

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**FEDERAL TRADE COMMISSION**, Plaintiff,

v.

**DR. CLARK RESEARCH ASSOCIATION**, a corporation,  
**DR. CLARK BEHANDLUNGZENTRUM GmbH**, d/b/a **DR.  
CLARK ZENTRUM**, a corporation, and  
**DAVID P. AMREIN**, individually and as an officer of both  
corporations, Defendants.

Civ. No.

**COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF**

Plaintiff, the Federal Trade Commission ("FTC" or "the Commission") for its complaint alleges:

1. This is an action under Sections 5(a), 12, 13(b) and 15 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 45(a), 52, 53(b) and 55, in connection with the marketing and sale to the public of various products, including the *Super-Zapper Deluxe*, *Syncrometer*, the *Dr. Clark's New 21 Day Program for Advanced Cancers*, and the *Complete Herbal Parasite Program*, (also called the *Herbal Parasite Cleanse*).

**JURISDICTION AND VENUE**

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

3. This Court has personal jurisdiction over the defendants pursuant to 15 U.S.C. § 53(b).

4. Venue in the Northern District of Ohio is proper under 15 U.S.C. § 53(b) and 28 U.S.C. §§ 1391(b), (c), and (d).

**PLAINTIFF**

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

**DEFENDANTS**

6. Defendant Dr. Clark Research Association ("DCRA") is a California corporation which lists its address at 8135 Engineer Road, #2748, San Diego, California 92111. The affairs of defendant DCRA are controlled entirely by the other two defendants. Defendant DCRA has engaged in marketing, advertising, and selling activities for its products directed to consumers in the Northern District of Ohio and throughout the United States.

7. Defendant Dr. Clark Behandlungszentrum GmbH ("DCZ") is a corporation existing under the laws of Switzerland with its official domicile at Bielstrasse 12, CH-3053 Munchenbuchsee, Switzerland. It has also used the address of Sonnhaldenstrasse 30, 6052 Hergiswil, Switzerland. It does business as Dr. Clark Zentrum. Defendant DCZ has engaged in marketing, advertising, and selling activities for its products directed to consumers in the Northern District of Ohio and throughout the United States.

8. Defendant David P. Amrein is a citizen and resident of Switzerland whose business addresses are the same as those of the other two defendants. He is the sole officer and director of both DCRA and DCZ. At all times material to this Complaint, acting alone or in concert with others, defendant Amrein has formulated, directed, controlled or participated in the acts and practices of DCRA and DCZ, including the acts and practices set forth in this Complaint. Acting through DCRA and DCZ, defendant Amrein has engaged in marketing, advertising, and selling activities for the products offered by DCRA and DCZ directed to consumers in the Northern District of Ohio and throughout the United States.

9. All Defendants have directly solicited business over the Internet and by other means from consumers in the Northern District of Ohio and throughout the U.S. by posting web sites for their products directed at U.S. consumers, by directing advertisements for their products toward U.S. consumers, and by enabling users throughout the United States to purchase products online from their web sites.

## COMMERCE

10. At all times relevant to this complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

## DEFENDANTS' COURSE OF CONDUCT

11. Since at least 1999, defendants have engaged in a plan, program or campaign to sell the *Dr. Clark's New 21 Day Program for Advanced Cancers*, the *Complete Herbal Parasite Program* (also called the *Herbal Parasite Cleanse* and which contains common cloves, black walnut hulls and wormwood and other products that are or contain "foods or drugs" within the meaning of Sections 12 and 15 of the FTC Act, 15 U.S.C. §§ 52 and 55--and the *Super-Zapper Deluxe*, the *Syncrometer* and other products that are "devices" within the meaning of Sections 12 and 15 of the FTC Act, 15 U.S.C. §§ 52 and 55.

12. To induce consumers to purchase the products named in Paragraph 11 above, defendants have disseminated or caused to be disseminated, via the Internet and other means, advertisements and ordering information for the above-described products, including, but not necessarily limited to, the attached Plaintiff's Exhibits ("PXs") 1 through 12. These advertisements contain the following statements that were found at defendants' interconnected Internet websites, which they name "www.drclark.com" and "www.drclark.net:"

### Electricity can now be used...

...to kill bacteria, viruses and parasites in **minutes**, not days or weeks as antibiotics require.

If you have been suffering from a chronic infection or have cancer, or AIDS, learn to build the electronic device that will stop it immediately or buy one [link to web page [www.drclark.net/utilities/b&p.htm](http://www.drclark.net/utilities/b&p.htm)]. It is safe and without side effects and does not interfere with any treatment you are now on. (From: "The Cure for all Diseases", after cover; copyright notice [link to web page [www.drclarknet/utilities/copyright.htm](http://www.drclarknet/utilities/copyright.htm)]) .

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**Any positively offset [DC] frequency kills all bacteria, viruses and parasites simultaneously** given sufficient voltage (5 to 10 volts), duration (seven minutes), and frequency (anything from 10 Hz to 500'000 Hz).

But it takes more than one treatment. It takes three treatments to kill everything. Why? The first zapping kills viruses, bacteria and parasites. But a few minutes later, bacteria and viruses (different ones) often recur. I conclude they had been infecting the parasites, and killing the parasites released them. The second zapping kills the released viruses and bacteria, but soon a few viruses appear **again**. They must have been infecting some of the last bacteria. After a third zapping I never find any viruses, bacteria or parasites, even hours later. (From: "The Cure for All Diseases", p. 13ff.; copyright notice [link to web page [www.drclark.net/utilities/copyright.htm](http://www.drclark.net/utilities/copyright.htm)].

**Order a Zapper**  
**Order the book**  
**Order other products**

[link to web page [www.drclark.net/utilities/b&p.htm](http://www.drclark.net/utilities/b&p.htm)]

PX 1, from [www.drclark.net](http://www.drclark.net)

## Dr. Clark's Plate Zapping Technique

### New Zapping Technique: Plate Zapping

Dr. Hulda Clark's zapper has not changed since its invention - or rather discovery? - in 1994. It is reliable and can achieve dramatic results, as confirmed by hundreds of testimonials. But a good researcher is never quite satisfied with what is good - because there may always be better or faster results. As detailed in "The Cure for All Advanced Cancers", Dr. Hulda Clark has been working a lot with supplements, vitamins and minerals, and ozonization; recently she has focused more on essential oils among others. Now she has found it time to re-examine the zapper concept and find ways to zap even more effectively.

### PCBS PREVENT EFFECTIVE ZAPPING

Most patients get fast results from using Dr. Hulda Clark's zapper. But with some patients, the success was limited. Dr. Clark found out that those patients had PCBs preventing the zapper from being effective. Besides this, PCBs are another factor reducing immunity, besides benzene, asbestos and lanthanides that were elaborated on in earlier issues of the Bulletin.

PCBs are found in commercial soaps and pesticides (which may occur in treated wood in homes; produce). The source must be found and eliminated as always. Then, PCBs can be eliminated from the body by taking ozonated olive oil (see separate article on ozonization), which takes 2-3 weeks.

### PLATE ZAPPING: COMBINING ZAPPER AND SYNCROMETER TECHNIQUES

Then, Dr. Clark made many experiments with different zapper techniques. They are not actually changes in the zapper circuit, but much rather additions to the existing zapper circuit. But Dr. Clark was only ready to talk about one of the new zapper techniques, which she calls plate zapping, while the others have not progressed enough and been tested enough to be released.

The Syncrometer uses test plates to test for pathogens and substances in the human body. It is a simple oscillating circuit with a 1000 Hz base frequency which is modulated by the frequencies that are fed into the circuit by the capacitor plates.

It is also possible to narrow the search for toxins and pathogens down to a specific organ in the body by placing an organ slide on the second test plate (the "anatomy plate", therefore).

Now, Dr. Clark has used this technique with the zapper: She simply connected two test plates to the zapper circuit. It does not matter where the capacitors are fed into the circuit, but Dr. Clark stresses they should be on the "hot" side (the red on the Super Zapper DeLuxe).

The plates can now be used to narrow the zapping down to an organ or a pathogen. This is very specific zapping and has proven to be much more effective for the organ or pathogen on the slide (while being less effective for the others). It is also possible to place organs and pathogens on the plates at the same time; as well as placing several organs and pathogens on the plates ("loading the plates") - but then the effect gets more diluted again.

Finally, it has become possible to zap the intestines with the plate zapping technique. The intestines have been shielded from regular zapper current. But they can't resist plate zapping current. "Almost all our cancer patients now find parasites in their stool", Dr. Clark said on our last visit to her office, and she showed us little baggies with textbook examples of parasites from the patients. "I have the patients bring them to the office. If they find no parasites I know we are missing something".

## SUMMARY

What is plate zapping? -- It means using the zapper with capacitor plates attached. On the plates you can put slides of anatomy or pathogens to specifically zap the organ or the pathogen that is on the plate.

Who is plate zapping for? -- Any patient could use it, but since you need the slides its costs makes it appear more suitable for advanced patients.

How can you plate zap? -- Take Syncrometer plates (or make your own plates with aluminum foil and cardboard), and connect them to the zapper, for example with a double alligator clip lead. Make sure you attach it to the "hot" side (usually red). You can also get plates and a ready made connection cable on the order form here. You need slides of whatever pathogens or organs you want to zap specifically. Dr. Clark has initiated a special digestive kit, because now it is possible to zap the digestive tract also. You can get slide kits on the order form or single slides from a biological supply company.

PX 2, from [www.drclark.net](http://www.drclark.net)

## Welcome to the Dr. Hulda Clark Cancer Page

Dear Visitor

You came here to find out more about Dr. Hulda Clark's approach to Cancer. Dr. Hulda Clark is the researcher who claims: "Cancer can now be cured!"

I can imagine that the first things you are interested to know is

Who is Dr. Hulda Clark?  
What are her findings about Cancer?  
How have those findings been corroborated?

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Dr. Clark's work is based on bio-feedback testing (the Syncrometer(TM)), with which she determines the ACTUAL CAUSES of cancer and other health conditions. Knowing the cause will open the door to prevention and treatment. For this purpose Dr. Hulda Clark uses a large number of approaches in natural medicine, but ALL TARGETED AT THE EXACT CAUSE of the conditions.

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In her first book about cancer "The Cure for All Cancers", Dr. Hulda Clark examined the EXACT CAUSES of malignancy, i.e. cancer. In an update 1998 she added the make-up of a tumor, which comes before a malignant tumor mass. In her second cancer book, "The Cure for All Advanced Cancers", Dr. Clark mapped out a lot more steps from a healthy individual to a person with cancer. It includes a lot more information about tumors, low immunity and how to shrink tumors. The "21 Day Program" is laid out in this book. Her third book about cancer is called the "Syncrometer Science Laboratory Manual". It contains the most advanced procedures for shrinking tumors, the "Mostly Zapping Program".

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### How have those findings been corroborated?

Dr. Hulda Clark has treated over 2,000 cancer patients in the last 15 years. Her techniques have evolved from rather crude to an exact science during this time. While she used to have all kinds of cancer patients, she now takes terminal cases only -- she feels the others can do it out of the book.

You may ask why no university has confirmed her work yet. The reason is simple, it has not been tested. It is one of the goals of this Association to do this kind of clinical work. We have started with

some research about Dr. Clark's zapper first. I have visited and communicated with many research institutes, and it is very hard to find one that is both qualified and interested in cooperating for such a research effort. Finally, the money for such studies is not easily found.

But consider this: The chance of a "spontaneous remission" of terminal cancer is 1:60,000. That means that out of 60,000 cases one will live. You can imagine that it does not take many cases to make this statistically relevant. It would be like watching a person walk over water and ask for a research study about it to prove it was statistically relevant.

And testimonials we do have galore. You can find them here:

<http://www.drclark.net/testimonials/testiframe.htm> , and this is only a small fraction of the many we have in our files!

PX 3 from [www.drclark.net](http://www.drclark.net)

### **Cancer Testimonial #0016**

Two and half years ago I got terminal liver cancer (primary) and was given 2 to 6months to live. First I used Breuss and after three months Dr. Clark's cancer cures for the next 15 months. I am 59 years old, feel great and looking for a job. I had hepatitis B for a long time and my liver was badly damaged. Many people diagnosed with cancer after me are dead, killed by orthodox methods. I didn't use any of them. My story was on TV channel 7, Today Tonight program verifying all CAT scans . Also, I could guarantee with my life that no cancer patient would die from cancer using Dr. Clark's treatments. This was not a fluke. I am an engineer for atomic and nuclear physics and I could understand and compare both treatments. I have all CAT scans and I would do everything possible to help Dr. Clark . Without her treatment I would not be alive.

For any help please do not hesitate to call or write.

Yours Sincerely,

V.

PX 4, from [www.drclark.net](http://www.drclark.net)

### **Dr. Clark's New 21 Day Program for Advanced Cancers**

The 21 day program is described in detail in Dr. Clark's new book "The Cure for All Advanced Cancers". Caution: It is intended for severely ill patients and not for prevention purposes.

We have seen amazing results in hopeless cases with this program that are nothing short of miraculous. But bear in mind that

1. the dental clean-up and other clean-ups are still the core of the therapy;
2. no therapy in medicine works in 100% of the cases, and be it just for lack of correct application;
3. the best results are only possible if Syncrometer testing is available. Excellent results are possible without if a radical approach is chosen, but Syncrometer testing definitely makes improved care possible.

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PX 5, from [www.drclark.net](http://www.drclark.net)

### **Cancer can now be CURED, not just treated**

We are not accustomed to thinking about a cure for cancer. We think of remission as the only possibility. But this book is not about remission. It is about a cure. This is possible because in 1990 I

discovered the true cause of cancer. The cause is a certain parasite, for which I have found evidence in every cancer case regardless of the type of cancer. So lung cancer is not caused by smoking, colon cancer is not caused by a low-roughage diet, breast cancer is not caused by a fatty diet, retinal blastoma is not caused by a rare gene, and pancreatic cancer is not caused by alcohol consumption. Although these are all contributing factors, they are not THE cause. Once the true cause was found the cure became obvious. But would it work? I set a goal of 100 cases to be cured of cancer before publishing my findings. That mark was passed in December, 1992. The discovery of the cause and cure of all cancers has stood the test of time and here it is! (From: "The Cure for all Cancers", after cover; copyright notice)

PX 6, from [www.drclark.net](http://www.drclark.net)

### **You may not have time...**

...to read this entire book first if you have cancer and are scheduled for surgery, chemotherapy or radiation treatment. You may wish to skip the first pages which describe how cancer develops.

Go directly to the cancer curing recipe and [order your supplies](http://www.drclark.net/utilities/b&p.htm) [link to web page [www.drclark.net/utilities/b&p.htm](http://www.drclark.net/utilities/b&p.htm)]. Using the [herbal recipe](http://www.drclark.net/disease/p_cleanse.htm) [link to web page [www.drclark.net/disease/p\\_cleanse.htm](http://www.drclark.net/disease/p_cleanse.htm)] together with the [zapper](http://www.drclark.net/disease/zapper.htm) [link to web page [www.drclark.net/disease/zapper.htm](http://www.drclark.net/disease/zapper.htm)] is best. It only takes days to be cured of cancer regardless of the type you have. It does not matter how far progressed the cancer is, you can still stop it in 5 days.

After you have stopped the cancer, you can turn your attention to getting well. Read the case histories to see how easy it is to stop even terminal cancer. Learn from them to avoid mistakes.

Does this mean you can cancel your date for surgery, radiation or chemotherapy? YES! After curing your cancer with this recipe it cannot come back. **This is not a treatment for cancer: It is a cure!** But if you do not wish to make your doctor angry, you could follow her or his wishes, too. Be careful not to lose any vital anatomical parts in surgery though, because you may need them later when you are healthy!

Remember that oncologists are kind, sensitive, compassionate people. They want the best for you. They have no way of knowing about the true cause and cure of cancer since it has not been published for them. I chose to publish it for you first so that it would come to your attention faster. (From: "The Cure for all Cancers", after cover; [copyright notice](http://www.drclark.net/utilities/copyright.htm) [link to web page [www.drclark.net/utilities/copyright.htm](http://www.drclark.net/utilities/copyright.htm)].

**Order your supplies**  
**Order the book**

[link to web page [www.drclark.net/utilities/b&p.htm](http://www.drclark.net/utilities/b&p.htm)]

PX 7, from [www.drclark.net](http://www.drclark.net)

### **The Basis of the Discoveries**

I have indicated throughout this book the existence of pollutants in food and other products. These pollutants were identified using a testing device of my invention known as the Syncrometer(TM). Complete instructions for building and using this device are contained in this book. Therefore anyone can repeat the tests described and verify the data.

The Syncrometer is more accurate and versatile than the best existing testing methods. A method for determining the degree of precision is also presented. However at this point it only yields positive or negative results, it does not quantify. The chance of a false positive or a false negative is about 5%, which can be lessened by test repetition.

PX 8, from [www.drclark.net](http://www.drclark.net)

### **53 CURED Cases the First Year**

Cure, not treatment, is the subject of this book. In 1991 I discovered the source of HIV. Once the source became clear the cure became obvious. But would it work? After curing 53 cases in a row, **all who used this method**, I could wait no longer to present these findings. Since that time many more have been cured, too many to be added to this book[\*]. Most important is adding yourself to that list! (From: "The Cure for HIV/AIDS", after cover; [copyright notice](#) [link to web page [www.drclark.net/utilities/copyright.htm](http://www.drclark.net/utilities/copyright.htm)].

[\* In the most recent edition of the book five cases verified by PCR lab testing for HIV have been added.]

PX 9, from [www.drclark.net](http://www.drclark.net)

## **You may not have time...**

...to read this entire book first if you are sick with AIDS. You may wish to skip the part about how HIV infection is caused and go directly to the HIV Curing Recipe. [Order your supplies](#) [link to web page [www.drclark.net/utilities/b&p.htm](http://www.drclark.net/utilities/b&p.htm)]. Follow the recipe exactly; it was carefully worked out for you. It takes 5 days to be cured of HIV regardless of how ill you are. After you have eliminated the virus, you can turn your attention to getting well from AIDS. Read the case histories to see how easy it is to stop even terminal AIDS. Learn from them to avoid mistakes.

Or you may [zap](#) [link to web page [www.drclark.net/disease/zapper.htm](http://www.drclark.net/disease/zapper.htm)] the virus with electricity for 7 minutes and eliminate it that way. Build or [purchase](#) [link to web page [www.drclark.net/utilities/b&p.htm](http://www.drclark.net/utilities/b&p.htm)] a zapper immediately. Using the [herbal recipe](#) [link to web page [www.drclark.net/disease/p\\_cleanse.htm](http://www.drclark.net/disease/p_cleanse.htm)] along with the zapper is best.

Does this mean you can cancel your appointment with your clinical doctor? No, it does not. Although you will not need HIV-specific drugs after you test negative, you may need antibiotics and life support systems for your AIDS. It could take you two years to get completely well.

Remember that doctors are kind, sensitive, compassionate people. They want the best for you. They have no way of knowing about the true cause and cure of HIV/AIDS since it has not been published for them. I chose to publish it for you first so that it would come to your attention faster. (From: "The Cure for HIV/AIDS", after cover; [copyright notice](#) [link to web page [www.drclark.net/utilities/copyright.htm](http://www.drclark.net/utilities/copyright.htm)].

**Order your supplies**

**Order the book**

[link to web page [www.drclark.net/utilities/b&p.htm](http://www.drclark.net/utilities/b&p.htm)]

PX 10, from [www.drclark.net](http://www.drclark.net)

## **The promise**

**Step into a new world.**

A world without chronic diseases.

**Step out of your old world.**

It has kept you a prisoner.

**Try something new.**

The prison has no walls. It has only lines. Lines that mark the ground around you. Inside the lines are your old ideas. Outside are new ideas that invite you to step over and escape your prison. Dare to try these new ideas and your illness promises to recede. In a few weeks it can be gone. (From: "The Cure for all Diseases", p.1; [copyright notice](#) [link to web page [www.drclark.net/utilities/copyright.htm](http://www.drclark.net/utilities/copyright.htm)].

PX 11, from [www.drclark.net](http://www.drclark.net)

## Only Two Health Problems

No matter how long and confusing the list of symptoms a person has, from chronic fatigue to infertility to mental problems, I am sure to find only two things wrong: they have in them **pollutants** and/or **parasites**. I never find lack of exercise, vitamin deficiencies, hormone levels or anything else to be a primary causative factor. So the solution to good health is obvious:

### Problem: Simplest Cure:

Parasites Electronic and herbal treatment

Pollution Avoidance

It's a valiant quest: The quest for health. With optimism in one hand and determination in the other, you too can work the miracles for yourself that my clients accomplished in the case histories.

More good news is that it is not expensive. The cost will range from a few hundred dollars to only a few thousand in order to eliminate both problems and cure your chronic diseases.

(From: "The Cure for all Diseases", p.2f.; [copyright notice](http://www.drclark.net/utilities/copyright.htm) .[link to web page [www.drclark.net/utilities/copyright.htm](http://www.drclark.net/utilities/copyright.htm)].

PX 12, from [www.drclark.net](http://www.drclark.net)

## DEFENDANTS' VIOLATIONS OF THE FTC ACT

13. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits deceptive acts or practices in or affecting commerce. Section 12(a) of the FTC Act, 15 U.S.C. § 52(a), prohibits the dissemination of any false advertisement in or affecting commerce for the purpose of inducing, or which is likely to induce, the purchase of food, drugs, devices or cosmetics. As set forth below, defendants have engaged and are continuing to engage in such unlawful practices in connection with the marketing and sale of various products, including the *Super-Zapper Deluxe*, *Syncrometer*, the *Dr. Clark's New 21 Day Program for Advanced Cancers*, and the *Complete Herbal Parasite Program*, (also called the *Herbal Parasite Cleanse*).

14. Through their advertising and promotional materials, including, but not limited to, the representations set forth in Paragraph 12, above, and through the use of their Internet websites, "www.drclark.net" and "www.drclark.com" defendants have represented expressly or by implication that:

- a. Use of the *Super-Zapper Deluxe* is effective to kill bacteria, viruses and parasites in the human body;
- b. Use of the *Super-Zapper Deluxe* is effective against chronic infections, cancer and Acquired Immunodeficiency Syndrome (AIDS);
- c. The *Super-Zapper Deluxe* and the *Complete Herbal Parasite Program*, are effective to cure all forms of cancer in humans;
- d. *Dr. Clark's New 21 Day Program for Advanced Cancers* is effective to cure all forms of cancer in humans;
- e. *Dr. Clark's New 21 Day Program for Advanced Cancers* has cured numerous people with advanced cases of cancer;
- f. The *Syncrometer* device is more accurate than the best testing methods at diagnosing all forms of disease;



- g. The *Syncrometer* device can detect the presence of any substance at specific points in the human body.
- h. The *Super-Zapper Deluxe*, used together with the *Complete Herbal Parasite Program*, is effective to cure AIDS;
- i. The *Super-Zapper Deluxe*, used together with the *Complete Herbal Parasite Program* and avoidance of pollutants, is effective to cure diabetes, multiple sclerosis, Alzheimer's, endometriosis, asthma and many other diseases.
- j. *Dr. Clark's New 21 Day Program for Advanced Cancers* and *Super-Zapper Deluxe*, when used by persons with cancer, make surgery and chemotherapy unnecessary.

15. Defendants did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 14, above, at the time the representations were made. Therefore, the making of the representations set forth in Paragraph 14, above, is deceptive and constitutes false advertising for a food, drug or device, in violation of the FTC Act, 15 U.S.C.

◆◆ 45(a), 52 and 55.

### CONSUMER INJURY

16. As a result of defendants' unlawful acts or practices, consumers throughout the United States have suffered and continue to suffer monetary loss and possible injuries to their health. Defendants also have been unjustly enriched as a result of their unlawful practices. Absent injunctive relief by this Court, the defendants are likely to continue to injure consumers, reap unjust enrichment and harm the public interest.

### THIS COURT'S POWER TO GRANT RELIEF

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

### PRAYER FOR RELIEF

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

1. Award plaintiff such temporary preliminary injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action, and to preserve the possibility of effective final relief;
2. Permanently enjoin defendants from violating the Federal Trade Commission Act as herein alleged;
3. Award such relief as the Court finds necessary to redress injury to consumers resulting from defendants' violations of the FTC Act, including the refund of monies paid and the disgorgement of ill-gotten monies; and
4. Award plaintiff the costs of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper.

Dated: \_\_\_\_\_

Respectfully Submitted,

WILLIAM E. KOVACIC  
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Federal Trade Commission  
Washington, D.C.

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