% Natural Formula
 model//

 Without side effects
 (doesn't cause weight gain or acne)

 Promotes generation of new tissue in the bust
 Growth of the bust and

 Great firmness
 Great firmness

Permanent results*

Who is this product for?

All women who want to have a bigger and firmer bust from puberty to around menopause. Especially those women who are left with flaccid and drooping breasts after pregnancy, this product is a miracle. It doesn't matter how many children you have had. With Beauty Bust, you can recover the freshness, firmness, and roundness that you had and also increase the size of your breasts up to 3 inches. For those women who never had a large bust, this is their opportunity to obtain it.

We'll include free of charge the famous Breast Firming Cream. From France and with marvelous effects, this cream firms and tones the bust tissue. It gives it more elasticity, preventing it from sagging and making it firmer!

Try Beauty Bust today risk- free. //illegible//

3- MONTH GUARANTEE WITH THE PURCHASE OF 3 BOTTLES FOR \$179.95, OBTAIN THIS SPECIAL GUARANTEE*

//image of bottle// AVAILABLE IN LIQUID With the liquid, obtain results a little faster. It's easier to take and has exactly the same effects as the pills.

10782 One bottle (pills or liquid) + cream \$69.95
10782 Two bottles (pills or liquid) + 2 creams \$129.95
10782 Three bottles (pills or liquid) + 3 creams \$179.95
THE PURCHASE OF 3 BOTTLES FOR \$179.95 COMES WITH A 3- MONTH GUARANTEE

WE ACCEPT CASH ON DELIVERY ORDERS OF \$29 OR MORE ONLY IF WE RECEIVE A DEPOSIT OF \$10 BY MAIL, NOT BY PHONE.

//image of buxom model//

//image of flat bust//

//image

of large bust// UN BUSTO MAS GRANDE Y BELLO

240

pastillasi FORMULA

TAMBIEN DISPONIBLE

EN LIQUIDO

Con el líquido, obtiene resultados un paco mas rapido, es mas

tócil de tomar y llene exactamente

los mismos efectos que las pasililas.

gratis!

También incluye

la creme afirmente

IN SET

\$69.₉₅

MEJORADA

Pastillas Naturales TOTAL BUSE



Crecimiento de hasta 3 pulgadas*

En nuestros años de experiencia clínica no hemos visto un produzca resultados tan extraordinarios como TOTAL BUST... Este producto es totalmente natural, făcilide usar y sin efectos nocivos y lo mas importante es que funciona eficazmente en mas del 85% de los casos, por ello lo recomiendo." Dr. Manuel Camafeita Pazos PhD Doctor en Medicina Nutricional

TOTAL;BUST tiene Ingredientes 100%naturales escogidos especialmente para el crecimiento del busto. Evita los peligros de una cirugía que te puede dejar marcas irreparables. Total Bust trabaja mas rápido que otras fórmulas, tiene capsulas mas pequeñas fáclles de tomar y los efectos son increíbles. Total Bust esta hecho de hierbas silvestres que al combinarias en las proporciones correctas, hacen que tu cuerpo desarrolle los tejidos del bústo nuevamente, como cuando estabas en la adolescencia. La fórmula promueve el balance hormonal causando el aumento en tus medidas del busto sin efectos secundarios adversos. Este es un proceso 100% natural sin intervención de químicos ni sustancias peligrosas en sus componentes activos.

A veces después del embarazo o dietas fuertes, el busto se cuelga y/o ablanda. En estos casos TOTAL BUST podría hacerte recuperar la apariencia original de tus senos y adlcionalmente hacerlos mas grandes (pasa de una copa A a una C). Las mujeres que nunca tuvieron un busto grande, también pueden obtener crecimientos de 1 a 3 pulgadas. Total Bustino solo ayuda a aumentar el tamaño del busto, también ayuda a la mujera mejorar su organismo en general. Muchas usuarlas han reportado una mejora sustancial en el estado de animo y mayor deseo sexual.

Comentarios de investros clientes

" Ya habia tomado la decisión de ponerne implantes cuando, una amigerne comento de Total Bust. No le crei al inicio pero decial probarlo, Enisolo 3 meses de tratamiento mi busto crecio en 2 y medio pulgadas: Lo firmeza es increible, mi esposo esta encantado." D.B Callsoad, California

"Después del parto y la lactancia mi ibusto fue el que pago: . Una omiga me dijo que intentara este producto así que lo hice. No tenia nada que perder. El resu tado fue inesperado, en solo 2 meses el busto se me afiimo y en 3 meses creció en 2 pulgadas! Tengo energía y me siento bonita otra vez:" R.S. Lauderhill, Florida

* Resuliados prieden valiar en cada persono. La gorantia es de un t

Llame y una representante 1-800-584-



Incluye la crema afirmante

Breast Firming Creme

Junto con las pastillas te incluimos una

crema afirmante de fórmula francesa. Tiene

efectos maravillosos, te afirma y tonifica

el tejido del busto.

A BIGGER AND MORE BEAUTIFUL BUST

NATURAL PILLS

TOTAL BUSTTM

//image of a buxom model//

//photo of a doctor// Growth up to 3 inches

"In our years of clinical experience, we have not seen a product that produces such extraordinary results as TOTAL BUST. This product is totally natural, easy to use, and without side effects, and most important, it works efficaciously in more than 85% of cases, that's why I recommend it."

Dr. Manuel Camefeita Pazos, PhD Doctor in Nutritional Medicine

TOTAL BUST contains ingredients that are 100% natural, especially selected to enlarge the bust. Avoid the dangers of surgery, which can leave you with permanent scars. Total Bust works quicker than other formulas, has smaller capsules that are easy to take, and the effects are incredible. Total Bust is made from wild herbs that are combined in correct proportions and make the body develop the tissues in the bust, newly, as when you were an adolescent. The formula promotes the hormonal balance, causing the increase in the measurements of the bust without secondary side effects. This is an 100% natural process without chemical intervention and without dangerous substances in its active ingredients.

Sometimes, after pregnancy or strenuous diets, the bust hangs and/or softens. In these cases, Total Bust can let you recuperate the original appearance of your breasts and additionally make them bigger. Increases of up to 2 cup sizes have been reported with this formula. Women who never had big breasts may also experience growth of 1 to 3 inches. Total Bust not only helps increase bust size, but also helps women improve their bodies in general. Many users have reported a significant improvement in their level of energy and an increase in sexual desire.

Comments from Our Customers:

"I had decided to get implants until a friend told me about Total Bust. I didn't believe her at first but I decided to try it. In only 3 months of treatment, my bust grew two and a half inches. The firmness is incredible. My husband is crazy about it." D.B. Carlsbad, Californ (MAKE YOUR MONEY ORDER PAYABLE TO M. SALES)

"After giving birth and breastfeeding, my bust paid the price. A friend told me to try this product, so I did it. I didn't have anything to lose. The results were unexpected. In only 2 months, my bust became firm and, in 3 months, it grew 2 inches. I have energy and feel attractive once again." R.S. Lauderhill, Florida

10

//image of a bottle// 240 pills IMPROVED FORMULA

Includes the Firming **Breast** Cream (together with the pills, we include a French- formula firming cream. It has marvelous effects. It firms and tones bust tissue

ALSO AVAILABLE IN LIOUID FORM With the liquid, obtain a little faster results. It's easier to take and has the same effects as the pills. Also includes the free firming cream! \$69.95 LIQUID #10782N

//image of a small bust//

//image of a small bust//

3- MONTH GUARANTEE WITH THE PURCHASE OF 3 BOTTLESFOR \$179.95

PRICE ITEM # 10782X 1 bottle of 240 pills + cream ...,,,\$69.95 2 bottles of 240 pills + 2 creams...\$129.95 3 bottles of 240 pills + 3 creams \$179.95

PAY BY CREDIT CARD AND AVOID SHIPPING COSTS. CALL: 1-800-584-9444 Extension 544-120

OR SEND THE TOTAL AMOUNT OF YOUR MONEY OR MONEY ORDER BY MAIL TO THE FOLLOWING ADDRESS: M. SALES PO BOX 185 (DEPT 544-120) IMPERIAL BEACH, CA 91933 FOR MORE INFORMATION, CALL 1-619-429-8993 EXT. 544-120 We don't accept CODs outside the USA

Exhibit F (translated)

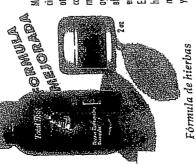


ECINMULA 10070 INATUMAL, JU

SIN CIRUGIAS NI DROGAS

Bast 100% Barisfaccion





Naturales

y actúa rapidamente.

Efectos

mula Total Bust ** es 100% natural y los efectos pueden ser mas rápidos que con otros productas. stal Bust **. Los clientes reportan no tener efectos secundarios adversos. Total Bust ** ha sido becho)ust 🛰 te puede dar senos mas grandes, mas firmes y completamente hermasas en poca tiempo. t uso de Saw Palmetto se han reportado crecimientos de kosta 3 pulgadas bajo la fórmula básica n laboratoria aprobado por la FDÁ.

B-B-H-B

DISPONIBLE EN LIGUIDO

tions winds that the second conductive second formers 1, 1964 **A. E. C. A. E. C. R. C. R. C. R. C. R. C. R. C. R.**

esting del emportat, este producto es maiavilloso. No importa 2:03353

5世的目的人間的目的目的。

Sov.

jeige que initia han tende in busto grande, este es su oportunitad.

tomofici de tité busto hoste an 355

opousia. En especial oquellas mujeres que se han quedado con seños

1

Después

no contrenen estrógeno u otros hormonos, sin emborgo sí contrenen substroncios que imitan

los staçtos banéticos de los mismas. Están diseñadas para estimular combios en ^ta

concentración de sustancias directamente relacionadas con el desarrollo del busto

las hierbas en Tortal Bust ^{Tar} afectan el rejido glandular en los senos. Los hierbas en sí

2

Como Funciona:

.

que el tejido graso hace que se caiga y ponga fiócido. Con esta, mujeres han reportado que importanta ya que el tejido glandular es la que la da la forma y redondez al seno mientras

ellos pueden bajar de peso pero sus senos mantienen su tomaño artginal. $^{\circ}$ \dot{q}_{s}^{s} ϕ_{s}

Es increible como muchos mujeres ya han recuperado la confranza en si mismas y sus vidas molestics. Total Bust 🏎 esta hecho de hierbes naturales, sin contraindicaciones conocidas

embellecer de vaa forma no concebido en años onleriotes.

han cambiada de repente. Attévete o recuperar tu belleza sin preocuparte de implantes ni

efectos secundarios adversas. De una furma fécil y rópida el busto se podrá llenor, afirmar y

ayudar a incrementar el tamaño del busto naturalmente sin usar ciragías pelígrasas y sin

estruevo tejido glandular soludable en los senos pero no la creación de tejido graso. Esto es (estrógano, progesteroro, prolactino, prostoglandinos y hormono del crecimientos) qua el

- cuerpo normalmente deja de producir en la adolescencia. El resultado es la creación de

caso, la verdad es que casi todas las mujeres se ven enfrentadas con este problema en algún

momento de sus vidas. Por esto es que creamos Total Bust 🐄, un suplemento capaz de otros como yo, simplemente para sentirse bellas y atroyentes otra vez. Cualquiera sea el

Muchas mujeres, especialmente después del embarazo, nos vemos tentadas a recurrir a la

cirugia pora mejorar la apariencia de nuestros senos. Algunas para complacer a su pareja



"Yo hobia tomado la decisión de ponerme implantes cuondo una amiga me comento de Beauty Bust. No le cel al inicio pero deciál prebaña. En solo 3 meses de trotomiento, mi busto creció en 2 y media pulgados. La firmezo es incelble, mí espeso esto encontedo $^{\sigma}$

D.B Carlsbad, California

Después del paria y la laciancia, mi busia fue el que pago. Quedo flaco, calgado y sin encanto. Una amiga me dip que intentara este producto esi que lo hice. Ne tento ando que perder. El resultado fue inesperado, en solo 2 meses el busto de me afirmó y en 3 méses creció en 2 pulgadas! Tengo energío y me siento bonito olca vez"

 Rasultados puedan variar en tado persona ्रि द्वताक्यींंव तकाक्यों को के आ एटन का <mark>10 केल्लांकर्त होडे क्याक्य.</mark> R.S Louderhill, Florido

and the Gratis at 1-800-584-9444 . Para maatulmienis lama l bala waa b meter.

(La compra de 3 botes por \$179.95 viene con 3 meses de garantía)

• La galanila especial de 3 meses unicamante se incluye con la compra da 3 boirs. No incluye tos gadoo de envio y son 3 mosos deade la fecha do la factura.

میں mus répido, es mes léai Can el llquido, oblicun rest

#10782 Un bote (elegir pastillas o liquido) + crema\$ 69.95 #10782 Dos botes (pastillas o liquido) + 2 cremas......\$129.95

r lions ezodeme que los postilios.

LHI 0075

ACEFTAMOS PEDIDOS PARA PAGAR AL RECIBIR DE \$29 6 NAS, SOLO SI RECIBINOS \$10 DE DÉPOSITO POR CARTA, NO POR TELEFONO.

BUST GROWTH UP TO 3 INCHES

Natural Herbal Formula

Total BustTM

100% Satisfaction Guaranteed

"In our years of clinical experience, we have never seen a product that produces such extraordinary results." **Dr. Manuel Camefeita Pazos, PhD** Doctor of Nutritional Medicine

IMPROVED FORMULA //image of a bottle// Natural Herbal Formula Many women, especially after pregnancy, are tempted to have surgery to improve the appearance of our breasts. Some to please their partners. Others, like me, simply to feel beautiful and striking once again. In any case, the truth is that nearly all women are faced with this problem at some point in their lives. That's why we created Total Bust,™ a supplement capable of helping increase bust size naturally, without dangerous surgery or adverse secondary effects. Easily and quickly, the bust fills out, becomes firmer, and becomes more beautiful in one week unlike ever imagined in previous years.

It is incredible how many women have regained self confidence and their lives have suddenly changed. Dare to regain your beauty without worrying about implants or problems. Total Bust[™] is made of natural herbs, without known interactions and is quick acting

The Effects

Total Bust[™] can give you bigger, firmer, and completely beautiful breasts in little time. The Total Bust[™] formula is 100% natural and its effects can be faster than those of other products. With the use of Saw Palmetto, growth of up to 3 inches has been reported with the Total Bust[™] basic formula. Customers have reported no secondary adverse side effects. Total Bust[™] has been developed in a laboratory approved by the FDA. MAIN INGREDIENTS

- Saw Palmetto
- Don Quai
- Pueraria Mirifica
- Damiana
- Fungreek Seed
- Blessed Thistle
- among others

TESTIMONIALS OF SOME SATISFIED CUSTOMERS:

"I had decided not get implants when a friend told me about Total Bust. I didn't believe her at first but I decided to try it. In only 3 months of treatment, my bust grew 2.5 inches. The firmness is incredible. My husband is crazy about it." D.B. Carlsbad, California

"After giving birth and breast feeding, my bust paid the price. A friend told me to try this product, so I did it. I didn't have anything to lose. The results were unexpected. In only 2 months, my bust became firm and, in 3 months, it grew 2 inches. I have energy and

100% NATURAL FORMULA, WITHOUT ADVERSE EFFECTS

WITHOUT SURGERY OR DRUGS

//image of model//

//image of

small bust//

//image of

large bust//

100% Natural Formula Without secondary side effects Promotes generation of our bust tissue Bust growth Increase firmness Permanent results

How it Works:

The herbs in Total Bust™ affect the glandular tissues of the breasts. The herbs in and of themselves don't contain estrogen or other hormones; however, they do contain substances that imitate their beneficial effects. They are designed to stimulate changes in the concentration of substances directly related to the bust development (estrogen, progesterone; prolactin, prostaglandins, and growth hormones) that the body normally stops producing during adolescence. The result is the creation of new glandular tissue in the breasts without creating fatty tissue. This is important because the glandular tissue is what gives breasts the shape and roundness while the fatty tissue causes them to sag and become flabby. With this, women have reported that they can lose weight but their breasts remain their original size.

Who is the ideal user of this product?

All women who want a larger and firmer bust from puberty to menopause. Especially for those women who have been left with flabby and sagging breasts after pregnancy, this product is marvelous. It doesn't matter how many children you have had. Total Bust can make you regain the freshness, firmness, and roundness that you had before and, in addition, increase the size of your bust by up to 3 inches. For those women who never had a large bust, this is their change to get it.

3- MONTH GUARANTEE WITH THE PURCHASE OF 3 BOTTLES FOR \$179.95, OBTAIN THIS SPECIAL GUARANTEE* //image of bottle// AVAILABLE IN LIQUID With the liquid, obtain results a little faster. It's easier to take and has exactly the same effects as the pills.

> \$69.95 \$129.95 \$179.95

THE PURCHASE OF 3 BOTTLES FOR \$179.95 COMES WITH A 3-MONTH GUARANTEE

10782 One bottle (pills or liquid) + cream

10782 Two bottles (pills or liquid) + 2 creams

10782 Three bottles (pills or liquid) + 3 creams

Exhibit G (translated)

14

GIFT WITH PURCHASE //image of bottle// Included free of charge is the Breast Firming

Cream //illegible//.