

Complaint

123 F.T.C.

IN THE MATTER OF

1554 CORPORATION, ET AL.

CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATION OF
SEC. 5 OF THE FEDERAL TRADE COMMISSION ACT*Docket C-3733. Complaint, April 14, 1997--Decision, April 14, 1997*

This consent order prohibits, among other things, the California company, doing business as The Mellinger Company, and its president from making any unsubstantiated success, profitability, performance, benefits, efficacy or success rate claims with regard to a business opportunity product or service. The consent order also prohibits the respondents from using testimonials or endorsements that make deceptive or unsubstantiated representations.

Appearances

For the Commission: *Justin Dingfelder, Lemuel Dowdy and Jonathan Cowen.*

For the respondents: *Shirley Johnson, Washington, D.C.*

COMPLAINT

The Federal Trade Commission, having reason to believe that 1554 Corporation, a corporation, and Brainerd L. Mellinger, III, individually as an officer of 1554 Corporation ("respondents"), have violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

PARAGRAPH 1. Respondent 1554 Corporation is a California corporation, with its office and principal place of business located at 6100 Variel Ave., Woodland Hills, CA. Respondent 1554 Corporation has traded and done business as The Mellinger Company.

Respondent Brainerd L. Mellinger, III, is president of the corporate respondent. Individually, or in concert with others, he formulates, directs and controls the acts and practices of the corporate respondent, including the acts and practices alleged in this complaint. His principal office or place of business is the same as that of the corporate respondent.

PAR. 2. Respondents have, individually or in concert with others, created and disseminated advertisements for the Mellinger World Trade Mail Order Plan ("Mellinger Plan"), and have offered for sale

and sold the Mellinger Plan to consumers who respond to their advertisements.

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

PAR. 4. Respondents' advertisements for the Mellinger World Trade Mail Order Plan include, but are not necessarily limited to, the attached Exhibits A-D. These advertisements contain the following statements:

A. A program-length television advertisement for the Mellinger Plan, identified as "Mellinger's Secret Treasures" (Exhibit A):

(1) Announcer: "How would you like to earn substantial income right from the comfort of your own home? . . . Living a luxurious lifestyle with long-term security for you and your family." (P. A1)

(2) Endorser: "Doesn't matter what age, what your background is, what your education is. The sooner you get started, the sooner you start making money." (P. A2)

(3) Host: "His name is Brainerd Mellinger III, and he makes it easier than ever for people to make riches they've only dreamed of." (P. A3)

(4) Endorser: "On my first customer my first day with the World Traders I made twelve thousand dollar profit." (P. A4)

(5) Host: "Brainerd, these folks are making a lot of money, and enjoying every minute of it." (P. A13)

(6) Brainerd Mellinger, III: "If you've ever dreamed of riches and living a luxurious lifestyle, give us a call right now." (P. A17)

(7) Endorser: "You will be successful. It's been proven time and time again." (P. A17)

(8) Endorser: "I started off with \$250 that my husband gave me, and last year I earned over \$35,000, and I did it all with the help of the Mellinger Company." (P. A21)

(9) Endorser: "Get involved with Mellinger, and if you stick with them they have the support team there for you, they can make something like this possible for you." (P. A23)

(10) Endorser: "Anybody today that really wants to work, and has the initiative to get out and try something new, this plan definitely makes it about as easy as pie." (P. A25)

(11) Announcer: "Kirk may not be a rocket scientist, but with the help of the Mellinger World Trade Plan he has launched a company with sky-rocketing profits. Today is a typical business day, and Kirk is shipping out more than 400 hats. The profits are all his." (P. A36)

(12) Endorser: "[A]nyone that gets involved with this is gonna really find [it] exciting, interesting, and create an income for themselves. It's fantastic." (P. A38)

(13) Host: "The Mellinger Plan makes it so easy to achieve financial independence. Why isn't everyone doing it?" (P. A42)

Brainerd Mellinger, III: "Good question. Well -- it's just that they don't know about the Mellinger Plan yet. They aren't aware that this fabulous opportunity for success

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and riches is waiting for them. And that's why I'm here today. I want to tell everyone that they can make money, like some of the folks you've seen on our show. The Mellinger company shows you how, step by step. And we make it simple and fun" (P. A43)

B. A magazine advertisement for the Mellinger Plan (Exhibit B):
2 valuable New Reports Can Make You Rich! I'll send both to you FREE! You've seen me on T.V.! Now I'm ready to help you get a fast start! Discover How to Be Independent -- Be Your Own Boss -- Make Big Money in your own IMPORT/EXPORT MAIL ORDER BUSINESS! . . . Enjoy earnings probably far greater than you ever dreamed any job could pay.

* * *

Join these successful Men and Women! . . .

"Mellinger has the answers! I'm looking at \$25,000. year's income -- just 2 hours a day part-time." [endorser]

"Just one world trade transaction paid me \$5,000 profit! Yes...follow the Mellinger Plan!" [endorser]

C. Mellinger Internet site (<http://www.tradezone.com>) (Exhibit C):
SUCCESSFUL INTERNATIONAL TRADERS MEMBERS[.] HOW PLAN BROUGHT SUCCESS TO THEM! . . .

Having trouble sleeping one night, [endorser] turned on his TV and became enthralled by a Mellinger infomercial. A phone call brought him full details about the Mellinger Plan. "I was so impressed with what I saw, I immediately began following the Mellinger Plan and became a Member of International Traders. I began putting the Plan into practice and started showing Import products. In less than two months, I had generated well over \$2,000 in business." . . .

The Mellinger Plan provided exactly what [endorser] needed. . . . "I would tell you this works for you. It's very good for beginners like myself." She reported sales of \$1200. right away and with her early momentum she says she is looking now at earnings of \$6000. a month!

D. A pamphlet mailed to consumers who request information about the Mellinger Plan (Exhibit D):

START AT HOME...make money your very first day!

* * *

MEN & WOMEN--Welcome to your exciting, high-income, full-or part-time future in Import/Export/Mail Order. Follow the Mellinger Plan as it guides your every step. Nothing has been left to chance. Each easily followed step is based 100% upon many years of successful business experience!

* * *

SUCCESS STORIES in World Trade! Read these ACTUAL REPORTS of MONEY-MAKING

Concentrating on imported sports equipment, [endorser] took in \$35,000.00 the first year, devoting only a few hours a day.

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

A. Consumers who use the Mellinger Plan typically succeed in readily starting and operating profitable businesses;

B. Consumers who use the Mellinger Plan typically earn substantial income; and

C. Endorsements appearing in Exhibits A-D reflect the typical or ordinary experience of members of the public who have used the Mellinger Plan.

PAR. 6. Through the use of the statements contained in the advertisements referred to in paragraph four, including but not necessarily limited to the advertisements attached as Exhibits A-D, respondents have represented, directly or by implication, that at the time they made the representations set forth in paragraph five, respondents possessed and relied upon a reasonable basis that substantiated such representations.

PAR. 7. In truth and in fact, at the time they made the representations set forth in paragraph five, respondents did not possess and rely upon a reasonable basis that substantiated such representations. Therefore, the representation set forth in paragraph six was, and is, false and misleading.

PAR. 8. The acts and practices of respondents as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

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EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

R- A1

DISCLAIMER GRAPHIC

FONT: TESTIMONIALS
USED IN THIS PROGRAM
REPRESENT BEST CASE
RESULTS. RESULTS WILL
VARY DEPENDING ON
INDIVIDUAL EFFORTS AND
PRODUCT SELECTION.

Narrator:

The following program is a paid
advertisement for the Mellinger World
Trade Mail Order Plan, by The Mellinger
Company.

TEASE:

COVER:
CU WOMAN COUNTING MONEY

COUPLE, WORKING AT
TABLE IN THEIR KITCHEN

YACHT

DREAM SHOTS:
MAN TAKING GOLF SWING

FAMILY & DOG IN POOL

ZOOM OUT FROM CU:
SHOT OF TREASURE CHEST
OVERFLOWING WITH
JEWELS, PEARLS AND
GOLD.

DISS. TO SHOT OF
TREASURE CHEST
OVERFLOWING WITH
MELLINGER IMPORTS.
ZOOM IN TO CU.

CU PAN ACROSS CHEST OF
IMPORTS.

GRAPHIC

FONT: SET A FREE
IMPORTS OVER THE
WORLD

Narrator:

How would you like to earn substantial
income right from the comfort of your
own home? Working the hours you
want--part time or full time. Enjoying
the freedom of not having to answer to
a boss.

Living a luxurious lifestyle with
long-term security for you and your
family.

Well, you don't have to discover a
secret treasure to make your dreams
come true. Stay tuned because
we're going to reveal a modern day
treasure...that can put you on the road
to success and happiness. It's a
time-tested formula that's been used by
hundreds of thousands of people all
over the world.

We'll also tell you how you can receive
an exciting personal import absolutely
free just for signing up.

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EXHIBIT A

"Mellinger's Secret Treasures" MSC-1
Final On Air Script

8-A2

Flash FREE

TESTIMONIAL

PONT:

CAROLYN KAPLAN
INTERNATIONAL TRADER

Carolyn Kaplan:

"Doesn't matter what age, what your background is, what your education is. The sooner you get started, the sooner you start making money."

TESTIMONIAL

PONT:

ROY HANSON
INTERNATIONAL TRADER

Roy Hanson:

"The Mellinger Company has a plan set up. Step one, two, three, four, it's, it's so simple."

SHOW TITLE SEQUENCE:
CU TREASURE CHEST OF
IMPORTS

Narrator:

"It's all next on 'Mellinger's Secret Treasures.'"

INTRO

PAN ACROSS EURASIA MAP

Richard V/O:

"700 years ago, a brave young merchant, named Marco Polo

SUPERIMPOSE VARIOUS
PICTURES OF MARCO POLO
OVER MAP

traveled 15,000 miles to discover the riches of the Orient."

PICTURE OF MARCO
RETURNED HOME W.
TREASURE

"He came home with exotic treasures and opened up trade routes that helped merchants build untold fortunes."

RICHARD ANDERSON IN
KOWLOON LOCATION

Richard:

"Hello. I'm Richard Anderson, here in the hidden city of Hong Kong at midnight to tell a modern day Marco Polo."

PONT:
RICHARD ANDERSON
FILM AND TELEVISION
STAR

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EXHIBIT A

"Mallinger's Secret Treasures" MET-1
Final On Air Script

p. A3

FAN ACROSS HONG KONG
SKYLINE

BRAINERD WALKS DOWN A
LANE OF STANLEY MARKET.

Richard V/O:

His name is Brainerd Mallinger the III,
and he

COVER OF BRAINERD IN
STANLEY MARKET STORE,
LOOKING AT CLOTHES
HANGERS

makes it easier than ever for people to
make riches they've only dreamed of.

BRAINERD W/ FAN

He goes on global product tours

FONT:
HONG KONG
STANLEY MARKET

searching the world over for sources of
exciting, low priced imports.

FONT:
ALL PRICES QUOTED
ARE BASED ON QUANTITY
FROM AN OVERSEAS
SUPPLIER AND ARE
SUBJECT TO CHANGE AND
AVAILABILITY.

Then shows you how to market them from
your home, at selling prices up to 11
times their cost and more!

BRAINERD AT STANLEY
MARKET FINDING MAGIC
RAZOR.

Richard V/O:

Look at what Brainerd's already found!

CU ON MAGIC RAZOR

First - a really handy item: The Magic

FONT:
BUY FOR.....\$1
SELL FOR.....\$11
GROSS PROFIT.....\$10

Razor. It's great for travel or at

home and sells in leading catalogs for

as much as thirteen dollars, but you

FONT: PROFIT MAY VARY
DUE TO OPERATING COSTS.

pay only a dollar. That's a 1001

markup.

BRAINERD IN STANLEY
MARKET W/ SITTIGUARI
SACKETS

Richard V/O:

Then look at these lovely poipourri

CU IN SITTIGUARI SACKETS

sacks - International Unisexo Sackets

CU FROM DIFFERENT ANGLE

buy these scented flower hangars for

FONT:
BUY 500
SELL 500

only \$100, five cents per set of 100

and sell that for \$11 a set.

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EXHIBIT A

Mellinger's Secret Treasures' WEST-1
 11/11/11 10:11:11

A4

GROSS PROFIT \$11.35

That's an 11.35% markup!

FONT:
 PROFIT MAY VARY DUE TO
 OPERATING COSTS.

TESTIMONIAL

Prince Cgunbarwo:

FONT:
 PRINCE ADEMOLA
 CGUNBARWO
 INTERNATIONAL TRADER

On my first customer my first day with
 the World Traders I made twelve
 thousand dollar profit.

BRAINERD W/ SAMURAI
 SWORDS

Richard V/O:

FONT:
 BUY FOR..... \$40 SELL
 FOR.....\$175 GROSS
 PROFIT \$135

And finally these detailed replicas of
 ancient Samurai swords. Intriguing
 conversation pieces that people will
 gladly pay \$175 for. But Mr.
 Mellinger's International Traders
 members buy these for only \$40.
 That's a \$135 gross profit on each set!

FONT: PROFIT MAY VARY
 DUE TO OPERATING COSTS.

END OF OPENINGMELLINGER SIX - SEGMENT ONE

RICHARD IN CHAIRMAN'S
 SUITE, GRAND HYATT HONG
 KONG.

Richard:

You know, we all dream of being
 wealthy and I'm here today with
 Brainerd Mellinger the third, to show
 you just how to make that dream come
 true in your own import export mail
 order business.

FULL OUT OF TWO HAND

Rashida to Brainerd

FONT:

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EXHIBIT A

'Mellinger's Secret Treasures' MSL-1
 Final Op. A15 10/1/71

A5

HONG KONG

Well Brainerd, everyone assumes that
 starting a business is a big risk.
 What's different about the Mellinger
 World Trade Mail Order Plan? And why
 do so many people do so well?

BRAINERD

Brainerd:

FONT:
 BRAINERD L. MELLINGER
 III, PRESIDENT/C.E.O.
 THE MELLINGER COMPANY

The main thing is that my family's
 company has developed and perfected
 this formula over four generations.
 And we show you how to start with very
 little, just like my grandfather did,
 and make money right from the start.
 So there's virtually no down side.

SHOTS OF 4 GENERATIONS
 OF MELLINGERS

FONT: THE MELLINGERS

BRAINERD & RICHARD

You don't need any special business
 experience or education. We make it
 simple and fun.

RICHARD

Richard:

Okay. So, let's get started. What's
 the first secret of your business
 Success Formula?

BRAINERD

Brainerd:

FONT: MELLINGER
 BUSINESS SUCCESS SECRET
 1.
 SELL PRODUCTS AT HIGH
 MARKUPS. YOU KEEP ALL
 THE PROFITS

Well, number one is finding really good
 products you can mark up for profits.
 You know markup is the key.

RICHARD AND BRAINERD IN
 STANLEY MARKET

STANLEY 10-1-71

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EXHIBIT A

"Mallinger's Secret Treasures" NAT-1
Final in All Rights

A6

Richard:

Which is why we are here in Hong Kong
right.

Brainerd:

Exactly.

ARIEL OF HONG KONG
IMPORTS ON TABLE

Hong Kong is just one of the many
international markets where my global
product scouts find fascinating,
low cost products.

CU ON PUPPY

Brainerd:

Like this lifelike, plush puppy.
Puppy Barks

Richard:

It barks when you pet it!

RICHARD AND BRAINERD W.
PUPPY

Brainerd:

This retails for as much as twenty four
dollars, and you only pay \$6.50.
That's an easy \$17.50 profit.

PONT:
BUY FOR.....\$6.50
SELL FOR.....\$24.00
GROSS PROFIT \$17.50

PONT:
PROFIT MAY VARY DUE TO
OPERATING COSTS.

RICHARD

Richard:

That's incredible!

BRAINERD

Brainerd:

It is incredible! We offer you over
14,000 hand picked, easy-to-sell,
quality products to choose from! All
this without having to leave your home!
Full step by step guidance

PONT: OVER 14,000
QUALITY PRODUCTS

DRAWING COVORDS

CAROUSEL

ALSO SKIDS

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EXHIBIT A

"Mallinger's Secret Treasures" MST-1
Final On Air Script

p. A7

RICHARD:

Richard:

So you can do everything in the
comforts of your own home.

RICHARD & BRAINERD

Brainerd:

Precisely! And many people prefer
working from home without any travel.
But if you've ever dreamed of world
travel,

this is a golden opportunity.

EXOTIC TRAVEL COVER
SHOTS
RIVER AT SUNSET

With your own import/export mail order
business you can explore exotic markets

INTERNATIONAL TRADERS
IN STANLEY MARKET
LOOKING AT SCARVES

around the world. And, in many cases,
your travel is tax deductible as a

INTERNATIONAL TRADERS
IN STANLEY MARKET
LOOKING AT BIRD CAGES

business expense.

NOTE: CONSULT YOUR
ACCOUNTANT FOR
ALLOWABLE DEDUCTIONS.

RICHARD

Richard:

Brainerd, aren't some Mallinger World
Trade members here with us in Hong
Kong?

IT MEMBERS W SUPPLIERS
& PRODUCTS

Brainerd V.O.:

Yes, and they're learning first hand
from my global

DIFFERENT SHOT OF IT
MEMBERS W SUPPLIERS

product source how to find the very
best deals on beautiful oriental
imports

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EXHIBIT A

"Mellinger's Secret Treasure" MST-1
Final On Air Script P. 10

BRAINERD SHAKING HANDS
WITH ALBERT CHAN

And meeting with some of our leading
Asian suppliers.

RICHARD & BRAINERD

Richard:

You know, Brainerd, this is such an
exciting, glamorous business. Do you
have to invest a lot of money to get
started?

BRAINERD

Brainerd:

Not at all, Richard.

RICHARD

Richard:

How's that possible?

BRAINERD

Brainerd:

MELLINGER EMPLOYEE
SORTING PRODUCT INTO
BOXES

Well, it's secret number 2 of the
Mellinger Business Success Formula,
called Drop Shipping.

PONT:
MELLINGER BUSINESS
SUCCESS SECRET #2:
DROP SHIPPING. NO NEED
TO STOCK PRODUCTS.

RICHARD & BRAINERD

Richard:

Drop shipping?

Brainerd:

Yes, that's how my father started. In a
garage with less than \$100 and went on
to make millions.

RICHARD

Richard:

Well, how does this drop shipping work?

RICHARD & BRAINERD

Brainerd:

BY IN CAMERA

Well for example take this item.
Spice blends from the Orient.

SPRAY 1 (10) 1-4

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EXHIBIT A

"Mallinger's Secret Treasures" MST-1
Final On Air Script

p. A9

It automatically takes four quick shots
in a row.

Richard:

Soy, this would be great for capturing
any action like sports or the kids at
play.

Brainerd:

Yes, and it costs only two dollars, but
you don't pay a cent until after you
sell it. You simply run an ad offering
it for \$15. Then when the checks come
pouring in you put the \$15 gross profit
right in your pocket--send the orders
and the \$2 cost per camera to the
supplier. Then the supplier sends the
cameras directly to your customers for
you.

Richard:

That's amazing! So you don't pay for
anything until it is sold?

Brainerd:

That's right. No inventory to buy, no
employees to pay. Before you know it
your business is expanding beyond your
wildest dreams.

Richard:

Like successful International Traders
Bernard Fred and Jacqui Ward.

BRAINERD

RICHARD & BRAINERD W/
CAMERA

CU ON CAMERA

PONT:
BUY FOR.....\$ 2.00
SELL FOR.....\$15.00
GROSS PROFIT.\$13.00

PONT:
\$2 COST DOES NOT
INCLUDE SHIPPING AND
DUTY CHARGES.

RICHARD

BRAINERD

BRAINERD & RICHARD

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Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

p. A10

Brainger:

Exactly.

FEATURE #1: FRED AND JACQUE WENZ.

WIDE SHOT, FRED AND
JACQUE WALKING ON THE
BEACH FACING CAMERA.

PONT: MELLINGER
SUCCESS PROFILE

Narrator:

For over 10 years, 52 year old Fred
Wenz was on the road. His business
kept him away from home and his wife
Jacque.

Jacque Wenz:

Besides the financial rewards that
we've gained from the Mellinger Plan,
and using it, I have my husband home
again.

DISSOLVE TO TWO SHOT OF
FRED AND JACQUE

PONT:
FRED AND JACQUE WENZ
INTERNATIONAL TRADERS

Fred Wenz:

It's really great being at home, but,
you know, all the travelling I used to
do puts a lot of wear and tear on the
body, and now I'm now able to spend
more quality time with my wife.

FRED AND JACQUE
WORKING TOGETHER AT
DESK

Narrator:

From his home in Marshfield,
Massachusetts, Fred has taken the
Mellinger Plan and has added his own
special twist that has been quite
successful.

FRED IS BY HIMSELF NOW

Fred Wenz:

Several years ago when we first started
endorsing at the Mellinger show in Las

VEGAS
TRADE SHOW

END OF SCRIPT

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EXHIBIT A

"Mallinger's Secret Treasures" MST-1
Final On Air Script

P-All

FRED AND JACQUE
DISPLAYING JEWELRY AT
TRADE SHOW BOOTH

Vegas, was where we noticed that a lot of customers were asking how they can get started in buying merchandise without capital expenditure of large inventories. We said, lets take the Mallinger Plan and couple it with our product group.

FRED AND JACQUE
WORKING AT DESK
TOGETHER

Narrator:

Well, it worked. In fact, it was so successful that they decided to come up with a sure fire system to ensure success for their distributors.

CU ON PERFECT STARTER
KIT, PAN DOWN

Fred Wenz:

We then developed what we call the Perfect Starter Kit, for lack of a better name. The Starter Kit, there are two types. There's one that's got 40 pieces of jewelry. Another one's got 70 pieces of jewelry. And everything in there has been a proven factor that for mail order or distributors, party plans, you name it.

FRED, JACQUE AND
DAUGHTER W/ DISPLAY AT
TRADE SHOW BOOTH

CU PAN ACROSS KITS

Narrator:

Fred and Jacque's success grew to the point where they joined into partnership with Henry Palisec. Together they now own an efficient assembly plant and a successful showroom where they display their

FRED AND JACQUE
PACKING PRODUCT

FRED AND HENRY LOOKING
AT MAP IN OFFICE WALL

PAN OVER WORKERS IN
PLANT

PAN ACROSS SHOWROOM

STAY 2-11-45

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EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

P. A12

CU ON JEWELRY

stunning jewelry. What's really convenient, Fred and Jacquie actually run the business right out of their home.

FRED AND JACQUIE
WORKING TOGETHER AT
DESK

FRED AND JACQUIE ON
COUCH TOGETHER

Fred Wenz:

One of the beauties about running a business out of your home is that you can do what you want, when you want, where you want, and how you want.

CU ON CALCULATOR

The profit margins are absolutely

CU TAKING PRODUCT OUT
OF BOX

fantastic, especially if you're directly importing. You can expect

FRED O/C

profits of up to 100%, which is

FONT: FRED WENZ
INTERNATIONAL TRADER

absolutely phenomenal. One of the best

things about the Mellinger World Trade Plan is that you do not have to have

any experience whatsoever. There is no

formal education required. You can do

it in the privacy of your own home.

FRED RECEIVING FAX

either full time or part time. And

FRED O/C

then the amazing part is, is that by

putting all of this effort on, you can

then go to your post office box or mail

box, and get all sorts of checks coming

in.

FRED AND JACQUIE
WALKING ON BEACH FRED
AND JACQUIE ON COUCH
TOGETHER

Jacquie Wenz:

I'm really thrilled at the fact that I

have my dream home now and we're

FONT: JACQUIE WENZ

STAY IN TOUCH

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EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

P. A13

INTERNATIONAL TRADER

working together at home, and I don't have to wait every night for a telephone call in order to communicate with him. If I have a question or a problem I can now turn to him and just ask it.

RICHARD & BRAINERD

Richard:

Brainerd, these folks are making a lot of money, and enjoying every minute of it.

BRAINERD

Brainerd:

FONT: BRAINERD L. MELLINGER
III, PRESIDENT/C.E.O.,
THE MELLINGER COMPANY

The Mellinger World Trade Mail Order Plan shows you how, every single step of the way.

TESTIMONIAL

Carolyn Kaplan:

FONT: CAROLYN KAPLAN
INTERNATIONAL TRADER

This has given me life. It's made me happy and I feel good, and I'm making money.

TESTIMONIAL

Kathy Land:

FONT: KATHY LAND
INTERNATIONAL TRADER

See my smile? I'm just really excited about it, cause I know that there's nothing but money ahead.

TEASE:

RICHARD

Richard: Stay tuned for Mellinger's

FONT: THIS PROGRAM IS
A PAID ADVERTISEMENT
FOR THE MELLINGER
COMPANY

third moneymaking sector and learn how you can buy fascinating products at below wholesale prices

ARIEL IF KING KING
SKYLINE

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EXHIBIT A

"Mellinger's Secret Treasures" MST-1
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p. A14

FONT: STAY TUNED FOR
MELLINGER'S 3RD MONEY
MAKING SECRET!

END OF SEGMENT 1

COMMERCIAL #1 (2:30):

800# DISPLAYED OVER
ANIMATED GRAPHIC.
DISSOLVE IN FLASHING
FONT:
CALL NOW FOR YOUR FREE
INFORMATION!

DVE IN DISPLAY SHOT OF
MATERIAL FROM MAILING
"A"
FONT: CALL FREE

SHOT OF "IMPORT/EXPORT
MAIL ORDER BUSINESS"
BOOKLET

SHOT OF "HOW TO START
IN MAIL ORDER" BOOKLET

FONT:
CALL NOW FOR YOUR FREE
SAMPLE IMPORT!

DISPLAY SHOT OF
MATERIAL
FLASHING FONT:
FREE!!!

TESTIMONIAL
DVE BOX WITH GLOSS
FONT:
MELLINGER
FONT:
1-800-300-1100

PRODUCT SHOT

FONT:

Narrator:

Call this toll free number right now
and we'll send you

everything you need to know about how
to get started with the Mellinger World
Trade Mail Order Plan.

Including, absolutely free, this
fascinating guide on the import/export
mail order business...

a special, condensed mini mail order
course...

Plus, your exciting free sample
import.

You get all three of these absolutely
free, with no obligation, if you call
now!

Fred Wenz:

To be very honest with you, I swear by
the Mellinger Plan. really, it has
given us everything that we wanted.

Narrator:

ETW 11-1108-1

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

F-A15

CALL FOR COMPLETE
DETAILS ON COST OF THE
MELLINGER PLAN

Once you receive the complete Mellinger
World Trade Mail Order Plan, you
automatically become a member

IT LOGO FLIES IN

of International Traders
with immediate access to

CATALOG SHOTS

over 24,000 products

FONT:
OVER 24,000 QUALITY
PRODUCTS

from around the world.

DVE IN SHOTS OF
IMPORTS.

Unique and exciting products that you
can market at substantial profits.

FONTS:
UNIQUE!
EXCITING!
INCREDIBLE PROFIT
MAKERS!

WENZ'S WORKING TOGETHER
AT DESK

Be your own boss. Working in the
comfort of your own home. Making extra
income -- spare time or full time.

FONT:
BE YOUR OWN BOSS!
CAROLYN KAPLAN COUNTING
MONEY

FONT:
MAKE EXTRA INCOME!

CURRENT FOOTAGE OF
MELLINGER BUILDING WITH
PEOPLE WAVING.

Mr. Mellinger's talented, dedicated
team of experts brings you

FONT:
OVER 45 YEARS OF
EXPERIENCE

MELLINGER PEOPLE AT
WORK

over 45 years of experience in the
import export mail order business.

MELLINGER PEOPLE
WORKING WITH 11 MEMBERS
IN PERSON AND OVER
PHONE

They'll give you the personal, step by
step guidance you need to succeed.

FONT:

8731 1/11 1-4

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final "On Air" Script

p. A16

HELP YOU EVERY STEP OF
THE WAY.

PAN OVER PRODUCT FILLED
CHEST help you select hot new products that
can generate substantial profits...

FONT: HELP YOU SELECT
NEW PRODUCTS

PAN ACROSS ADS IN BOOK show you how to advertise at little or
no cost...

FONT: ADVERTISE AT
LITTLE OR NO COST

ANSON W/ PRODUCT and how to market your products
effectively.

FONT:
AND MARKET YOUR
PRODUCTS EFFECTIVELY

MELLINGER PRINTING
PRESS TURNING OUT They'll even print your business cards
and stationery.

STATIONARY & BUSINESS
CARDS. FONT:
PRINT BUSINESS CARDS

BRAINERD MEETING IT And gladly answer any questions you may
have, in person or over the phone.

IT MEMBER ON PHONE

FONT:
ANSWER ANY QUESTIONS
YOU HAVE!

SHORT CUTS OF IT People all over the United States and
Canada have used the plan successfully.

MEMBERS FROM FEATURES

FONT: CALL NOW FOR starting with very little, with no
YOUR FREE SAMPLE IMPORT special education or background.

FONT:
1-800-300-0000

MAN OR WOMAN WALKS TO Get started now. Learn how to cut out
MAIL BOX, OPENS IT, AND the middleman.

THROWS THROUGH PILE OF
ENVELOPES SMILING.

FONT:
OUT OUT THE MIDDLEMAN!

IT'S LOOKING AT CATALOG deal direct with the source ...

FONT: DEAL DIRECT
WITH THE SOURCE

SP-101-101-101

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

P. A17

TV CATALOG

buy below wholesale...

FONT: BUY BELOW
WHOLESALE

CU ADDING CHECKS ON
CALCULATOR

and make money right from the start...

FONT: MAKE MONEY
RIGHT FROM THE START

IT'S ON COUCH READING
BROCHURES

part time or full time.

BRAINERD FROM VICTORIA
PEAK.

Brainerd:

If you've ever dreamed of riches and
living a luxurious lifestyle, give us a
call right now.

TAG PAGE:

GET YOUR FREE SAMPLE
IMPORT!
CALL OR WRITE:

Narrator:

Call the toll free number on your
screen now.

THE MELLINGER CO.
6100 VARIEL AVE. DEPT B
WOODLAND HILLS,
CA 91367

Or write to us at: The Mellinger
Company, 6100 Variel Avenue, Woodland
Hills, California.

There's no obligation.

No salesman will call.

IF PHONE LINES ARE
BUSY, KEEP TRYING.

Take advantage of this incredible
opportunity, NOW!

1-800-800-3000

TESTIMONIAL
DVE BOX W/ GLOBE

Rev Hansen:

You will be successful. It's been
proven time and time again.

FONT:
1-800-800-3000

SEGMENT 2:

RICHARD & BRAINERD

Richard:

FONT:

MST-1 (11/1/74)

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

P. A18

HONG KONG

OK, we've learned two secrets of the
Mellinger success formula. What's the
third?

PONT:
MELLINGER BUSINESS
SUCCESS SECRET #3:
CUT OUT MIDDLE MEN.
BUY DIRECTLY FROM
SOURCE.

Brainerd:

Well, the third secret--and listen
carefully, this is really important--
you've got to cut out all the middle
men.

PONT: PRICE
COMPARISONS ARE BASED
ON COMPARABLE
QUANTITIES.

Richard:

Middle men.

Brainerd:

They can easily eat up most of your
profits. So we show you how to buy
directly from the source at below
wholesale prices.

RICHARD

Richard:

How can you find the source?

RICHARD & BRAINERD

Brainerd:

We do it for you by searching the world
over for new product ideas. When you
receive the Mellinger Plan and join
International Traders you immediately
have access to over 24,000 exciting
products.

Richard:

24,000 products?

BRAINERD

Brainerd:

All carefully chosen for their

END OF SCRIPT

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

S.A19

CU WONDER KNIFE	quality.
FONT: QUALITY	
CU TOY JEEP	easy salability,
FONT: SALABILITY	
CU PUPPY	mark-up
FONT: MARK UP	
CU AQUA SHOES	and profit.
FONT: PROFIT	
BRAINERD	And every month you'll receive
	information on many new product
	opportunities.
DROP SHIP DIRECTORY	Plus, International Traders Members
FONT: DIRECTORY OF	also receive a confidential directory
FOREIGN SUPPLIERS	listing hundreds of foreign suppliers.
BRAINERD	You easily contact them direct. There
	are no middle men. And we collect no
FONT:	commission.
BRAINERD L. MELLINGER	
III, PRESIDENT/C.E.O.,	
THE MELLINGER COMPANY	
RICHARD	<u>Richard:</u>
	Now, wait a minute, the Mellinger
FONT: RICHARD	Company gets nothing?
ANDERSON, FILM AND	
TELEVISION STAR	
BRAINERD	<u>Brainerd:</u>
	No commission to us. You get the
FONT: FURTHER	suppliers' below wholesale prices
INFORMATION ON THE COST	Nobody takes a cut.
OF THE MELLINGER PLAN	
IS AVAILABLE WHEN YOU	
CALL.	<u>Richard:</u>
RICHARD & BRAINERD	O.K. So now you have your product.
	How do you turn this into a quick
	profit?
	<u>Brainerd:</u>
FONT:	Well,
MELLINGER BUSINESS	
SYSTEM REPORT #4:	
FREE ADVERTISING	

STAY 11-11-77

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Signal on film strip

A20

LISA IN OFFICE

FOUNT: LISA GARCIA
ADVERTISING MANAGER
THE MELLINGER CO.

CU ARTICLE ON FREE
ADVERTISING

LISA GARCIA

RICHARD & BRAINERD

that brings us an Success Secret Number

4. Free advertising.

We show you how to advertise your

product at little or no cost.

Lisa Garcia:

For example, one International Trader

member received a

free ad worth over \$2,000 in a national
magazine.

As an International Trader, I may be

able to do the same for you.

Richard: (to camera)

Talking to people who have used the

Mellinger Plan has shown me over and

over again that dreams do come true,

and almost anything is possible. Watch

this...

FEATURE #2: CAROLYN KAPLAN

CAROLYN WALKING THROUGH
GIFT SHOP

CAROLYN WALKING ONTO
HER BALCONY

FOUNT: MELLINGER
SUCCESS PROFILE

Carolyn:

This is African Gift shops. This is my
baby.

Narrator:

Not long ago, 40 year old Carolyn

Kaplan of Atlanta Georgia had her

entire life turned upside down when she

was diagnosed with severe recurring

muscular weakness and initially

rendered disabled.

ARMY 11-11-11-11

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

S-A21

CAROLYN

FONT: CAROLYN KAPLAN
INTERNATIONAL TRADER

Carolyn:

I was unemployable with the migraine headaches because I wasn't dependable. I didn't know when they were going to strike or how long they were going to last, so it put me in a situation where no employer would employ me, and I had to do something.

CU PERFUME BOTTLES IN
STORE

CU CHESS SET IN STORE

I started off with \$250 that my husband gave me, and last year I earned over \$15,000, and I did it all with the help of the Mellinger Company. I'm real proud of that.

CLIFFORD

FONT: CLIFFORD HUGHES
INTERNATIONAL TRADER

Clifford:

Once we found out she had learned about the Mellinger program, we saw how quickly she, her spirit picked up and how she just became, she had a zest for life. I think that one of the best programs out today is the Mellinger program through what it has done for her, my aunt, as brought her morale back up.

CAROLYN WORKING IN
STORE CLIFFORD

COVER OF AFRICAN GIFT
STORE

Narrator:

Carolyn started with one gift shop in Atlanta, but her business grew so rapidly that she needed to open an another shop in a different part of town.

CAROLYN IN STORE WITH
CUSTOMER

STAY LISTEN

1108

Complaint

EXHIBIT A

"Mellinger's Hidden Treasures" MST-1
Final On All Script

p. A22

COVER OF INTERNATIONAL
GALLERIES STORE

Carolyn:

This is my newest shop, International
Galleries, which is just recently
opened.

CAROLYN

It's amazing to me how all this has
come together in such a short time.

CAROLYN COUNTING MONEY

I make money. I sell. No matter what
the economy is like, I sell.

CU ARTICLES: "US
FAMILIES DRIFTING
APART" "UNEMPLOYMENT ON
THE RISE"

Narrator:

Keeping families together in such
uncertain times is not an easy task.

CAROLYN WITH PRODUCT
FROM STORE

But Carolyn, with help from the
Mellinger company, has been able to do
just that by bringing her nephew

CLIFFORD WORKING

Clifford and her son Patrick into her
thriving business.

CLIFFORD AND PATRICK

Clifford:

I don't think people really understand,
actually, how easy the Mellinger Plan
has been to learn about basic business
functions. Since I started working
here I learned, I've been learning a
lot about just the import/export
business a lot. My aunt showed me the
plan and I just have, just really kind
of fallen in love with it. It's taught
me a lot.

WMAV 11-17-2011

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

S A23

CU ON JEWELRY ON
DISPLAY, TILT UP TO
CAROLYN

Carolyn:

I would advise anyone who's sitting
there thinking well, I have a job or
you know, I'm disabled or I'm confined
to a wheelchair, or whatever reason.
I'm a single mother. Listen.

PONT: YOUR RESULTS
MAY VARY.

Get involved with Mellinger, and if you
stick with them they have the support
team there for you, they can make
something like this possible for you.

RICHARD & BRAINERD

Richard:

Carolyn Kaplan demonstrates just what
we're attempting to say today.
BRAINERD, your company's doing
something very special. Allowing
people to do things that they've
dreamed of doing all their life.

BRAINERD

BRAINERD:

PONT: BRAINERD L.
MELLINGER III,
PRESIDENT/C.E.O.,
THE MELLINGER COMPANY

Yes, and it's the wonderful freedom
that comes from being your own boss,
the master of your own destiny. And we
show you exactly how to do it, step by
step.

MELLINGER CO. WAVE
OUTSIDE HEADQUARTERS

BRAINERD (voice over):

With The Mellinger Mail Order Plan
you're never alone.

BRAINERD

You ultimately become a member of
International Traders--

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final In Air Script

P. A24

WORLD MAP W. TRADE
ROUTES
IT LOGS

our huge world wide organization of
importers, exporters, and direct
marketers.

FONT: ORGANIZATION OF
IMPORTERS, EXPORTERS
AND DIRECT MARKETERS.

BRAINERD

Once you've joined this exclusive
group, top notch experts help you in
every phase of your business.

BRAINERD AND STAFF IN
OFFICE

CHRIS HARDENEROCK AND
CO-WORKER

FONT: WE HELP YOU
EVERY STEP OF THE WAY

LISA ON PHONE

Brainerd:

FONT: WE HELP YOU
EVERY STEP OF THE WAY

You can call, write, or visit.

BRAINERD WITH CLIENT IN
OFFICE

And we'll give you prompt, personalized
assistance.

ANSON IN OFFICE

Anson Jackson:

FONT:
ANSON JACKSON
WORLD TRADE CONSULTANT
THE MELLINGER COMPANY

Any member of International Traders can
pick up the phone and call me. I'm
here to work with them and help them
find the big money making products and
market them effectively and
inexpensively.

RICHARD & BRAINERD

Richard:

And how much time and effort does it
take to be a success at this?

Brainerd:

It's up to you. You can work full
time or start off in your spare time.

TESTIMONIAL

Jim Hiedler:

ONE ON SHOW CASE

The Mellinger Plan has enabled me to

REF: 17-1349-

Complaint

123 F.T.C.

EXHIBIT A

"Mallinger's Secret Treasures" VST-1
Final On Air Script

P. A25

FONT: JIM BEIGLER
INTERNATIONAL TRADER

move in a total career change from
working for a large corporation to
being my own boss.

TESTIMONIAL

Mark Miller:

DVE IN BOX W/ GLOBE
FONT: MARK MILLER
INTERNATIONAL TRADER

Anybody today that really wants to
work, and has the initiative to get out
and try something new, this plan
definitely makes it about as easy as
pie.

FONT: RESULTS VARY
DEPENDING ON HOW MUCH
TIME INVESTED AND OTHER
FACTORS.

TEASE:

RICHARD

Richard:

FONT: THIS PROGRAM IS
A PAID ADVERTISEMENT
FOR THE MELLINGER
COMPANY

Don't go away. When we come back
Brainerd will reveal one of the most
important moneymaking secrets.

ARIEL SHOT OVER HONG
KONG SKYLINE

FONT: STAY TUNED FOR
MORE MONEY MAKING
SECRETS.

END OF SEGMENT 2

COMMERCIAL TWO

800# DISPLAYED OVER
ANIMATED GRAPHIC.
DISSOLVE IN FLASHING
FONT:
CALL NOW FOR YOUR FREE
INFORMATION!

Narrator:

Call this toll free number right now
and we'll send you

DVE IN DISPLAY SHOT OF
MATERIAL FROM MAILING
"A"
FONT: CALL FREE

everything you need to know about how
to get started with the Mallinger World
Trade Mail Order Plan.

40451 00011-004

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

p. A26

SHOT OF "IMPORT/EXPORT
MAIL ORDER BUSINESS"
BOOKLET

Including, absolutely free, this
fascinating guide on the import/export
mail order business...

SHOT OF "HOW TO START
IN MAIL ORDER" BOOKLET

a special, condensed mini mail order
course...

FONT:
CALL NOW FOR YOUR FREE
SAMPLE IMPORT!

Plus, your exciting free sample
import.

DISPLAY SHOT OF
MATERIAL
FLASHING FONT:
FREE!!!

You get all three of these absolutely
free, with no obligation, if you call
now!

TESTIMONIAL
DVE BOX WITH GLOSS
FONT:
MELLINGER
FONT:
1-800-203-0000

Ron Hart:
I'm creating my own job security.
That's what this is all about. This is
a way that you can control your own
destiny.

PRODUCT SHOT

Narrator:

FONT: CALL FOR
COMPLETE DETAILS ON
COST OF THE MELLINGER
PLAN

Once you receive the complete Mellinger
World Trade Mail Order Plan, you
automatically become a member

IT LOGO FLIES IN.

of International Traders
with immediate access to
over 24,000 products

CATALOG SHOTS

FONT: OVER 24,000
QUALITY PRODUCTS

from around the world.

DVE IN SHOTS OF
IMPORTS
FONTS:
UNIQUE
EXCITING

Unique and exciting products that you
can market at substantial profits

STAY LISTEN

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

p. A27

INCREIBLE PROFIT
MAKERS!

TESTIMONIAL
IVE BOX W GLOBE

FONT: MELLINGER

Toni Mahon:

I'm having a delightful time. I have
learned. I have learned so much more
than I could had I gone to college for
4 years.

WENZ'S WORKING TOGETHER
AT DESK

FONT:
BE YOUR OWN BOSS!

CAROLYN KAPLAN COUNTING
MONEY

FONT:
MAKE EXTRA INCOME!

CURRENT FOOTAGE OF
MELLINGER BUILDING WITH
PEOPLE WAVING.

FONT:
OVER 45 YEARS OF
EXPERIENCE

MELLINGER PEOPLE AT
WORK.

MELLINGER PEOPLE
WORKING WITH IT MEMBERS
IN PERSON AND OVER
PHONE.

FONT:
HELP YOU EVERY STEP OF
THE WAY.

PAN OVER PRODUCT FILLED
CHEST

FONT: HELP YOU SELECT
NEW PRODUCTS

PAN ACROSS ADS IN BOOK

FONT: ADVERTISE AT
LITTLE AS NO COST

Narrator:

Be your own boss. Working in the
comfort of your own home. Making extra
income -- spare time or full time.

Mr. Mellinger's talented, dedicated
team of experts brings you

over 45 years of experience in the
import/export mail order business.

They'll give you the personal, step by
step guidance you need to succeed...

help you select hot new products that
can generate substantial profits...

show you how to advertise at little or
no cost.

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

P. A28

ANSON W. PRODUCT	and how to market your products
FONT: AND MARKET YOUR PRODUCTS EFFECTIVELY	effectively.
MELLINGER PRINTING PRESS TURNING OUT STATIONARY & BUSINESS CARDS.	They'll even print your business cards and stationary.
FONT: PRINT BUSINESS CARDS	
BRAINERD MEETING IT MEMBER IN OFFICE	And gladly answer any questions you may have, in person or over the phone.
IT MEMBER ON PHONE	
FONT: ANSWER ANY QUESTIONS YOU HAVE!	
SHORT CUTS OF IT MEMBERS FROM FEATURES	People all over the United States and Canada have used the plan successfully, starting with very little, with no special education or background.
FONT: CALL NOW FOR YOUR FREE SAMPLE IMPORT	Get started now. Learn how to cut out the middleman...
FONT: 1-800-000-0000	
MAN OR WOMAN WALKS TO MAIL BOX, OPENS IT, AND THUMBES THROUGH PILE OF ENVELOPES SMILING.	
FONT: CUT OUT THE MIDDLEMAN!	
IT'S LOOKING AT CATALOG	deal direct with the source...
FONT: DEAL DIRECT WITH THE SOURCE	
CU CATALOG	buy below wholesale...
FONT: BUY BELOW WHOLESALE	
CU ADDING CHECKS IN CALCULATOR	and make money right from the start...
FONT: MAKE MONEY RIGHT FROM THE START	
IT'S IN YOUR READING MATERIALS	part time or full time

SP-10 10000000

Complaint

123 F.T.C.

EXHIBIT A

"Mallinger's Secret Treasures" MST-1
Final On Air Script

P A29

BRAINERD FROM VICTORIA
PEAK.Brainerd:

If you've ever dreamed of riches and
living a luxurious lifestyle, give us a
call right now.

TAG PAGE:
GET YOUR FREE SAMPLE
IMPORT!
CALL OR WRITE:

Narrator:

Call the toll free number on your
screen now.

THE MALLINGER CO.
6100 VARIEL AVE. DEPT 5
WOODLAND HILLS, CA
91367

Or write to us at: The Mallinger
Company, 6100 Variel Avenue, Woodland
Hills, California.

There's no obligation,
No salesman will call.

IF PHONE LINES ARE
BUSY, KEEP TRYING.

Take advantage of this incredible
opportunity, NOW!

1-800-800-0000

SEGMENT 3

RICHARD AND BRAINERD

Richard:

Welcome back to Mallinger's Secret
Treasures. I'm here in Hong Kong with
Brainerd Mallinger the Third, our
modern day Marco Polo, on one of his
global product tours.

RICHARD & BRAINERD

And he's revealing

ON FAN ACROSS DISPLAY
OF PLAN BOOKShis secret formula in the
import export mail order business.

RICHARD AND BRAINERD

Now Brainerd. Let's talk about
products. How do you know what's going
to sell and what's not?

END 11-11-84

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

9 A30

BRAINERD

FONT:
MELLINGER BUSINESS
SUCCESS SECRET #1:
FINDING PRODUCTS THAT
SELL EASILY AND
QUICKLY.

RICHARD & BRAINERD

CU CN HAND AND GOLD
SNAKE BRACELET

CU CAROLYN HOLDING VASE

CU HANDS HOLDING GOLD
CLOCK

BRAINERD

CU CN AQUA SHOE

FONT:

BUY FOR..... \$3
SELL FOR..... \$25
GROSS PROFIT \$22

FONT:

PROFIT MAY VARY DUE TO
OPERATING COSTS.

RICHARD

FONT:
RICHARD ANDERSON
FILM AND TELEVISION
STAR

BRAINERD

FONT: BRAINERD L.
MELLINGER,
PRESIDENT C.B.C.
THE MELLINGER COMPANY
FONT:

Brainerd:

Well, Richard, that's very important.
The fifth secret of the Mellinger
Success Formula is finding really hot
products.

Brainerd V/O:

We look for quality products that are
unique,

novel,

and appealing to many people.

Brainerd:

Like these aqua shoes. They're one of
the hottest new items.

Richard:

You know, I've seen shoes like these in
stores and they sell up to \$40.

Brainerd:

But International Traders can sell them
for \$28 because they get them for only
\$3.

Richard:

Tell me, how do you find products like
that?

Brainerd:

All you have to do is follow the
Mellinger World Trade Mail Order Plan.
We give you everything you need to get
started fast.

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

P- A31

RESULTS MAY VARY
DEPENDENT ON TIME
INVESTED AND OTHER
FACTORS.

The products, and step by step
guidance.

CHRIS AT SUPPLIER'S
LUNCHEON, HONG KONG

Chris Hardenbrook:

PONT:
CHRIS HARDENBROOK
IMPORT MANAGER
THE MELLINGER CO.

Hong Kong is just one of the great
international trade centers we travel
to in our search for reputable
suppliers of new moneymaking products.
We check it out for you - make sure the
supplier is reliable, has readily
available product, it's of the highest
quality, and is easily sellable.

BRAINERD LOOKING AT
JEWELRY IN STANLEY
MARKET

Richard: (To Camera)

BRAINERD LOOKING AT
MAGIC RAZOR IN STANLEY
MARKET

Now, we're going to jump from Hong Kong
to the United States because I want to
show you success in action.

RICHARD

PONT: LAS VEGAS

ESTABLISHING SHOT DOWN
BRIGHT LIGHTS OF VEGAS
STREET

Richard V/O:

At this annual trade show/convention,
the Mellinger Company puts the whole
world of exciting products under one
roof.

WIDE SHOT OF TRADE SHOW

LAS VEGAS FEATURE: BRAINERD & RICHARD ROAM THE FLOOR
LOOKING AT PRODUCTS, SPEAKING TO VENDORS. AT MEMBERS
COMMENT ON THEIR SUCCESSES.

RICHARD

Richard V.O.:

GRAPHIC OF TURNING
SLICES W/ LIVE'S NAMES OF
COUNTRIES FLYING OUT
FROM BEHIND IT

International Traders can pick up
exciting new money makers from

Asia Africa Europe Gall. South
America Ireland Egypt

1108

Complaint

EXHIBIT A

"Mallinger's Secret Treasures" MST-1
Final On Air Script

A32

BRAINERD & RICHARD AT
LAS VEGAS TRADE SHOW AT
EGYPTIAN PAPYRUS
DISPLAY

Brainerd:

Richard, look at this. Beautiful
Egyptian papyrus!

CU ON PAPYRUS

Richard:

Oh! That's beautiful! That's King Tut
and his wife on a hunting party.

FONT:
BUY FOR.....\$4
SELL FOR.....\$13
GROSS PROFIT.\$45

Brainerd:

That's right. You can buy this for
three dollars and ninety cents and sell
it for as much as fifty dollars.

FONT:
PROFIT MAY VARY DUE TO
OPERATING COSTS.

Richard:

Well that's a thirteen to one mark-up!

BRAINERD AND RICHARD AT
TRADE SHOW DISPLAY FOR
CALYPSO CUP

Richard:

Brainerd, what in the world is this?

Brainerd:

Spill Buster.

Richard:

Spill...?

Brainerd:

Buster.

Richard:

Buster.

Brainerd:

That's right. It's the best mobile
beverage holder in the market.

CU SPILLBUSTER

Richard:

This is amazing!

STAMP 10-11-61

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

P. A33

BRAINERD AND RICHARD AT
TRADE SHOW DISPLAY FOR
CALYPSO CUP

Brainerd:

Yeah. It keeps beverages from spilling
in mobile homes,
cars and boats.

Richard:

Is it easy to install?

Brainerd:

A child could install it.

Richard:

Cost?

PONT:
BUY FOR.....\$ 9.00
SELL FOR....\$20.00
GROSS PROFIT.\$11.00

PONT: PROFIT MAY VARY
DUE TO OPERATING COST.

Brainerd:

\$9.00

Richard:

And, well, what do you sell it for?

Brainerd:

\$20.00

RICHARD AND BRAINERD

Richard:

Obviously, the Mellinger Trade Show in
Las Vegas was hugely successful and
fun. But you don't have to travel
beyond your mail box if you don't want
to. Isn't that right Brainerd?

Brainerd:

Right! You can do absolutely
everything in the comfort of your own
home.

BRAINERD

PONT: BRAINERD L.
MELLINGER,
PRESIDENT U.S.C.
THE MELLINGER COMPANY

COUPLE ON SOFA W. PLANT

Brainerd V.C.:

END OF TAPING

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MCT-1
Final On Air Script

P. A34

CU ON CATALOG - WANT
TURNING PAGES

The Mellinger Company puts the
treasures of the world right at your
finger tips.

FONT: OVER 24,000
QUALITY PRODUCTS

Every member of International Traders
has access to over 24,000 profit making
products.

PAN UP PAGE OF NEW
PRODUCTS

And we continually give you new ones
each month.

BRAINERD & RICHARD
RICHARD PICKS UP A COPY
OF "TRADE
OPPORTUNITIES"
MAGAZINE.

Richard:
Plus, International Trader Members also
receive "Trade Opportunities Magazine".

PAN SPREAD OF T.O.
MAGAZINES

Brainerd:
That's right Richard. You find out
about the hottest new products every
month in our magazine. And you won't
find this on any newsstand. It's an
exclusive publication with all kinds of
money making information, for members
only.

CU PAGE OF T.O.
MAGAZINE

FONT: AN EXCLUSIVE
PUBLICATION FOR MEMBERS
ONLY

Richard:
So you simply pick a product, run an ad
if you choose mail order, and you're on
your way.

And anyone can do it?

BRAINERD

Brainerd:
Anyone who's willing to follow our
simple step by step plan.

END OF TAPES

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On All Script

P. A35

PONT:
MELLINGER BUSINESS
SUCCESS SECRET #6:
LEARN FROM THE EXPERTS.
SAVE TIME AND MONEY.

And that's our 6th secret of the
Mellinger Success Formula. Learn from
the experts, not from your own
mistakes.

BRAINERD & RICHARD

Richard:

Well, mistakes can be expensive and
time consuming.

PONT:
1-800-000-0000

Brainerd:

They sure can. And with our plan you
don't need to start from scratch. All
you have to do is pick up the phone and
call us right now.

We'll show you how to make money right
from the start.

FEATURE #3: KIRK YAGER

JAG LEAVING DRIVEWAY

Rodney Benn V/O:

PONT: MELLINGER
SUCCESS PROFILE

So, Kirk, you started your business at
the age of nineteen. Now, let's be
honest. Were you some kind of a wild
kid or something in school?

INTERIOR SHOT - KIRK
AND RODNEY DRIVING IN
JAG

Kirk Yager:

No, not really. I played sports and
had a good time, and nothing, just went
to school.

PONT: RODNEY BENN

Rodney:

Now be honest. How were your grades
like?

Kirk:

Average. Average grades.

END 1-800-000-0000

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
 Final On Air Script

p. A36

Rodnev:

Amazing. What made you start the business in the first place?

Kirk:

Well, I was looking for a good business program, and I ran across the Mellinger program with imported items, and mailed off for it, and was able to get into some real easy businesses with imported items.

Rodnev:

Let's talk about the Mellinger Plan itself. So, what was it like? Did you think it was easy, that something just about anybody could follow?

Kirk:

Oh, definitely.

JAG TURNING INTO
 DRIVEWAY

You know, I have one year of college and I'm no genius.

Rodnev:

No rocket scientist.

Kirk:

No, no rocket scientist.

Narrator:

Kirk may not be a rocket scientist, but with the help of the Mellinger World Trade Plan he has launched a company with skyrocketing profits. Today is a typical business day and

END 1147-11

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MET-1
Final On Air Script

P- A37

FONT: YOUR RESULTS
MAY VARY

RODNEY AND KIRK GOING
TO BOXES OF HATS

RODNEY AND KIRK BY
BOXES OF PRODUCT

Kirk is shipping out more than 400
hats. The profits are all his.

Rodney:

Well, this must be the product.

Kirk:

Yeah, we have the pitch on the solar fan
hat has a solar voltaic cell on top.

Rodney:

So this is a solar cell that collects
the sun's rays and turns it into
electricity?

Kirk:

Yeah, exactly. Or you have a battery
backup for shade or night time. Yeah,
and what it does is with a moistened
sponge here, it works just like an
induct cold system on your head. It's
fantastic.

RODNEY AND KIRK

Rodney:

Ah ha. It's a great idea.

Kirk:

Oh yeah.

CU HAT

It's one of the best items I've found,
I've found. you know, just basically
through one of the Mellinger programs.

IN RODNEY

Rodney:

Really? What was it like when the
business money started to roll in?

END 114848

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

S A38

RODNEY AND KIRK BY POOL

FONT: THIS PROGRAM IS
A PAID ADVERTISEMENT
FOR THE MELLINGER
COMPANY

KIRK AND FAMILY
SWIMMING IN POOL

Kirk:

Oh, it was fantastic. You know, I'm
able to spend a lot more time with my
family, and go on vacations...
and enjoy outings, and dinners, and
swimming, and boating, you know...

Rodney:

Having a fuller life.

Kirk:

Exactly. Enjoying a lot of, you know,
activities.

CU KIRK

FONT: KIRK YAGER
INTERNATIONAL TRADER

Brainerd Mellinger's World Trade
Program has been very beneficial to
myself and my family, and I think that
anyone that gets involved with this is
gonna really find exciting,
interesting, and create an income for
themselves. It's fantastic. So, my
advice would be to give it a try. You
know, That's all I can say is give it a
try.

END OF SEGMENT 1COMMERCIAL THREE

800# DISPLAYED OVER
ANIMATED GRAPHIC
DISCLOSE IN FLASHING
FONT:
CALL NOW FOR YOUR FREE
INFORMATION!

Narrator:

Call this toll free number right now
and we'll send you

COPY 11-11-91

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MET-1
Final On Air Script

9 A39

DVE IN DISPLAY SHOT OF MATERIAL FROM MAILING "A" FONT: CALL FREE SHOT OF "IMPORT/EXPORT MAIL ORDER BUSINESS" BOOKLET SHOT OF "HOW TO START IN MAIL ORDER" BOOKLET FONT: CALL NOW FOR YOUR FREE SAMPLE IMPORT! DISPLAY SHOT OF MATERIAL FLASHING FONT: FREE!!! TESTIMONIAL DVE BOX WITH GLOBE FONT: MELLINGER FONT: 1-800-000-0000 PRODUCT SHOT FONT: CALL FOR COMPLETE DETAILS ON COST OF THE MELLINGER PLAN IT LOGO FLIES IN. CATALOG SHOTS FONT: OVER 24,000 QUALITY PRODUCTS	everything you need to know about how to get started with the Mellinger World Trade Mail Order Plan. Including, absolutely free, this fascinating guide on the import export mail order business... a special, condensed mini mail order course... Plus, your exciting free sample import. You get all three of these absolutely free, with no obligation, if you call now! <u>Bernard Alexander:</u> It's very easy, everything is spelled out from A to Z. You just follow the information and direction they give you. <u>Narrator:</u> Once you receive the complete Mellinger World Trade Mail Order Plan, you automatically become a member of International Traders with immediate access to over 24,000 products from around the world
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SEP 10-1984

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

9 A40

DVE IN SHOTS OF
IMPORTS,
FONTS:
UNIQUE!
EXCITING!
INCREDIBLE PROFIT
MAKERS!

Unique and exciting products that you
can market at substantial profits.

TESTIMONIAL
DVE BOX W. GLOBE

Nabil Assad:

The Mellinger Program, it changed my
life. It made a professional out of
me. It taught me one thing, to work
smart, don't work hard.

FONT: MELLINGER

WENZ'S WORKING TOGETHER
AT DESK FONT:
BE YOUR OWN BOSS!

Narrator:

Be your own boss. Working in the
comfort of your own home. Making extra
income -- spare time or full time.

CAROLYN KAPLAN COUNTING
MONEY

FONT:
MAKE EXTRA INCOME!

CURRENT FOOTAGE OF
MELLINGER BUILDING WITH
PEOPLE WAVING.

Mr. Mellinger's talented, dedicated
team of experts brings you

FONT:
OVER 45 YEARS OF
EXPERIENCE

MELLINGER PEOPLE AT
WORK.

over 45 years of experience in the
import/export mail order business.

MELLINGER PEOPLE
WORKING WITH IT MEMBERS
IN PERSON AND OVER
PHONE.

They'll give you the personal, step by
step guidance you need to succeed...

FONT:
HELP YOU EVERY STEP OF
THE WAY.

PAN OVER PRODUCT FILLED
Chest

help you select hot new products that
can generate substantial profits...

FONT: HELP YOU SELECT
NEW PRODUCTS

PAN ACROSS ADS IN BOOK

show you how to advertise at little or
no cost

END OF PAGE

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

S-A41

FONT: ADVERTISE AT LITTLE OR NO COST	
ANSON W/ PRODUCT	and how to market your products
FONT: AND MARKET YOUR PRODUCTS EFFECTIVELY	effectively.
MELLINGER PRINTING PRESS TURNING OUT STATIONARY & BUSINESS CARDS.	They'll even print your business cards and stationary.
FONT: PRINT BUSINESS CARDS	
BRAINERD MEETING IT MEMBER IN OFFICE	And gladly answer any questions you may have, in person or over the phone.
IT MEMBER ON PHONE	
FONT: ANSWER ANY QUESTIONS YOU HAVE!	
SHORT CUTS OF IT MEMBERS FROM FEATURES	People all over the United States and Canada have used the plan successfully,
FONT: CALL NOW FOR YOUR FREE SAMPLE IMPORT	starting with very little, with no special education or background.
FONT: 1-800-800-0000	
MAN OR WOMAN WALKS TO MAIL BOX, OPENS IT, AND THUMBES THROUGH FILE OF ENVELOPES SMILING.	Get started now. Learn how to cut out the middleman...
FONT: CUT OUT THE MIDDLEMAN!	
IT'S LOOKING AT CATALOG	deal direct with the source...
FONT: DEAL DIRECT WITH THE SOURCE	
CU CATALOG	buy below wholesale...
FONT: BUY BELOW WHOLESALE	
CU ADDING CHECKS IN CALCULATOR	and make money right from the start.
FONT:	

encl 11-11-84

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Signal On Air Script

P. A42

MAKE MONEY RIGHT FROM
THE START

IT'S ON COUCH READING
BROCHURES

BRAINERD FROM VICTORIA
PEAK.

TAG PAGE:
GET YOUR FREE SAMPLE
IMPORT!
CALL OR WRITE:

THE MELLINGER CO.
6100 VARIEL AVE. DEPT B
WOODLAND HILLS,
CA 91367

IF PHONE LINES ARE
BUSY, KEEP TRYING.

1-800-800-8000

part time or full time.

Brainerd:

If you've ever dreamed of riches and
living a luxurious lifestyle, give us a
call right now.

Narrator:

Call the toll free number on your
screen now.

Or write to us at: The Mellinger
Company, 6100 Variel Avenue, Woodland
Hills, California.

There's no obligation.

No salesman will call.

CLOSE

RICHARD AND BRAINERD AT
KOWLOON LOCATION.

Richard:

You know, this is an exciting
opportunity. Now
Brainerd, you have told us the six
secret treasures of the Mellinger
Business Success Formula. I've got just
one last question for you. The
Mellinger Plan makes it so easy to
achieve financial independence.

END 11-11-80

Complaint

123 F.T.C.

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

E- A43

Why isn't everyone doing it?

Brainerd:

Good question.

Well... it's just that they don't know about the Mellinger Plan yet. They aren't aware that this fabulous opportunity for success and riches is waiting for them. And that's why I'm here today.

BRAINERD

I want to tell everyone

CAROLYN AND CLIFFORD IN
STORE

that they can make money, like some of the folks you've seen on our show. The Mellinger Company shows you how, step by step.

JACQUE AND FRED ON
BEACH

And we make it simple and fun, but the first step is up to you.

FONT:
1-800-000-0000

Pick up the phone and dial the toll free number on your screen now.

There's absolutely no obligation. As soon as you call, the Mellinger Company is behind you every step of the way. And we'll get you started on the roads to riches--fast. Our operators are standing by 24 hours a day for your convenience. So call now!

TESTIMONIAL

FONT:
1-800-000-0000

Ray Hansen:

If you want medical advice you go to a doctor. If you want legal advice you go to an attorney.

enav 10-00-80

1108

Complaint

EXHIBIT A

"Mellinger's Secret Treasures" MST-1
Final On Air Script

P. A44

If you want mail order advice you go to
the Mellinger Company.

TESTIMONIAL

PONT:
1-800-000-0000

Carolyn Kaplan:

The Mellinger Company really has opened
up many new avenues of my life. My
family is the world, and it's just
great.

TESTIMONIAL

PONT:
1-800-000-0000

Kirk Yager:

Anyone that gets involved with this is
gonna really find it exciting,
interesting and create an income for
themselves that's fantastic, so, my
advice would be to give it a try.

DISCLAIMER GRAPHIC

Narrator:

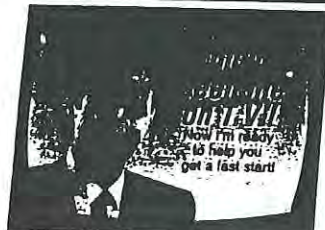
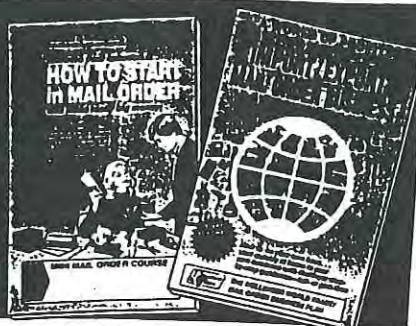
The preceding program was a paid
advertisement for The Mellinger World
Trade Mail Order Plan by The Mellinger
Company.

Complaint

123 F.T.C.

EXHIBIT B

2 valuable New Reports
**Can Make
 You Rich!**
 I'll send
 both to you **FREE!**



BRAINERD L. MELLINGER III
 President/CEO, The Mellinger Co.

Fourth generation of internationally respected World Trade/Mail Order family. The Mellinger Co. started by our founder in a rented garage with barely \$100. Our 45 years of successful World Trade/Mail Order experience is your time-proven guide to profits. Follow Mellinger methods, global contacts, and profit secrets to a prosperous business of your own. Mail coupon for all facts...discover how to start quickly, surely!

Discover How to Be Independent — Be Your Own Boss — Make Big Money in your own **IMPORT/EXPORT MAIL ORDER BUSINESS!..**

Deal Direct
 with leading suppliers
 and keep ALL profits!

Buy Below Wholesale
 Rock-bottom prices pay
 fantastic markups!

Profit big with exciting import products!

MEN-WOMEN... you'll never get rich working for somebody else! Your answer is being your own boss in your own business! World Trade/Mail Order is the one business you can still "start on shoestring"! Enjoy earnings probably far greater than you ever dreamed any job could pay. The Mellinger World Trade/Mail Order home business plan guides you step by step. Plan based and backed by four generations of Mellinger family global success! We travel the world, discovering dazzling new import product and handcraft values you'll turn into quick, steady profits. Start with choice of 24,221 of today's hottest import moneymakers. Always deal direct—no middlemen—keep all profits!

**Join these successful
 Men and Women!**

"My biggest day's sales has been \$15,535.50 and the largest single sale was \$1,122. This Plan has made a change in my life."

Ann M. Moncey

"Mellinger has the answer! I'm looking at \$25,000. year's income—just 2 hours a day part-time!"

Alan Peterson

"Just one world trade transaction paid me \$3,000. profit! You...follow the Mellinger Plan!"

Glen Campbell

"Following the Mellinger Plan I opened my own gift shop. Plus, made \$12,000. Mail Order 'revenue'!"

Mame Ciron

"I was full-time now and my wife works part-time. The hours are long, but there is great satisfaction associated with being directly responsible for actions taken by the company and the rewards when these actions are successful. I anticipate sales of more than \$50,000. in the coming year."

David Schneider



**START WITH CHOICE OF
 24,221
 HIGH PROFIT IMPORTS!**

Personal Guidance

You're never alone! Mellinger Personal Consultants help at every step. Be invited to regional Mellinger Seminars for extra incentive.

**ADDED
 EARNINGS**

Now make even more money with Mellinger Plan. Deal direct in U.S. made products at lowest rock-bottom prices...keep all profit! No "buying losses!"

START FAST FROM HOME...Full-Time or Part-Time!
 No employees! No rent! Almost no overhead! Actually make first import transaction 10 minutes after Plan arrives. Can operate without product investment. Plan reveals exactly how to sell by Mail Order or many other high profit ways. Receive free membership in International Traders organization...immediately puts you in direct contact with suppliers overseas. Age, past experience not important. Ideal for husband and wife team or retirement!

FIND OUT! I'll send 2 reports, Free Sample Import and Condensed Mail Order Course—all free!
 Discover how to turn imports we find into really big money. Read my 2 complete reports. Marvel at free sample import I'll send! No obligation. No salesman will call. Mail certificate today!

**This Certificate Good for
 ONE SAMPLE IMPORT—FREE**

B. L. MELLINGER III, THE MELLINGER CO.
 8100 VARIEL AVE., Dept. 02089
 WOODLAND HILLS, CA 91367-3779

Sends FREE Sample Import, FREE Report and FREE Condensed Mail Order Course. Shows me how I can start a profitable home-based business. No obligation.

Name _____
 Address _____
 City _____ State _____ Zip _____

IMPORTANT:
 Initial Below (name)
 by agree to limit my
 request to ONLY
 one Free Sample
 Import. I am aware
 of this limit.

THE MELLINGER CO. Dept. 02089 8100 Variel Ave., Woodland Hills, CA 91367-3779

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Complaint

EXHIBIT C

Mellinger Company

<http://www.noboss.com/mellingr.html>PRIME-CATEGORY: Consumer ServicesCATEGORY: Import/Export

SOURCE: The Mellinger Company

OFFER: become a member of International Traders, gain introduction and access to hundreds of carefully screened foreign suppliers carrying over 20,000 imports plus gain information regarding profit potential as export agent for domestic manufacturers.

COST: \$198 or payments of \$15 to start. \$18.90 for 12 months.

THE PACKAGE: Receive 20 Section Mellinger World Trade/Mail Order Plan, Supplement and 11-piece Visualizer Kit. When paid in full, receive 3 Year International Traders Membership, Free sample Imports, Trade Agreements, Drop Ship Directory, Trade Opportunities Magazine for 3 years (published bimonthly) and sample portfolio of business forms. Free personal telephone consultation available to members. Visa/Mastercard payment accepted.

In addition, the Platinum Profession Training includes round-trip air fare transportation and hotel accommodations at a 4-star hotel while attending 3 days of factory training and Master Certificate as a Professional Glass Repair Technician.

Bonus Book "How To Run Mail Order Advertising" for orders within 14 days of receipt of information.

MARKETING TECHNIQUE: sell imports by mail. Members-only Drop-Ship Plan enables you to start without product investment.

MISCELLANEOUS: Mellinger family active in world trade and mail order for over 90 years. You deal directly with overseas suppliers, cut out middlemen and keep all profits. International Traders Trade Show Convention in Las Vegas held annually for International Traders members.

TYPICAL EARNINGS: Examples of earnings of individual members (1) borrowed \$500 to start, made \$45,000 after 6 months, (2) first year brought \$30,000; recently had sales of \$41,920 in a single day, (3) first year sales of \$55,000; now serve 250 customers are 'trying for a million'.

GEOGRAPHIC AVAILABILITY: USA

ADDITIONAL INFORMATION: For full details on this Business Opportunity simply.

REQUEST TO BE SENT DETAILED INFORMATION

or you can write :

The Mellinger Company 6100 Variel Avenue, Dept NOBOSS Woodland Hills, CA 91367

6100 Variel Avenue, Dept NOBOSS
Woodland Hills, CA 91367

NOTE: this "Listing" has NOT been reviewed-for-accuracy by the Source

TO TOP

Complaint

123 F.T.C.

EXHIBIT D



1108

Complaint

EXHIBIT D

4 Generations of Mellinger experience guide you to Success and Fortune!

B.L. Mellinger III
President/CEO, The Mellinger Co.

In the pages of this book, I invite you to discover how the Mellinger World Trade/Mail Order Plan has helped me and probably more money than you ever dreamed. Proudly, I can tell you how the plan has helped me and my family to build a global business organization that has added this success to the lives of many ambitious men and women of all ages and backgrounds. I look forward to helping you get your fair, profitable share in World Trade/Mail Order!

B.L. Mellinger III

The Mellinger family has been directly active in World Trade/Mail Order for nearly 80 years! Starting with Great Grandfather Louis Mellinger, our family has directed the flow of millions upon millions of dollars of goods to buyers through the mails. The Mellinger family played a key role in making World Trade/Mail Order a primary career for ambitious men and women. You enjoy the best benefit of this vast experience as you follow Mellinger guidance.

As you begin following the Mellinger Plan and become a Member of International Traders, we put you at once in direct contact with leading suppliers overseas offering you thousands of fast-selling imports below wholesale. We show you to cut out middlemen so you keep all profits. And we guide you step-by-step in marketing your imports for big profits in Mail Order and many other ways. This is the International Traders way to business success!

The most respected Mail Order business family in the world leads you to security and independence

B.L. MELLINGER JR.
Founder, the Mellinger Plan, International Import/Export Business, World Trade/Mail Order; he quickly built a multimillion dollar business. You will profit big with guidance established by this World Trade/Mail Order pioneer.

B.L. MELLINGER SR.
In 1912, B.L. Mellinger built and operated one of America's first and most successful mail order businesses. He taught his sons the secrets of success in mail order. He left a price-cutting policy of excellence from which newcomers benefit greatly today.

LOUIS G. MELLINGER
Early in the century, he founded a business future in World Trade/Mail Order. He guided his son into a career where the Mellinger family became a leading force in mail order business expansion and international business.

GOLD CHANG FOR PROFITS

DOLLS FROM MANY COUNTRIES

MAXIMUM PROFITS WITH MULTI-PURPOSE RADIO LIGHT

MAXIMUM PROFITS WITH MULTI-PURPOSE RADIO LIGHT

KING TUT PAPYRUS SCROLL

Start fast in your own profitable HOME IMPORT/EXPORT MAIL ORDER BUSINESS

MEN & WOMEN—Welcome to your exciting, high-income, full or part time future in Import/Export/Mail Order! Follow the Mellinger Plan and it guides you every step. Nothing has been left to chance. Factually followed step is based 100% upon many years of successful experience. Your Import/Export/Mail Order business is handled in a person, family or retirement operation. Age, location, past experience doesn't matter! Unlike most new enterprises, you will almost no overhead... and with tiny capital. The Mellinger Plan offers this exceptional opportunity to you... now!

Start with choice of 24,221 fantastic import bargains!

BUY BELOW WHOLESALE

Always deal direct—keep ALL profits!

MELLINGER PRODUCT SCOUTS across the world open doors to hundreds of carefully screened foreign suppliers. Members of International Traders (Membership is free when you follow the Mellinger Plan) immediately have access to over 20,000 of today's most startling import values. The Mellinger Plan guides you in marketing your import selections by Mail Order as well as many other ways for quick, easy profit! Deal in one import or many. Even buy one at a time. You always buy below wholesale. You always deal direct—cutting out all middlemen... so you keep all profits!

Start without product investment!

The Mellinger family developed and refined a unique, step-by-step plan to guide you by today's international business. Members ideal for the new import business. The Mellinger Plan shows exactly how to start in the very day you receive the Mellinger Plan Order form. Ship suppliers are selected and shipped.

Complaint

123 F.T.C.

EXHIBIT D



Priceless Mellinger worldwide supplier contacts help you CASH IN FAST!

Most men and women enjoying greatest success in World Trade Mail Order... are those offering new products FIRST! A valuable benefit of the Mellinger Plan is exclusive worldwide organization immediately puts you in direct touch with leading innovative suppliers abroad ready to do business with you!

Mellinger Executives and Scouts travel widely, visiting suppliers, factories and handicraft centers... negotiating best below-wholesale prices! T.T. Members get news of product discoveries quickly! You turn over the job of product searching to the expert!

Membership starts you at once with free import samples plus everything needed to turn your samples into profitable orders. Next, you get exclusive Trade Agreements with top overseas suppliers, offering hundreds of fast-moving imports you can deal in right away.

You receive Trade Opportunities magazine (published bi-monthly)... available only to T.T. Members. Each issue reveals brand-new product discoveries. You contact suppliers timely! Every penny of profit is yours to keep!

Fantastic bargains to be turned at once into big profit! Via its paid consultant weekly tips and day intervention! T.T. Members have almost unlimited sources of dazzling new imports.

Take up this remarkable opportunity to become successful with the only... **World Trade Mail Order!**

The Woman's Role

In World Trade/Mail Order

Import/Export offers success and profit to anyone with ambition and ability to make good. Women have a very special "dash sense" about choosing products to offer by Mail Order and other ways we show you... especially imports needing the "feminine touch." Husband/wife teams have created many highly successful businesses.

Enjoy all the benefits of being your own boss in your own part-time or full-time home business

START WITH CHOICE OF 24,221 TODAY'S HOTTEST NEW PRODUCTS!
Hundreds more discovered every month!

PROFITS... SECURITY... INDEPENDENCE! How often have you talked about getting into your own business? How think seriously about your opportunity to start... quickly... in your own home Import/Export/Mail Order business.

No employees to hire or pay. Little or no investment in products. Even keep your present job income while operating in spare hours. No store or warehouse to rent. For your fastest possible start, The Mellinger Plan reveals how to handle orders without pulling up a penny of your own money. Everything you will do is based 100% on positive, proved demand! "Strong" Our founder started with almost nothing, and he did it "on his own!" He drew on experience of this success. His resources. His hard-earned methods are yours to follow in The Mellinger Plan! You can start in the garage or at the kitchen table. Our family did! Avoid usual mistakes. "Dealing DIRECT" means you keep all the profits. More... to save and work with! Carefully America, Asia, Australia and many other lands... prefer to do business with International Traders Members. We find the imports. You pick them. The Mellinger Plan shows how to sell by mail and every other way. You can't get rich working for someone else. You CAN make it big being your own boss in your own business as so many T.T. Members have proved!

Your Bi-monthly Trade Opportunities magazine brings contacts with hundreds of suppliers. Many can be sources for personal use. Save on orders of watches, cameras, furniture, tools, electronics, etc. Always save the International Traders way!

- Products like these you buy DIRECT:**
- | | |
|-------------------|----------------|
| COMPUTERS | DIAMONDS |
| SECURITY PRODUCTS | BEER STEINS |
| AUTO ACCESSORIES | DINNERWARE |
| CHRISTMAS GIFTS | GERMAN CLOCKS |
| COSMETICS | TELESCOPES |
| CUTLERY SETS | FISHING RODS |
| ELECTRONIC GAMES | SPINNING REELS |
| ATHLETIC GEAR | WATCHES |
| CERAMICS | RADIOS |

Turn Import Values Like These Into Immediate Big Profits!

TRAVEL OPPORTUNITY

Go abroad! If you (that Travel) to local products... Plan to deduct travel expenses. Com-... to include business with... bine business with... Member... South America... The... and... contact... welcome... advice... services... for... cases... IRs can be... for... cases... regarding... information... They provide... information...

1108

Complaint

EXHIBIT D

Take a tour of the vast



WORLD HEADQUARTERS

Your guide: famed motion picture/TV star and I.T. Member Richard Anderson



Personal help and service you can't find anywhere else.

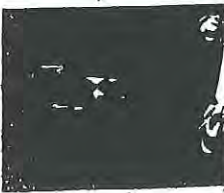


You are never alone

When you follow the Melling Plan
The Melling Team is ready to help you make money!
We are some of the key International Traders staff...
...dedicated to helping ambitious men and women
get a fast start to World Trade/Mail Order profits. Experts
in all aspects of World Trade/Mail Order work for your
success. Discover what this team can do for you...
send for the complete Melling Plan to examine seven
full days in your own home!



HAL TAYLOR
Vice President/COO
As Melling Comp-
troller, he brings
many years of finan-
cial experience that
can assist in bring-
ing capital for your
business.



A. J. MELLINGER III
President, Melling Co.
Drawing upon wide foreign travel
and four generations of Melling
family accomplishment, he brings
expert guidance you can turn at once
into profit. He contributes personally
to Trade Opportunities magazine.



LISA M. GARCIA
Advertising Manager
Her advice guides
you in advertising
the most profitable
Mail Order
sales and profits.
Lisa is always ready
with answers.



CHRIS HARDENBROOK
Import Manager
Supervises vast corps of Melling
Global Product Sources. One of the
world's most trusted names in ex-
ports on Import Product Sources.



LAURA SELIGSON
World Trade
Consultant
Ask Laura, and
know you are get-
ting the most accu-
rate answers to your
questions. You may
contact her by phone
or call for an ap-
pointment.



PHIL COLLINS
World Trade
Consultant
Whether you need
advice on just start-
ing out, or have a
question in one per-
ticular area, Phil has
your answer. You
may call or write
any time.



ALBERTA KURGAN
Import Assistant
Her background in
World Trade helps
you create vital
contacts with im-
portant overseas
suppliers. Seek her
advice on any World
Trade topic.



KRISTIN LARSON
Office Manager
Mrs. Larson's men-
tal skills keep
The Melling Co.
operating at top ef-
ficiency. She will
direct your call to
the appropriate
I.T. Headquarters.



JOHN MORJAN
Mail Order
Publications
Benefit from his
wide contacts with
important publishers.
Learn from him
when, where, how
to place your mail
Order ads for most
profitable results.



JOHN D'AMICO
Sales Director
John manages all
marketing and sales
activities for peak
results. He passes
his expertise on to
you by closely
working with I.T.
Consultants.

EXHIBIT D

COMPARISON PROVES

MELLINGER WORLD TRADE/MAIL ORDER BUSINESS PLAN Gives you everything you need for quick start to profits...

The Mellinger Plan comes from four highly successful generations of one family - a name instantly associated with World Trade and Mail Order. When you look at the facts, when you ask questions... you discover quickly why so many ambitious men and women succeed by following the Mellinger Plan. Compare... then decide.

ASK THESE QUESTIONS—INSIST UPON ANSWERS—THEN DECIDE

QUESTIONS	ANSWERS	ANSWERS	ANSWERS	ANSWERS
Can you start with at least 25,000 products?	No	No	No	No
Can you choose from 100's of new products every other month?	No	No	No	No
Will you have paid sources product expertise?	No	No	No	No
Will you have full-time consultants at every step?	No	No	No	No
Will you be invited to personal World Trade and Mail Order Seminars?	No	No	No	No
Will you be invited to an annual Trade Show (open each year... like popularity with suppliers)?	No	No	No	No
Will your name be given to leading international suppliers, opening doors to exclusive offers?	No	No	No	No
Will you get selling materials at products, all copy, prices, sales strategy?	No	No	No	No
Will you get free Membership in International Trade's exclusive organization?	No	No	No	No
Will you get actual sample reports for full facts?	No	No	No	No
Can you order supplies at special low rates? (International, Trade, overseas, direct?)	No	No	No	No
Can you get FREE Mail Order call in national telephone numbers in countries?	No	No	No	No
Will you get a private 24-hour toll-free telephone number?	No	No	No	No
Will you get to talk to and directly select your products and price levels?	No	No	No	No
Will you be able to buy personal products at special, once prices?	No	No	No	No
Can you start without investment in products?	No	No	No	No

EXPORTS BOOMING! Get your...

Dramatic world changes open amazing opportunities for Exporters. From flower seeds to bulldozers... from a few dollars to millions! The Mellinger Plan shows how to realize these opportunities and manufacturers of products needed in other countries. We tell you what products are needed... why these items... from Exporters... could be produced.

The MELLINGER

WORLD TRADE MAIL ORDER BUSINESS PLAN

Your very first day

Start Importing—Start Making Money

A Complete Business Plan—How it Works for You...

The day you open the Mellinger World Trade/Mail Order Plan, you can make your first import transaction. Do it within 10 minutes! That's a fact! Instantly, you get the feel of this exciting business. You get everything needed to make money fast, including free Membership in International Traders. At once, you are in direct contact with suppliers all over the world! We show you how to get high-profit orders by mail, from stores and individuals, at swap meets... many ways to make money. THE MELLINGER PLAN is a complete business plan you put to work from the day the mail carrier delivers it!

Personal Step-by-Step guidance

It's like having experienced friends at your side! You have a question about suppliers, products, advertising, pricing, shipping... anything about your business... just pick up the phone. A skilled counselor is ready to help. Also you will be invited to personal, free, Conducted Mellinger Seminars near your home for individual guidance!

FREE Specialty Merchandise Catalogs

As your business grows, you may want to expand your lines. One way to profit with products offered by local merchandise jobbers, International Traders Members get sources for merchandise catalogs... free. You will deal directly with these sources without paying a fee for the privilege of buying wholesale.

Sources for U.S. Manufacturers

As a Member of International Traders, you may contact domestic manufacturers for products in which you can deal. Products like cosmetics, vitamins, clothing, tools, auto and garden supplies... and in many millions of dollars annually in Mail Order. Cash in on this bonanza with Mellinger contacts.

We show you how to set up shop without paying rent or employees... how you can use the very same Plan that developed Mellinger World Trade/Mail Order business bringing in many millions of dollars!

EXHIBIT D

need to know to Start Fast for Big Profits
day you join INTERNATIONAL TRADERS

PLUS...all these additional Mellinger aids for a quick, easy start in your business!

Profitable Marketing of Imports

Profitable Marketing of Imports
Plan gives guidance for doing profitable business by Mail Order and many other ways to turn imports into big money. Direct Selling, Swap Meets, Party Plan, Cart Merchandising and Fund Raising are just some of the ways you can boost your earnings.

11-Piece World Trade Visualizer Kit
Complete set of forms used in World Trade

Complete set of forms used in World Trade Includes Quotation and Foreign Order Forms, Bill of Lading, Certificate of Origin, Export Declaration, Consular Invoice, common U.S. and Canadian Duties. Easy to understand as you see them.

World Trade Membership Certificate

World Trade Membership Certificate
As you join International Traders, you receive a beautiful Certificate certifying your entrance into World Trade/Mail Order. Frame and hang it on your wall... an impressive symbol of your career. Display your Certificate proudly to all who visit your business.

Big Portfolio of Business Forms

Big Portfolio of Business Forms
Carrying on your business with foreign suppliers and customers, you will need printed forms . . . letterheads, envelopes, invoices and purchase forms. A large sample assortment is included with I.T. Membership. You may order supplies at big discount.

How to Start in World Trade

How to start in World Trade
The basics you need to locate customers, how to handle inquiries, how to price products, all about documents needed, hundreds of other subjects. A vital reference that guides you step-by-step as you start in World Trade/Mail Order.

Membership in International Traders

Free Membership arranged. The I.T. Seal on your business cards and stationery identifies you as a Member of this global organization. Opens doors to opportunities tightly closed to outsiders. Entitles you to privileges you could never enjoy any other way.

Invitation to Trade Show/Convention

Each year, the giant Melling Trade Show/Convention in Las Vegas is host to suppliers and I.T. Members from all over the world. You will be invited. Meet famous suppliers in person... see and deal in over 10,000 newest products... hear famous Mail Order/World Trade personalities.

How to Export for Big Profits

Plan shows how export sales are made to buyers abroad...also how to contact manufacturers of products needed in other countries. All profit. No investment. You are continually advised what products are in demand for export with names and addresses.

**Your Personal I. T. Member Subscription
to TRADE OPPORTUNITIES Magazine**

Every other month as an International Traders Member, you receive your own personal copy of your official magazine. Features trade leads for hundreds of new import products, helpful articles by Mellinger World Trade/Mail Order experts and names and addresses of overseas firms seeking export products. *Trade Opportunities* magazine is available only to I.T. Members for their exclusive benefit and profit.



Everything you
—all this is yours the



Many Imports we discover are available to you in small quantities—even one at a time. You can start by ordering samples, or just a few Imports. As the money rolls in, you can expand, ordering larger quantities at even lower, direct, below-wholesale prices. Compare your Import bargains with department store prices. Think of the giant markup! You can start your small business at home, supplying stores, friends and others seeking exciting new products but don't know where to find them!

FREE SAMPLE IMPORTS

with I.T. Membership. Show and start making orders the day they arrive!

These actual sample imports are a Mellinger Plan PLUS. We send them to you for one important reason...to give you an instant start to profit. Show your samples and take orders right away. Let people see these unusual imports from faraway places...get their reaction of delight and wonder! With each import comes full supplier ordering directions which help you introduce other imports in the high-profit lines from which they are selected. These imports give you a quick start in your newly established World Trade/Mail Order business.



6 Valuable Exclusive Trade Agreements

You don't have to invest a penny in merchandise

On day you put International Trailers, you receive a complete Trade Agreement for thousands of companies from major consumer suppliers in leading cost-to-trade centers. Every detail is revealed. So complete are these Agreements, you should immediately be ready to make profitable sales. Get information for drop-ship costs on single imports as well as quantity prices for the entire line. Exact "drop-ship" selling tips are included.

Personal Consultation and Guidance

One of the important services included with the Challenger Plan is the privilege of consulting with our most expert advisors on your business progress. Our staff of skilled specialists is ready to help you. Call on us for individual guidance in importing, exporting, advertising, sales, record keeping, Mail Order, and many related topics. This service alone may be worth many times the cost of your Plan.

You are invited
TO MR. MELLINGER'S
PERSONAL SEMINARS
NEAR YOUR HOME



Your business goals and needs are what we'll be talking about. We meet informally near your home. We get to know each other right away like a family gathering. We sit down together and we answer and discuss your questions. You get advance news of hot new imports and how to sell them. Only I.T. Members are invited to attend. Plan to join us!

EXHIBIT D



MR. MELLINGER ANSWERS YOUR QUESTIONS



These are questions most often asked when I meet with International Trade Members at my Seminars. Perhaps you have questions like these. I believe my answers will help you...

Breinard L. Mellinger III
President/CEO
The Mellinger Co.
Chairman, International Traders



Q: You say I can start immediately. How?

A: The day you receive the Mellinger Plan, you get exact, easily followed instructions for making your first import transaction. You could be making your first supplier contact within 10 minutes.

Q: How soon can I start making money?

A: The minute you become a Member of the Mellinger Plan, you can start making money. With these, easy-to-follow supplier introductions I include, you can start taking profitable orders at once. You can operate on my Drop Ship Plan. You can collect your profit even before paying for products.

Q: How do I hear about new products?

A: Every other month, you receive Trade Opportunities (exclusive) for I.T. Members... plus money-making ideas, ideas and support needs.

Q: Do I need previous experience?

A: Not at all! The Mellinger Plan is a complete home business plan. Follow it and you have everything you need to start and operate your business. Successful I.T. Members come from all walks of life... all ages... all kinds of backgrounds. The only thing you need to make money is what's really important!

Q: Does Mellinger import and export?

A: Indeed! Our warehouse receives almost daily shipments from abroad, filling orders for contacts who have depended upon us for decades. Our World Trade facilities place us in an enviable position to inform I.T. Members about what's really going on.

Q: Is my I.T. Membership renewable?

A: Yes, you can renew your Membership. We have many Members with I.T. service records of 25 years or more.

Q: Do I need a lot of capital to start?

A: Probably no other business can be started with less capital... and pay off so big! Following the Mellinger Plan, you can start with no investment in products. Later, as you grow bigger, you can stock your products for quick delivery.

Q: Can I start without quitting my job?

A: Yes, most newcomers start at home in spare hours. Keep present income while building your World Trade/Mail Order business. Consider going full-time only when you are ready.

Q: What if I have questions?

A: It's unlikely because The Plan is so up-to-date and revised constantly. But, if a question does come up, the Mellinger Co. (don't call it in person) will promptly answer your question by phone or in person.

Q: Do you check suppliers personally?

A: Mellinger Executives and Product Scout visit suppliers and factories in overseas trade centers. We spend large amounts of money to make sure you see a product offered in Trade Opportunities... so you can be sure the supplier has been carefully checked first!

Q: Can I deduct foreign travel from my taxes?

A: As an active I.T. Member, you are in business. The tax laws permit deduction of business-related travel for the purpose of meeting and dealing with overseas suppliers... or any business. Remember, you do not have to export unless you want to. The Mellinger Plan does the hard work of product searching for you.

Q: What are the opportunities for women?

A: Exactly the same as for men! I.T. Membership includes a large proportion of women and husband-wife teams working full-time and full-time income!

Now—let us send you this 5-Volume World Trade/Mail Order Plan

Examine the Plan 7 Full Days Before You Decide

In these pages, you have read many facts about exciting opportunities for starting your own Import/Export/Mail Order business from home. You have read about successful men and women who profit from import and full-time following the Mellinger Plan. You've seen how we help you get started... how we invite you to join International Traders for exclusive direct-below-wholesale import offers. But we do not ask you to make a decision on this information alone. See

The Plan for yourself... read it... discover how complete and easy it is to follow. We invite you to send for the Mellinger World Trade/Mail Order Plan (all 5 volumes) to examine for 7 full days in the quiet of your home. Then... and only then... decide if this is the opportunity for profits, security and personal success you have always looked for. We know from generations of experience we can help you with fortune in your own business. But it is up to you who must decide!

Seeing is believing... and understanding! That's why we will send you the Mellinger Plan on a 7-day examination. Examine The Plan... find out what it can do for you!

Here is just a partial list of subjects and guidance you'll discover in the Mellinger Plan. We invite you to inspect the complete Plan... see everything for yourself!

- WELCOME TO WORLD TRADE/MAIL ORDER
- TURNING IMPORTS INTO PROFIT
- HOW TO IMPORT BY DEALING DIRECT
- STARTING AN IMPORT MAIL ORDER BUSINESS
- HOW TO MAKE UP LOW-COST MAIL ORDER ADS
- HOW, WHEN, WHERE TO RUN MAIL ORDER ADS
- HOW TO SELL BY DIRECT MAIL
- SELLING IMPORTS THROUGH DIRECT SALES REPRESENTATIVES
- WHEN PROVERBIAL WANTS TO MARKET IMPORTS
- HOW TO START WITHOUT PRODUCT INVESTMENT
- HOW TO SECURE AN EXPORT AGENT
- EASY BUSINESS: AN EXPORT RECEIPT
- WORLD TRADE CONFIRMATION PROCEDURE
- HOW TO HANDLE MAIL ORDER
- HOW TO GET PROFESSIONAL AD HELP FREE
- FREE ADVERTISING IN NATIONAL PUBLICATIONS
- MEETING WITH SUPPLIERS FROM OVERSEAS
- HOW TO PRICE IMPORTS FOR TOP PROFITS
- COMPLETE WORLD TRADE REFERENCE SECTION



Mail 7-Day
Home Inspection
Request... NOW

Complaint

123 F.T.C.

EXHIBIT D



Follow The Mellinger Plan to World Trade/Mail Order Profits

We are ready now to help you get your fast start in your own profitable business.

THIS IS YOUR DAY OF DECISION

There comes a time when success hinges on a decision... a change in life's direction. Perhaps you are at that turning point now...

How often have you heard people say—"If only I had gone into real estate before prices started shooting up." Or "If I had only known how well this or that would sell... I could have made a fortune." Usually decisions like that call for risk and big investment that may not turn out at all. I am ready to remove the risk from your decision today. It's like having your cake and eating it, too.

Your decision... today... to enter the world of World Trade/Mail Order is ONLY TO LOOK AT THE MELLINGER PLAN. I do not want you to obligate yourself in any way whatsoever. Just look and consider. This could be your opportunity to look back in years to come and

say, "I got my start the right way... struck it rich... not only in money, but in all the good things of life!"

You will be taking your first all-important step by filling out and mailing the enclosed Home Inspection Request. In return, I will send the Mellinger World Trade/Mail Order Business Plan to inspect and discuss for seven full days.

We take the risk... you have a whole world of opportunity to gain. All that stands between you and an active role in this great and exciting business... is your decision to look at the Mellinger Plan. Make that decision today. Mail your Home Inspection Request now!

W. Mellinger

Start small at home... as others did...
move ahead when you are ready



MAIL HOME INSPECTION REQUEST NOW ... IMMEDIATE ATTENTION ASSURED Only Mellinger gives you this MONEY-BACK AGREEMENT

It's only fair and right! Purchase of a product or service should come with an agreement to refund your money if you are not satisfied. The Mellinger Co. does this without question... for a very important reason. We want you to be sure you are not only pleased with the Mellinger Plan but that you know you can be a success. Read the Money-Back Guarantee. It is offered for your protection.

THE MELLINGER CO.
6100 Varrel Avenue, Woodland Hills, CA 91367-3779 U.S.A.

POSITIVE MONEY-BACK GUARANTEE

Order your Mellinger World Trade/Mail Order Plan with the understanding that you can examine it in your home for 7 days after it has been delivered. If, within that time, for any reason—that you do not wish to keep The Plan, simply mail it back to us by insured parcel post and we will refund your inspection deposit in full.

The Mellinger Co.

DECISION AND ORDER

The Federal Trade Commission having initiated an investigation of certain acts and practices of the respondents named in the caption hereof, and the respondents having been furnished thereafter with a copy of a draft complaint that the Bureau of Consumer Protection proposed to present to the Commission for its consideration and that, if issued by the Commission, would charge the respondents with violation of the Federal Trade Commission Act, 15 U.S.C. 45 *et seq.*; 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 aforesaid draft of complaint, a statement that the signing of said agreement is for settlement purposes only and does not constitute an admission by respondents that the law has been violated as alleged in such complaint, and waivers and other provisions as required by the Commission's Rules; and

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

1. Respondent 1554 Corporation is a California corporation, with its office and principal place of business located at 6100 Variel Ave., Woodland Hills, CA. Respondent 1554 Corporation has traded and done business as The Mellinger Company. Respondent Brainerd L. Mellinger, III, is president of the corporate respondent. Individually, or in concert with others, he formulates, directs and controls the acts and practices of the corporate respondent, including the acts and practices alleged in the draft complaint. His principal office or place of business is the same as that of the corporate respondent.

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

Decision and Order

123 F.T.C.

ORDER

DEFINITIONS

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

1. "*Mellinger Plan*" shall mean the Mellinger World Trade Mail Order Plan.

2. "*Business opportunity*" shall mean an activity engaged in for the purpose of making a profit.

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

I.

It is ordered, That respondents 1554 Corporation, a corporation, its successors and assigns, and its officers, and Brainerd L. Mellinger, III, individually and as an officer of said corporation, and respondents' agents, representatives and employees, directly or through any corporation, subsidiary, division or other device, in connection with the advertising, offering for sale, sale or distribution of the Mellinger Plan, or any other product or service concerning business opportunities, in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, do forthwith cease and desist from making any representation, in any manner, directly or by implication:

A. That consumers who use such product or service typically succeed in readily starting and operating profitable businesses;

B. That consumers who use such product or service typically earn substantial income; or

C. Otherwise concerning the performance, benefits, efficacy or success rate of any such product or service,

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

II.

It is further ordered, That respondents 1554 Corporation, a corporation, its successors and assigns, and its officers, and Brainerd L. Mellinger, III, individually and as an officer of said corporation, and respondents' agents, representatives and employees, directly or through any corporation, subsidiary, division or other device, in connection with the advertising, offering for sale, sale or distribution of any product or service, in or affecting commerce, as "commerce" is defined in the Federal Trade Commission Act, do forthwith cease and desist from:

A. Using, publishing, or referring to any endorsement (as "endorsement" is defined in Section 255(b), Part 255, Title 16, Code of Federal Regulations) unless respondents have good reason to believe that at the time of such use, publication, or reference, the endorsement reflects the honest opinions, findings, beliefs, or experience of the endorser and contains no express or implied representations which would be deceptive or unsubstantiated if made directly by the respondents; or

B. Representing, directly or by implication, that any endorsement of the product or service represents the typical or ordinary experience of members of the public who use the product or service unless such representation is true and unless, at the time of making the representation, respondents possess and rely upon competent and reliable evidence, which when appropriate must be competent and reliable scientific evidence, that substantiates such representation. Provided, however, respondents may use such endorsements if the statements or depictions that comprise the endorsements are true and accurate, and if respondents disclose clearly, prominently, and in close proximity to the endorsement:

1. What the generally expected performance would be in the depicted circumstances; or

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

III.

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

1. All advertisements and promotional materials setting forth any representation covered by this order;
2. All materials that were relied upon to substantiate any representation covered by this order; and
3. All test reports, studies, surveys, demonstrations or other evidence in their possession or control, or of which they have knowledge, that contradict, qualify, or call into question such representation or the basis upon which respondents relied for such representation, including complaints from consumers or governmental entities.

IV.

It is further ordered, That:

A. Respondent 1554 Corporation shall notify the Federal Trade Commission at least thirty (30) days prior to any proposed change in the corporation such as dissolution, assignment, or sale resulting in the emergence of a successor corporation, the creation or dissolution of subsidiaries or any other change in the corporation which may affect compliance obligations arising under this order; and

B. Respondent Brainerd L. Mellinger, III, shall, for a period of three (3) years from the date of service of this order, promptly notify the Commission of the discontinuance of his present business or employment, or his affiliation with a new business or employment, with each such notice to include his 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 the respondent's duties and responsibilities in connection with the business or employment.

V.

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

VI.

It is further ordered, That this order will terminate on April 14, 2017, or twenty years from the most recent date that the United States or the Federal Trade Commission files a complaint (with or without an accompanying consent decree) in federal court alleging any violation of the order, whichever comes later; provided, however, that the filing of such a complaint will not affect the duration of:

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

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

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

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

VII.

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

Complaint

123 F.T.C.

IN THE MATTER OF

HERB GORDON AUTO WORLD, INC., ET AL.

CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATION OF SEC. 5 OF THE FEDERAL TRADE COMMISSION ACT, THE TRUTH IN LENDING ACT, REGULATION Z, THE CONSUMER LEASING ACT AND REGULATION M

Docket C-3734. Complaint, April 15, 1997--Decision, April 15, 1997

This consent order prohibits, among other things, the Maryland company and its seven dealerships from obscuring important cost information in fine or unreadable print, from advertising financed purchase or leasing terms that are not available to consumers, and from misrepresenting the terms of financing or leasing any vehicle, the existence of the amount of any balloon payment, or the existence, number or amount of payments for financed purchases. The consent order requires the respondents to make all the disclosures required by the Truth in Lending Act, Regulation Z, Consumer Leasing Act, and Regulation M, and to ensure that the disclosures are noticeable, readable, and comprehensible to an ordinary customer.

Appearances

For the Commission: *Carole L. Reynolds.*

For the respondents: *Charles M. English, Jr., Ober, Kaler, Grimes & Shriver, Washington, D.C.*

COMPLAINT

The Federal Trade Commission, having reason to believe that Herb Gordon Auto World, Inc. dba Herb Gordon Auto World, Herb Gordon Dodge, Herb Gordon Mercedes-Benz, Herb Gordon Nissan, Herb Gordon Oldsmobile, Herb Gordon Volvo, and Herb Gordon Used Cars, a corporation, ("respondent") has violated the Truth in Lending Act ("TILA"), 15 U.S.C. 1601-1667, as amended, and its implementing Regulation Z, 12 CFR 226, as amended, the Consumer Leasing Act ("CLA"), 15 U.S.C. 1667-1667e, as amended, and its implementing Regulation M, 12 CFR 213, as amended, and the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. 45-58, as amended, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, hereby issues this complaint and alleges:

PARAGRAPH 1. Herb Gordon Auto World, Inc. dba Herb Gordon Auto World, Herb Gordon Dodge, Herb Gordon Mercedes-Benz, Herb Gordon Nissan, Herb Gordon Oldsmobile, Herb Gordon