

IN THE MATTER OF

BUCKINGHAM PRODUCTIONS, INC., ET AL.

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

Docket 9194. Amended Complaint, July 30, 1987—Decision, July 30, 1987

This consent order requires, among other things, the Furlong, Pa. marketers of mail-order weight reduction or weight control products, programs or services to cease falsely representing the effectiveness of its programs, products or services without competent and reliable evidence supporting such claims.

Appearances

For the Commission: *Michael Dershowitz.*

For the respondents: *John J. Hare, Jr., Buckingham Commons, Furlong, PA.*

AMENDED 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., Health and Diet Corp., Inc., corporations; Howard Elliot, individually and as an officer of said corporations, ("respondents"); and Dr. Barry Bricklin, individually, ("expert respondent") have violated 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 Rotation Diet Center, 73 Valley Drive, Furlong, Pennsylvania; Furlong-Elliot Corp., 73 Valley Drive, Furlong, Pennsylvania; Freedom Center, Inc., 73 Valley Drive, Furlong, Pennsylvania; Plaza Business Services, Inc., 73 Valley Drive, Furlong, Pennsylvania; N.F. Rotation, Inc., 73 Valley Drive, Furlong, Pennsylvania; and Rotation-Freedom Diet, Inc., 73 Valley Drive, Furlong, Pennsylvania; and Health and Diet Corp., Inc., 73 Valley Drive, Furlong, Pennsylvania are Pennsylvania corporations.

* Complaint issued June 24, 1985. Published at 106 F.T.C. 115 (1985).

(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 formulates, directs and controls the acts and practices of the corporate respondents, including the acts and practices alleged in this complaint. His address is 73 Valley Drive, Furlong, Pennsylvania.

(d) 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.

PAR. 2. Respondents manufacture, offer for sale, and sell weight 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 mails, 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 expert respondent Dr. Barry Bricklin, which appear in respondents' 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 then 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 Rotations 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 para-

graphs 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.

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 Diet You Can Live With. Does It Really Work?

It Worked For Dot Wooslager...



Dot before she started the Rotation Diet



Dot now
62 pounds lighter

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

I started the Rotation Diet on April 23, 1979. By the end of the summer I had lost 35 pounds, dropping my weight from 185 to 145 pounds. I was beginning to regain the human race.

Since then I have been able to enjoy a modified maintenance program. I eat whatever I want and still my weight continues to drop. My original goal was 120 pounds. I'm now down to 123 pounds with a new goal of 115. I've lost a total of 62 pounds so far. Translated 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 husband is also very proud of the dramatic change in their life. Mom! And although my husband was extremely understanding during my fat years, I know he enjoys having his "pride 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 Rotation 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 Rotation Diet has transformed my life and I know I 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 Rotation Diet. And here she is at 143 pounds. Her goal is 125 and Rotation Diet is going to help her get there!

It worked for Judy...

Here I am with the slacks I used to wear before the Rotation 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
Larry	24	Jerry	25
Jo	23	Janece	13 in 3 weeks
Emmy	25	June	25

Plus tens of thousands more!

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

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

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

housewife	politician
physician	dress shop owner
stewardess	computer analyst
dancer	writer
psychologist	lawyer
real estate agent	fireman
school teacher	doctor
minister	computer programmer
factory worker	secretary
dentist	law professor
photographer	teacher
eye doctor	journalist
baker	teen-aid counselor
nurse	artist
student	college basketball player
teenager	banker
beautician	fireman
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

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

It Worked For Dot Woollager...



Dot before she started the Rotation Diet



Dot now
62 pounds lighter

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

I started the Rotation Diet on April 23, 1979. By the end of the summer I had lost 65 pounds, dropping my weight from 285 to 145 pounds. I was beginning to "rejoin the human race."

Since then I have been able to enjoy a modified maintenance program. I never diet again and still my weight continues to drop. My original goal was 130 pounds. I'm now down to 123 pounds with a new goal of 115. I've lost a total of 62 pounds so far. Translated, 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 skin is also very proud of the dramatic change in their life. Mom! And although my husband was extremely understanding during my fat years, I know he enjoys having his "pride 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 Rotation 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 Rotation Diet has transformed my life and I know it could do the same for you!

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



It worked for Arlene...

Here's Arlene H. at 238 pounds before the Rotation Diet. And here she is at 143 pounds. Her goal is 125 and Rotation Diet is going to help her get there!

It worked for Judy...

Here I am with the stacks I used to wear before the Rotation Diet. Now I'm 23 pounds lighter!

And it worked for all

these people, too!

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

Plus tens of thousands more!

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

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

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

housewife	politician
physician	travel agent
stewardess	computer analyst
dancer	journalist
psychologist	lawyer
real estate agent	electrician
school teacher	chef
minister	comedian
factory worker	secretary
senator	professor
photographer	actor
live doctor	theater producer
maker	news anchor
nurse	artist
student	business executive
teenager	banker
beatnik	physician
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 I'm working great! I now have only ONE diet day each week." S.R., Los Angeles, CA

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!**

EXHIBIT B



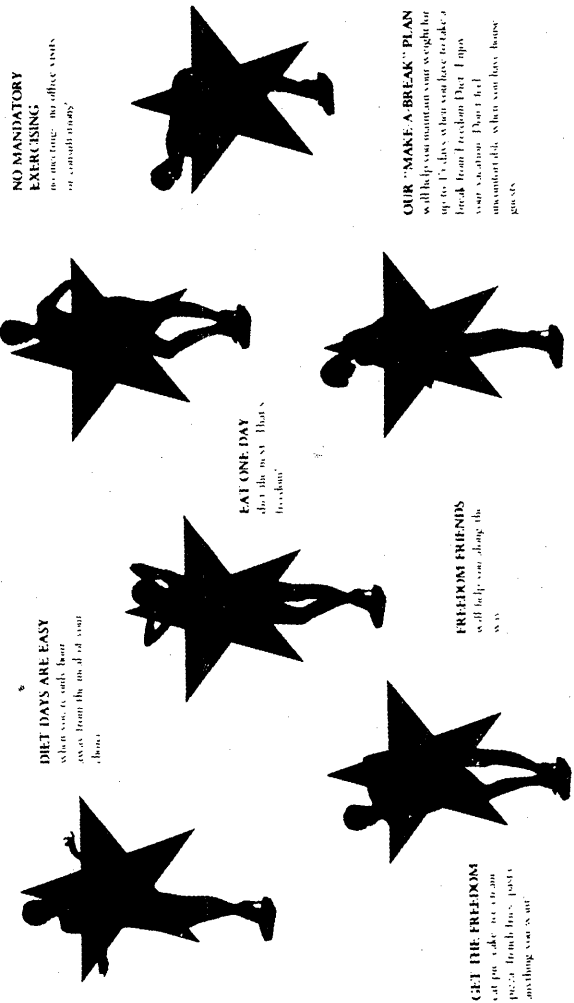
Discover
DIET FREEDOM with
The **FREEDOM DIET**

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.

Eat AND Lose...

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



NO MANDATORY EXERCISING:
No running. No office visits.
No casual strolls.

DIET DAYS ARE EASY:
When you're only four
pounds from the goal of your
dreams.

EAT ONE DAY:
Just the next. That's
freedom!

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.

GET THE FREEDOM
eat pie, cake, ice cream,
pizza, french fries, pasta,
anything you want!

FREEDOM FRIENDS
will help you along the
way.

[illegible]

By following the FFFDDDDF 1-3 days a week, you can lose up to 20 pounds the first month! And best of all, nobody has to know you're on a diet because FFFDDDDF 1 has a special plan for switching your Freedom Days and Diet Days. It lets you enjoy special days without messing up your diet.

After You Reach Your Goal, It's Easy To Maintain
 Since you've lost all the weight you want, it's easy to keep it off because FRODO™ 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 FRUIT-OM-DIE! contains no drugs or indications of any kind. It's a food product. Ask your doctor about it. Have him call us if you like.

It's sane because it just makes good sense to choose 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 FR-FIT DDM hands you love. And because it doesn't deprive you, you'll be able to keep it all!



Kathy Used To Weigh 189 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 169 pounds. I carried 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 myself 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 all these scrumptious and luscious and fattening foods she loves so much. So she always ended up cheating and these scrumptious

Then Kathy heard about the FRET-FROM DIET—a diet that lets you eat anything you want a day a week. “It was hard to believe,” she said, “but I decided to give it a try. I had plenty of friends to have who also wanted to start something from diet to diet.”

Today Kathy weighs 126 pounds. "It wasn't hard to stick with it the family had cheese cake on one day they'd save me a piece and I'd have it the next day ..."

my diet day, they'd save me a piece and I'd have a little more to eat. I never dreamed I'd be so much of a foodie!"

Kathy

110 F.T.C.

Freedom Friends Will Be Here To Help You
At Freedom Headquarters there are special people who only help you take a minute right now and meet a couple of these special Freedom Friends.

whenever you want 4 days a week!

Freedom Dieters Tell Us...

Freedom Dieters Pen Us...

"I'm a guy, and frankly I was tacit. I pondered me in my work. But I like to eat. A friend of mine was losing weight with the Rotation Diet. But since I'm just starting my career it's just too much to think for me to shell out. Then I heard about the FREEDOM DIET. At a price I could swing. Now I've lost my first 10 pounds, and I can still afford to take my girlfriend out to dinner!"

"I saw the Rotation Diet on TV and it sounded simply wonderful. I wanted to get rid of at least 25 pounds, but the cost of that diet was a bit steep for me. Now the RHHQMDH I collected at such a low price that even I can afford it."

"I needed to lose weight very badly, but my husband's only working part time these days and I couldn't afford to spend a lot of money on a diet program. Then I received word about the **FRANKMIDE**! I was so pleased your low price makes it possible for me to lose weight."

“We’ve been married now for just 6 months, and between the two of us, we’ve gained a total of 42 pounds. We both agreed it had to stop. We got your brochure telling us about the FIRST DDM DUEL. Together, we’ve lost enough weight to fit into our wedding dresses again. Thank you!”

Freedom Headquarters Answers Your Questions

Q How much weight can I really lose on the FRED-DIE?

A Rate of weight loss varies with lifestyle, but pending on how much you have to lose, you can expect to lose 10 to 20 pounds in the first month, and up to 50 pounds in the first year.

Q Can the FREEDOM INFO Act harm me in any way?
A No, that experience is that the Act when followed to its end will only help you. There are no dangers involved.

Q What exactly are the Diet Fats & Cholesterol Tablets for?

A These special tablets help reduce the levels of cholesterol and triglycerides in the blood, which in turn helps to reduce the risk of heart disease. They also help to improve the overall health of the cardiovascular system.

Q Can I buy PRELIMINUM Chewable Tablets in the store?

A No. They are sold only by mail order and are not available in any drug store, health food store or other store.

They are available only from us.

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

A. We encourage everybody to consult his or her doctor before beginning, especially if you are taking any medications or have any chronic health conditions. We want you to be safe and healthy.

Q: Once I lose, how can I be sure I won't gain it all back?

A: Let's be realistic. You just might be, and you're as good as evened. That's why you should be willing to walk away with your "game" money when the odds are against you.

ERIK FUKUMOTO: I have a question about the tendency of the Japanese to eat more rice than the Americans. I have a question about the tendency of the Japanese to eat more rice than the Americans. I have a question about the tendency of the Japanese to eat more rice than the Americans.

your schedule. You can also schedule your vacation during the summer months, when you can take advantage of the many special vacation packages that airlines, hotels and cruise lines offer. And, if you're looking for a more relaxing vacation, you can take advantage of the many special vacation packages that airlines, hotels and cruise lines offer.

MIRA CAREY...Freedom Friend

Nona, a slender mother of two children, is responsible for answering many of the Freedom Diet phone calls that come in. She has been with us for over a year. "The Freedom Diet phone calls that come in," Nona has kept her figure by constantly resisting lousy weight-loss ideas. "I don't believe in any of those things the advertising tells you," she says. "I don't believe in any of those things the advertising tells you. One day I was extra pounds slipped upon her. She decided it was time to try it, and the Freedom Diet for herself."

In one week I lost those three extra pounds, and found a lifting solution. I decided it was time to take up the Freedom Diet on my own. I carefully maintained my weight. I simply use the Freedom Diet one day a week on what anything I want; the other six days, it's a perfect way to maintain my diet weight.

Let all *Businessmen* you tried to talk to get your questions answered just that. The freedom that really works!

Charles Yard Freedom Fund

Shirley, 42, and weighed 498 pounds as a bride and she managed to hold her slim figure even after four children. Eight years ago she gave up smoking and her weight began to creep up. She decided to try the Freedom Diet and has lost 27 pounds in less than 12 weeks.

[illegible]

**A PERSONAL MESSAGE FROM
BARBARA EDEN**

BARBARA LEDEN
It's easy to understand why thousands upon thousands of people on the Freedom Diet write to tell us that this is really a diet you can live with. It just makes good sense: you can eat all the foods you love and still be on a diet.

If you want to lose weight, take it from me: you will never find another diet that is so easy, works so well, and lets you eat anything you want four days a week. The Freedom Diet is

Richard Dean

our first step to diet freedom by completing and
order form today. You'll be glad you did!

Don't wait any longer—take your first step to diet freedom by completing and mailing your enclosed personalized order form today. You'll be glad you did!

**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 all the weight you want. No counting, no drugs, no diets, no eating out, 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, except 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 newsletters • 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 3 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've 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 while they lose weight. 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 Saturdays and Sundays!

Imagine losing up to 20 pounds the first month without having to give up all the fattening foods you're used to. 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 while you lose—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 18977

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
 • **WITHOUT GUILT!** 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 it 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 215 594 3255 or 215 594 3643 any day of the week, including Saturdays and Sundays 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. Also, 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 + \$3.75 postage & handling \$23.73 total

Where did you first hear about the FREEDOM DIET? _____

Please check one:

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

Date _____ Signature _____

Phone # _____

If you wish 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 NH 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...

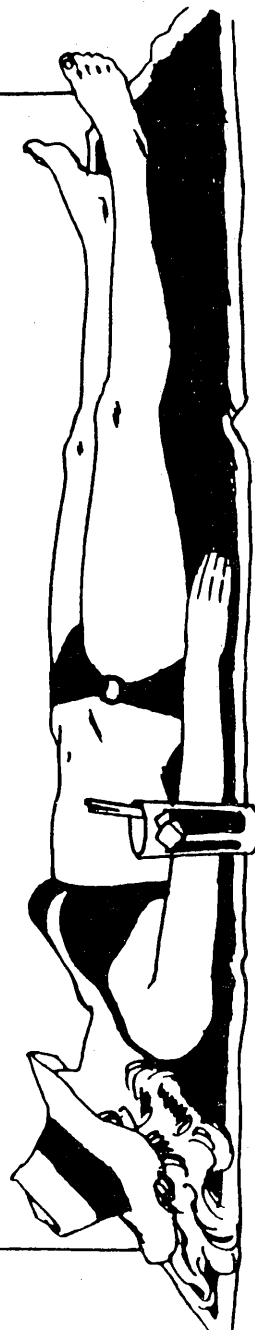


EXHIBIT C

ROTATION CENTER
Rotation Plaza, Village of Funching, PA 18925

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 Woosieger Lost 82 Pounds While Eating Cheesecake, Fettuccine, Ice Cream Sundaes, Tea Martinis - 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

started the Rapid 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 continued to drop. I am now down to 123 pounds! My weight loss is 62 pounds! My only goal was to lose 30 pounds. My total loss so far has been 62 pounds! And hundreds of smiles (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 feel like I'm 15 pounds lighter!

My morning routine is simple. I wake up at 6:00 a.m. Although my husband Bob was extremely understanding during my "fast" 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) and couldn't help but think how "really miraculous" the results of the diet were. I feel like I'm 15 pounds lighter and hundreds of pounds! I've been able to enjoy all of the food that I love all during the diet — chocolate, lettuce, ice cream, sundries, The Manna on the shelves — everything that I love.

The Rapid Diet™ has transformed my life and it can do the same for you!



LOSERS ARE WINNERS			
Pro	74 pounds lost	Bill	31 pounds lost in 30 days
Artisan	53 pounds lost	Ann	40 pounds lost



WOMEN'S



gross Shipping Cost: \$5.00 + \$0.00

Do's Statistics	THEN	NOW
WEIGHT	185	123
WAIST	34	27
HIPS	43	37
CHEST	35	35
NECK	13	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.

"I've lost over 70 pounds since starting all of the exercises I wrote 4 days every week. This is THE MOST SUCCESSFUL DIET EVER!!" —Marianne, 40

I've been on maintenance for 9 months and it's working great. Now have only ONE balance. Say each week \$8.
Los Angeles, CA

...each dig out on my
very dirty - pulled
cheesebuns - beer
potato chips - all to my
"man's content and
have still not 57
..."

The Rotation Diet™ will work for YOU



Everyone has a problem or another during weight loss, but on this site, you get the answers and all the help you need. - C T



403-017 7 10/2004 - 2nd EDITION

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 limitations!

• 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 "reward" 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 "fast-and-loose" 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 Wafers™, 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 Phonamend - a very important part of your diet.

• Rotation Wafers™ 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 snort, 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 'til late at night)

• This is a personalized, custom diet, not a "mass program" that's the same for everyone. The amount of Rotation Wafers 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 sodas, coffee, tea or water you want. Additional foods will be added later by your personal counselor.

• You'll save more than you spend on the 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

There are 3 Very Special Ingredients in
The Rotation Diet.[™]

**THE ROTATION DIET CENTER. YOUR
PHONEFRIENDS AND YOU.**

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 you need. Without attending meetings. Without having to compare your weight with someone else's. It's all done by phone, toll-free at no cost to you.

When you start The Rotation Diet™ you become a member of The Rotation Diet Center. You get complete membership—and you never have to renew. You're a lifetime member!

**CALL THE ROTATION DIET CENTER
AS OFTEN AS YOU LIKE.**

TOLL FREE (800) 523-6262
(215) 794-3278 FROM PENNSYLVANIA

Or contact your Phonefriend. Their names and numbers are included in the package.

- **Call daily if you need to.** We've found that people who speak in touch with the Rotation Diet Center or their Phonefriends lose weight more quickly, and more easily.
- **Enjoy your conversation.** The Phonefriends have actually been on The Rotation Diet themselves. So they know just what you're going through. Discuss whether you're a "strong" or "weak" friend, who you understand that where's progressing in the diet of your life affects the progress of your diet.
- **Celebrate your success.** Your Phonefriend will congratulate you every time you lose, and then give a big cheer when you've reached your goal weight, and become the person you want to be.
- **Keep it going off.** After you leave off, the Rotation Diet Center will help you maintain your weight loss. Even when you're no longer ordering supplies from us.

RECEIVE A FREE SUBSCRIPTION TO PARTYLINE

RECEIVE A FREE SUBSCRIPTION TO FANTASY
You'll learn all the latest diet news, collect beauty tips, share the experience of other Diet members, gather new recipes, maybe see your own before and after pictures printed.

HERE'S WHAT YOU GET IN YOUR ROTATION DIET™ KIT:

- **Rotation Waters™**
2 week or 4 week supply. You choose the starting amount on your membership application.
- **Rotation Multi-Vitamins™**
A full 2 week or 4 week supply.
- **Instruction Handbook**
All you need to know, including the number of Rotation Waters™ personally allotted for you, how to switch days, how to add *FREE DAYS, and much more.
- **Stickers for your *FREE DAYS***
- **Calendar for the year**
Record your weight loss, watch the numbers rise.

PLUS -
"UNLIMITED TELEPHONE CONTACT WITH
THE ROTATION DIET CENTER AND YOUR
PHONEFRIENDS.

Here's what you'll enjoy as a Lifetime Member of The Rotation Diet Center

- Free telephone contact whenever you want, as often as you like—whether you're on the diet or a maintenance program, or not receiving supplies at all.
- Free subscription to the *Parvaneh* newsletter.



CALL THE ROTATION DIET CENTER FOR MORE INFORMATION

TOLL-FREE
(800) 523-6262 Seven days 9-9
In Pa. Call (215) 794-3278 Seven days 9-9
Or call a Phonefriend days, evenings.

Call the Rotation Diet Center and use your credit card today! 9-9 Eastern Time! Your order is processed and on its way in ONE day!

2 FOR 1 SPECIAL

Find out about the special rate for you and a friend on the membership application enclosed. (Green form.)

ANSWER - to your questions

[illegible]

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



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

37

Amended Complaint

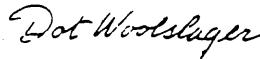
Dear Friend:

I'm beginning to feel like a celebrity. Hundreds of people have been calling me personally, asking, "Why did you pick The Rotation Diet?" "Didn't 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 exactly like you who's just a few months ahead of you on "The Rotation Diet" Program. And I'm not even unusual — 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 Phonefriends. Any one of them would be glad to speak to you. Look for their names and numbers on the yellow sheet.

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

Amended Complaint

110 F.T.C.

EXHIBIT D



"THE DIET YOU CAN LIVE WITH!"

PARTYLINE

Published by the Phonofriend Rotation Diet®

ROTATION CENTER, Bucks County, Pennsylvania • (215) 794-3278 7 days, 9 to 9 • Outside PA (800) 523-4262 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., Norcross, 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."

S.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.L., 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., Boston, 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 Hope, Pennsylvania

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

Barry Bricklin, Ph.D., is an associate professor of psychology at the Hahnemann Medical College of Philadelphia. Previously, he served on the faculty of the Jefferson Medical College of Philadelphia. He has served as consultant in psychology to the Office of Naval Affairs (Naval) Research Center in Washington, D.C., to the United States Army, to the U.S. Air Force, to the U.S. Navy, 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 a number of books and articles on a wide variety of topics.

Among the results of Dr. Bricklin's cooperative experience with us with the Rotation Diet are numerous articles, three books, and four children (Brian, Scott, Carol and Alfred). Some of their books have been translated, English Child — Poor Grades: The Psychology of Underachievement, and Strong Family — Strong Child. These books have been translated into nine different languages.

CONGRATULATIONS!

Pat	74 lb. loss	Ann	40 lb. loss
John	53 lb. loss	Lynn	52 lb. loss
Bob	31 lb. loss in 20 days	Sam	20 lb. loss
Sam	10 lb. loss in 1 week	Joan	10 lb. loss in 2 weeks, 20 lb. loss
Barry	20 lb. loss and maintenance	William	20 lb. loss
Ann	40 lb. loss	Joan	20 lb. loss
John	7 lb. loss in 1 week	Joan	10 lb. loss in 2 weeks
Barry	10 lb. loss	Ann	20 lb. loss and maintenance
John	20 lb. loss	Barry	20 lb. loss
Patricia	20 lb. loss	Joan	10 lb. loss in 2 weeks
Barry	20 lb. loss	Ann	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!

I've been an engineer
and worked for 8 months and
it's nothing great I have
have only 100k balance
day each week. 89.
Los Angeles, CA

Tuesday, Thursday, Saturday and Sunday are the best days to eat. The reason is simple: "FREE DAYS." You'll eat less and drink what you like—good food and good wine—because you know you can't think food anything you wish for. Linger at a restaurant and enjoy the food. You'll have a cheeseburger and a ranch fries double or triple the size of the ones you're used to. Or if you're hungry? Piletons and fries.

Inspired everything you want to eat in whatever quantities you choose? Absolutely no limitations!

● Four "FREE DAYS" every week
● Four "FREE DAYS" every month
● "FREE DAYS" are your "reward days."

You make the difference between your "reward days" and your "cheat days." Many people give up diets because they feel deprived of favorite foods, because they're bored with the same food choices, or because they're not motivated by purchasing special foods. There's none of that with the Rotation Diet.

● The Rotation Diet "is the diet you eat your goal weight, you get more and you lose more." "FREE DAYS" each week—up to six out of seven.

● The Rotation Diet "is the diet that's the best of both worlds." It's not just because of its wonderful, fulfilling day program. It lets you make all special days into "FREE DAYS" without giving up your diet.

● celebrate holidays with the cake, eat the cake, and then go back to your diet. (I eat cakes 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 eat the stocking.

● turn the hard for you to remember your "FREE DAYS." Put it to help you highlight these feast days; you'll find in your Rotation Diet "FREE DAYS" stickers.

● use your calendar. When you look at the month, you'll see that "FREE DAYS" far outnumber the rest!

Dad's		THEN	NOW
Statistics			
WEIGHT	185	123	
WAIST	34	27	
HIPS	43	37	
CHEST	35	35	
NECK	13	11	
THIGHS	22	18½	
CALF	13	11	
UPPER ARM	12	10	

[illegible]

Pat-74 lbs. lost
B.W.-31 lbs. lost in 30 days
Ann-40 lbs. lost



Nancy lost 25 lbs ~ ~ 62 lbs, Marianne, 30 lbs

Amended Complaint

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



Dot Wooslager
before at
185 pounds

Now on the
Rotation Diet
plan, holding
steady at 123.
Goal: 115 lbs



I'm Dottie Wooslager. 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

NAME

Please Print

ADDRESS

CITY

STATE

ZIP

Amended Complaint

110 F.T.C.

EXHIBIT F

*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.

800-523-62-62

THAT'S

800-523-62-62

ONCE AGAIN, FOR A FREE BROCHURE CALL

800-523-62-62

SEE OUR AD IN THIS WEEK'S TV GUIDE

Amended Complaint

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 \$ 3.25
15 Days \$48.75

(includes postage
and handling)

Amended Complaint

110 F.T.C.

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 sundaes, 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
"high and dry" after you've reached your weight loss goal like most every other diet.

OVER, PLEASE

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 just isn't convenient. That's right—Rotation's special Take-A-Break schedule lets you 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 Woodslager

Dot Woodslager
Director
Rotation Diet Program

P.S. Just for taking the first step to a new, thinner life, we want to send you a beautiful FREE GIFT valued at over \$22.00. 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 Woolslager, age 42, and
Judy Ruttrough, age 23, are company
executives at Rotation Diet and long
time users of Rotation Diet and its Main-
tenance 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's no newsletter
- there's no fancy packaging
- there are no "free" gifts to increase the cost
- there's 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 . . .

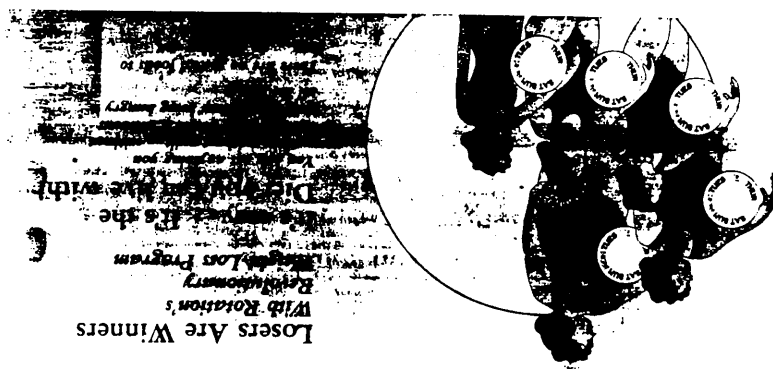
Do these other "miracle" diets require you to count calories? Prepare special foods? Do special exercises? Take some sort of drug? Do without your favorite foods for weeks at a time? Make you spend money and waste valuable time at weight reduction sessions?

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 Woolslager Judy Ruttrough

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



Dr. Harry Brucklin 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 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. 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 has extra merit. And, but as any diet with years of experience behind it, it is also designing a way to lose weight. It is a variation of the challenge diets. It is a observation of this diet is that the diet is a breaking down of the unique way it allows a person to find his or her own amount and then stay there.

Q: Is the Rotation Diet medically safer?

A: You take no drugs or medications with this diet. However, we encourage you to discuss the Rotation Diet with your doctor before starting it.

Q. What are Rotation Chewable Tablets?

Q How much weight can I lose?

A Weight loss depends on the individual, the diet, the exercise, and the amount of weight to be lost. For example, a person who weighs 200 pounds and wants to lose 50 pounds will lose weight faster than a person who weighs 150 pounds and wants to lose 25 pounds.

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

A: No. Our special agent, Ross Chewable Tablets, can only be purchased by express from the Rotation Diet Center and are available for \$2.99 per bottle.

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 • 215-794-1294 • 215-794-8881
 • 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!

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

Here's How:

1. Complete this brief order form.
2. Don't forget to fill in the credit card information and sign if you are charging your order.
3. 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) 794-3293 or (215) 794-8881, 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 19925

- ☐ **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 + \$3.95 for postage & handling TOTAL \$23.93
 - ☐ 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 _____ APT _____
ADDRESS _____
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 + \$3.95 for postage & handling TOTAL \$23.93
 - ☐ NO FRILLS" Rotation Diet—4 Week Supply \$39.95 TOTAL \$39.95

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 _____ APT _____
ADDRESS _____
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 + \$3.95 for postage & handling TOTAL \$23.93
 - ☐ NO FRILLS" Rotation Diet—4 Week Supply \$39.95 TOTAL \$39.95

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 # _____



4F103-02

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. Cause you'll cut down on expensive foods during our 3 Balance Days each week. And that will be less 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!"
B.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

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.

no special foods to buy
no drugs, no medicines — just natural ingredients
no weighing out portions, no counting calories

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

- 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

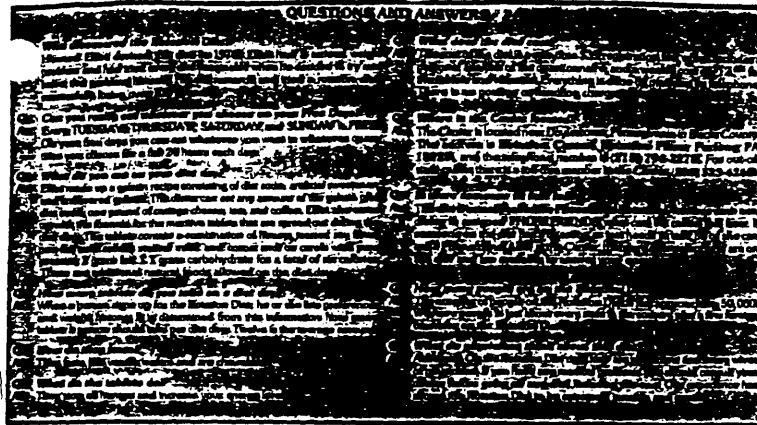
FOR EASY ORDERING CALL
TOLL FREE 800-523-5763

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 8 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

Amended Complaint

110 F.T.C.

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 use goodie beans or split. ~~See your favorite. Second if you want.~~

Diet Days... on just 3 days (Mondays, Wednesdays and Fridays) you follow the simple Rotation-Freedom Weight Loss Program and eat 100% 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 weightloss 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-end 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 normal-weight adults lose between 8 to 10 pounds the first month. ~~See actual loss.~~

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 all are in day-to-day contact with members who have lost weight.

Extraordinary Success Stories

■ Maggie began at 153 pounds. After less than three weeks, she is at 128 pounds. "I love the program!"

■ Edna... "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. I am now down to 200 pounds. I'm a waist of 48 to 42."

Local Mail Order - Introductory Price - \$9.95 - Plus P&H
For more information, call or write: Paul Lehman
Rotation-Freedom Center - Health Plaza 8, Furlong, PA 16925
717-765-5776 or 717-765-5576

INTRODUCTORY

2 WEEKS
OF THE
ROTATION FREEDOM DIET

\$9.95

OFFER VALID FOR NEW MEMBERS ONLY SPECIAL

ROTATION-FREEDOM DIET

Health Plaza, Furlong, PA 16925

1. I am interested in the Rotation-Freedom Diet. I will send you the 2-week trial kit. ()
2. I want to know more about the diet. ()
3. I want to know more about the diet. ()
4. I want to know more about the diet. ()
5. I want to know more about the diet. ()

Name _____

Address _____

City _____ State _____ Zip _____

Phone () _____

Send me the 2-week trial kit. ()
Send me the 2-week trial kit. ()
Send me the 2-week trial kit. ()
Send me the 2-week trial kit. ()
Send me the 2-week trial kit. ()

Paul Lehman
Rotation-Freedom Center - Health Plaza 8, Furlong, PA 16925
717-765-5776 or 717-765-5576

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!*

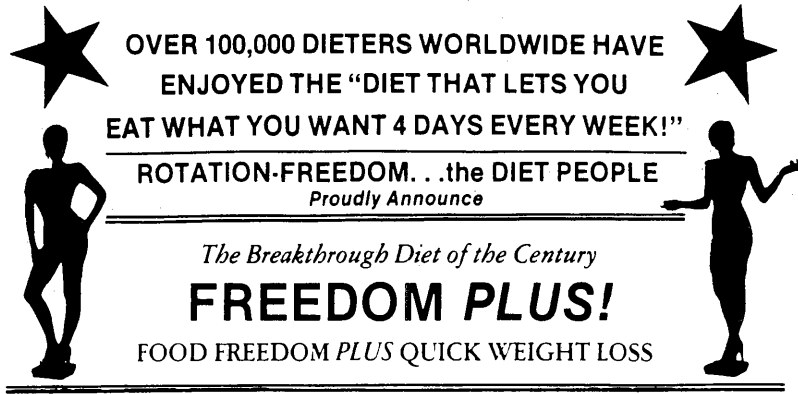
Food Freedom plus Quick Weight Loss

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 week-time 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
	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			



DOT and JUDY Answer Your Questions

Dot Wedelager, left, age 62, and Judy Rahn, right, age 22, both Company Executives at Main Plaza, made an exciting announcement in response to demanding product inquiries, 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 Waters 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 maintain my weight loss?

*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' file 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 testimonials 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." (13 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!

☐ 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 respondents named in the caption hereof with violations of sections 5 and 12 of the Federal Trade Commission Act, as amended, and the respondents having been served with a copy of that complaint, together with a notice of contemplated relief; and

The respondents, their attorney, and counsel for the Commission having thereafter executed an agreement containing a consent order, an admission by the respondents of all the jurisdictional facts set forth in the complaint, a statement that the signing of said agreement is for settlement purposes only and does not constitute an admission by respondents 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 Buckingham Productions, Inc., trading and doing business as Rotation Diet Center, is a Pennsylvania corporation with its principal office and place of business at 73 Valley Drive in Furlong, Pennsylvania.

Respondent Furlong-Elliot Corp. is a Pennsylvania corporation with its principal office and place of business at 73 Valley Drive in Furlong, Pennsylvania.

Respondent Freedom Center, Inc. is a Pennsylvania corporation with its principal office and place of business at 73 Valley Drive in Furlong, Pennsylvania.

Respondent Plaza Business Services, Inc. is a Pennsylvania corporation with its principal office and place of business at 73 Valley Drive in Furlong, Pennsylvania.

Respondent N.F. Rotation, Inc. is a Pennsylvania corporation with its principal office and place of business at 73 Valley Drive in Furlong, Pennsylvania.

Respondent Rotation-Freedom Diet, Inc. is a Pennsylvania corporation with its principal office and place of business at 73 Valley Drive in Furlong, Pennsylvania.

Respondent Health and Diet Corp., Inc. is a Pennsylvania corporation with its principal office and place of business at 73 Valley Drive in Furlong, Pennsylvania.

Respondent Howard Elliot is an officer of the corporate respondents. He formulates, directs and controls the acts and practices of the corporate respondents, and his address is the same as the corporate respondents.

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

ORDER

I.

It is ordered, That respondents Buckingham Productions, Inc., also trading and doing business as Rotation Diet Center, Furlong-Elliot Corp., Freedom Center, Inc., Plaza Business Services, Inc., N.F. Rotation, Inc., and Rotation-Freedom Diet, Inc., and Health and Diet Corp., Inc., corporations, their successors and assigns, and their officers, and Howard Elliot, individually and as an officer of the corporations; and respondents' agents, representatives, and employees, directly or through any corporation, subsidiary, division, distributorship or other device, in connection with the 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, do forthwith cease and desist from:

(A) Representing, directly or by implication, that:

(1) Any consumer can eat any quantity of food and still lose weight or maintain 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.

(2) Thousands of consumers, or any number of consumers, have lost or maintained a specified amount of weight loss, or range of weight loss, unless such is the case.

(3) Any such product, either alone or in conjunction with any weight reduction or weight control program or service, will stop hunger or otherwise function as an appetite suppressant, or will eliminate or prevent fatigue, unless such is the case.

(4) Any such product, either alone or in conjunction with any weight

reduction or weight control program or service, will help keep food from turning to fat, unless such is the case.

(B) Representing, directly or by implication, that any person has endorsed any such product, program or service, unless that person has committed that endorsement in writing and has authorized, in writing, its use in promotional or advertising materials, and unless respondents have good reason to believe that at the time of their representation that person continues to subscribe to the views presented.

(C) Failing to disclose any material connection, where one exists, between an endorser (except for a celebrity endorser) of any such product, program or service and any respondent; provided, however, that a "*material connection*" shall mean, for purposes of this order, any relationship between an endorser of any such product, program or service, and any entity marketing such product, program or service which relationship would not reasonably be expected by consumers and, if known by consumers, might materially affect the weight or credibility given to the endorsement.

(D) Representing, 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 respondents possess and rely upon competent and reliable survey or other scientific evidence that substantiates the representation.

(E) Making any representation, directly or by implication, regarding the efficacy, safety, 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, or the monetary savings that may or will result from the purchase or use of such product, program or service, unless at the time of making such representation respondents possess and rely upon competent and reliable survey of other scientific evidence that substantiates the representation.

For purposes of Part I of this order, "*competent and reliable*" evidence shall mean tests, analyses, research, studies, surveys, or other evidence, conducted and evaluated by qualified persons in an objective manner and using generally accepted procedures.

II.

It is further ordered, That for three years from the date that the representations to which they pertain are last disseminated, respondent corporations, their successors and assigns, and their officers, and the individually named respondent, and respondents' agents, repre-

sentatives and employees 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 their possession or control that contradict, qualify, or call into question such representation.

III.

It is further ordered, That respondents shall notify the Commission at least thirty (30) days prior to the effective date of any proposed change in respondents such as dissolution, assignment, or sale resulting in the emergence of a successor corporation, the creation or dissolution of subsidiaries, or any other change in the corporation(s) which may affect compliance obligations arising out of the order.

IV.

It is further ordered, That respondents and their successors or assigns, shall forthwith distribute a copy of this order to each of their operating divisions, to all officers, agents or representatives who are engaged in the preparation and placement of advertisements or promotional materials, to all employees who communicate with customers or potential customers as part of their employment responsibilities, and to all distributors of products manufactured or marketed by respondents.

V.

It is further ordered, That the individual respondent named herein 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, the individual respondent named herein 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 the respondent's new business address and a statement of the nature of the business or employment in which the respondent is newly engaged as well as a description of respondent's duties and responsibilities in connection with the business or employment.

VI.

It is further ordered, That respondents and their 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 they have complied with this order.

Commissioner Bailey was recorded as voting in the negative.

IN THE MATTER OF

PURITAN-BENNETT AERO SYSTEMS COMPANY

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

Docket C-3217. Complaint, Aug. 25, 1987—Decision, Aug. 25, 1987

This consent order prohibits, among other things, an El Segundo, California seller of fire and smoke protection masks from making deceptive advertising claims that any emergency escape mask or hood can absorb, remove or filter out any hazardous gas associated with fire, or that any mask or hood can protect users from any fire hazards, unless the claim is substantiated and supported by a scientific test. Respondent is required to retain for three years all test reports or materials it uses as substantiation for claims and is also required to make specified disclosures on its packaging and in advertisements.

Appearances

For the Commission: *Joel Winston and Susan Cohn.*

For the respondents: *Daniel C. Weary and Robin Foser, Blackwell, Sanders, Matheny, Weary, & Lombardi, Kansas City, Mo.*

COMPLAINT

The Federal Trade Commission, having reason to believe that Puritan-Bennett Aero Systems Company, a corporation ("respondent"), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

PARAGRAPH 1. Respondent Puritan-Bennett Aero Systems Company is a California corporation with its office and principal place of business at 111 Penn Avenue, El Segundo, California. It is a wholly-owned subsidiary of Puritan-Bennett Corporation.

PAR. 2. Puritan-Bennett Aero Systems has been engaged in the advertising, marketing, distribution and sale to the public of the Escape Fire and Smoke Hood ("Escape Hood" or "Hood").

PAR. 3. The acts and practices of Puritan-Bennett Aero Systems alleged in this complaint have been in or affecting commerce.

PAR. 4. Typical of Puritan-Bennett Aero Systems' advertising and promotional material for the Escape Hood, but not necessarily all inclusive thereof, is the attached Exhibit A. The aforesaid material contains the following statements: