

IN THE MATTER OF
DR. BARRY BRICKLIN

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

Docket 9194. Complaint, June 24, 1985—Decision, Sept. 20, 1985

This consent order requires Dr. Barry Bricklin, among other things, to cease representing that he used his expertise as a psychologist and expert in the psychological aspects of dieting to test and evaluate weight control programs and products in the same way similarly qualified experts normally would. Also, respondent is prohibited from representing that consumers can eat as much food as they want and still lose weight without also giving specified disclosures about weight reduction; and from making claims about "usual" or "average" weight loss, or the efficacy or performance of weight reduction or weight control products or programs without competent and reliable surveys or other scientific evidence that substantiates the representation. Further, respondent is required to maintain records of substantiation for three years; file compliance reports with the Commission at specified times; and notify the Commission of the discontinuance of his present employment and any future employment in similar areas.

Appearances

For the Commission: *Michael Dershowitz and Sandra N. Hammer.*

For the respondents: *Pro se.*

COMPLAINT*

The Federal Trade Commission, having reason to believe that Buckingham Productions, Inc., trading and doing business as Rotation Diet Center; Furlong-Elliot Corp.; Freedom Center, Inc.; Plaza Business Services, Inc.; N.F. Rotation, Inc.; Rotation-Freedom Diet, Inc., corporations; Howard Elliot; Judy Ruthrauff; Dorothy Woolslager; and Benito Ventresca, individually and as officers of said corporations; Gail Elliot, individually ("respondents"); and Dr. Barry Bricklin, individually, ("expert respondent") 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.

(a) Buckingham Productions, Inc., trading and doing business as

* The Decision and Order following this Complaint applies to respondent Dr. Barry Bricklin only. The Complaint against the other named respondents remains in litigation.

Rotation Diet Center, 4131 Swamp Road, Doylestown, Pennsylvania; Furlong-Elliot Corp., 73 Valley Drive, Furlong, Pennsylvania; Freedom Center, Inc., Rotation Plaza, Furlong, Pennsylvania; Plaza Business Services, Inc., Edison-Furlong Road and Route 263, Plaza Building, Furlong, Pennsylvania; N.F. Rotation, Inc., Furlong, Pennsylvania; and Rotation-Freedom Diet, Inc., Box 315, Health Plaza, Furlong, Pennsylvania, are Pennsylvania corporations.

(b) Furlong-Elliot Corp. dominates and controls the acts and practices of its wholly-owned subsidiaries, Buckingham Productions, Inc.; Freedom Center, Inc.; Plaza Business Services, Inc.; N.F. Rotation, Inc.; and Rotation-Freedom Diet, Inc.

(c) Howard Elliot is an officer of Furlong-Elliot Corp. Howard Elliot and Gail Elliot formulate, direct and control the acts and practices of the corporate respondents, including the acts and practices alleged in this complaint. Their address is 73 Valley Drive, Furlong, Pennsylvania.

(d) Judy Ruthrauff is an officer of Buckingham Productions Inc.; Freedom Center, Inc.; Plaza Business Services, Inc.; N.F. Rotation, Inc.; and Rotation-Freedom Diet, Inc. Ruthrauff formulates, directs and controls the acts and practices of said corporate respondents, including the acts and practices alleged in this complaint. Her address is R.D. 1, Box 252A, Riegelsville, Pennsylvania.

(e) Dorothy Woolslager is an officer of Buckingham Productions, Inc.; Freedom Center, Inc.; Plaza Business Services, Inc.; N.F. Rotation, Inc.; and Rotation-Freedom Diet, Inc. Woolslager formulates, directs and controls the acts and practices of said corporate respondents, including the acts and practices hereinafter set forth. Her address is R.D. 1, Box 24, Carversville-Wisner Road, Pipersville, Pennsylvania.

(f) Benito Ventresca is an officer of Buckingham Productions, Inc.; Freedom Center, Inc.; Plaza Business Services, Inc.; N.F. Rotation, Inc.; and Rotation-Freedom Diet, Inc. Ventresca formulates, directs and controls the acts and practices of said corporate respondents, including the acts and practices hereinafter set forth. His address is 4716 Woodfield Circle, R.D. 4, Doylestown, Pennsylvania.

(g) Dr. Barry Bricklin is a clinical psychologist, with a doctor of philosophy degree in psychology, and a license to practice psychology in Pennsylvania. He is now and at all material times has been an associate professor of clinical psychology at Hahnemann University. His address is 470 General Washington Road, Wayne, Pennsylvania. Expert respondent Bricklin possesses an expertise in psychology, and in the physiological and psychological aspects of dieting, superior to that generally acquired by ordinary individuals.

reduction and/or weight control programs and products. Expert respondent Dr. Barry Bricklin, for his part, developed some of the basic principles upon which the weight reduction and/or weight control programs offered for sale through the corporate respondents are based. Expert respondent Bricklin has had a continuing role in the marketing of these programs by serving as the Director of the programs' Professional Advisory Board, and by providing advice concerning the products and programs to Howard Elliot, to other respondents, and/or to employees of the respondents as requested. In addition, expert respondent Bricklin has aided in the promotion and sale of these weight reduction and/or weight control programs and products by providing as an expert in the field endorsements of the efficacy of the programs and products that appear in advertisements. The advertisements in which expert respondent Bricklin's endorsements appear depict him as possessing an expertise in psychology, and in the physiological and psychological aspects of dieting, superior to that generally acquired by ordinary individuals.

PAR. 3. Respondents have disseminated or caused to be disseminated, advertisements for weight reduction and/or weight control programs and products that include a "food" and/or a "drug" within the meaning of these terms in Section 12 of the Federal Trade Commission Act. These advertisements, some of which contain expert respondent Dr. Barry Bricklin's endorsement, have been disseminated (a) by United States mail, or in or having an effect upon commerce by any means for the purpose of inducing, or which have been likely to induce, directly or indirectly, the purchase of food and/or drugs, or (b) by any means, for the purpose of inducing, or which is likely to induce, directly or indirectly, the purchase in or having an effect upon commerce of food and/or drugs.

PAR. 4. The acts and practices of respondents and expert respondent Dr. Barry Bricklin alleged in this complaint have been in or affecting commerce.

PAR. 5. Typical of respondents' advertisements, but not necessarily inclusive thereof, are the advertisements attached hereto as Exhibits A through L. Specifically, the aforesaid advertisements contain the following statements:

(a) Women usually lose 8 to 20 pounds a month, men 12 to 25 pounds [on the Rotation Diet].

(b) [. . . The] "No Frills" Rotation Diet Plan . . . works just like the original Plan. It's just as safe, just as effective. . . .

(c) Now you can truly eat whatever you want, as much as you want without feeling guilty and you'll still lose weight.

(d) The all natural diet—no drugs or medicine! The Rotation Diet is really SANE and PROVEN SAFE!

(e) My total loss so far has been 62 pounds . . . There are thousands of Rotation Diet Center Members who've lost as much weight as I have. Even more!

(f) Reach your goal then keep it off with the Rotation Diet Maintenance Plan.

(g) . . . [R]eal breakthrough [of the Rotation Diet] is the unique way it allows a person to find his or her right weight and then stay there.

(h) Once you reach your weight goal, you only diet two days each week. Then as your body adjusts to its new weight, you diet just one day a week. You'll be able to stay slim all your life . . . comfortably and easily.

(i) Q. What do the [Rotation] tablets do?

A. They stop all hunger and increase your energy level.

(j) Rotation Wafers makes (sic) the diet work. They're critical to the success of the diet because they: STOP HUNGER (yet they're not a medicine, drug, or shot, so they're perfectly safe) . . . ELIMINATE FATIGUE. . . .

(k) Take-A-Break Tablets are specially formulated to work with the Rotation Diet and help to keep food from turning to fat. This means that for one day, two days, any number up to 15 days, you can enjoy taking a break from your Rotation Diet. Soon as you . . . get back on the Rotation Diet . . . in one week or less you'll be back at your "Pre-Break" weight.

(l) [I]t saves you more than it costs. . . . *You'll save more than you spend on this diet!* Most people cut about 40% off their food bill because they've cut down on expensive foods during their three Balance Days a week.

(m) Q. How much weight can I really lose on the FREEDOM DIET?

A. . . . [A]s a rule, women usually lose anywhere from 8 to 20 pounds the first month; men up to 25 pounds.

(n) The Freedom Chewable Tablets are the key to your weight-loss success. They contain no medicine or drugs, yet they stop hunger and help you to feel good on your diet day.

(o) Q. Can the FREEDOM DIET harm me in any way?

A. No. Our experience is that the diet when followed accurately, takes off weight safely and naturally.

(p) After You Reach Your Goal, It's Easy to Maintain. Once you've lost all the weight you want, it's easy to keep it off because FREEDOM DIET has a special Maintenance Program. You'll reduce your Diet Days to 2 per week . . . then as your system adjusts to your new weight, you'll cut back to just 1 diet day per week and you'll be able to stay slim for the rest of your life!

(q) Here's how the FREEDOM DIET works: This amazing diet actually let you eat and drink what and whenever you want on TUESDAYS, THURSDAYS, SATURDAYS AND SUNDAYS. You can have foods like spaghetti, ravioli, fettucini, and pizza. Bread and potatoes too. And desserts like chocolate layer cake, ice cream, banana splits, sundaes, pecan pie with whipped cream—whatever your favorites might be! You can even have double helpings of everything because that's the whole idea of the FREEDOM DIET. You're FREE to eat anything you want, as much as you want 4 days every week.

(r) Our "Make-A-Break" Plan will help you maintain your weight for up to 15 days when you have to take a break from FREEDOM DIET.

(s) [T]he majority of women [on the Rotation-Freedom Diet] fit within range of 8 to 20 pounds loss during the first month, men usually lose more.

(t) Take-A-Break Tablets [in the Rotation-Freedom Diet] let you go off your diet for 9 days without regaining.

PAR. 6. Typical of the statements in endorsements authorized by

advertisements, and are attached hereto as Exhibits A and I, are the following:

Q. Does the Rotation Diet really work? Do people lose weight on it?

A. It works extremely well. But as any doctor with years of experience in weight control knows, designing a way to lose weight is only a small part of the challenge. My years of observation of this diet convince me that its real breakthrough is the unique way it allows a person to find his or her right weight and then stay there. . . .

Q. How much weight can I lose?

A. Women usually lose 8 to 20 pounds a month, men 12 to 25 pounds. The amount depends on many personal variables, including the total amount of weight you have to lose. . . .

PAR. 7. Respondents' advertisements also contain the following statements, which purport to be actual and genuine testimonials from customers of the Rotation Diet Center:

(a) "The Rotation Tablets taste like Necco Wafers. They really stop my hunger and increase my energy level. I feel good on my 3 diet days!" E.R., Boston, Massachusetts

(b) "I really pig-out on my free days—pizza, cheesecake, beer, potato chips. I eat to my 'heart's content' and have still lost 57 pounds!" N.M., Princeton, New Jersey

(c) "I save enough on my 3 diet days to more than pay for the whole week. The diet actually costs me nothing!" J.A., Stowe, Ohio

(d) "The all natural diet—no drugs or medicine! The Rotation Diet is really SANE and PROVEN SAFE!" C.D., Wilmington, DE

(e) "I just used your switching process to make Wednesday a FREE DAY—it worked great!" A.Z., Hartford, CT

(f) "I've been on maintenance for 6 months and it's working great! I now have only ONE diet day each week." S.R., Los Angeles, CA

(g) "I've lost over 70 pounds while eating all of the ice cream that I want 4 days every week. THIS IS THE MOST SUCCESSFUL DIET EVER!" P.A., Philadelphia, PA

(h) "I've lost over 70 pounds while eating all of the ice cream I want 4 days every week. THIS IS THE MOST SUCCESSFUL DIET EVER!" D.C., Norristown, PA

PAR. 8. Respondents' advertisements also contain photographs of individuals accompanied by the following statements:

(a) I'm Dottie Woolslager. I'm thin for the first time since the kids came, and I know I'll never be fat again. I found the Rotation Diet, the only diet I've ever been able to live with. . . .

I'm so pleased about what happened to me, I'd love to help it happen to you. . . .

I'm beginning to feel like a celebrity. Hundreds of people have been calling me personally, asking, "Why did you pick the Rotation Diet?" . . . They had read about me and The Rotation Diet, and seen how successful I was. But they weren't sure they could actually do it themselves.

That's why I volunteered to let The Rotation Diet Center relay calls to my home. I want to help spread the word about this wonderful diet. . . .

P.S. I'm no celebrity. I'm someone exactly like you, who's just a few months ahead of you on the Rotation Diet Program. . . .

(b) I'm Judy Ruthrauff. After the birth of my last little girl, I couldn't get rid of 23 pounds. I was always hungry, and I ate enormous amounts of diet food until I discovered The Rotation Diet. It really worked for me. It not only got the weight off, it got me feeling good about myself again.

PAR. 9. Through the use of the statements referred to in Paragraphs Five and Seven, and other statements in advertisements not specifically set forth herein, respondents have made the following material representations, directly or by implication:

(a) Consumers can eat unlimited quantities of food four days a week and, regardless of how much they eat on those four days, still lose substantial amounts of weight on the Rotation Diet, the Freedom Diet, and the Rotation-Freedom Diet.

(b) Thousands of consumers on the Rotation Diet have lost sixty-two pounds or more.

(c) Rotation Diet Wafers, Rotation Chewable Tablets, and Freedom Chewable Tablets stop hunger.

(d) Rotation Diet Wafers, Rotation Chewable Tablets, and Freedom Chewable Tablets eliminate or prevent fatigue.

(e) Rotation Diet "Take-A-Break" tablets help keep food from turning to fat.

(f) The testimonials in Paragraph Seven represent actual and genuine consumer testimonials from customers of the Rotation Diet Center.

PAR. 10. Through the use of the endorsements authorized by expert respondent Dr. Barry Bricklin, referred to in Paragraph Six, and other endorsements in respondents' advertisements not specifically set forth herein, expert respondent Bricklin has made the following material representation, directly or by implication:

Consumers can eat unlimited quantities of food four days a week and, regardless of how much they eat on those four days, still lose substantial amounts of weight on the Rotation Diet, the Freedom Diet, and the Rotation-Freedom Diet.

PAR. 11. In truth and in fact:

(a) Consumers cannot eat unlimited quantities of food four days a week and regardless of how much they eat on those four days, still lose substantial amounts of weight on the Rotation Diet, the Freedom Diet, and the Rotation-Freedom Diet.

(b) Only a small number of consumers on the Rotation Diet have lost sixty-two pounds or more.

(c) Rotation Diet Wafers, Rotation Chewable Tablets, and Freedom Chewable Tablets do not stop hunger.

(d) Rotation Diet Wafers, Rotation Chewable Tablets, and Freedom Chewable Tablets do not eliminate or prevent fatigue.

(e) Rotation Diet "Take-A-Break" Tablets do not help keep food from turning to fat.

(f) The testimonials in Paragraph Seven do not represent actual and genuine consumer testimonials from customers of the Rotation Diet Center.

Therefore, the representations set forth in Paragraph Nine were, and are, false and misleading.

And therefore, the representation contained in endorsements authorized by expert respondent Dr. Barry Bricklin, set forth in Paragraph Ten was, and is, false and misleading and expert respondent Bricklin knew or should have known that said representation was, and is, false and misleading.

PAR. 12. Through their use of the photographs and statements referred to in Paragraph Eight, and others not specifically set forth herein, respondents have represented that the photographed individuals are satisfied users of the Rotation Diet and have endorsed the Rotation Diet, but respondents failed to disclose that the photographed individuals were employees of respondents. Consumers would not reasonably expect individuals so portrayed to be employees of the advertiser and that fact might materially affect the weight or credibility given to the endorsements. Therefore, respondents' representations, because of their failure to disclose such a material connection between respondents and the photographed individuals was, and is, false and misleading.

PAR. 13. Through the use of the statements referred to in Paragraphs Five and Seven, and other statements in advertisements not specifically set forth herein, respondents have represented, directly or by implication, that:

(a) Usual weight loss for women customers of the Rotation Diet is eight to twenty pounds per month, and for men is twelve to twenty-five pounds per month.

(b) Usual first month weight loss for women customers of the Freedom Diet is eight to twenty pounds. A significant portion of men lose twenty-five pounds the first month on the Freedom Diet.

(c) The Rotation Diet is safe.

(d) The Freedom Diet cannot harm consumers.

(e) The Rotation Diet, the Freedom Diet, and the Rotation-Freedom Diet include maintenance programs that are effective in enabling consumers to maintain weight loss.

(f) Consumers on the Rotation Diet "Take-A-Break" plan can cease dieting for 15 days and after one week back on the diet, will have lost all weight gained during those 15 days.

(g) Consumers on the Freedom Diet "Make-A-Break" Plan can maintain their weight for up to fifteen days without any dietary restrictions and regardless of the type and quantity of food consumed.

(h) The Rotation Diet saves consumers more than it costs.

(i) Most Rotation Diet customers save approximately 40% on their food bill.

(j) Most women customers of the Rotation-Freedom Diet lose eight to twenty pounds the first month on the diet, while most men lose even more.

(k) Customers on the Rotation-Freedom Diet "Take-A-Break" plan can cease dieting for nine days and can maintain their prior weight without any dietary restrictions and regardless of the type and quantity of food consumed.

(l) The majority of women customers of the Rotation-Freedom Diet lose eight to twenty pounds the first month on the diet; men usually lose more.

PAR. 14. Through the use of the endorsements authorized by expert respondent Dr. Barry Bricklin, referred to in Paragraph Six, and other endorsements in respondents' advertisements not specifically set forth herein, expert respondent Bricklin has made the following representation, directly or by implication:

Usual weight loss for women customers of the Rotation Diet is eight to twenty pounds per month, and for men is twelve to twenty-five pounds per month.

PAR. 15. Through the use of the statements set forth in Paragraphs Five and Seven, and others not specifically set forth herein, respondents have represented, directly or by implication, that at the time of making the representations set forth in Paragraphs Nine and Thirteen they possessed and relied upon a reasonable basis for those representations.

PAR. 16. Through the use of the endorsements authorized by expert respondent Dr. Barry Bricklin, set forth in Paragraph Six, and other endorsements in respondents' advertising not specifically set forth herein, expert respondent Bricklin has represented, directly or by implication, that at the time of making the representations set forth in Paragraphs Ten and Fourteen he possessed and relied upon a reasonable basis for those representations, consisting of an actual exercise of his expertise in evaluating weight reduction and/or weight control programs and products with respect to which he is expert, in the form of an examination or testing of the programs and products

at least as extensive as someone with a similar degree of expertise would normally conduct in order to support the conclusions presented in the endorsement.

PAR. 17. In truth and in fact, at the time of the initial dissemination of the representations set forth in Paragraphs Nine and Thirteen and each subsequent dissemination, respondents did not possess and rely upon a reasonable basis for making such representations. Therefore, respondents' representations, as set forth in Paragraph Fifteen were, and are, false and misleading.

PAR. 18. In truth and in fact, at the time of the initial dissemination of the representations set forth in Paragraphs Ten and Fourteen and each subsequent dissemination, expert respondent Dr. Barry Bricklin did not possess and rely upon a reasonable basis for making such representations. Therefore, expert respondent Bricklin's representations, as set forth in Paragraph Sixteen were, and are, false and misleading.

PAR. 19. Expert respondent Dr. Barry Bricklin has received compensation for the use of his endorsements in respondents' advertisements for weight reduction and/or weight control programs and products.

PAR. 20. The acts or practices of respondents and expert respondent Dr. Barry Bricklin as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce and false advertisements and endorsements in violation of Sections 5 and 12 of the Federal Trade Commission Act.

Commissioners Bailey and Azcuenaga dissented as to the inclusion of Dr. Barry Bricklin as a respondent.

Complaint

106 F.T.C.

EXHIBIT A

Losers Are Winners*With Rotation Center's Revolutionary Weight-Loss Program***It's easy because it's the diet you can live with.**

You can eat anything you want...without guilt...without injuring your health...without drugs...without being hungry all the time.

There are no special foods to buy...no weighing out portions...no calorie counting...no exercising. In fact, people don't even need to know you're on a diet. Best of all, you're never more than 24 hours away from the best meal of your life!

Think it's impossible? It's not! Read on for complete details...



The Rotation Diet Will Work For You, Too!

Now you can truly eat whatever you want, as much as you want without feeling guilty and you'll still lose weight. ~~It's~~ It's impossible. In fact, it's easy!

Here's how the Rotation Diet works:

FREE DAYS

Tuesday, Thursday, Saturday and Sunday are FREE DAYS. You eat and drink whatever you like—good food or junk food—as much as you want. Not just ice cream, but a sundae with fudge sauce, whipped cream, nuts, a cheeseburger and french fries (double order if you're hungry), pretzels and beer... absolutely anything you want!

For 4 days a week you're eating the way you like to eat. FREE DAYS are your "reward" days and they are what makes the difference between your staying on the diet and giving up. Most people give up diets because they're bored with the same foods, or bothered counting calories or tired of buying special, and frequently expensive, foods. There's none of that with the Rotation Diet.

The Rotation Diet is the diet you can live with and stick with. After you reach your weight goal, you'll get more FREE DAYS each week—up to 6 out of 7!

We call the Rotation Diet the "no-one has to know you're on a diet" diet. That's because of its special switching day feature. It lets you enjoy all special days without messing up your diet.

It won't be difficult for you to remember your FREE DAYS. And when you look at the month you'll see that FREE DAYS far outnumber the diet days.

S	M	T	W	Th	F	S
un	Diet	Free	Diet	Free	Diet	un
der	Day	Day	Day	Day	Day	der
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	28
29	30	31				

BALANCE DAYS

Monday, Wednesday and Friday are BALANCE DAYS. On these days we provide our special program which includes Rotation Waters and Rotation Multi-Flavors. We also give you simple, quick recipes for additional delicious foods. In addition, you get unlimited private consultation with the Rotation Diet Center and your personal Phonefriends.

Rotation Waters make the diet work. They're crucial to the success of your diet because they STOP HUNGER without medicine or drugs. PROVIDE ENERGY with a unique combination of healthful, high energy, natural ingredients... ELIMINATE FATIGUE so you can do anything you want on a Balance Day from early morning to late at night.

Rotation Waters allow your system to operate much like it does on your "training" days.

Rotation Diet is not a "mass program" that's the same for everyone. The unique Rotation Waters and Multi-Flavors are based on your answers to the questionaire and determined by a Rotation Center Diet Counselor.

Rotation Rotation Foods make the diet even easier for you to live with. And you can have all the diet soda, coffee, tea or water you want. Additional foods will be added after by your personal counselor.

Rotation Diet doesn't have "bad days" because the "freed and fast" method doesn't work. It often causes dizziness and fatigue. And when hunger pangs strike, most people end up eating on their "bad days." But with the Rotation Diet you have Rotation Waters, beverages and food 3 BALANCE DAYS each week. You also have 4 FREE DAYS when you can really live it up and satisfy your cravings. The day after each of these you won't have any trouble doing without your favorite foods because you'll know you can have as much as you want of them in less than 24 hours!

A.J. Robbins, M.D.

Dr. Robbins, our newest member of the Professional Advisory Board, is a well known thoracic surgeon. Her experience in the field of nutrition began at St. Peter's College where she has been the Director of Health Services and the team physician since 1962. She has continued her recent comprehensive work on nutrition at Fairleigh Dickinson University. Dr. Robbins lost 25 pounds in 2 1/2 months on the Rotation Diet.

One can diet safely and wisely on the Rotation Diet Program. Even patients under medical care for specific conditions can incorporate this diet with their medical regimen.



A.J. Robbins, M.D.



Meet Another Member Of The Advisory Board...

Dr. Barry Brinklin is Director of Rotation Center's Professional Advisory Board. He works with physicians, nutritionists and other scientific specialists to evaluate the plan and develop recommendations.

About 13 years ago Dr. Brinklin weighed over 220 pounds. He's 5'8" tall. He lost 75 pounds with an earlier version of the Rotation Diet and has maintained his desired weight of 145 pounds for 12 years with the current plan.

Currently Dr. Brinklin is an associate professor of psychology at Hahnemann Medical College in Philadelphia. Previously, he's served Jefferson Medical Hospital, Walter Reed Army Hospital, E.I. DuPont Company, New York Academy of Medicine and the Columbia Broadcasting System (CBS).

The Rotation Diet Advisory Board

Answers Your Questions...

Q: Does the Rotation Diet really work? Do people lose weight on it?

A: It works extremely well. But as any doctor with years of experience in weight control knows, designing a way to lose weight is only a small part of the challenge. My years of observation of the diet prove the "fast" is the breakthrough is the unique way it allows a person to find his or her right weight and then stay there.

Q: Is the Rotation Diet medically safe?

A: Yes, there are no drugs or medications with this diet. However, we do encourage you to discuss Rotation Diet with your doctor before starting this diet.

Q: What do Rotation Waters contain?

A: They contain only natural ingredients specially formulated to make the diet work. They include six flour minerals, mineral oils, water, natural fruit flavors, vitamin C, and pure natural sodium, calcium, potassium, magnesium and stevia extractives. The nutritive value of each water is 45 grams protein, 100 grams carbohydrate, 100 grams fat, and 100 grams water.

Q: How much weight can I lose?

A: Women usually lose 10-15 pounds a month, men 12-15 pounds. The amount depends on many personal variables including the individual's weight you have to lose.

Q: Can I buy Rotation Waters at my drug store?

A: No. Our special weight loss waters are made by hand in the Rotation Diet Center and are shipped nationwide.

If you have a question about the Rotation System...

Our Professional Advisory Board will answer as many questions as we have in future issues of our Newsletter "Rotation Rescue" and our quarterly newsletter "Rotation Center, Rotation Plaza".

Professional Advisory Board
c/o Rotation Center, Rotation Plaza
Furlong, PA 19925

DON'T WAIT ANY LONGER—ORDER TODAY AND JOIN THE THOUSANDS OF OTHER ROTATION DIET WINNERS!

(See your enclosed personalized form for complete program details.)

The Diet You Can Live With. Does It Really Work?

It Worked For Dot Woollager...



Dot before she started the Rotanon Diet



Dot now
62 pounds lighter

and she ate cheesecake, lettuce, ice cream sundaes, Tia Maras and all the other foods that she loves! Here's Dot's fabulous success story.

I started the Rotanon Diet on April 23, 1979. By the end of the summer I had lost 45 pounds, dropping my weight from 185 to 145 pounds. I was beginning to "rejoin the human race."

Since then I have been able to enjoy a modified maintenance program (fewer diet days) and still my weight continues to drop! My original goal was 130 pounds, but now I'm down to 123 pounds with a new goal of 115. I've lost a total of 62 pounds so far. That's great, that's over 29 inches! See my chart below. I'm almost down to the same weight as when I was a teenager. My skin is tight and I feel great!

I'm very proud of the way I look now—and looking good makes me feel good. My family is also very proud of the dramatic change in their "old" Mom. And although my husband was extremely understanding during my fat years, I know he enjoys having his "ride back." (And I enjoy being back!)

I just bought a new dress—size 9-10—that shows off my legs and I couldn't help but think how truly miraculous the Rotanon Diet has been for me.

Not only have I lost 62 pounds and 29 plus inches, but I've been able to enjoy all the foods I love during this diet without that nagging guilty feeling.

The Rotanon Diet has transformed my life and I know it could do the same for you!

Dot's statistics	Before	Now
WEIGHT	185 lbs.	123 lbs.
WAIST	34"	26"
HIPS	43"	36"
CHEST	35"	34"
NECK	13"	11"
THIGH	22"	15 1/2"
CALF	13"	10"
UPPER ARM	12"	10"

It worked for Arlene...

Here's Arlene H. at 218 pounds before the Rotanon Diet. And here she is at 143 pounds. Her goal is 125 and Rotanon Diet is going to help her get there!

It worked for Judy...

Here I am with the slacks I used to wear before the Rotanon Diet. Now I'm 33 pounds lighter!

And it worked for all these people, too!

Name	Pounds Lost	Name	Pounds Lost
Pat	74	Ann	40
Arlene H.	53	Linda	52
Bill	31 in 30 days	Bill	30
Bob	10 in 1 week	Jean	10 in 2 wks. 24 total
Barry	25 & maintaining	William	50
Ann	40	Judy	25
June	7 in 1 week	Maxine	15 in 2 weeks
Mary	16	Ruth	25 and maintaining
Andy	24	Jerry	25
Jo	23	Janice	13 in 3 weeks
Emery	25	June	25

Plus tens of thousands more!

With the Rotanon Diet, losers are winners. Wouldn't you like to see your name added to our list of winners? Start the Rotanon Diet now and it won't be long before you too are saying, "I'm a losing winner with Rotanon, and I feel great!"

In fact, people from all walks of life have become winners with the Rotanon Diet.

Just look at all the professions represented by Rotanon Dieters from all across the country.

housewife	politician
physician	dress shop owner
stewardess	computer analyst
dancer	author
psychologist	lawyer
real estate agent	fireman
school teacher	chef
minister	ambassador
factory worker	secretary
dentist	newspaper editor
choreographer	media personality
veterinarian	journalist
baker	television host
nurse	artist
student	public relations
teenager	banker
beautician	organ
model	business executive
radio personality	

"I feel normal!" J.F., New York, NY
"I've lost over 70 pounds while eating all the ice cream that I want 4 days every week. THIS IS THE MOST SUCCESSFUL DIET EVER!"

P.A., Philadelphia, PA

"I've been on maintenance for 6 months and it's working great! I now have only ONE diet day each week!"
S.R., Los Angeles, CA

Meet a Few Of Your Phonefriends...

It's easier to succeed on the Rotation Diet because you don't have to do it alone. You get all the answers, all the help and support you need without attending meetings and without having to compare your weight with someone else's. Best of all, it's done by phone, toll free at no cost to you.

not try it out right now? Call one of your new Phonefriends today—they're ready and waiting to help you.

JY is 29 years old, 5'4", married with two children, ages three and nine, both girls. She has a large garden and enjoys canning and freezing her own vegetables. ~~was~~ line until she got pregnant with her second child. She put on an extra 20 lbs. and couldn't seem to get rid of it. Regular ~~dieting~~ ~~away~~ all of her snacks and the more strenuous diets made her sick. On the Rotation Diet she has lost 23 lbs. in 2½ months! ~~Wow~~ ~~great!~~



NANCY is 34 years old, 5'9", married, with two children, ages five and nine, a boy and a girl. She enjoys ice skating, bowling, bingo and buying new clothes for her new figure. Nancy has been fighting the "battle of the bulge" for about ten years. Three years ago she went on the Rotation Diet and has lost 32 lbs. At the time the Rotation Diet was new and maintenance procedures had not been developed. Without a maintenance program, Nancy put the 32 lbs. back on. Last year she went back on the Rotation Diet and has lost 25 lbs. in 2½ months. This time she will be able to use the Rotation Diet Maintenance Program and will be slim for the rest of her life.

VICKI is 28 years old, she's been married eight years and has two children. Vicki is one of those girls who really has to fight to keep her weight down. Keeping after a family with three different schedules (and eating habits) certainly doesn't make dieting easy. Since starting the Rotation Diet eight weeks ago, Vicki has lost 22 pounds. Soon she will reach her goal—and be able to stay there! Vicki enjoys hobbies and crafts and at the present time is renovating their old Bucks County home.



KAREN is 21 years old and single. She never really had a weight problem until she finished high school and went to college. The college social scene plus the pressure of studies helped contribute 10 pounds to Karen's usual slim frame. After business school, Karen went to work at the Rotation Diet Center and decided to try the Rotation Diet. She quickly lost the extra ten pounds and is now enjoying the freedom of the maintenance program. Karen is an "outdoorsie," people person. (She enjoys being with people, talking to people, and enjoying people.) Her hobby is art and drawing.

MARYANN is a 38 year young grandmother who has been married 23 years. She has three children—two girls and one boy—and 4 grandchildren. She works as a nurse and lives on a small farm raising beef cattle and ducks. She has lost 30 pounds and 25½ inches in four months on the Rotation Diet. Her interests include hunting, fishing, young, eating, ice and roller skating and the Rotation Diet.

PROMPT CONFIDENTIAL SERVICE

Orders Filled In 1 Day!

know that when you decide to go on a diet you want to start NOW. With this in mind, we are geared to process all new orders the same day they are received. We ship by UPS which means that usually you receive your materials in 2 to 5 days.

Plus, you can call us TOLL FREE any day of the week between 8 a.m. and 11 p.m. Eastern time. Call to place an order, call if you have questions, call if you just want to share your weight loss success, or call if you need a little encouragement.

TOLL FREE 900-523-5763

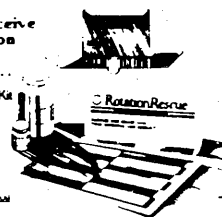
We invite you to visit us as you pass our way. We'd love to meet you in person and hear about your success with the Rotation Diet. Come see us soon!

Here's What You'll Receive When You Join Rotation Center's Revolutionary Weight Loss Program...

Your personalized Rotation Diet Kit will include all of the following:

- Rotation Waters (the key to success)
- Rotation Multi vitamins
- Instruction Handbook
- Calendar
- Free Subscription to our special newsletter, "Rotation Rescue"

And of course you get unlimited telephone contact with the Rotation Center and your Phonefriends!



MONEY BACK GUARANTEE

The Rotation Diet has been so successful that we never needed to guarantee it. However, we want to put your hesitations aside—we want to let you know this is a great offer. So we guarantee to refund the full purchase price of your unused Waters & Vitamins if you're not completely satisfied. Use the waters and vitamins exactly as prescribed for 2 weeks. If you don't lose the weight established by your goal,

return the unused portions within 30 days of original order. We guarantee to send you a refund based on the unused portion of supplies, not including membership set-up fee. (Guarantee valid only if supplies are accompanied by original invoice. Not responsible for returns not received—recommend "receipt requested" mailing.) Don't wait any longer! Get the diet you can live with—ORDER TODAY!



If You Act Now You'll Also Receive This Very Special FREE GIFT...

Your free "welcome" gift is a lovely glittering gemstone ingot, sterling silver, exquisitely covered with 24 karat gold with a hand cut gemstone set in the center. You'll also receive a free gold covered frame and 13 inch gold filled serpentine chain.

Each ingot has been handcrafted expressly for the Rotation Center through a special arrangement with the Buckingham Mint. These exquisite ingots weigh 2 grams and measure 11 mm by 21 mm—perfect to display or wear as a necklace or on a charm bracelet. You choose the gemstone you want: EMERALD • RUBY • SAPPHIRE • PEARL • PERidot • TOPAZ • GARNET • CUBIC ZIRCONIA • AQUAMARINE • ROSE QUARTZ • OPAL • AMETHYST.

So don't wait! This is a \$22.90 value and it's yours when you act now. See the ad in your enclosed Membership Kit.

As extra incentive, we have a special program where you can receive FREE gold and silver ingots when you reach your weight loss goals. Complete details will be included in your Membership Kit.

"Everyone has one problem or another during weight loss, but on this diet, you get the answers and all the help you need."

C.T., Toronto, Canada

"I love the true freedom of being able to eat whatever I want every TUESDAY, THURSDAY, SATURDAY AND SUNDAY!"

M.A., Norristown, PA

EXHIBIT B



Read what glamorous

Barbara Eden

Star of "I Dream of Jeannie" and "Harper Valley" has to say about The Freedom Diet.

"No wonder homemakers, business people, workers everywhere have chosen The Freedom Diet. It's fantastic."

Now, You too can Discover Diet Freedom with the Safe, Simple and Affordable Freedom Diet. You can eat anything you want 4 days a week and still lose weight.

Complaint

Eat AND Lose...

the FREEDOM DIET gives you the freedom to eat while you lose weight.
No more fighting with power no more guilt no more changing your lifestyle!

DIET DAYS ARE EASY
when you're with Diet
Days from the mind of a man

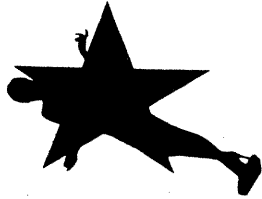
EAT ONE DAY
about the most that's
freedom

FREEDOM FRIENDS
is the only way to keep the
weight

GET THE FREEDOM
eat, you can eat, eat, eat, eat
you can find the diet
anything you want

NO MANDATORY
EXERCISING
no more long, no more hard
or complicated

OUR "MAKE A BREAK" PLAN
will help you maintain your weight for
up to 12 days when you have to take a
break from Freedom Diet. It's the
most convenient plan when you have to
take a break.



Complaint

106 F.T.C.

Now you can eat whatever you want...as much as you want.
The New FREEDOM DIET—It's safe, simple and affordable.



Here's how the FREEDOM DIET works:

This amazing diet actually lets you eat and drink what and whenever you want on **TUESDAYS, THURSDAYS, SATURDAYS AND SUNDAYS**. You can have foods like spaghetti, ravioli, fettuccine and pizza. Bread, and desserts like chocolate layer cake, ice cream, banana splits, sundae, pecan pie with whipped cream—whatever your favorites might be! You can even have double helpings of everything because that's the whole idea of the FREEDOM DIET. You're FREE to eat anything you want as much as you want 4 days every week.

The other 3 days a week—**MONDAYS, WEDNESDAYS AND FRIDAYS**—are your Diet Days, and on these days you follow a simple weight loss program. You'll lose weight with Freedom Chewable Tablets. And you won't suffer from hunger pangs or experience dizziness or fatigue. You'll be able to drink all the diet soda, coffee and tea you want. And there are even optional foods you can have on these Diet Days (they'll be explained in your Diet Day book).

The **Freedom Chewable Tablets** are the key to your weight loss success. They contain no medicine or drugs, yet they stop hunger and help you to feel good on your diet day.

S	M	T	W	T	F	S
Freedom Day	Diet Day	Freedom Day	Diet Day	Freedom Day	Diet Day	Freedom Day
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28			31			

By following the FREEDOM DIET 1, 3 days a week you can lose up to 26 pounds the first month! And best of all, nobody has to know you're on a diet because FREEDOM DIET 1 has a special plan for watching your Freedom Days and Diet Days. It lets you enjoy special days without missing up your diet.

After You Reach Your Goal, It's Easy To Maintain

Once you've lost all the weight you want, it's easy to keep it off because FREEDOM DIET 1 has a special Maintenance Program. You'll reduce your Diet Days to 2 per week, then as your system adjusts to your new weight, you'll cut back to just 1 diet day per week and you'll be able to stay slim for the rest of your life!

It's Safe. And It's Sure

The FREEDOM DIET 1 contains no drugs or medications of any kind. It's a food product. Ask your doctor about it. Have him call us if you like.

It's sure because it just makes good sense to change a diet that doesn't deprive you of all the foods you love. And because it doesn't deprive you, it's easy to stick with the FREEDOM DIET 1. You'll love all the weight you want to lose, and you'll be able to keep it off!



Kathy Used To Weigh 180 Pounds...Today She Weighs 126 Pounds

"My Mother and sister and my grandmother were all heavy. And I was heavy. I continued to gain weight over the years until I reached 180 pounds. I arrived that weight around for three years. And the one day I looked at myself in the mirror, really looked! I decided I couldn't stand in self another day."

So Kathy went on a diet. She tried one diet after another with OK results—losing until she would start to cheat and the weight would begin to come back. She simply couldn't give up at those temptations and lusting looks she loved so much. So she always ended up cheating, and feeling guilty.

Then Kathy heard about the FREEDOM DIET 1—a diet that lets you eat anything you want 4 days a week. "It was hard to believe," she said, "but I decided to give it a try. I had plenty of weight to lose, plus I wanted to start jumping into diet to diet."

Today Kathy weighs 126 pounds. "I wasn't kidding when I said I'd lose it. It's the family had cheese, at my diet day, they'd save me a piece and I'd have it the next day."

Today Kathy is happy. Her husband is happy. And her family is happy. "I never dreamed I'd ever find a diet that gives me the freedom I've found on the FREEDOM DIET. I'm so much happier with ME!"

Kathy

Complaint

106 F.T.C.

**THE FREEDOM DIET™**

Freedom Headquarters • Washington Crossing, Pennsylvania 18977

215-794-3255 or 215-794-5643

**NOW FOR THE FIRST TIME YOU CAN GET ALL
THE ADVANTAGES OF A ROTATION DIET
BUT AT A BARGAIN PRICE!**

Eat anything you want — as much as you want — whenever you want 4 days a week and still lose weight. No counting — no fads — no diets — nothing — no special foods.

Dear Friend:

If you're like me, you've read all about the "Rotation Diet" that so many people have been using. It's true that it works. But it's also true that it's expensive — you have to pay a membership fee in order to use the diet program — and then of course you have to pay a high price for the diet itself.

It's for this reason that I'm writing you today. I'm very pleased to be able to tell you about the FREEDOM DIET. It's the same kind of diet — but it doesn't cost you nearly as much. You get the same advantages — the plan works the same way — and the Freedom Chewable Tablets do the same job. The big difference is the price!

If you're wondering how we can make this offer, let me explain. You save money because:

- we don't have big, costly new letters • we don't have a toll-free phone line • we don't send you separate vitamins — they're included as part of the Freedom Chewable Tablet • we don't waste money on fancy packaging • we don't charge you a costly membership fee • we don't promise expensive 1-day service — but we do process all orders within 5 days.

But are you getting a real "Rotation Diet"? Yes. And as you will see when you read the enclosed brochure, there are thousands of people who have already lost many pounds with the FREEDOM DIET. They freed themselves of unwanted weight safely and easily — and saved money at the same time.

Just like me, these people found that the FREEDOM DIET gives them the freedom to eat what they love, when they want. There's no more fighting will power — no more guilt — no more need to change your lifestyle because you can eat whatever you want, as much as you want whenever you want 4 days a week — including Saturday and Sunday!

Imagine losing up to 20 pounds the first month without having to give up all the tempting foods you love — like cakes and pies, bread and potatoes, ice cream and candy, pasta, pizza, and other fast food. With the FREEDOM DIET you can keep right on eating all these wonderful foods and still lose weight.

Even after you've reached your weight loss goal you needn't worry about gaining all those unwanted pounds back again. FREEDOM DIET has a special weight maintenance plan to keep you slim.

So what are you waiting for? Read the enclosed brochure for complete details and then order your own FREEDOM DIET Kit today. See for yourself how you can have the freedom of eating what you love — without it costing you a fortune!

Sincerely,

Barbara L. Thompson
Director, Freedom Diet Headquarters

P.S. We've enclosed a special personalized order form and postage paid return envelope for your convenience. However, if you wish, you can call us at 215-794-3255 or 215-794-5643 and place your order immediately. We accept Visa, MasterCard, American Express and Diners Club.



THE FREEDOM DIET™ Order Form

Freedom Diet Headquarters • Washington Crossing, Pennsylvania 19380

DIET FREEDOM with the FREEDOM DIET

Special Diet Opportunity For:

Now You Can Eat Whatever You Want...As Much As You Want... Whenever You Want 4 Days A Week And Still Lose All Those Unwanted Pounds!

And that's exactly what you'll get—the freedom to eat whatever you want while you lose weight:
 * without exercising * without pills or drugs
 * without counting calories * without special diets * without getting dizzy or fatigued
THOUGHTFUL: Best of all you get all the advantages of the Rotation Diet—but at a bargain price. There are no membership fees. No office visits or consultation fees.

It's Easy To Begin The FREEDOM DIET

Here's all you have to do:

1. Complete the form at right. (There are additional order blanks on the reverse for your friends.)
2. Be sure to fill in your credit card information and sign if you are charging your order.
3. Mail your order form and payment if paying by check or money order in the handy postage paid envelope we've provided for your convenience.

If YOU PREFER, you can phone in your order. Just call 215-794-3233 or 215-794-3643 any day of the week, including Saturday and Sunday, between 8 a.m. and 11 p.m. eastern time.

Whatever you do, don't wait any longer. Take your first step to diet freedom by ordering your own FREEDOM DIET Kit today!

Name _____
 Address _____ Apt. _____
 City _____ State _____ Zip _____

This will be your mailing label. No P.O. Boxes please. UPS cannot deliver. Please include apartment number.

☐ **YES!** I want to get diet freedom with the FREEDOM DIET. Please send me the following right away:

- ☐ 1 **FREEDOM DIET KIT** (4 week supply) \$19.95 total
 \$19.95 + we pay postage & handling \$19.95 total
☐ 1 **FREEDOM DIET KIT** (2 week introductory offer) \$19.98 - \$1.75 postage & handling \$18.23 total

Where did you first hear about the FREEDOM DIET? _____

Please check one:

☐ check ☐ money order ☐ O.D. is made payable to FREEDOM DIET
 OR ☐ VISA ☐ MASTERCARD ☐ AMERICAN EXPRESS ☐ DINERS CLUB
 Card # _____ expiration date _____

Date _____ Signature _____

Phone # _____

If we ship you may add \$4.00 for each kit for UPS AIR delivery if you live in one of these states: AL AK AZ AR CA CO FL GA HI IL IN IA KS KY LA MI MN MS MO MT NE NV NM ND OK OR SD TN TX UT WA WI WY



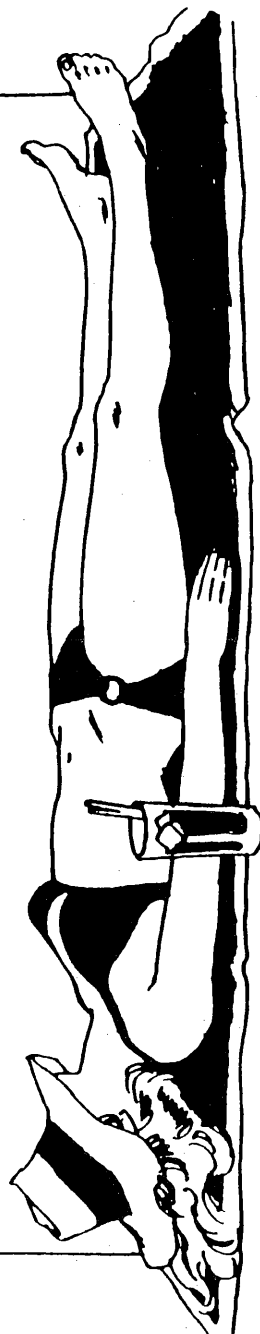
Additional order forms for your friends on the back.

Now You Can Get Bathing Suit Freedom With The Freedom Diet!

If you feel a little self-conscious when you slip (or struggle) into your swimsuit, then you need the **FREEDOM DIET!** It's the safe, simple, affordable way to shed unwanted pounds **WITHOUT** giving up any of the foods you love.

No exercising...no counting calories...no special foods...no drugs...
NO GUILT.

OUR "MAKE-A-BREAK" PLAN will help you maintain your weight for up to 15 days when you have to take a break from Freedom Diet. Enjoy your vacation...don't feel uncomfortable when you have house guests...



Complaint

EXHIBIT C

ROTATION CENTER
Rotation Plaza, Village of Funching, PA 18025

The diet you can live with

You can lose 16-20 pounds per month (comfortably, happily, eating what you like) and keep it off with THE ROTATION DIET™



ROTATION DIET™

DOES IT WORK?

Dot Woollager Lost 62 Pounds While Eating Cheesecake
Fettucine, Ice Cream Sundae's Tie Mamas - All The Foods She
Loves - Every Tuesday, Thursday, Saturday And Sunday



S	M	T	W	T	F	S
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
28	29	30				

It worked for Dot Woolslager

Dot's Fabulous Success Story

I started the Rotation Diet™ on April 23, 1979. By the end of the summer I had dropped from 185 pounds to 140 pounds and was beginning to "rejoin the human race." During these intervening months, I have been able to enjoy a modified maintenance program (minus diet days) and still my weight has remained stable. I now weigh 135 pounds. I have lost a new goal of 115 pounds! (My original goal was "130 pounds")

My total loss so far has been 62 pounds! And hundreds of inches! (see my chart.) My skin is tight and I feel great – "I'm almost down to the same weight as when I was a teenager – I'm very proud of the way that I look –" and looking good makes me feel good. I have been able to enjoy my life and my family and my dear old Mom. Although my husband Bob was extremely understanding during my "fear years, I know that he enjoys having his "bride back" (and I enjoy being back).

I just bought a new dress – size 8-10 (one that shows off my legs). My husband helped out when he really enjoyed the Rotation Diet™ has been. Not only have I lost 62 pounds and hundreds of inches but I've been able to enjoy all of the food that I love all during the diet – cheese-cake, lettuce-on-oil cream salad, Tia Maria on the rocks – everything!

The Rotation Diet™ has transformed my life and it can do the same for you.



**ROTATION DIET™
LOSERS ARE WINNERS**

Phi	174 pounds lost	88	31 pounds lost in 30 days
Alyson	23 pounds lost	Aryn	40 pounds lost



Legend: 75 km, Oct. 64 km, March 20 km

Actual Shipping Cost 39.00.00

Dot's Statistics	THEN	NOW
WEIGHT	'85	'23
WAIST	34	27
HIPS	43	37
CHEST	35	35
NECK	'3	'11
THIGHS	22	16½
CALF	13	11
UPPER ARM	12	10

IT WORKED FOR THOUSANDS MORE WHO LOST AS LITTLE AS 5 AND AS MUCH AS 110 POUNDS.

[illegible]

JUDY LOST 23 POUNDS - SHE'S NOW AT HER GOAL

Here's how...

It's easy! It's successful!

And it *saves* you more than it costs!

EAT WHATEVER YOU WANT, AS MUCH AS YOU LIKE

Tuesday, Thursday, Saturday and Sunday are "FREE DAYS." You'll eat and drink what you like — good food or junk food — anything you want. Not just ice cream, but a sundae with fudge sauce, with whipped cream, with nuts. A cheeseburger and french fries (double order if you're hungry). Pretzels and beer. Imagine! Everything you want to eat in whatever quantities you choose! Absolutely no restrictions!

● Four "FREE DAYS" every week. You're eating the way you like to eat.
● "FREE DAYS" are your "reward days." They make the difference between your staying on the diet and giving it up. Most people give up diets because they feel deprived of favorite foods, because they're bored with the same foods, or bothered counting calories, or tired of purchasing special foods. There's none of that with The Rotation Diet™.
● The Rotation Diet™ is the diet you can live with and stick with. After you reach your goal weight, you'll get more and more "FREE DAYS" each week — up to six out of seven!

SPECIAL "FLEXIBILITY" FEATURE

The Rotation Diet™ is the "no-one-has-to-know-you're-on-a-diet" Diet. That's because of its wonderful switching day program: it lets you make all special days into "FREE DAYS" without messing up your diet.

- celebrate birthdays with the cake
- at parties, join in the eating and drinking
- dine in restaurants knowing you can choose anything on the menu — and still stay on your diet
- stuff the stocking at Christmas, then stuff yourself

It won't be hard for you to remember your "FREE DAYS." But to help you highlight these "FREE DAYS," you'll find in your Rotation Diet™ kit a supply of brightly-colored "FREE DAY" and Balance Day stickers for your calendar. When you look at the month, you'll see that "FREE DAYS" far outnumber the rest.

And it *saves* you more than it costs!

LOSE WEIGHT FEELING GREAT

The other three days a week — Monday, Wednesday and Friday — you'll follow our special 3 point program.

This is what makes The Rotation Diet™ the diet you can live with. You see, on "FREE DAYS" you'll really live it up. You'll have a feast, satisfy all your cravings. The next day you won't have trouble doing without your favorite foods. Because you'll know you can have as much as you want of them — and anything else — in less than 24 hours. And remember, every Tuesday, Thursday, Saturday and Sunday are Free Days! The Rotation Diet™ doesn't have "fast days." The "feed-and-fast" method of dieting doesn't work. It often causes dizziness and fatigue. And when hunger pangs come, most people end up eating on their "fast days." The Rotation Diet™ gives you BALANCE DAYS.

● On Balance Days you'll have Rotation Waters™, Rotation Multi-Vitamins™ and a number of Rotation foods. In addition, you'll have unlimited, private consultation by phone with the Rotation Diet Center and your PhoneHand™ — a very important part of your diet.

● Rotation Waters™ make the diet work. They're critical to the success of the diet because they

STOP HUNGER (yet they're not a medicine, drug or shot, so they're perfectly safe);
PROVIDE ENERGY through a unique combination of healthful, high-energy, natural ingredients).

ELIMINATE FATIGUE (you can do whatever you want on a Balance Day from early morning till late at night).

● This is a personalized, custom diet, not a "mass program" that's the same for everyone. The amount of Rotation Waters you must take is determined by a Rotation Diet Center counselor, based on the enclosed questionnaire and then filed in by hand in your member's instruction Handbook.

● Rotation foods make the diet even easier to live with. Choose from a list that includes a full 16 ounces of cottage cheese, Rotation Custard in every flavor you can imagine, Rotation Jello in every color of the rainbow, and all the diet foods, coffee, tea or water you want. Additional foods will be added later by your personal counselor.

● You'll save more than you spend on this diet! Most people cut about 40% off their food bill because they've cut down on expensive foods during their three Balance Days a week. That more than covers the cost of The Rotation Diet™. And, with The Rotation Diet™, there are no office visits or expensive consultations. You get unlimited telephone support included in your low weekly charge.

- No calorie counting
- No forbidden foods
- No drugs or medicine
- No weighing of portions
- No gadgets or machines
- No expensive office visits.

Enjoy unlimited advice, support and encouragement

You'll lose more, lose faster with the help of your personal counselor

ANSWERS TO THE QUESTIONS

"I'm so pleased about what happened to me, I'd love to help it happen to you."



*Talk it over with
Dot herself....*

Complaint

106 F.T.C.

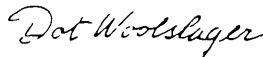
Dear Friend:

I'm beginning to feel like a celebrity. Hundreds of people have been calling me personally asking "Why did you pick The Rotation Diet?" Did I you feel guilty, eating so much on your "FREE DAYS", and weren't you worried you wouldn't lose weight? They had read about me and The Rotation Diet™ and seen how successful I was. But they weren't sure they could actually do it themselves.

That's why I volunteered to let The Rotation Diet™ Center relay calls to my home. I want to help spread the word about this wonderful diet.

So just call toll free (800) 523-6262 (In Penna. (215) 794-3278) and ask for Dot. I'm available most days and evenings plus weekends. I hope I'll be talking to you soon.

Sincerely,



Dot Woolslager

P.S. I'm no celebrity. I'm someone exact like you who's just a few months ahead of you on The Rotation Diet™ Program. And, more importantly, there are thousands of Rotation Diet™ Center members who've lost as much weight as I have. Even more! In fact, many of these people have joined the Center as Prochampions. And, if they would be glad to speak to you too. Look for their names and numbers on the next page.

In Pennsylvania the Center's Number is
(215) 794-3278



Return Address (please print)

Name _____
Street _____
City _____ State _____ Zip _____



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 6 FURLONG, PA

POSTAGE WILL BE PAID BY ADDRESSEE

THE ROTATION DIET CENTER

National Headquarters
Rotation Plaza
Furlong, Pennsylvania 18925



EXHIBIT D



"THE DIET YOU CAN LIVE WITH!"

PARTYLINE

Published by the Phonefriend Rotation Diet®

ROTATION CENTER, Bucks County, Pennsylvania • (215) 794-3278 7 days, 9 to 9 • Outside PA (800) 523-6262 toll free, 7 days, 9 to 9

ROTATION DIET CALLED — "MOST SUCCESSFUL DIET EVER!!"

Here are some comments from the thousands of people who are currently enjoying the Rotation Diet:

"I love the true freedom of being able to eat whatever I want every TUESDAY, THURSDAY, SATURDAY and SUNDAY!"

M.A., Pittsburgh, Pennsylvania

"I feel normal!"

J.F., New York, NY

"I've lost over 70 pounds while eating all of the ice cream that I want 4 days every week. **THIS IS THE MOST SUCCESSFUL DIET EVER!**"

P.A., Philadelphia, PA

"I've been on maintenance for 6 months and it's working great! I now have only ONE diet day each week."

L.B., Los Angeles, CA

"The Rotation Tablets taste like Necco Wafers. They really stop my hunger and increase my energy level. I feel good on my 3 diet days!"

S.E., Boston, Massachusetts

"I really pig-out on my free days — pizza, cheesecake, beer, potato chips. I eat to my heart's content and have still lost 57 pounds!"

T.M., Princeton, New Jersey

"I save enough on my 3 diet days to more than pay for the whole week. The diet actually costs me nothing!"

J.A., Salem, Ohio

"The all natural diet — no drugs or medicine! The Rotation Diet is really SANE and PROVEN SAFE!"

C.D., Washington, DC

"I just used your switching process to make Wednesday a FREE DAY — it worked great!"

A.L., Hartford, CT

"It's wonderful to know that I'll never have to miss another 'eating day' — no more birthday parties without the cake!"

D.W., New Haven, Pennsylvania

Dr. Barry Bricklin Joins Rotation Diet Staff as DIRECTOR of our Professional Advisory Board

Dr. Barry Bricklin, Ph.D., is an assistant professor of psychology at the Hahnemann Medical College of Philadelphia. Presently, he served on the faculty of the Jefferson Medical College of Philadelphia. He has served as consultant in psychology to the Walter Reed Army Hospital Research Center in Washington, D.C., to the United States Army, to the E.I. duPont Company in Wilmington, Delaware, to the National Research Council in Washington, D.C., to the New York Academy of Medicine and to the Columbia Broadcasting System. He is past president of the Philadelphia Society for Personality Assessment. He has authored or co-authored a number of books and articles on a wide variety of topics.

Among the results of Dr. Bricklin's comparative ventures with his wife Pat (also a Dr. Bricklin) are numerous articles, three books, and four children (Glen, Scott, Carol and Elliot). Some of their books have been best sellers, *Single Child — Four Greats*, *The Psychology of Underachievement*, and *Strong Family — Strong Child*. These books have been translated into nine different languages.

CONGRATULATIONS!

Pat	71 lb. loss	Ann	48 lb. loss
Angene	52 lb. loss	Linda	52 lb. loss
Bill	21 lb. loss in 20 days	Sam	30 lb. loss
Bob	10 lb. loss in 1 week	Joan	10 lbs. in 7 wks., 24 wks.
Berry	20 lbs. and maintenance	William	20 lb. loss
Ann	48 lb. loss	Julie	20 lb. loss
Joan	17 lb. loss in 1 week	Marianne	15 lb. loss in 3 weeks
Mary	10 lb. loss	Ruth	20 lb. loss and maintenance
Joan	20 lb. loss	Joan	20 lb. loss
Joan	20 lb. loss	Joan	20 lb. loss
Joan	20 lb. loss	Joan	20 lb. loss
Joan	20 lb. loss	Joan	20 lb. loss
Joan	20 lb. loss	Joan	20 lb. loss

One Day Service Fast and Personal

We know that when you decide to go on a diet you want to start NOW! With this in mind we are geared-up to process all new orders the same day that they are received. We ship UPS and usually the order is delivered within a day or two in the East and two or three days to the West Coast. Many orders are actually delivered the next day.

How are we so efficient? Easy — we use people not computers! My son Blair ordered a book from Time-Life and it took 6 weeks before it was delivered. He asked me every day for 6 weeks where his book was (he's 12) and I kept telling him that computers take time. He asked why they were used if they took so long and I explained that they were needed in large-scale operations. The Rotation Diet Center is relatively small. All together we are run by 75 people (up from 10 people only 12 months ago.) Don't expect Sears-Roebuck. When you call us you get a person who is on the Rotation Diet and CARES about YOU! No answering machines — no computers — just people who care!

Complaint

106 F.T.C.

EXHIBIT E

THE DIET YOU CAN LIVE WITH!

You can lose 16-20 pounds per month with The Rotation Diet without giving up your favorite foods.

Four days a week, eat what you like, as much as you like. Tuesday, Thursday, Saturday and Sunday, eat and drink whatever you like, good food or junk food, from pancakes to pizza to pastry.

Three days a week, Monday, Wednesday, and Friday, you follow our special three-point program. The weight comes off and stays off.

• No calories to count • No forbidden foods • No drugs
• No foods to weigh • No gadgets • No fatigue

To start looking the way you want, call for your free, no-obligation information package.

CALL US TOLL FREE.

(800) 523-5763

In Penna. call (215) 794-3278

Call 7 days a week from 9 AM to 9 PM



Don't lose sudden
pounds at
180 pounds

Now on the
Rotation Diet
plan, holding
steady at 123
pounds



I'm Dottie Woolslager. I'm thin for the first time since the kids came, and I know I'll never be fat again. I found the Rotation Diet, the only diet I've ever been able to live with.

Included in the free information packet will be telephone numbers of people like me who are on the Rotation Diet right now and can tell you about their experience with it. OR, get your free information packet by filling out the coupon below.

Do It Right Now!

ROTATION DIET CENTER
NATIONAL HEADQUARTERS
FURLONG, PA 18925

Please send me your FREE, NO OBLIGATION information packet today.



Rotation Diet

Buckingham
Direct Response Advertising
Buckingham, PA 18912-0102 • (215) 794-5914

SCRIPT FOR BUCKINGHAM PRODUCTS
60 SECOND DIET SPOT

PLEASE GET A PENCIL AND STAND BY.

I'M GOING TO TELL YOU ABOUT AN EXCITING NEW DIET THAT IS SWEEPING THE COUNTRY. THERE ARE NOW OVER 100,000 PEOPLE ON THE ROTATION DIET---AND THESE PEOPLE ARE LOSING POUNDS WHILE EATING WHATEVER THEY WANT 4 DAYS EVERY WEEK.

THAT'S RIGHT! ON THE ROTATION DIET EVERY TUESDAY, THURSDAY, SATURDAY AND SUNDAY ARE FREE DAYS WHEN YOU ARE ENTIRELY FREE TO EAT WHATEVER YOU WANT---AND AS MUCH AS YOU WANT. THE OTHER 3 DAYS YOU OPERATE ON A PERSONALIZED DIET THAT KEEPS YOUR ENERGY HIGH AND YOUR HUNGER LOW AND YOU'RE NEVER MORE THAN TOMORROW MORNING AWAY FROM BEING ABLE TO HAVE WHATEVER YOU WANT. FOR A FREE BROCHURE CALL NOW TOLL FREE.

800-521-62-62

THAT'S

800-521-62-62

ONCE AGAIN, FOR A FREE BROCHURE CALL

800-521-62-62

SEE OUR AD IN THIS WEEK'S TV GUIDE

Complaint

106 F.T.C.

EXHIBIT G

Take-A-Break Tablets[®]

help to maintain
your current weight up to 15 days
if you must "Take-A-Break" from your
Rotation Diet.[®]

That's right! You can now enjoy up to 15 consecutive Free Days without regaining the weight that you have lost!

We know that there are times when it's impossible to diet — even Rotation Diet®.

- Vacations with meals paid in advance.
- Last-second business dinners.
- When you're sick in the hospital.
- Just a feeling that you can't argue with...
- All sorts of pleasant times, emotional times, hard times — when it's just not the time to diet.

NO DRUGS OR MEDICINE

Take-A-Break Tablets[®] are specially formulated to work with the Rotation Diet[®] and help to keep food from turning to fat. This means that for one day, two days, any number up to 15 days, you can enjoy taking a break from your Rotation Diet[®]. Soon as you return — get back on the Rotation Diet[®] and in one week or less, you'll be back at your Pre-Break weight. It takes 1 to 3 balance days to rid your body of the food that was accumulated during your Break Time.



Order Now...
You should have a supply of Take-A-Break Tablets[®] on hand for those situations that develop at the last minute! Don't worry about keeping the tablets around — they have unlimited life!

COST	
Per Day	\$ 1.25
15 Days	\$48.75
(includes postage and handling)	

EXHIBIT H



ROTATION CENTER

National Headquarters • Rotation Plaza • Furlong, Pennsylvania 18925



You were very wise to request information about our popular
Rotation Diet...

*And because you acted at this time, you can now take advantage of
a very special offer, including a valuable free gift
and a money back guarantee.*

The ROTATION DIET is the only diet available to you that lets you
eat or drink anything you want 4 days a week and still lose up to 20
lbs. a month!

No Pills. No calorie counting. No special foods. No weighing or
measuring. No exercising. No boredom. No gimmicks. NO KIDDING!

Dear Friend,

If you're like me, and the thousands of people I've helped to lose weight, you've tried
everything to shed all those unwanted pounds...from calorie counting and weighing foods to
carbohydrate, grapefruit, water, and liquid protein diets. But the problem with diets is just that.
They're diets! And as we all know, anything that demands that you alter your lifestyle is difficult
to stick with. And when you don't, all those pounds and inches come right back!

The Rotation Program is the diet you can live with.

That's right—the Rotation Diet is different from all the others because 4 days a week you eat and
drink anything you want, as much as you want. Not celery and carrots, but suncoas, pizza, french fries,
pies, cake, anything at all. These 4 days are your "FREE DAYS" and they help satisfy your cravings so
you can stay with the program and lose each and every pound you want to.

Unlike other weight loss plans, Rotation Diet lets you celebrate birthdays with cake...dine out with no
restrictions...vacation without limitations...and enjoy parties without guilt just like everybody else.

"Dieting" 3 days a week to lose weight month after month, including 16 to 20 pounds the
first month. Impossible? Not at all...I've lost 62 pounds!

That's right. I've lost 62 pounds by using the Rotation Plan. Three days a week I followed a
personalized weight loss program using Rotation Waters and Vitamins. I didn't experience fatigue, dizziness,
hunger or boredom. I lost the weight I wanted to without guilt and without drugs.

Plus, I've kept off that unwanted weight. That's the beauty of the Rotation Diet. They don't leave you
"tired and dry" after you've reached your weight loss goal like most every other diet.

OVER PLEASE

Complaint

106 F.T.C.

Rotation Diet gives you an easy weight maintenance plan, too!

After you reach your goal, Rotation Center will show you how easy it is to keep that weight off without anyone ever knowing and without it interfering with your lifestyle.

In addition, the Rotation Diet also allows you to vacation free of guilt with our special TAKE-A-BREAK plan. You can now safely put your diet on hold for up to 15 days when it isn't convenient. That's right—Rotation's special Take A Break allows you to take a break without feeling guilty and without gaining back all the weight you've lost.

The Rotation Diet can actually save you more money than it costs!

With the Rotation Diet you can save more than you spend for the diet. If you're like most people, you'll cut about 40% off your food bill because you'll cut down on expensive foods during your 3 "BALANCE DAYS" each week.

Plus, there are never any expensive consultations or office visits to pay for. Our TOLL FREE HOTLINE also assures that you won't have any phone bills, and we guarantee you unlimited use of this special personal and confidential service.

Now's the time to act!

I hope you will take a few minutes right now to read my personal story and all the other important information in the enclosed brochure. Then call me and I'll send out the Rotation Diet for you. Or if you prefer, use the handy personalized order form that we've enclosed. Either way, don't put it off—you've got nothing to lose except a lot of unwanted pounds.

Sincerely,

Dot Woolslager

Dot Woolslager
Director
Rotation Diet Program

PS Just for taking the first step to a new, thinner life, we want to send you a beautiful FREE GIFT valued at over \$25.00. So don't put it off for one more day. Call or write to me now!

*I'll be looking for
your order—be sure
to mark the envelope
to my personal attention!*

EXHIBIT I



Dot Woolblager, age 45, 5'2" tall, and Judy Ritttrauff, age 42, 5'6" tall, are company executives at Rotation Diet and long time users of Rotation Diet and its Maintenance Plan.



Dot and Judy Introduce the "NO FRILLS" Rotation Diet...

It's the real thing—not an imitation!

Because of overwhelming product interest, we've created a low cost "No Frills" version of our unique Rotation Diet Program. **You still eat anything you want 4 days a week, and you still lose weight.** It's still the diet you can live with because you're never more than 24 hours away from eating all the foods you love.

How Is This Possible?

You can now get this very popular, successful diet at a substantially reduced cost because

- there is no membership fee
- there are no expensive movie stars advertising our diet
- there are no expensive TV or radio commercials
- there is no newsletter
- there is no fancy packaging
- there are no "free" gifts to increase the cost
- there is no free "800" phone number
- and there are no separate vitamins—you chose your own multi-vitamin

Everything else about the Rotation Diet remains the same—you sacrifice nothing when it comes to losing weight!

Compare Rotation Diet With Others You See Advertised . . .

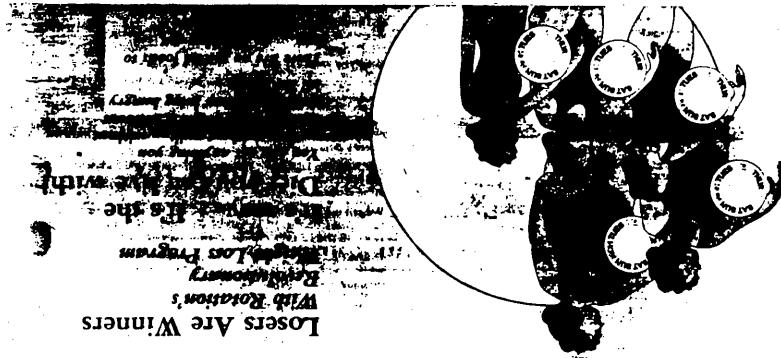
Do these other "miracle" diets require you to count calories? Prepare special foods? Do special exercises? Take some sort of drug? Do without your favorite foods for weeks at a time? Make you spend money and waste valuable time at weight reduction sessions?

Rotation Diet doesn't make you do any of these!

Please take a few minutes right now to read the enclosed details on this "NO FRILLS" Rotation Diet Plan. You'll see that it works just like the original Plan. It's just as safe, just as effective and just as easy! Best of all, you can now try it for as little as \$19.98. So go ahead—ORDER TODAY. What do you have to lose besides pounds?

Dot Woolblager Judy Ritttrauff

If you're still not convinced give us a call. We'll talk with you personally and answer any questions you have!



**Rotation Center's
Advisory Board
Director
Answers Your
Questions...**

Dr. Barry Bricklin is Director of Rotation Center's Professional Advisory Board. His responsibilities are to evaluate the plan and develop recommendations.

About 15 years ago Dr. Bricklin weighed over 320 pounds. He's 5'8" tall. He lost 75 pounds with an earlier version of the Rotation Diet and has maintained his desired weight of 145 pounds for 12 years with the current plan.

Currently Dr. Bricklin is an associate professor of psychology at Hahnemann Medical College in Philadelphia. Previously he's served Jefferson Medical Hospital, Walter Reed Army Hospital, E.I. DuPont Company, New York Academy of Medicine and the Columbia Broadcasting System (CBS).

Prompt Confidential Service

Orders are processed the day they are received. We know that when you decide to go on a diet you want to start NOW. With this in mind, we are pleased to process all new orders the same day they are received. We ship by air, which means that usually you receive your materials in 4 to 7 days.

Q: Does the Rotation Diet really work? Do people lose weight on it?

A: It works extremely well. But as any doctor with years of experience in weight control knows, designing a way to lose weight is only a small part of the challenge. My years of observation of this diet convince me that its real breaking edge is the unique way it allows a person to find his or her own weight and then stay there.

Q: Is the Rotation Diet medically safe?

A: You take no drugs or medications with this diet. However, we do encourage you to discuss the Rotation Diet with your doctor to insure the maximum safety.

Q: What are Rotation Chewable Tablets?

A: They are the natural ingredients specified in our plan that make the diet work. They are the only diet that uses the Tablet as a primary means of determining intake. They contain 100% pure, performance Tablets.

Q: How much weight can I lose?

A: Women usually lose 50 pounds a month, men 40 to 50 pounds. The amount depends on many personal variables including the total amount of weight you have to lose.

Q: Can I buy Rotation Chewable Tablets at my drug store?

A: No. Our special weight loss Chewable Tablets are manufactured expressly for the Rotation Diet Center and are available only to us.

We invite you to visit us if you pass our way. We'd love to meet you in person and hear about your success with the Rotation Diet. Come see us soon...

National Headquarters • Rotation Plaza •
Furlong, Pennsylvania 18925 • 215-794-4294 • 215-794-8881 •
7 days a week • 9:00 a.m. - 9:00 p.m. EST

Why wait any longer? **ORDER TODAY!** Get the diet you can truly live with!

SP-14

Complaint

106 F.T.C.

It's Easy To Get The
Diet You Can Live
With . . .

Here's How:

Complete this brief order form.
Don't forget to fill in the credit card information and sign if you are charging your order.
Mail your order form along with your payment if paying by check or money order in the handy postage paid envelope enclosed.

CREDIT CARD USERS:
Get extra fast service by phoning in your order. Call (215) 794-5293 or (215) 794-8811 7 days a week 9:00 a.m. - 9:00 p.m. EST.

ADDITIONAL ORDER BLANKS ON REVERSE FOR YOUR FRIENDS

**DON'T WAIT...
ACT TODAY
TO GET THE DIET YOU
CAN LIVE WITH!**
(orders processed within 24 hours.)

The Real Rotation Diet "NO FRILLS" Plan

National Headquarters • Rotation Plaza • Furlong, Pennsylvania 18925

- ☐ YES! I want to begin the NO FRILLS Rotation Diet Plan right away. Please send the following:
- ☐ NO FRILLS Rotation Diet—2 Week Introductory Supply \$19.98 + \$1.95 for postage & handling TOTAL \$21.93
 - ☐ NO FRILLS Rotation Diet—4 Week Supply \$39.95 TOTAL \$39.95
- Rotation Center pays postage & handling

OM7021000

Andrea Sacks
2727 29th St NW Apt 311
Washington, DC 20008

Please Check One: (no C.O.D.)

- ☐ Money Order ☐ Check Payable to: ROTATION DIET
OR
☐ MasterCard ☐ Visa ☐ American Express ☐ Diners Club

Card # _____
Expiration Date _____
Signature _____
Date _____ Phone # () _____

PLEASE
CHANGE ANY
INCORRECT
INFORMATION
USE STREET
& APARTMENT
ADDRESS—
UPS CANNOT
DELIVER TO
P.O. BOXES

Tell a friend about the "NO FRILLS" Rotation Diet Plan . . .

If you have friends or relatives who would also like to get the diet they can live with, just have them use the forms below. Then mail all orders with appropriate payment in the enclosed postage paid reply envelope.

NAME _____
ADDRESS _____ APT _____
CITY _____ STATE _____ ZIP _____
No P.O. Boxes please. UPS cannot deliver.

- ☐ YES! I want to begin the NO FRILLS Rotation Diet Plan right away. Please send the following:
- ☐ NO FRILLS Rotation Diet—2 Week Introductory Supply \$19.98 + \$1.95 for postage & handling TOTAL \$21.93
 - ☐ NO FRILLS Rotation Diet—4 Week Supply \$39.95 TOTAL \$39.95
- Rotation Center pays postage & handling

PLEASE CHECK ONE (no C.O.D.): ☐ Money Order ☐ Check Payable to: ROTATION DIET
OR ☐ MasterCard ☐ Visa ☐ American Express ☐ Diners Club

Card # _____ Expiration Date _____
Signature _____ Date _____ Phone # _____

NAME _____
ADDRESS _____ APT _____
CITY _____ STATE _____ ZIP _____
No P.O. Boxes please. UPS cannot deliver.

- ☐ YES! I want to begin the NO FRILLS Rotation Diet Plan right away. Please send the following:
- ☐ NO FRILLS Rotation Diet—2 Week Introductory Supply \$19.98 + \$1.95 for postage & handling TOTAL \$21.93
 - ☐ NO FRILLS Rotation Diet—4 Week Supply \$39.95 TOTAL \$39.95
- Rotation Center pays postage & handling

PLEASE CHECK ONE (no C.O.D.): ☐ Money Order ☐ Check Payable to: ROTATION DIET
OR ☐ MasterCard ☐ Visa ☐ American Express ☐ Diners Club

Card # _____ Expiration Date _____
Signature _____ Date _____ Phone # _____



VF103-02

EXHIBIT J

The Rotation Diet Can Actually Save You More Money Than It Costs!

That's right! With the Rotation Diet you'll save more than you spend on this diet. If you're like most people, you'll cut about 40% off your food bill. And you'll cut down on expensive foods during your 3 Balance Days each week. And that will more than cover the cost for the Rotation Diet. Plus, there are never any expensive office visits or consultations. Our TOLL FREE HOTLINE also

assures that you won't even have any phone bills because we guarantee you unlimited use of this service. It's included in your low weekly cost.

So what do you have to lose besides a lot of pounds? Call us today or use the easy order blank on page 13 to start your Rotation Diet. Remember, losers are winners with Rotation Diet!

"Everyone has one problem or another during weight loss, but on this diet, you get the answers and all the help you need."
C.T., Toronto, Canada

"I love the true freedom of being able to eat whatever I want every TUESDAY, THURSDAY, SATURDAY AND SUNDAY!"
M.A., Harrisburg, PA

lose Weight. Feel Great and Improve Your Health...
The Rotation Plan is truly a diet you can live with!

eat anything you want and as much as you want 4 days a week — no limitations, no guilt

diet only 3 days each week

no special foods to buy

no drugs, no medicines — just natural ingredients

no weighing out portions, no counting calories

- enjoy better health and longer life
- experience weight loss without dizziness or fatigue
- save up to 40% on your current food bills
- reach your goal then keep it off with the Rotation Diet Maintenance Plan
- enjoy unlimited help and support from your Rotation Center Phonefriends

This is a personalized diet. It isn't the same for everybody. A special Rotation Center Diet Counselor will analyze your needs and set up your diet accordingly.

And remember with the Rotation Diet you are never more than 24 hours away from the best meal of your life!

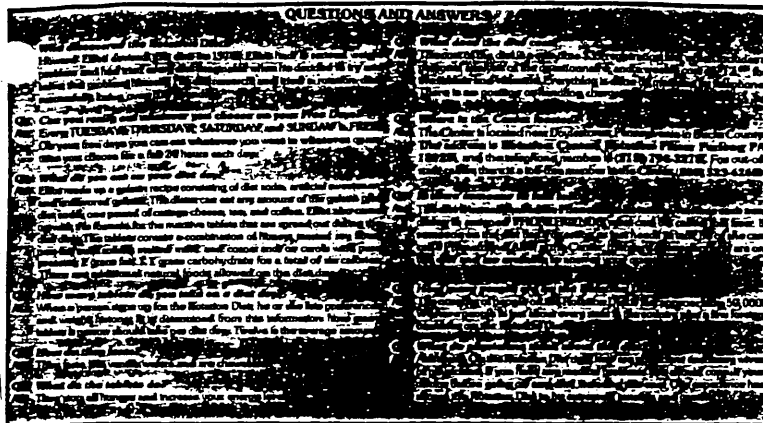
FOR EASY ORDERING CALL
TOLL FREE 800-523-5763

Your new Phonefriends are waiting to help you in any way they can.



"I've lost over 70 pounds while eating all the ice cream that I want 4 days every week. THIS IS THE MOST SUCCESSFUL DIET EVER!"
P.A., Philadelphia, PA

"I've been on maintenance for 6 months and it's working great! I now have only ONE diet day each week."
S.B., Los Angeles, CA



CALL FOR MORE INFORMATION

TOLL FREE (800) 523-6262

In Penna. (215) 794-3278

Seven days a week from 9 A.M. to 11 P.M. (Eastern time)
there is a Phonefriend ready to answer your questions or take your order.
Why not call now!

**A FRIEND CAN USE THE COUPON BELOW
TO ORDER AN INFORMATION PACKET LIKE THE ONE YOU RECEIVED**

Yes, I'm interested in finding out more about a diet that lets me eat whatever I want every **TUESDAY, THURSDAY, SATURDAY and SUNDAY**. Please send me the **Rotation Diet Information Packet**. I understand that the Packet is **FREE** and that there is absolutely no obligation!

Name

Street address Apt.

City State Zip

Telephone (optional) ()
area code

Please fill out this **FREE** request form and mail
it in an envelope to:
ROTATION DIET CENTER
Furlong, PA 18925
or call:
Toll Free (800) 523-6262
In Penna. (215) 794-3278

ROTATION REP NUMBER

EXHIBIT K



**JUDY RUTHRAUFF
PRESIDENT
ROTATION-FREEDOM DIET**

"Four years ago I lost 23 lbs on this diet while eating whatever I wanted 4 days every week. More amazing! I've stayed at my right weight for 4 years and I eat whatever I want 6 days a week! I enjoy the freedom - and knowing that I'm in control of my life. I also enjoy the way I look --- I'm not a movie star but I'm the best I can be. Our files are filled with 1000's of people who have made this diet a part of their lives and are enjoying themselves just as I do. Join us! This diet has changed my life so dramatically that it thrills me to be able to offer you the chance of doing the same. To make it easier I'm establishing a special introductory price of \$9.95 (plus P&H) for a full 2 weeks of the Rotation-Freedom Diet. Join me!"

Here's how the diet works:

Free Days: on Tuesdays, Thursdays, Saturdays, and Sundays you eat and drink anything you want. As much as you want. Eat spaghetti, pizza, breads, and desserts like gooey banana splits. Eat all you desire. Second if you want! You are never more than one day away from your next exciting meal.

Diet Days: on just 3 days (Mondays, Wednesdays and Fridays) you follow the simple Rotation-Freedom Weight Loss Program and eat tasty Rotation-Freedom Chewable Tablets.

There Are Even Real Foods allowed on Diet Days listed in your instruction Booklet.

Rotation-Freedom Chewable Tablets are one of the keys to your weight-loss success. They are specially formulated food supplement tablets, manufactured only for the Rotation-Freedom Diet. They contain no medicine or drugs, yet help to make your Diet Days easier.

Great News: You can Switch Diet Days. Special Occasions, holidays, and week-time parties take precedence. (The "Switching Plan" is in the Rotation-Freedom instruction Booklet).

Exciting Weight-Loss: The First Month. Rate of weight-loss varies with different people, but the majority of women in our file lose at least 10 to 20 pounds during the first month. (The majority lose more).

A Way To Maintain Weight-Loss Too. The Rotation-Freedom Diet has a built-in weight maintenance plan that adds more freedom to your week automatically.

Phone Friends are here to help. 12 hours a day, 7 days a week. Most are on our Diet and are in 24-hour contact with members who have lost weight.

Extraordinary Success Stories

- Maggie began at 183 pounds. After less than three weeks she was at 178 pounds. "I've gained 10 pounds the program."
- Edgar "I've lost 31 lbs in 3 months. I'm losing 10 lbs a month. I've lost 18 pounds in 22 weeks. 13 pounds the first month."
- Diana "I've lost 20 lbs in 3 weeks and have never felt better. I really love this diet."
- John "I weighed 250 pounds when I first started the diet and am now down to 200 lbs. I'm a head at 18 to 50."

Judy

INTRODUCTORY

2 WEEKS OF THE ROTATION FREEDOM DIET

\$9.95

OFFER VALID FOR NEW MEMBERS ONLY. SPECIAL

ROTATION FREEDOM DIET

Health Plaza, Fort Worth, TX 76102

NAME _____

ADDRESS _____

CITY _____

STATE _____

ZIP _____

DATE _____

TIME _____

PHONE _____

TELETYPE _____

TELEFAX _____

TELEMAIL _____

TELEVIDEO _____

TELEPHONE _____

TELETYPE _____

TELEFAX _____

TELEMAIL _____

TELEVIDEO _____

TELEPHONE _____

TELETYPE _____

TELEFAX _____

TELEMAIL _____

TELEVIDEO _____

DIET GRAM

**FREE GIFTS PLUS SPECIAL PRICE
... BUT YOU MUST ACT NOW!**

Rotation-Freedom ... the diet people

ANNOUNCE

the breakthrough diet of the future!

FREEDOM *Plus!*

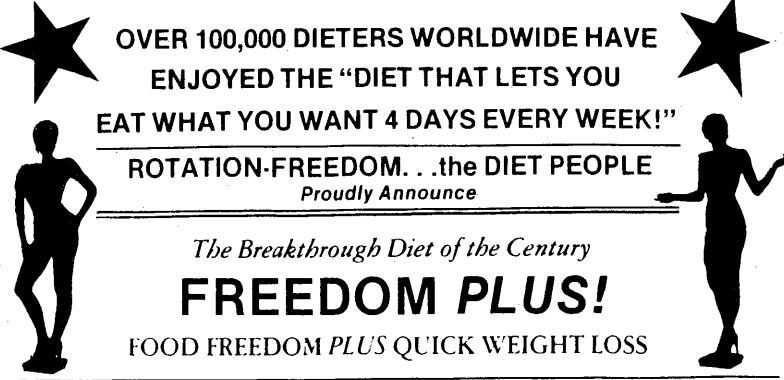
Food Freedom plus Quick Weight Loss

Just like Rotation-Freedom, you will enjoy 4 ABSOLUTELY FREE EATING DAYS every week BUT NOW LOSE UP TO 3 TIMES AS FAST!! Every Tuesday, Thursday, Saturday, and Sunday enjoy your ice cream, French Fries, cake and cookies — whatever you want, and as much as you want WHILE YOU LOSE 10, 20, 40, 60, or more POUNDS FAST!

All FREEDOM *Plus!* dieters are automatically eligible for \$500 weight loss prizes! You will receive complete information with your supplies.

Monday, Wednesday, and Friday you'll enjoy the all-natural FREEDOM *Plus!* Chewable Tablets and eat real foods as outlined in your instructions. It's pretty easy getting through the Diet Day when you know that tomorrow you can eat whatever you want!

We've added Q-L 2001 to the Free Day. Q-L 2001 can be used as a delicious soup or as a dip with crackers or vegetables. ITS SPECIAL ALL-NATURAL INGREDIENTS HELP THE FREE DAY FOOD MOVE RIGHT OUT OF YOUR BODY. Within 3 days you'll see the change IN YOUR CLOTHES AND ON YOUR SCALE as this dramatic new weight loss plan DOES ITS JOB!



OVER 100,000 DIETERS WORLDWIDE HAVE
ENJOYED THE "DIET THAT LETS YOU
EAT WHAT YOU WANT 4 DAYS EVERY WEEK!"

ROTATION-FREEDOM. . .the DIET PEOPLE
Proudly Announce

The Breakthrough Diet of the Century
FREEDOM PLUS!
FOOD FREEDOM *PLUS* QUICK WEIGHT LOSS

Here's How The FREEDOM *PLUS* DIET Works:

Free Days... it really is fabulous because on Tuesdays, Thursdays, Saturdays and Sundays you eat and drink anything you want. As much as you want. And still lose weight. It's truly a diet you can live with.

Eat Anything You Want... eat spaghetti, ravioli, pizza, breads, potatoes. And desserts: chocolate mousse, and fudge cake. Goody banana splits. Pecan pie (with ice cream if you want). Eat all your favorites. Seconds if you want.

It's Fantastic... imagine: eat anything you want 4 days every week and still lose weight. Tuesdays, Thursdays, Saturdays and Sundays are your Free Days.

YOU ARE NEVER MORE THAN ONE DAY
AWAY FROM YOUR NEXT EXCITING MEAL.
QL 2001!

On your Free Days you will sip 3 cups of QL 2001: a delicious soup that comes in chicken, onion and beef flavors. The special all-natural fiber in the soup helps to move the free day food right out of your body!

Diet Days... on just 3 days (Mondays, Wednesdays and Fridays) you follow the simple Freedom *Plus* Weight Loss Program. On Diet Days, you eat tasty Freedom *Plus* Chewable Tablets along with as much water, tea, coffee or diet soda that you want.

There Are Even Real Foods allowed on Diet Days (listed in your Instruction Booklet). The Freedom *Plus* Chewable Tablets are one of the keys to your weight-loss

success. They are specially formulated, food supplement tablets, manufactured only for the Freedom *Plus* Center. They contain no medicine or drugs yet help to make your Diet Days easier. They are only available for members of this weight-loss plan.

Great News... You Can Switch Diet Days. Wow, that is great news... Special Occasions, Holidays, and weektime parties take precedence. Your friends won't even know you're on a diet. (The "Switching Plan" is in the Freedom *Plus* Instruction Booklet).

A Way To Maintain Weight Loss Too... the Freedom *Plus* Diet has a built-in weight maintenance plan. Once you have reached your goal you reduce your Diet Days to "2," then as your system adjusts to your new weight your Diet Day Number is "1". You can then adjust any weight changes by adding and subtracting diet days as you need them. In other words, if you stick to the plan you should be able to stay at the weight you want for the rest of your life. Isn't that incredible!

Exciting Weight Loss the First Month. Rate of weight loss varies with different people, but the majority of women usually fit within a range of 8 to 20 pounds loss during the first month, men usually lose more.

S	M	T	W	T	F	S
Free	Diet	Free	Diet	Free	Diet	Free
Days	Days	Days	Days	Days	Days	Days
7	1	2	3	4	5	6
14	8	9	10	11	12	13
21	15	16	17	18	19	20
28	22	23	24	25	26	27
	29	30	31			



DOT and JUDY Answer Your Questions

Dot and Judy, who were obese and just four feet minus 12, lost 100 pounds each after the Freedom Plus Diet Plan. "It made an exciting announcement," responds to overwhelming product interest. "We now offer the FREEDOM PLUS Diet Plan."



Q. How much weight can I really lose on the FREEDOM PLUS Diet Plan?

Q. Can I buy FREEDOM PLUS Where in the store?

Q. What about vacations, parties and other times when I will be forced to eat what is served?

Q. Should I consult my doctor before starting the FREEDOM PLUS Diet Plan?

Q. How will this diet help me lose my weight?

Here's what dieters were telling us before QL-2001 Imagine what they'll be saying NOW!!!



"I'm very, very happy. For the first time in my life I can be included in the 'before after' life of a diet plan. I have sent you three more members."



"I've lost 39 lbs. Your diet was fantastic. I have been on your maintenance program for over a year now and I am holding my weight right where I want it."



She heard about the diet's success stories while working in our shipping department and decided to try it. Janet needed a diet that let her eat anything she wanted while attending Dog Shows. Dieting on Mondays, Wednesdays and Fridays was perfect for her.

Full copies of the testimonial letters above are available from the Center. Weight loss is a personal matter and therefore it should not be concluded that the testimonial above, although exact quotes are typical of the weight loss that any specific individual should expect.

Read What Other Happy Dieters Say

- "I began at 193 lbs. A little less than three weeks later I am at 178 lbs. It feels terrific. I love the program."
- "Your diet is the only one I've found that really works. I've lost 36 lbs. in 22 weeks. (113 lbs. the first month.)"
- "She stopped smoking! I went from 112 to 138 lbs. I'm now down to 118 and feel great. I would recommend the diet to anyone."
- "This is one diet you can really live with and enjoy yourself while on it." (Dress size down from 18 to 14.)
- "I weighed 250 pounds when I first started the diet... and am now down to 200 pounds... from a waist size of 48 to 42."
- "...a loss of 61 pounds in 4 months. My waist dropped from 39" to 32" inches."

AND IT CAN WORK FOR YOU TOO!

FREE \$14.⁹⁵ WEIGHT-MATE PLUS LOWER PRICES IF YOU ORDER NOW!

As Seen In . . .

TV
GUIDE

ORDER FORM

I'm ready for Diet Freedom with the FREEDOM Plus Diet! Please send me:

☐

One 2 week FREEDOM Plus Diet Kit including FREEDOM Plus Chewable Tablets, QL 2001, complete instructions, information on the free weight loss contest, and Diet Tips.

~~\$19.95~~ plus \$2.00 postage & handling. TOTAL ~~\$21.95~~ **\$16.95 SAVE!**

☐

One 4 week FREEDOM Plus Diet Kit including FREEDOM Plus Chewable Tablets, QL 2001, complete instructions, information on the free weight loss contest, and Diet Tips.

~~\$39.90~~ (we pay postage & handling). TOTAL ~~\$39.90~~ **\$29.90 SAVE!**

LOSE FASTER!

Substitute one of our wonderful milkshakes for any meal on your Free Day. Contains the vitamins, minerals, and fiber that you need!

We'll send Vanilla,
Chocolate and Strawberry!

SAVE!
☐

8 Shakes — Add \$7.95
(2 Week Plan)

☐

16 Shakes — Add \$14.95
(4 Week Plan)

We pay postage & handling

Name _____

Address _____ Apt. _____

City _____ State _____ Zip _____

(No P.O. Boxes please. UPS cannot deliver.)

Please check one:

check money order (no C.O.D.'s)
made payable to: FREEDOM Plus!

VISA MasterCard AE Diners Club

Card # _____ Exp. Date _____

Signature _____

Phone # () _____

TOLL FREE

Credit Card Orders Only:

Call (800) 433-3378, Ext. 300

In PA call (215) 794-5643, Ext. 300

9 AM to 9 PM Eastern Time

7 days a week

FREEDOM Plus! ROTATION-FREEDOM CENTER, HEALTH PLAZA, FURLONG, PA 18925

DECISION AND ORDER

The Commission having heretofore issued its complaint charging the respondent named in the caption hereof with violations of Sections 5 and 12 of the Federal Trade Commission Act, as amended, and the respondent having been served with a copy of that complaint, together with a notice of contemplated relief; and

The respondent and counsel for the Commission having thereafter executed an agreement containing a consent order, an admission by the respondent 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 respondent that the law has been violated as alleged in such complaint, and waivers and other provisions as required by the Commission's Rules; and

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 Dr. Barry Bricklin is an individual whose address is 470 General Washington Road, Wayne, Pennsylvania.
2. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the respondent, and the proceeding is in the public interest.

ORDER

I

It is ordered, That expert respondent Dr. Barry Bricklin, individually and through any corporate entity over which he now or hereafter exercises control, and his corporate successors and assigns, in connection with the endorsing, advertising, offering for sale, sale, or distribution of any weight reduction or weight control product, program or service, in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, does forthwith cease and desist from:

(A) Representing in advertising, directly or by implication, that any consumer can eat any quantity of food and still lose weight or main-

tain that weight loss, without an accompanying and proximate, clear and prominent disclosure that the consumer's weight loss or ability to maintain that weight loss depends on a reduction in caloric intake in the short term and an overall reduction in caloric intake over the long term.

(B) Representing in advertising, directly or by implication, the usual or average weight loss, or range of weight loss, obtained or obtainable from any such weight reduction or weight control product, program or service, unless at the time of making such representation expert respondent Dr. Barry Bricklin possesses and relies upon competent and reliable survey or other scientific evidence that substantiates the representation.

(C) Making any representation in advertising, directly or by implication, regarding the efficacy or performance of any weight reduction or weight control product, program or service, the content or mode of action of any weight reduction or weight control product, program or service, unless at the time of making such representation expert respondent Dr. Barry Bricklin possesses and relies upon competent and reliable survey or other scientific evidence that substantiates the representation.

For purposes of Part I of this order, *competent and reliable* evidence shall mean an actual exercise of expert respondent Dr. Barry Bricklin's expertise in evaluating weight reduction and/or weight control programs and products with respect to which he is expert, in the form of an examination or testing of the programs and products at least as extensive as someone with a similar degree of expertise would normally conduct in order to support the conclusions presented in the representation.

II

It is further ordered, That for three years from the date that the representations to which they pertain are last disseminated, expert respondent Dr. Barry Bricklin shall maintain and upon request make available to the Federal Trade Commission for inspection and copying:

1. All materials that were relied upon to substantiate any such representation.
2. All test reports, studies, surveys, or other materials in his possession or control that contradict, qualify, or call into question such representation.

III

It is further ordered, That expert respondent Dr. Barry Bricklin shall promptly notify the Commission of the discontinuance of his present business or employment and of his affiliation with a new business or employment and that, for a period of 10 years from the date of service of this order, expert respondent Dr. Barry Bricklin shall promptly notify the Commission of each affiliation with a new business or employment whose activities include the advertising, endorsing, promotion, offering for sale, sale, or distribution of any weight reduction or weight control product, program, or service, and of his affiliation with a new business or employment in which his own duties and responsibilities involve the advertising, endorsing, promotion, offering for sale, sale, or distribution of any weight reduction or weight control product, program or service, with each such notice to include expert respondent Dr. Barry Bricklin's new business address and a statement of the nature of the business or employment in which expert respondent Dr. Barry Bricklin is newly engaged as well as a description of expert respondent Bricklin's duties and responsibilities in connection with the business or employment.

IV

It is further ordered, That expert respondent Dr. Barry Bricklin, and his corporate successors or assigns, shall, within sixty (60) days after service of this order, and also one (1) year thereafter, file with the Commission a report, in writing, setting forth in detail the manner and form in which he has complied with this order.

Commissioners Bailey and Azcuenaga were recorded as voting in the negative with the notation that, not having reason to believe that Dr. Bricklin should have been charged with violations of Sections 5 and 12 of the Federal Trade Commission Act, they dissented from the decision to accept an agreement that placed him under an order to cease and desist.

IN THE MATTER OF
JOHN TREADWELL
d/b/a TRANS-CONTINENTAL INDUSTRIES

CONSENT ORDER IN REGARD TO ALLEGED VIOLATION OF SEC. 5 OF THE
FEDERAL TRADE COMMISSION ACT

Docket C-3165. Complaint, Sept. 23, 1985—Decision, Sept. 23, 1985

This consent order requires John Treadwell, doing business as Trans-Continental Industries, to cease, among other things, making any performance claims for any gasoline additive without competent and reliable evidence; claiming that tests support any performance claims without proper substantiation; and misrepresenting the results or conclusions of any tests pertaining to gasoline additives or the potential profits or marketing assistance that will be provided for distributors of respondent's products. Further, respondent is required to maintain records of substantiation for three years; file a compliance report with the Commission within 60 days; and notify the Commission of the discontinuance of his present employment and any future employment in similar areas for five years.

Appearances

For the Commission: *Paul R. Roark.*

For the respondent: *Pro se.*

COMPLAINT

Pursuant to the provisions of the Federal Trade Commission Act, as amended, and by virtue of the authority vested in it by said Act, the Federal Trade Commission, having reason to believe that John Treadwell, an individual doing business as Trans-Continental Industries, hereinafter sometimes referred to as respondent, has violated the provisions of said Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, hereby issues its complaint stating its charges in that respect as follows:

PARAGRAPH 1. Respondent John Treadwell is an individual doing business as Trans-Continental Industries ("TCI"), a sole proprietorship with its office and principal place of business located at 2489 Burlingham Place, Simi Valley, California.

PAR. 2. Respondent is now, and at all times relevant to this complaint has been, engaged in the manufacturing, offering for sale, sale, and distribution to the public of a product known as 20% PLUS ORGANIC FUEL CATALYST ("20% Plus") and other gasoline and