

## Complaint

## IN THE MATTER OF

**HOLLY A. BACON,  
d/B/A CLEANSING TIME PRO**CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATIONS  
OF SEC. 5 OF THE FEDERAL TRADE COMMISSION ACT*Docket No. C-4238; File No. 082 3119**Complaint, October 22, 2008 – Decision, October 22, 2008*

This consent order relates to claims made by Holly A. Bacon, doing business as Cleansing Time Pro, that Cleansing Time Pro Black Salve & Tablets were effective to treat, prevent, or cure numerous forms of cancer and various viral infections. The order requires the respondent to have competent and reliable scientific evidence substantiating any claim that Cleansing Time Pro Black Salve & Tablets, or any other covered product or service, is effective in the prevention, treatment, or cure of cancer, hepatitis, HIV, SARS, West Nile Virus, or Avian Bird Flu. The order requires that any future claim about the absolute or comparative benefits, performance, efficacy, safety or side effects of any covered product or service be truthful and supported by competent and reliable scientific evidence. The order also addresses the charge of deceptive endorsement by requiring that respondent disclose any material connection between an endorser and respondent, if such a connection exists. The order does not prohibit the respondent from making representations for any drug that are permitted by the Food and Drug Administration. The order requires the respondent to compile a list of all consumers who purchased Cleansing Time Pro Black Salve & Tablets since July 1, 2005, and to mail a letter to each purchaser describing the scientific evidence related to these products. The respondent is prohibited from providing any identifying information about her purchasers to anyone other than the Commission, another law enforcement agency, or as required by law. Additional provisions require the respondent to keep copies of relevant advertisements and materials that substantiate claims made in the advertisements; to provide copies of the order to certain of her employees; to notify the Commission of her affiliation with any new health-related business or employment; and to file compliance reports with the Commission.

*Participants*

For the *Commission*: *Kenneth Abbe and Matthew D. Gold.*

## Complaint

For the *Respondent*: Marie C. Mirch, Mirch & Mirch.

**COMPLAINT**

The Federal Trade Commission, having reason to believe that Holly A. Bacon, doing business as Cleansing Time Pro (“respondent”), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent is the sole proprietor of Cleansing Time Pro, a Nevada company with its principal office or place of business at 9732 State Rt. 445, #114, Sparks, Nevada 89436.

2. Respondent has advertised, labeled, offered for sale, sold, and distributed herbal products to the public, including Cleansing Time Pro Black Salve & Tablets. Respondent offers these products through her website, [www.cleansingtimepro.com](http://www.cleansingtimepro.com). Cleansing Time Pro Black Salve & Tablets are “foods” and/or “drugs” within the meaning of Sections 12 and 15 of the Federal Trade Commission Act.

3. According to respondent’s promotional materials, Cleansing Time Pro Black Salve & Tablets contain “blood root, galangal & zinc chloride in a base of blended synergistic herbs (+ calcium in the tablets).” Cleansing Time Pro Black Salve is an ointment that respondent recommends for external use. Alternatively, respondent recommends that consumers take the product internally by purchasing Black Salve Tablets or by placing an amount of the Black Salve ointment into a gelatin capsule.

4. Respondent promotes her Cleansing Time Pro Black Salve Tablets and Gelatin Capsules as an internal treatment or cure for many kinds of cancer including stomach, colon, prostate, testicular, bladder, throat, thyroid, mouth, cervical, uterine,

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ovarian, pancreatic, breast, lung, liver, kidney, brain, and bone cancers, as well as lymphoma. Respondent also promotes these products as an internal treatment for various viral infections, including hepatitis, HIV, SARS, West Nile Virus, and Avian Bird Flu. Respondent promotes her Cleansing Time Pro Black Salve as an external treatment for carcinoma, melanoma, and other skin cancers. Excluding shipping and handling fees, respondent charges \$49.95 for a one-ounce jar of Cleansing Time Pro Black Salve, and \$34.95 for a 15-day supply of Cleansing Time Pro Black Salve Tablets (60 tablets).

5. The acts and practices of respondent alleged in this complaint have been in or affecting commerce, as “commerce” is defined in Section 4 of the Federal Trade Commission Act.

6. Respondent has disseminated or caused to be disseminated advertisements for Cleansing Time Pro Black Salve & Tablets, including but not necessarily limited to the attached Exhibits A and B. These advertisements contain the following statements:

Internet Advertising (respondent’s website, [www.cleansingtimepro.com](http://www.cleansingtimepro.com))

A. “Cleansing Time Pro

CANCER, VIRUS & HEART DISEASE PRODUCTS  
NATURAL - EASY TO USE  
USE IN THE COMFORT OF YOUR OWN HOME  
NO HEALTH INSURANCE REQUIRED

We have many testimonials to support our products from people who have used them to avoid major operations, radiation, chemotherapy & other drugs! We invite you to read this entire page & click on the buttons to the left to learn more about these wonderful products.

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Cleansing Time<sub>TM</sub> Pro Black Salve & Tablets:

All natural herbal cancer & virus treatment & preventative that is **the** 'ORIGINAL FORMULA' and is the **Grandfather** of black salve used for over 116 years! This product has been used successfully on humans, pets & animals to prevent cancer, treat & overcome a wide range of internal & external cancers, viruses and other illnesses. It starts working in 5 seconds!

Known Uses for Cleansing Time<sub>TM</sub> Pro Black Salve & Tablets

- Used in place of radiation therapy treatments & chemotherapy treatments
- Used to attack all known forms of cancer in & on the human & animal
- Used to eliminate fluid build up around tumors & shrink [sic] them
- Used to normalize atypical cells with the capability of becoming a cancer
- Used **internally** to treat & overcome a variety of cancers, malignancies & tumors. Used for stomach cancer, colon cancer, prostate cancer, testicular cancer, bladder cancer, throat cancer, thyroid cancer, mouth cancer, cervical cancer, uterine cancer, ovarian cancer, pancreatic cancer, breast cancer, lung cancer, liver cancer, kidney cancer, brain cancer & brain tumors, lymphoma, blood diseases, bone cancer & all types of viruses
- Used **externally** as a skin cancer treatment, treating carcinoma, melanoma, warts, moles & as a drawing salve
- People with in-operable cancers sent home to die have used black salve with astonishing results

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- ...
- Used to treat all types of hepatitis viruses, HIV, SARS & West Nile Virus
- ...

**Testimonials and classic examples:**

Unfortunately there is not enough room on this site to cover all the testimonials from people who have used these products to treat minor conditions to very serious conditions by both humans and their pets & animals. You are always welcome to use the products first hand to discern their value and/or pass the information along to those who may benefit.

I had lymphoma B cancer & used this herbal **Black Salve** internally & **Black Salve Tablets** instead of a doctors prescribed 68 radiation treatments with excellent results! I avoided all the unwanted long term side effects of radiation by using black salve. I have chosen to share my experience with others so that they may benefit from it as I have. My cancer is gone and as an added bonus I have a lot more energy. My oncologist told me near the middle of my black salve treatment I had 'the blood of a child' but he didn't know why. I had serious reservations about having radiation because of all I've heard & seen from people who have had it. After all these years of humans being subjected to radiation and all the testing they've done with it, people are still dying from it! In my opinion, black salve is the safest and most effective alternative to radiation. Holly B.

I have been plagued for 20 years with malignant basil cell carsinoma. [sic] My face & forehead have seven scars from the doctor's knife. Recently my daughter, who used black salve for her horse's melanoma, gave

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me a little dab of black salve. I used it on what I was sure was another malignant cancer. I made 1 application & about 10 days [sic] the tumor came off in the bandaid. There was a hole about 1/8 of an inch deep. It has now filled in & I don't believe there will be much of a scar, if any. I have the salve on another & hopefully the last, cancer & it's working just like the first. To me this is a miracle salve. Bill P., TX.

...

**About Cleansing Time Pro**

Cleansing Time Pro was established to meet the concerns and problems faced by cancer, virus, heart & vascular diseased victims who are seeking treatment for their conditions.

We began on the frontiers and over 116 years later are on the cutting edge of protecting people from such deadly diseases as the Bird Flu, SARS and the West Nile Virus worldwide! It was only months ago we first heard of these and they spread quickly to the U.S. It is common knowledge there is little that can be done once infected, according to health professionals. Medical facilities have even tried to hide the number of people infected! This is because they are not knowledgeable about and did not use our herbal treatment that is effective against viruses but instead relied on traditional medical paths. They soon discovered they were faced with full blown epidemics and most recently of SARS and the West Nile Virus. Cleansing Time Pro is all about revealing the facts. With Cleansing Time Pro's Black Salve Tablets, why not protect or treat yourself? It starts working within 5 seconds!

...

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While traditional medical paths have helped many they have also made many, many people sick. In contrast, Cleansing Time Pro is here to make people aware there is an alternative & there is something you can do right now even if you have no insurance! Our alternative treatment products have over 116 years of history behind them with many, many testimonials to prove their weight for treating & overcoming a long list of conditions unrelated & related to viruses & cancer in & on the human body as well as most pets & animals. Do you have heart or vascular problems? We have helped thousands with that too!

We believe our products are key to treatment of cancer, viruses, heart & vascular disease and prevention can be attained here in the U.S. as well as abroad.

...”

[Exhibit A, respondent’s website *www.cleansingtimepro.com*, as accessed on February 6, 2008]

Print Advertising (respondent’s Black Salve & Tablet Information & Instruction Package)

B. “**DIRECTIONS FOR HUMAN USE:**

...

**Black Salve - Used Externally** (Read carefully - starts working within 5 seconds)

Black Salve has been used to draw out all kinds of foreign material from the body such as glass, wood, shrapnel as well as cancer tumors and abnormal cells and tissue.

...

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The medical approach is successful in some peoples lives. However, some people who use Black Salve do not have medical operations, chemotherapy or radiation treatments with reported results. Some people have had all operations, chemotherapy and radiation either in whole or in part and have taken Black Salve with reported results. Some people with inoperable cancer/tumors have taken Black Salve with reported results. So it doesn't matter where you are in your treatment, just that you are doing something, because time is of the essence. Most people like the fact that Black Salve, a natural holistic folk remedy, can be taken in the comfort of their own home without insurance.

...

**IMPORTANT WARNING NOTES:**

...

Black salve can cause swelling. Because of this, people with brain tumors should not take black salve. However, if treating a brain tumor(s) with black salve you may need a qualified surgeon to insert a small hole(s) in the skull [sic] to relieve pressure. Do not think this is odd in any way. Many brain tumors are inoperable. However, a small hole is far superior to the sort of treatment one would receive from the full blown standard medical procedures.

...

**Known Uses For Cleansing time™ Pro Black Salve & Tablets:**

- Used in place of radiation therapy treatments & chemotherapy treatments
- Used to attack all known forms of cancer in & on the human & animal bodies

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- Used to eliminate fluid build up around tumors & shrink them
  - Used to normalize atypical cells with the capability of becoming a cancer
  - Used internally to prevent & treat a variety of cancers, malignancies & tumors such as in the stomach, colon, prostate, testicles, bladder, throat, thyroid, mouth, cervix, uterus, ovaries, pancreas, breasts, lungs, liver, kidney, skin, lymph nodes, extremities, blood, brain & bone & terminal cancer
  - Used internally to prevent & treat all types of viruses & virus infections such as colds, flu, strep throat, mouth & gum diseases, yeast infections, all types of herpes & hepatitis viruses, shingles and even things such as prevention & treatment of HIV, SARS, West Nile Virus & Avian Bird Flu
  - Used externally to treat skin cancer, carcinoma, melanoma, warts, moles & as a drawing salve
- ...
- Used to purify blood & induce oxygen into the system inhibiting carcinogen growth
- ...

**Ingredients & Formula:**

Blood root, galangal & zinc chloride in a base of blended synergistic herbs (+ calcium in the tablets). Extensive research into herbal and plant life properties has indicated substantial disease prevention and healing qualities in each as well as having a multiplying effect when combined together.

Cleansing Time Pro's products have a natural chemical which enhances an enzyme known to neutralize carcinogens prior to their stimulating tumor growth. This works directly on the immune system

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and, quite naturally, acts as a preventative in that capacity. Reference: National Academy of Science.

Several case histories have revealed that formulating the proper portions of various herbal, as well as mineral ingredients results in a wide variety of healing abilities. Improper portions of the ingredients will not result in a favorable outcome. Therefore, duplication of 'Original Formula' Cleansing Time Pro Black Salve should not & can not be achieved.

**History of Black Salve:**

In 1890 Tom McCreary was diagnosed as having incurable, cancerous tumors on his neck, by physicians. They refused to operate, not wanting to risk his jugular vein. Tom said he paid attention to a repeated dream that came to him about how to make a remedy to cure himself. He obtained the elements and herbs for the remedy from some gypsies traveling through Texas at the time. He mixed up a black salve and applied it to his tumors. In less than a month Tom was healed and went on to live another 70 years. Over his lifetime, he was a preacher, rancher, doctor, farmer and sheriff under Judge Parker. He lived with a strength that became legendary. Tom kept the formula for the black salve to himself except for sharing it with an old friend. After Tom's long life, his son Howard and grandson Mickey, sought out the old friend who taught them how to make the black salve. Howard McCreary, attempting to make the black salve available to everyone, started a company in the '60's. The company had some tests done in the early '70's at the University of Colorado to discover more about it. The Veterinarian College at Fort Collins tested it on all viruses known at the time. They discovered that it

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killed those known viruses on contact. They discovered that with one application, sarcoids on horses (similar to skin cancer) had an 80% cure. With two applications, they achieved 100% cure. For many years it had been used to cure cancer in cows, save herds of calves from early viral diseases and treat abnormal tissue growths in all kinds of pets. By word of mouth, ranchers, homesteaders and folks on the rodeo circuits used it on external cancers, tumors and growths on themselves. Some successfully treated gangrene and even leprosy, in situations far from towns and doctors. Tom's son, Howard McCreary, was the first to use it internally. He had been diagnosed as having stomach cancer in the '60's. After he checked himself in the hospital for surgery the night before, as they did in those days, he took the first dose in a capsule without telling his doctors. The next morning they postponed his surgery because he was running a fever which continued for several days. On the 5th day, Howard said he passed a large quantity of black, vile smelling feces - apparently the growth itself. When the doctors took x-rays, they discovered that the cancerous growth was gone. Howard went on to live another 25 years without recurring stomach cancer. . . ."

[Exhibit B, respondent's Black Salve & Tablet Information & Instruction Package]

**Deceptive Representations Regarding the  
Efficacy of Cleansing Time Pro Black Salve & Tablets**

7. Through the means described in Paragraph 6, respondent has represented, expressly or by implication, that Cleansing Time Pro Black Salve & Tablets:

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A. are effective in preventing, treating and/or curing all cancers, malignancies and tumors, including, but not limited to, stomach cancer, colon cancer, prostate cancer, testicular cancer, bladder cancer, throat cancer, thyroid cancer, mouth cancer, cervical cancer, uterine cancer, ovarian cancer, pancreatic cancer, breast cancer, lung cancer, liver cancer, kidney cancer, brain cancer and brain tumors, lymphoma, blood diseases, and bone cancer;

B. are effective in treating inoperable cancers;

C. are effective in treating skin cancer, including melanoma;

D. are effective in reducing the size of, or eliminating, cancerous tumors;

E. are safer and more effective in the treatment of cancer than are conventional cancer therapies, such as surgery, radiation, chemotherapy, and other drug treatments; and

F. are effective in preventing, treating, and/or curing numerous viral infections, including hepatitis, HIV, SARS, West Nile Virus, and Avian Bird Flu.

8. Through the means described in Paragraph 6, respondent has represented, expressly or by implication, that she possessed and relied upon a reasonable basis that substantiated the representations set forth in Paragraph 7, at the time the representations were made.

9. In truth and in fact, respondent did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 7, at the time the representations were made. Therefore, the representation set forth in Paragraph 8 was, and is, false or misleading.

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**Deceptive Representation Regarding  
Endorser of Cleansing Time Pro Black Salve & Tablets**

10. Through the means described in Paragraph 6, respondent has disseminated testimonials for Cleansing Time Pro Black Salve & Tablets from consumers who purportedly were treated or cured of cancer in the ordinary course of using the product. Respondent has failed to disclose adequately that one of the endorsers had a material connection with Cleansing Time Pro. Specifically, at the time of providing her endorsement, one of the consumers was Holly A. Bacon, the sole owner of Cleansing Time Pro. This fact would materially affect the weight and credibility given by consumers to the endorsement and would be material to consumers in their purchase or use of the products. Therefore, the failure to adequately disclose this fact, in light of the representation made, was, and is, a deceptive practice.

11. The acts and practices of respondent as alleged in this complaint constitute unfair or deceptive acts or practices, and the making of false advertisements, in or affecting commerce in violation of Sections 5(a) and 12 of the Federal Trade Commission Act.

**THEREFORE**, the Federal Trade Commission this twenty-second day of October, 2008, has issued this complaint against respondent.

By the Commission.

## Complaint

## EXHIBIT A

Black Salve &amp; Wings Heartdrops



**Cleansing Time Pro**

**CANCER, VIRUS & HEART DISEASE PRODUCTS**  
**NATURAL - EASY TO USE**

**USE IN THE COMFORT OF YOUR OWN HOME**  
**NO HEALTH INSURANCE REQUIRED**

We have many testimonials to support our products from people who have used them to avoid major operations, radiation, chemotherapy & other drugs! We invite you to read this entire page & click on the buttons to the left to learn more about these wonderful products.

**Cleansing Time™ Pro Black Salve & Tablets:**

All natural herbal cancer & virus treatment & preventative that is **the**

**" ORIGINAL FORMULA "**

is the **Grandfather** of black salve used for and  
over **116 years!** This product has been used  
successfully on **humans** , **pets** &  
**animals** to prevent cancer, treat & overcome a wide  
range of internal & external cancers, viruses and other illnesses. It starts  
working in 5 seconds!

**Known Uses for Cleansing Time™ Pro Black Salve & Tablets**

- Used in place of radiation therapy treatments & chemotherapy treatments
- Used to attack all known forms of cancer in & on the human & animal
- Used to eliminate fluid build up around tumors & shrink them
- Used to normalize a-typical cells with the capability of becoming a cancer
- Used **internally** to treat & overcome a variety of cancers, malignancies & tumors. Used for stomach cancer, colon cancer, prostate cancer, testicular cancer, bladder cancer, throat cancer, thyroid cancer, mouth cancer, cervical cancer, uterine cancer, ovarian

EXHIBIT A-1

## Complaint

### Black Salve & Wings Heartdrops

cancer, pancreatic cancer, breast cancer, lung cancer, liver cancer, kidney cancer, brain cancer & brain tumors, lymphoma, blood diseases, bone cancer & all types of viruses

- Used **externally** as a skin cancer treatment, treating carcinoma, melanoma, warts, moles & as a drawing salve
- People with in-operable cancers sent home to die have used black salve with astonishing results
- People with virus infections sent home without a prescription by their doctor have used black salve with excellent results.
- Viruses have been repeatedly overcome such as colds, flu, strep throat, mouth diseases, herpes & yeast infections
- Used to treat all types of hepatitis viruses, HIV, SARS & West Nile Virus
- Used to repair & boost the immune system
- Highest of antioxidants
- Used to treat pets & animals with Parvo, Corona Virus, colds & flu
- Used to prevent cat cancer & dog cancer & treat bone cancer in large breed dogs

### Ambrosia Skin & Scar Nectar

Massage Ambrosia emollient onto the skin to prevent & reduce the appearance of scars & sun spots - soothes & protects

### Wings Heartdrops:

A Certified herbal formula used to treat & prevent heart disease, heart attacks, congestive heart failure & vascular plaque build up!

### Known uses for Wings Heartdrops:

- Used to remove plaque build up in the heart & arteries
- Used to regulate the heart beat
- Used to relieve angina pain
- Used to normalize high blood pressure
- Used to lower cholesterol
- Used as a powerful anti-bacterial agent
- Used to boost the immune system

EXHIBIT A-2

## Complaint

Black Salve &amp; Wings Heartdrops

**Russian Gold:**

Anti-aging formula from Russia once classified and held top-secret.  
It's youthening and energy capabilities are rewarding!

**Known uses for Russian Gold:**

- Used to increase mental function
- Used to increase energy
- Used to improve physical performance
- Used as a powerful anti-aging elixer

NOTE: This is not a scientific report or study. The above are what users have reported. These products are not endorsed by the FDA. No claims or guarantees are made & Cleansing Time Pro assumes no liability for the use of these products. This is a personal choice made solely by you. Pregnant women & people who have stomach ulcers should not use black salve or black salve tablets. Do not touch metal to black salve as it will render it useless - only use plastic or wooden utensils for application.



**HOW TO PLACE YOUR ORDER:** After clicking "catalog" button on the top left of the site or by clicking items found at the bottom of the site, make your selections by adding items to the shopping cart then click on the "view cart/checkout" button to add up and/or finalize your purchase.

**SHIPPING:** Most orders are only \$4.05 but your order will be adjusted to actual at time of transaction.

**Priority Mail - Shipping Chart**

| Weight not over | USA 1-3 days   | Int'l 4 -7 days |
|-----------------|----------------|-----------------|
| 1 pound         | 4.05           | 6.00 - 15.00    |
| 2 pounds        | 4.05 - 6.00    | 9.00 - 19.00    |
| 3 pounds        | 6.00 - 8.10    | 12.00 - 26.00   |
| 4 pounds        | 8.10 Flat Rate | 16.00 - 31.00   |

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EXHIBIT A-3

Complaint

Black Salve & Wang Heartdrops

Featured Products:

|                                                                                    |                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <a href="#"><u>Ambrosia Skin &amp; Scar Nectar - Emollient used to prevent &amp; reduce the appearance of scars &amp; sun spots</u></a> - 24.95<br>50 ml jar                                                  |
|   | <a href="#"><u>Black Salve &amp; Tablet Information &amp; Instruction Package - For internal &amp; external use &amp; history of the product</u></a> - 3.00<br>Included FREE with a Salve or Tablet purchase! |
|   | <a href="#"><u>Black Salve - Used externally or internally to prevent &amp; treat cancer &amp; viruses in &amp; on the human &amp; animal bodies</u></a> - 49.95<br>1 Oz Jar                                  |
|   | <a href="#"><u>Black Salve Pet &amp; Animal Formula - Used internally to prevent &amp; treat cancer &amp; viruses - for small breed animals under 50 lbs.</u></a> - 22.00<br>30 Capsules                      |
|   | <a href="#"><u>Black Salve Tablets-Used internally to prevent &amp; treat cancer &amp; viruses in the human, pet &amp; animal body in a convenient tablet</u></a> - 34.95<br>60 Tablets                       |
|   | <a href="#"><u>Empty Gelatin Capsules - Pk of 100 - Required for internal use of black salve</u></a> - 4.00<br>Empty Gelatin Capsules                                                                         |
|   | <a href="#"><u>Heartdrops - 2 Fluid Oz - Certified herbal formula used to prevent &amp; treat heart &amp; vascular diseases</u></a> - 34.95<br>2 Fluid Oz                                                     |
|   | <a href="#"><u>Heartdrops - 4 Fluid Oz - Certified herbal formula used to prevent &amp; treat heart &amp; vascular diseases</u></a> - 59.95<br>4 Fluid Oz                                                     |
|  | <a href="#"><u>Russian Gold - Adaptogens used for deep immune support, anti-aging, energy &amp; vitality</u></a> - 39.95<br>2 fl. oz. bottle                                                                  |

EXHIBIT A-4

## Complaint

Testimonials on Black Salve &amp; Wings Heartdrops



Cleansing Time Pro

Testimonials

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## Testimonials and classic examples:

Unfortunately there is not enough room on this site to cover all the testimonials from people who have used these products to treat minor conditions to very serious conditions by both humans and their pets & animals. You are always welcome to use the products first hand to discern their value and/or pass the information along to those who may benefit.

I had lymphoma B cancer & used this herbal **Black Salve** internally & **Black Salve Tablets** instead of a doctors prescribed **68 radiation treatments** with excellent results! I avoided all the unwanted long term side effects of radiation by using black salve. I have chosen to share my experience with others so that they may benefit from it as I have. My cancer is gone and as an added bonus I have a lot more energy. My oncologist told me near the middle of my black salve treatment I had "the blood of a child" but he didn't know why. I had serious reservations about having radiation because of all I've heard & seen from people who have had it. After all these years of humans being subjected to radiation and all the testing they've done with it, people are still dying from it! In my opinion, black salve is the safest and most effective alternative to radiation. Holly B.

I have been plagued for 20 years with malignant basil cell carcinoma. My face & forehead have seven scars from the doctor's knife. Recently my daughter, who used black salve for her horse's melanoma, gave me a little dab of black salve. I used it on what I was sure was another malignant cancer. I made 1 application & about 10 days the tumor came off in the bandaid. There was a hole about 1/8 of an inch deep. It has now filled in & I don't believe there will be much of a scar, if any. I have the salve on another & hopefully the last, cancer & it's working just like the first. To me this is a miracle salve. Bill P., TX

On January 1, 2001 my litter of 8 Rottweiler pups was vomiting & defecating with blood in the stools at 11pm. By 4:00 a.m. all were so ill that I called my daughter in St. Louis because she has worked extensively in veterinary care & is currently working at the university there in the Dept. of Research. She told me it sounded like **Parvo or Corona**, both of which can be fatal. I put all the pups on **Cleansing Time (black salve products)** & within 72 hours they were all drinking & eating on their own & all the above symptoms were over! Karen C.

My friend used **Wings Heart Drops** so he would not have to undergo **surgery for heart disease** that caused his heart to beat irregular & for high blood pressure. He didn't have insurance & was afraid he might not come out of the operation. I gave him a bottle of Wings & less than a week later he told me I was an 'angel' but I only supplied him with 'Wings'. He looked & felt great! Lin Gardnerville, NV

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EXHIBIT A-5

<http://www.cleansingtimepro.com/black?pagelid=6&catid=0&prodid=0> (1 of 2) [2/6/2008 10:38:55 AM]

## Complaint

Treatments on Black Salve & Wingo Heredrops

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EXHIBIT A-6

<http://www.cleansingtimepro.com/black/pagenid=6&catref=0&prodref=0> (2 of 2) [2/8/2006 10:38:55 AM]

## Complaint



EXHIBIT A-7

## Complaint

About Cleansing Time Pro



Welcome!

**About Cleansing Time Pro**

**Cleansing Time Pro** was established to meet the concerns and problems faced by cancer, virus, heart & vascular diseased victims who are seeking treatment for their conditions.

We began on the frontiers and over 116 years later are on the cutting edge of protecting people from such deadly diseases as the Bird Flu, SARS and the West Nile Virus worldwide! It was only months ago we first heard of these and they spread quickly to the U.S. It is common knowledge there is little that can be done once infected, according to health professionals. Medical facilities have even tried to hide the number of people infected! This is because they are not knowledgeable about and did not use our herbal treatment that is effective against viruses but instead relied on traditional medical paths. They soon discovered they were faced with full blown epidemics and most recently of SARS and the West Nile Virus. Cleansing Time Pro is all about revealing the facts. With Cleansing Time Pro's Black Salve Tablets, why not protect or treat yourself? It starts working within 5 seconds!

We stand firm in our knowledge & belief that the traditional medical based treatments are doing little to relieve pain their patients feel while undergoing invasive operations, chemotherapy and other drug treatments along with radiation treatments that has proven harmful by the United States government. Feel free to take a look at what the National Council for Radiation Protection (NCRP) has to say at [www.ncrponline.org](http://www.ncrponline.org). And see what virtually every site advocating radiation has to say about their side effects. Yet hundreds of thousands of cancer victims are being directed by medical professionals to have radiation treatments. Again, Cleansing Time Pro is all about revealing the facts. We are knowledgeable on the effects of radiation on humans and hope that you also take a serious look into this subject.

While traditional medical paths have helped many they have also made many, many people sick. In contrast, Cleansing Time Pro is here to make people aware there is an alternative & there is something you can do right now even if you have no insurance! Our alternative treatment products have over 116 years of history behind them with many, many testimonials to prove their weight for treating & overcoming a long list of conditions unrelated & related to viruses & cancer in & on the human body as well as most pets & animals. Do you have heart or vascular problems? We have helped thousands with that too!

We believe our products are key to treatment of cancer, viruses, heart & vascular disease and prevention can be attained here in the U.S. as well as abroad.

**Focus Group:**

Meets to discuss & categorize individual cancer, virus, heart & vascular conditions & documents individual progress & testimonials.

EXHIBIT A-8

Complaint

About Cleansing Time Pro

**Great News:**

Our own Ms. Holly Bacon attended the American Cancer Society's Relay For Life - Hunters for the cure (Southwest division), a 2 day & night team event to help fight cancer and remember those who lost the battle. She along with hundreds of other cancer survivors and other participants ran & walked several miles around a track, lit candles and placed donated quarters along the track. She helped raise money for the American Cancer Society by making & selling Smores (yum), sunglasses & other items. She participated in a Pajama Parade at midnight & won 1st place! She was honored with a tiara, sash & wand then made one last trip around the track in her PJ's! Way to go Holly!

**Special Thanks:**

Thanks go to Cleansing Time Pro Advisory Board Committee members including Research & Cleansing Consultants who so generously volunteer their time for a very good cause! Good Job!

**CLEANSING TIME™ PRO**

**YOUR ALTERNATIVE FOR LIFE**

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**Hours of Operation**  
24 Hours Online !

**Payment Methods**  
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MasterCard  
American Express  
Discover Card  
Checks & money orders by mail

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EXHIBIT A-9

## Complaint

Feel Good Tips from Cleansing Time Pro



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Here at Cleansing Time Pro we are committed to those who suffer from cancer, heart & vascular related illnesses. We want you to feel good! We hope these tips can help. Please feel free to share any others with us!

### Feel Good Tips:

If you are undergoing ct (cat) scans and the thick white contrast/dye you are asked to drink does not agree with you or makes you sick then ask them to let you drink the lemonade drink instead. It's just like drinking lemonade and has a watery consistency.

Most people lose their hair with chemotherapy drugs and this is a trauma all by itself. However, with Black Salve products you will not lose your hair.

Most people with cancer have become 'dis'-eased due to some personal trauma or tragedy, over work, over stress and not eating right. They tend to further compound the issue with negative thinking. Therefore, it is of utmost importance that you try to think positive and 'ease' yourself! Please, let your condition just leave your mind for a minute and focus instead on all the positive things in your life right now. Do this on a regular basis several times per day & feel what a difference this makes. The body often follows what the mind is thinking. Remember, you are special so be kind to yourself! Also, treat yourself to something special as often as possible.

Cancer, viruses, infections - "let's just throw the bums out!" So says Dr. Susan Lark, Founder of the Menopause & PMS Self Help Center & graduate of N.W. University School of Medicine & 3 time winner Am. Med. Asso. Dr.'s Recognition award. From cervical cancer to sniffles, from chronic fatigue to a flattened immune system she tells us she wants us to "tune in" to our body.

While undergoing any of your treatment mostly try to stay away from spicy foods.

It's important that you get your vitamins & minerals daily to strengthen your immune system. One way to do this is to get some good tasting chewable vitamins. You probably don't need mega vitamins because your system won't absorb them unless you're taking Cleansing Time Pro's "Original" formula black salve or black salve Tablets. But with the chewable vitamins you will be able to keep them on your person & take them whenever you remember even if you don't have water. Come on, you can do it. Just think of them as breath fresheners!

EXHIBIT A-10

<http://www.cleansingtimepro.com/black?pageno=7&catstart=0&prodstart=0> (1 of 2) [2/6/2008 10:38:58 AM]

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EXHIBIT A-11

<http://www.cleansingtimepro.com/blank?pagenid=7&catstart=0&prodstart=0> (2 of 2) [2/6/2008 10:38:58 AM]

## Complaint

Cleansing Time Pro answers your questions about Black Salve & Wings Heartdrops



Welcome!

### Contacting Cleansing Time Pro

|                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>Cleansing Time Pro</li><li>Testimonials</li><li>View Catalog</li><li>About Us</li><li>Feel Good Tips</li><li>Contact Us</li><li>FAQ's</li><li>History</li><li>Privacy Policy</li><li>Useful Links</li><li>View Cart / Checkout</li></ul> | <p><b>Our Address</b><br/>Cleansing Time Pro<br/>9732 State Rt. 445, #114<br/>Sparks, NV 89436<br/>USA</p> <p><b>Phone Contact Information:</b><br/>Call Toll Free! : (866) 330-3667<br/>:</p> <p><b>Internet Contact Information:</b><br/>Customer Service: <a href="mailto:cleansingtimepro@msn.com">cleansingtimepro@msn.com</a><br/>Website Address: <a href="http://www.CleansingTimePro.com">www.CleansingTimePro.com</a></p> | <p><b>Contact Us</b></p> <p>Name: <input type="text"/></p> <p>Company: <input type="text"/></p> <p>Email Address: <input type="text"/></p> <p>Phone: <input type="text"/></p> <p>Comments<br/><input type="text"/></p> <p><input type="button" value="Send"/></p> |
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EXHIBIT A-12

## Complaint

FAQ's about Black Salve &amp; Wings Heartdrops



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**FAQ's about Black Salve & Wings Heartdrops**

**If Cleansing Time Pro's products work on cancer, viruses, heart & vascular diseases, why don't most traditional medical doctors use them?**

Because the products are herbal in nature & grown out of the ground they are not endorsed by the American Medical Association. It is soon discovered that medical facilities do not make much money with these types of "remedies" due to their effectiveness & the fact that people can & do use them in their own homes. Doctors will always use the scientific (drug) approach. Drug companies will always be advertising through the medical journals & to doctors. Please read our 'History' page to learn more about why the American Medical Association does not recognize herbal treatments.

**Are there any side effects from these products?**

Black salve products taken internally should be taken with food and on a full stomach to avoid an upset stomach. Side effects are usually mild & go away during or after treatment. This may include loose stools, sinus headache, stiffness in joints or fever. Black salve used externally as a poultice could cause a burning sensation and/or pain that will go away during or after treatment & may cause some degree of scarring. However, we have worked to reduce the chances of this by defining dermatological practices for your use before, during & after treatment. However, every effort should be made to let the cancerous material come to the surface of the skin naturally, leave it alone & not pick it off. Picking it off could cause unnecessary scarring & prevent the full mass from coming out. Usually this process is completed when it falls off by itself. External treatment can last days or months from start to finish depending on the severity of the condition. Wings Heartdrops will leave a garlic taste in the mouth for a few minutes after use.

**Can I take these products with other medications?**

It depends but there should not be any problems with most over the counter meds. The choice is ultimately solely up to you. Cleansing Time Pro is held harmless from any action you may take arising out of your condition. It is best if you either contact us or your physician or both and give it some thought about what you're trying to achieve. However, please be aware that regular physicians do not know about herbal treatments. So in most cases, if asked or told about these products it may interfere in your treatment by that physician.

EXHIBIT A-13

<http://www.cleansingtimepro.com/faq/?pageid=8&catstart=0&prodstart=0> (1 of 2) [2/6/2008 10:39:04 AM]

## Complaint

FAQ's about Black Salve & Wings Heartdrops

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Due to the complex human, animal & pet nature & various conditions, we will be happy to try to help you with any specific questions you may have. Simply click on the 'Contact Us' button on the left of this page & fill in the form with your question. It will be e-mailed to us at [cleansingtimepro@msn.com](mailto:cleansingtimepro@msn.com) or telephone us toll free at 1-866-330-3667.

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### How long will it take to get my order?

We always ship U.S. Priority mail & usually takes 2 - 3 days (United States ) or 4 - 7 days (Internationally) not including holidays or weekends.

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EXHIBIT A-14

<http://www.cleansingtimepro.com/fac/news/faq/faq.html> (7 of 7) (7/8/2008 10:10:04 AM)

## Complaint

History of herbs & black salve



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A piece of history of particular interest dates back to 1825. This is an excerpt from a book authored by John S. Haller published in 1994 by the Southern Illinois University Press called Medical Protestants - the eclectics in American medicine.

With the practice of French physicians using minerals (gold, silver & copper to name a few) to treat their patients came many unsuccessful attempts. But with the few people they were able to miraculously heal with the use of metals they received much attention. The news spread to America, the practice continued and they went on to form an association of physicians. Over a period of time, some physicians incorporated the use of plant life to heal people.

After many years about 50% of the doctors left the association to form a new association of medical protestants built entirely on the use of remedies made from plant life or herbs.

However, since the original mineral association was much older it received more attention from those who would finance their endeavors. So while the mineralists struggled with many disappointing setbacks in their treatments the new protestants were slowly healing people in one small town after another. They remained healing people in this fashion ever since while the old association of metalists continued to grow with the new scientific discoveries being made throughout the century and later became known as the American Medical Association.

So there you have it folks. We can send people to the moon & mars, have a lot of fancy medical machinery to peer deeper into our beings but still can't eradicate deadly diseases. The mark (herbal treatment) was missed by a long shot as explained here but Cleansing Time Pro is turning the tide on this!

The history of black salve started when Tom McCreary was diagnosed with incurable, cancerous tumors on his neck in 1890. He used black salve and went on to live another 70 years!

So please celebrate with us as Cleansing Time Pro salutes 116 years of black salve and the history of the natural healing process!

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## Complaint

History of herpes & black sores

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EXHIBIT A-16

<http://www.cleansingtimepro.com/black>?pageno=4&catref=0&prodref=0 (2 of 2) [2/8/2006 10:39:05 AM]

## Complaint

Privacy Policy of Cleansing Time Pro



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**Privacy Policy**Protecting Your Privacy

The privacy & security of personal information about our customers is important to us. Our Privacy Policy governs customer information which means personally identifiable information. The policy covers individuals who obtain products from us for personal, family or household uses.

Security & Confidentiality

We only use a state of the art SSL (secure) system on our website for the purpose of conducting a sales transaction using the buyers information. This information is not shared by us with anyone and not retained once the transaction is complete.

We do not retain, hold or share with any outside source any personally identifiable information regarding our customers.

Information Sharing

Cleansing Time Pro may retain information on the actual condition treated and the outcome of the treatment.

Cleansing Time Pro may retain the name, address and e-mail address of any customer for the purpose of questionnaires, notification of any new treatments, products or promotional sales.

The above information is not shared with any outside source. However, you may opt out of Cleansing Time & Cleansing Time Pro's internal information sharing by requesting to opt out by clicking on our "contact us" button located on the left side of our website, calling toll free at 1-866-330-3667 or e-mailing us at [cleansingtimepro@msn.com](mailto:cleansingtimepro@msn.com)

Federal & State Laws

The practices stated above are in accordance with federal and state law.

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EXHIBIT A-17

<http://www.cleansingtimepro.com/blank?pagenid=9&catid=0&product=0> (1 of 2) [2/6/2008 10:39:06 AM]

Complaint

Privacy Policy of Cleaning Time Pro

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EXHIBIT A-18

<http://www.cleantimepro.com/blank?pageno=9&catno=0&pridno=0> (2 of 2) [2/8/2008 10:39:06 AM]

## Complaint

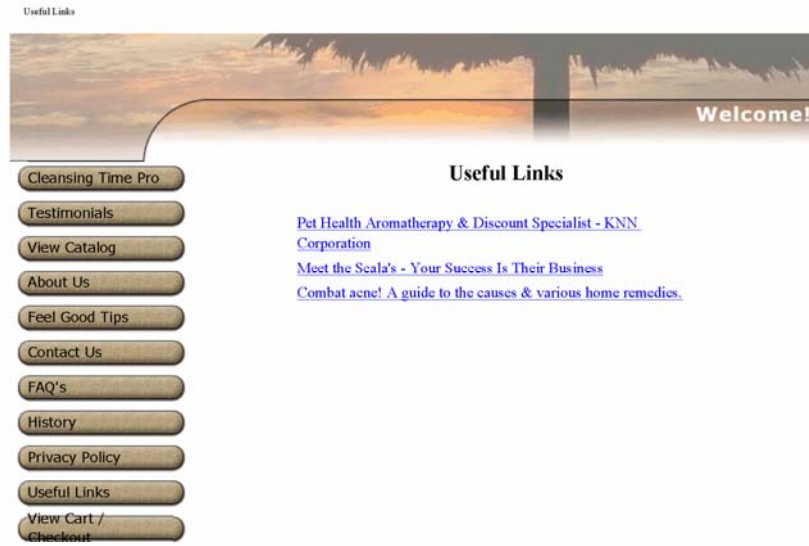


EXHIBIT A-19

Complaint

http://www.cleansingtimepro.com/proddetail?prodid=1055249



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Ambrosia Skin & Scar Nectar - Emollient used to prevent & reduce the appearance of scars & sun spots

50 ml jar Emollient used to prevent & reduce the appearance of scars & sun spots, hydrates tissues & restores elasticity

24.95

Qty:

EXHIBIT A-20

Complaint

<http://www.cleansingtimepro.com/proddetail?prodid=744149>



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Black Salve & Tablet Information & Instruction Package -  
For internal & external use & history of the product.

Includes instructions for internal and external use for both humans and animals and history of the product. Included FREE with a Salve or Tablet purchase.

3.00

Qty:

EXHIBIT A-21

Complaint

http://www.cleansingtimepro.com/proddetail?prodid=744147



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1 oz. BLACK SALVE  
**CLEANSING  
TIME™ PRO**

Black Salve - Used externally or internally to prevent & treat cancer & viruses in & on the human & animal bodies

49.95

Qty:

EXHIBIT A-22

Complaint

http://www.cleansingtimepro.com/proddetail?prodid=1034888



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Black Salve Pet & Animal Formula - Used internally to prevent & treat cancer & viruses - for small breed animals under 50 lbs.

Powdered, beef flavored pet & animal black salve formula used internally to prevent & treat cancer & viruses. For use with smaller breed animals under 50 lbs.

22.00

Qty:

EXHIBIT A-23

Complaint

<http://www.cleansingtimepro.com/proddetail?prodid=744148>



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Black Salve Tablets-Used internally to prevent & treat cancer & viruses in the human, pet & animal body in a convenient tablet

34.95

Qty:

EXHIBIT A-24

Complaint

http://www.cleansingtimepro.com/proddetail?prodid=488190



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Empty Gelatin Capsules - Pkg of 100 - Required for internal use of black salve  
Used for internal ingestion of black salve

4.00

Qty:

http://www.cleansingtimepro.com/proddetail?prodid=488190 [2/6/2008 10:39:30 AM]

EXHIBIT A-25

## Complaint

http://www.cleansingtimepro.com/proddetail?prodid=744855

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Heartdrops - 2 Fluid Oz - Certified herbal formula used to prevent & treat heart & vascular diseases

34.95

Qty:

EXHIBIT A-26

## Complaint

<http://www.cleansingtimepro.com/proddetail?prodid=744856>

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Heartdrops - 4 Fluid Oz - Certified herbal formula used to prevent & treat heart & vascular diseases

59.95

Qty:

EXHIBIT A-27

## Complaint

http://www.cleansingtimepro.com/proddetail?prodid=1055250

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Russian Gold - Adaptogens used for deep immune support, anti-aging, energy & vitality

Anti-aging herbal extract contains adaptogens used for deep immune support, to slow the aging process & increase energy, vitality & endurance.

39.95

Qty:

EXHIBIT A-28

## Complaint

## EXHIBIT B

**Cleansing Time Pro**

9732 State Rt. 445, #114  
Sparks, NV 89441  
Toll Free: 866-330-3667  
www.CleansingTimePro.com  
e-mail: cleansingtimepro@msn.com

Please read this informational package more than once. We are here to help. Please allow us to do so. For more information please visit us on the world wide web or e-mail us at the addresses above.

**DIRECTIONS FOR HUMAN USE:****Black Salve Tablets - Used Internally**

**Virus Related Disorders:** After a full meal, oral ingestion of one Cleansing Time Pro Black Salve Tablet daily for four days will usually suffice. This procedure may take several more days for more severe cases and fortify the immune system - take for a period of up to 27 days - once daily for seven days, then abstain for two days, then repeat the process for two additional weeks.

**Internal Growths/Cysts:** After a full meal, oral ingestion of one Cleansing Time Pro Black Salve Tablet daily for seven days, then abstain for two days, then repeat the process for three additional weeks. This should produce results of non activity. Large growths with lengthy history may take longer.

**Cancer Tumors:** After a full meal, oral ingestion of two Cleansing Time Pro Black Salve tablets in the morning, then two more tablets after a full meal in the evening. Do this for seven days, then abstain for two days, then repeat this process for three additional weeks. At this time you may want to perform diagnostic tests to monitor progress, if any. Another 4 week process may be necessary and then follow up with tablets periodically as you see fit to maintain non activity.

**Black Salve - Used Internally**

**Internal Tumors:** After a full meal, prepare an empty small size gelatin capsule by using a plastic or wooden instrument or toothpick. Never use metal objects as it will render the product useless. Fill the gel cap with a dab of Cleansing Time Pro Black Salve the size of a small pea - size = ( ) in the smaller portion of the gel cap, join the gel cap back together and drink down with a large glass of water. Always prepare these daily/as needed because the moisture from the salve will cause the gel cap to melt. Take for a period of up to 28 days - once daily for seven days, then abstaining for two days, then repeating the process for three additional weeks.

A beneficial option is to begin drinking a catalyst water several days ahead such as Willard Water, Colloidal Silver Water or Lifeline is best. Check your health food stores. It is used for the distribution of the active ingredients of Black Salve to the tissue and organs but it is not necessary.

**Black Salve - Used Externally** (Read carefully - starts working within 5 seconds)

Black Salve has been used to draw out all kinds of foreign material from the body such as glass, wood, shrapnel as well as cancer tumors and abnormal cells and tissue.

Apply a sufficient amount of Cleansing Time Pro Black Salve to cover the irritated area (usually a thin layer but still maintaining the black color). Apply Vaseline to the gauze portion of a bandage. This is very important to prevent the bandage from sticking to the affected area. Cover the treated area with the bandage for 8 to 24 hours. Then, soak a cotton ball in Hydrogen Peroxide, remove the bandage and wash the excess salve from the area applied.

Normally a red and greyish coloring will have appeared with a degree of swelling, indicating favorable penetration. If only a

## Complaint

small area in the treated area is red and greyish in color you may wish to reapply an additional amount of salve for another 24 hour period, repeating the same cleaning process. Change the Vaseline coated bandage each day after cleaning the perimeter of the area with Hydrogen Peroxide to eliminate excess excretion. Usually, the more excretion that appears the better. The salve is drawing the abnormal tissue, cells and mass to the surface for elimination. This is usually accomplished without any noticeable bleeding. Often at this stage the growth will become twice or more its normal size and the area around the growth may swell. The growth may lighten in color becoming 'dead white' after the first day and may then re-darken slightly. Pus may form under and around the growth as the body pushes the growth out.

You may shower or wash the area every day. It is essential to keep it covered with new daily applications of Vaseline and clean bandages. This is based on experience.

A scab will appear and remove itself usually within ten days to three weeks. More favorable results will occur if the scab is not lifted or pried from the area. Normally, the skin will return to a smooth surface shortly after either by filling in with new tissue or scar tissue. Effects of scarring can be eliminated or minimized by taking vitamin E orally before and during use and rubbing vitamin E on the area after the scab falls off.

The salve used externally can cause a burning sensation. This should be kept in mind when applying to very large areas. The effects of this can be lessened by taking over the counter pain medication prior to and during its use. If severe pain develops only leave the salve on for 8 hours, wash the salve off the skin and apply plain Vaseline to another clean bandage and cover the affected area.

If dealing with a skin cancer, it is recommended to treat one area at a time but not more than five areas, waiting for the hole to fill in with new skin before treating the second or consecutive area(s). You may want to start in a place where you can hide the bandage easily such as just under your shirt sleeve, etc. The salve will draw from the surrounding circumference of the treated area.

These recommendations describe the absolute minimum doses that people have found to be effective. It cannot be stressed enough that Black Salve is very potent. Do not assume that if a little works, more will be better. Use the smallest doses possible and increase only if it truly seems necessary to you. Otherwise you will engender far more pain than necessary and extend the healing period.

### **What Everyone Needs to Know:**

The tablets are all you need if you are just doing a regular detoxification. But if you're dealing with a very serious problem you should have both tablets and salve. For instance, you might want to take up to two salve capsules per day then follow up your treatment with the tablets at a later date to maintain non activity. Do not exceed 4 tablets or 2 capsules per day. If using the salve externally, you may want to take a tablet orally as well.

There is no set dosage and the amount taken will depend on each person and the way they feel after taking it. You may want to increase or decrease the dosage. Always take with a meal to avoid stomach upset.

Due to the ingredients used to hold the tablets together to form the pill it has less active ingredients than the salve. A single tablet is 1/2 the potency of a pea size portion of salve in a gelatin capsule.

You might feel 'pain', a 'pulling', 'drawing' or 'tingling' sensation as the tumor or cancer starts to break down and come away or dissolve. You may notice a lessening of the above feelings as your treatment progresses & this is a good sign!

'Original Formula' Cleansing Time Pro Black Salve products have been called 'the relentless healer' tracking down cancer cells and abnormalities throughout the body when used internally and flushing them from your system via your waste. Some people have reported loose bowels, foul breath and feces due to the elimination process. And when used externally, deposits them to the surface of the skin in varied appearances (usually the uglier the excretion the better). Pain, swelling and sometimes fever is associated during its use but in almost all reported cases, it eliminates abnormal tissue and stimulates regrowth of either healthy tissue or scar tissue.

If you are in the process of using chemotherapy, do not use Black Salve. The chemical action that occurs with the herbs could clash with the substances in chemotherapy drugs. Also, Black Salve may destroy or rid your body of the chemotherapy drugs. Waiting a sufficient amount of time after chemotherapy is your best bet.

## Complaint

The medical approach is successful in some peoples lives. However, some people who use Black Salve do not have medical operations, chemotherapy or radiation treatments with reported results. Some people have had all operations, chemotherapy and radiation either in whole or in part and have taken Black Salve with reported results. Some people with inoperable cancer/tumors have taken Black Salve with reported results. So it doesn't matter where you are in your treatment, just that you are doing something, because time is of the essence. Most people like the fact that Black Salve, a natural holistic folk remedy, can be taken in the comfort of their own home without insurance.

It is particularly important to take daily vitamins & minerals and to try to eat fresh fruits & vegetables during and after treatment with Black Salve Tablets or Capsules to help fortify your immune system and give you strength and energy. Vitamin E tablets or vitamin E cream is also recommended for use.

Refuse to indulge in self doubt or in feeling like a victim. Rather, (on a daily basis as often as possible) fan in yourself the ferocious feeling of YES to the life-force, to preservation and to becoming greater than you were yesterday. This triggers the body's release of hormones and enzymes that literally instruct the body to become whole and stay well! Please understand that each of us can do anything and that miraculous change is the result of a mind and a feeling that will accept nothing less.

**IMPORTANT WARNING NOTES:** Pregnant women or people with stomach ulcers should not use black salve or black salve tablets. Always take black salve on a full stomach. Do not touch anything metal to black salve, use only wooden or plastic utensils. People applying salve topically should use extreme caution. People treating late stage liver cancer should use black salve or tablets sparingly. Do not take black salve if you are currently on chemotherapy, wait at least 2 weeks. Keep out of the reach of other people, children, pets & animals.

Cleansing Time Pro recommends diagnostics (blood tests, MRI's, CT scans or PET scans) be performed to gauge your condition, progress or size of your tumor, your blood levels, etc.

Black salve can cause swelling. Because of this, people with brain tumors should not take black salve. However, if treating a brain tumor(s) with black salve you may need a qualified surgeon to insert a small hole(s) in the skull to relieve pressure. Do not think this is odd in any way. Many brain tumors are inoperable. However, a small hole is far superior to the sort of treatment one would receive from the full blown standard medical procedures.

While we have had great success in treating cancer and viruses with these products, they may not be for everyone. This informational package has been prepared as a narration of what users have reported and what to be the most effective way to use Black Salve products. No claims or guarantees can be made by Cleansing Time™ Pro as to the use of Black Salve products. By virtue of its use it must be understood that the choice and process used in the various forms of application or ingestion of these products is the sole responsibility of the user and does so at their own risk and accept full responsibility for any effects. Use remains at your sole discretion and Cleansing Time Pro is held harmless from any and all claims.

**Known Uses For Cleansing Time™ Pro Black Salve & Tablets:**

- Used in place of radiation therapy treatments & chemotherapy treatments
- Used to attack all known forms of cancer in & on the human & animal bodies
- Used to eliminate fluid build up around tumors & shrink them
- Used to normalize atypical cells with the capability of becoming a cancer
- Used internally to prevent & treat a variety of cancers, malignancies & tumors such as in the stomach, colon, prostate, testicles, bladder, throat, thyroid, mouth, cervix, uterus, ovaries, pancreas, breasts, lungs, liver, kidney, skin, lymph nodes, extremities, blood, brain & bone & terminal cancer
- Used internally to prevent & treat all types of viruses & virus infections such as colds, flu, strep throat, mouth & gum diseases, yeast infections, all types of herpes & hepatitis viruses, shingles and even things such as prevention & treatment of HIV, SARS, West Nile Virus & Avian Bird Flu
- Used externally to treat skin cancer, carcinoma, melanoma, warts, moles & as a drawing salve
- Used to treat pets & animals with colds, flu, Parvo, Corona Virus, cancer, tumors & prevention/treatment of bone cancer in large breed dogs
- Used to purify blood & induce oxygen into the system inhibiting carcinogen growth
- Used to repair & boost the immune system & enhance overall assimilation of nutrients
- Used as the highest of antioxidants
- Used to remove plaque from teeth and disease from gums by applying a match head size portion of Cleansing Time Pro Salve to the toothpaste used once daily for 7 to 10 days

## Complaint

- Used to alleviate yeast infection in human females with use of one pea size portion of salve per quart of warm water as a douche. Used to alleviate infections on male human & animal gender parts (including horses) by washing with the above douche.

**DIRECTIONS FOR PET & ANIMAL USE:**

Black salve works in/on animals in very much the same way as humans! Please read the animal & history sections that follow for more information.

Black Salve - external use: The same directions for salve used on humans apply to animals & can be found on page 2. Exception: Do Not use salve on areas of the animal where it can be licked off such as on the paws or legs unless a cone collar is used and the animal proves not to be able to access the treated area with the collar on. Do not remove the cone collar until the full treatment is over and the salve is washed off completely or the hole has filled in with new skin.

The doses for tablets & salve are different for animals than they are for humans. Be sure to feed the animal plenty of food before each dose and have plenty of water available. Open the jaws/mouth and slip the tablet to the back of the throat so it can be swallowed. Keep an eye on the pet for any unusual signs such as vomiting and discontinue use if necessary or cut back on the dose. The pet may have loose stools - be prepared in advance for this. Diagnostics such as x-rays, & blood tests are recommended to gauge the animals progress.

Black Salve Tablets - internal use: General illnesses - Animals 2 to 15 pounds - 1/4 of a tablet per day. Animals 15 to 30 pounds - 1/2 of a tablet per day. Animals 30+ pounds - 1 full tablet per day. Administer for 5 days then abstain for 2 days. Depending on the effectiveness of the first treatment, a second treatment may be given and follow up with subsequent treatments as you see fit. Severe illnesses - double the dose by administering once in the morning and once in the evening.

Black Salve using empty gelatin capsules - internal use: More severe illnesses or cancer - animals 50 pounds or more - prepare an empty gel cap with 1/2 of a dried pea size portion of salve. Administer for 7 days then abstain for 2 days. Repeat this process for an additional 2 weeks or up to 27 days. Animals 80 to 150 pounds (and when trying to prevent/treat bone cancer in large breed dogs) - prepare an empty gel cap with 1 dried pea size portion of salve. Size found on page 1 of this informational packet. Administer for 7 days then abstain for 2 days. Repeat this process for an additional 2 weeks. A second course up to 27 days may be administered.

Horses, cattle & large animals: General illnesses: prepare 1 or 2 gel caps with a dried pea size portion of salve. Administer for 7 days then abstain for 2 days then repeating this process if needed. For more severe illnesses: prepare up to 3+ gel caps in the morning after the animal has been fed & another 3+ gel caps in the evening after its meal with a dried pea size portion of salve. Administer for 7 days, then abstain for 2 days. Repeat this process for an additional 2 weeks or up to 27 days. A second course up to 27 days may be administered. For ease in treating very large animals, the same stated portions of salve may be blended up with a liquid such as water and squirted down the throat taking care not to let the liquid splash out onto yourself, the animal or surrounding areas.

Small breed pets & animals (Under 50 lbs.) - We carry a specially designed powdered, beef flavored gelatin capsule specifically for use on small breed animals under 50 pounds. Separate directions & dosage comes printed on the product bottle. This product may be stirred in the pets food or the capsule may be inserted to the back of the pets throat.

**Ingredients & Formula:**

Blood root, galangal & zinc chloride in a base of blended synergistic herbs (+ calcium in the tablets). Extensive research into herbal and plant life properties has indicated substantial disease prevention and healing qualities in each as well as having a multiplying effect when combined together.

Cleansing Time Pro's products have a natural chemical which enhances an enzyme known to neutralize carcinogens prior to their stimulating tumor growth. This works directly on the immune system and, quite naturally, acts as a preventative in that capacity. Reference: National Academy of Science.

Several case histories have revealed that formulating the proper portions of various herbal, as well as mineral ingredients results in a wide variety of healing abilities. Improper portions of the ingredients will not result in a favorable outcome. Therefore, duplication of 'Original Formula' Cleansing Time Pro Black Salve should not & can not be achieved.

## Complaint

**History of Black Salve:**

In 1890 Tom Mc Creary was diagnosed as having incurable, cancerous tumors on his neck, by physicians. They refused to operate, not wanting to risk his jugular vein. Tom said he paid attention to a repeated dream that came to him about how to make a remedy to cure himself. He obtained the elements and herbs for the remedy from some gypsies travelling through Texas at the time. He mixed up a black salve and applied it to his tumors. In less than a month Tom was healed and went on to live another 70 years. Over his lifetime, he was a preacher, rancher, doctor, farmer and sheriff under Judge Parker. He lived with a strength that became legendary. Tom kept the formula for the black salve to himself except for sharing it with an old friend. After Tom's long life, his son Howard and grandson Micky, sought out the old friend who taught them how to make the black salve. Howard Mc Creary, attempting to make the salve available to everyone, started a company in the '60's. The company had some tests done in the early '70's at the University of Colorado to discover more about it. The Veterinarian College at Fort Collins tested it on all viruses known at the time. They discovered that it killed those known viruses on contact. They discovered that with one application, sarcoids on horses (similar to skin cancer) had an 80% cure. With two applications, they achieved 100% cure. For many years it had been used to cure cancer in cows, save herds of calves from early viral diseases and treat abnormal tissue growths in all kinds of pets. By word of mouth, ranchers, homesteaders and folks on the rodeo circuits used it on external cancers, tumors and growths on themselves. Some successfully treated gangrene and even leprosy, in situations far from towns and doctors. Tom's son, Howard Mc Creary, was the first to use it internally. He had been diagnosed as having stomach cancer in the '60's. After he checked himself in the hospital for surgery the night before, as they did in those days, he took the first dose in a capsule without telling his doctors. The next morning they postponed his surgery because he was running a fever which continued for several days. On the 5<sup>th</sup> day, Howard said he passed a large quantity of black, vile smelling feces - apparently the growth itself. When the doctors took x-rays, they discovered that the cancerous growth was gone. Howard went on to live another 25 years without recurring stomach cancer.

Another piece of history of particular interest dates back to 1825 in America. This is an excerpt from a book authored by John S. Haller published in 1994 by the Southern Illinois University Press called Medical Protestants - the eclectics in American medicine. With the practice of French physicians using metals (gold, silver & copper to name a few) to treat their patients came many unsuccessful attempts. But with the few people they were able to miraculously heal with the use of metals they received much attention. The news spread to America, the practice continued and they went on to form an association of physicians. Over a period of time, some physicians incorporated the use of plant life to heal people. After many years about 50% of the doctors left the association to form a new association of medical protestants built entirely on the use of remedies made from plant life or herbs. However, since the original association was much older it received more attention from those who would finance their endeavors. So while the metalists struggled with many disappointing setbacks in their treatments the new protestants were slowly healing people in one small town after another. They remained healing people in this fashion ever since while the old association of metalists continued to grow with the new scientific discoveries being made throughout the century and later became known as the American Medical Association. So there you have it folks, the reason why we have a lot of fancy medical machinery to peer deeper into our beings but can't seem to eradicate deadly diseases.

Please celebrate with us as Cleansing Time Pro salutes 117 years of "Original Formula" Black Salve, the grandfather of cancer and virus treatment and the history of the natural prevention and healing process!

**TABLETS****SALVE**

## Decision and Order

**DECISION AND ORDER**

The Federal Trade Commission having initiated an investigation of certain acts and practices of the respondent named in the caption hereof, and the respondent having been furnished thereafter with a copy of a draft of complaint which the Western Region proposed to present to the Commission for its consideration and which, if issued by the Commission, would charge respondent with violation of the Federal Trade Commission Act; and

The respondent and counsel for the Commission having thereafter executed an agreement containing a consent order, an admission by the respondent of all the jurisdictional facts set forth in the aforesaid draft of complaint, a statement that the signing of said agreement is for settlement purposes only and does not constitute an admission by respondent that the law has been violated as alleged in such complaint, or that the facts as alleged in such complaint, other than jurisdictional facts, are true, 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 respondent has violated the said Act, and that 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 thirty (30) 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 Holly A. Bacon is the sole proprietor of Cleansing Time Pro, a Nevada company with its principal office or place of business at 9732 State Rt. 445, #114, Sparks, Nevada 89436.

## Decision and Order

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

**ORDER****DEFINITIONS**

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

1. Unless otherwise specified, “respondent” means Holly A. Bacon, individually and doing business as Cleansing Time Pro, her successors and assigns, and her officers, agents, representatives and employees.
2. “Commerce” means as defined in Section 4 of the Federal Trade Commission Act, 15 U.S.C. § 44.
3. “Competent and reliable scientific evidence” means 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.
4. “Food” and “drug” mean “food” and “drug” as defined in Section 15 of the Federal Trade Commission Act, 15 U.S.C. § 55.
5. “Covered product or service” means any food, dietary supplement, or drug, including, but not limited to, Cleansing Time Pro Black Salve & Tablets, or any other health-related product, service, or program.

## Decision and Order

6. “Endorsement” means as defined in 16 C.F.R. § 255.0(b).
7. “Clearly and prominently” means as follows:
  - a. In an advertisement communicated through an electronic medium (such as television, video, radio, and interactive media such as the Internet and online services), the disclosure shall be presented simultaneously in both the audio and video portions of the advertisement. *Provided, however,* that in any advertisement presented solely through video or audio means, the disclosure may be made through the same means in which the ad is presented. The audio disclosure shall be delivered in a volume and cadence sufficient for an ordinary consumer to hear and comprehend it. The video disclosure shall be of a size and shade, and shall appear on the screen for a duration, sufficient for an ordinary consumer to read and comprehend it. In addition to the foregoing, in interactive media the disclosure shall also be unavoidable and shall be presented prior to the consumer incurring any financial obligation.
  - b. In a print advertisement, promotional material (including, but not limited to a rebate coupon or form), or instructional manual, the disclosure shall be in a type size and location sufficiently noticeable for an ordinary consumer to read and comprehend it, in print that contrasts with the background against which it appears. In multipage documents, the disclosure shall appear on the cover or first page.
  - c. On a product label, the disclosure shall be in a type size and location on the principal display panel sufficiently noticeable for an ordinary consumer to read and comprehend it, in print that contrasts with the background against which it appears.

## Decision and Order

The disclosure shall be in understandable language and syntax. Nothing contrary to, inconsistent with, or in mitigation of the disclosure shall be used in any advertisement or on any label.

8. The term “including” in this order means “without limitation.”
9. The terms “and” and “or” in this order shall be construed conjunctively or disjunctively as necessary, to make the applicable phrase inclusive rather than exclusive.

**I.**

**IT IS ORDERED** that respondent, directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, labeling, promotion, offering for sale, sale, or distribution of Cleansing Time Pro Black Salve & Tablets, or any other covered product or service, in or affecting commerce, shall not represent, in any manner, expressly or by implication, including through the use of a product name or endorsement:

- A. that such product is effective in the prevention, treatment, or cure, or assists in the prevention, treatment, or cure, of cancer;
- B. that such product is effective in the treatment of inoperable cancers;
- C. that such product is effective in the treatment of skin cancer, including melanoma;
- D. that such product reduces the size of, or eliminates, cancerous tumors;

## Decision and Order

- E. that such product is safer and more effective in the treatment of cancer than are conventional cancer therapies, such as surgery, radiation, chemotherapy, and other drug treatments; or
- F. that such product is effective in the prevention, treatment, or cure, or assists in the prevention, treatment, or cure, of hepatitis, HIV, SARS, West Nile Virus, or Avian Bird Flu,

unless the representation is true, non-misleading, and, at the time it is made, respondent possesses and relies upon competent and reliable scientific evidence that substantiates the representation.

**II.**

**IT IS FURTHER ORDERED** that respondent, directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, labeling, promotion, offering for sale, sale, or distribution of any covered product or service, in or affecting commerce, shall not make any representation, in any manner, expressly or by implication, including through the use of a product name or endorsement, about the absolute or comparative benefits, performance, efficacy, safety, or side effects of such covered product or service, unless the representation is true, non-misleading, and, at the time it is made, respondent possesses and relies upon competent and reliable scientific evidence that substantiates the representation.

**III.**

**IT IS FURTHER ORDERED** that respondent, directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, labeling, promotion, offering for sale, sale, or distribution of any covered product or service, in or affecting commerce, shall not make any representation, in any manner, expressly or by implication, about any user or endorser of such product or service unless she discloses, clearly and

## Decision and Order

prominently, a material connection, when one exists, between such user or endorser and the respondent or any other individual or entity manufacturing, advertising, promoting, offering for sale, selling, or distributing such product or service. For purposes of this Part, “material connection” means any relationship that materially affects the weight or credibility of the user testimonial or endorsement and that would not reasonably be expected by consumers.

**IV.****IT IS FURTHER ORDERED** that:

- A. Nothing in this order shall prohibit respondent from making any representation for any drug that is permitted in labeling for such drug under any tentative or final standard promulgated by the Food and Drug Administration, or under any new drug application approved by the Food and Drug Administration; and
- B. Nothing in this order shall prohibit respondent from making any representation for any product that is specifically permitted in labeling for such product by regulations promulgated by the Food and Drug Administration pursuant to the Nutrition Labeling and Education Act of 1990.

**V.****IT IS FURTHER ORDERED** that:

- A. Within thirty (30) days of the date of entry of this order, respondent shall compile a list containing the full name and mailing address, the product(s) purchased, and, if available, the consumer’s telephone number and email address, of every person who has purchased Cleansing

## Decision and Order

Time Pro Black Salve & Tablets from the respondent since July 1, 2005; and

- B. Within forty-five (45) days after the date of entry of this order, respondent shall send by first class mail, postage prepaid, an exact copy of the notice attached as Attachment A to all persons identified in Subparagraph A of this Paragraph. The mailing shall not include any other documents.

**VI.**

**IT IS FURTHER ORDERED** that respondent shall not sell, rent, lease, transfer, or otherwise disclose the name, address, telephone number, credit card number, bank account number, e-mail address, or other identifying information of any person who paid any money to respondent, at any time prior to entry of this order, in connection with the purchase of Cleansing Time Pro Black Salve & Tablets. *Provided, however;* that respondent shall disclose to the FTC, upon request, the list compiled pursuant to Paragraph V.A of this order; and respondent may disclose such identifying information to a law enforcement agency or as required by any law, regulation, or court order.

**VII.**

**IT IS FURTHER ORDERED** that respondent shall, for five (5) years after the last date of dissemination of any representation covered by this order, maintain and upon request make available to the Federal Trade Commission for inspection and copying:

- A. A specimen copy of all advertisements and promotional materials containing the representation;
- B. All materials that were relied upon in disseminating the representation; and

## Decision and Order

- C. All tests, reports, studies, surveys, demonstrations, or other evidence in her possession or control that contradict, qualify, or call into question the representation, or the basis relied upon for the representation, including complaints and other communications with consumers or with governmental or consumer protection organizations.

**VIII.**

**IT IS FURTHER ORDERED** that respondent shall deliver a copy of this order to all current and future principals, officers, directors, and managers, and to all current and future employees, agents, and representatives having responsibilities with respect to the subject matter of this order, and shall secure from each such person a signed and dated statement acknowledging receipt of the order. Respondent shall deliver this order to current personnel within thirty (30) days after the date of service of this order, and to future personnel within thirty (30) days after the person assumes such position or responsibilities. Respondent shall maintain and upon request make available to the Federal Trade Commission for inspection and copying a copy of each signed statement acknowledging receipt of the order.

**IX.**

**IT IS FURTHER ORDERED** that respondent, for a period of three (3) years after the date of issuance of this order, shall notify the Commission of the discontinuance of her current business or employment, or of her affiliation with any new health-related business or employment. The notice shall include respondent's new business address and telephone number and a description of the nature of the business or employment and her duties and responsibilities. All notices required by this Part shall be sent by certified mail to the Associate Director, Division of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, Washington, D.C. 20580.

## Decision and Order

**X.**

**IT IS FURTHER ORDERED** that respondent shall, within sixty (60) days after the date of service of this order, and at such other times as the Federal Trade Commission may require, file with the Commission a report, in writing, setting forth in detail the manner and form in which she has complied with this order.

**XI.**

This order will terminate on October 22, 2028, or twenty (20) 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 Part in this order that terminates in less than twenty (20) 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 Part.

*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 Part 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.

By the Commission.

FEDERAL TRADE COMMISSION DECISIONS  
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## Decision and Order

## ATTACHMENT A

ATTACHMENT A  
LETTER TO BE SENT BY FIRST CLASS MAIL  
[To be printed on letterhead of Cleansing Time Pro]

[Name and address of recipient] [Date]

Dear [Recipient]:

Our records show that you bought Cleansing Time Pro Black Salve & Tablets. These products were sold on our website [www.cleansingtimepro.com](http://www.cleansingtimepro.com). We are writing to tell you that the Federal Trade Commission ("FTC") has alleged that our advertising claims for these products were false or unsubstantiated. To resolve these charges, we have entered into a settlement with the FTC that prohibits us from making misleading claims about these products or any other health-related product. The settlement with the FTC does not constitute an admission that we have violated the law. As part of the settlement, however, we agreed to send you the following information about the scientific evidence on Cleansing Time Pro Black Salve & Tablets.

Very little scientific research has been done concerning Cleansing Time Pro Black Salve & Tablets as a treatment or cure for cancer in humans. The scientific studies that have been done do not demonstrate that Cleansing Time Pro Black Salve & Tablets, or the ingredients in these products, are effective when used as treatments for cancer. In addition, according to the American Cancer Society, there have been numerous reports of severe burns and permanent scarring from some of these salves.

It is very important that you talk to your doctor or health care provider before using *any* alternative or herbal product, including Cleansing Time Pro Black Salve & Tablets. Speaking with your doctor is important to make sure that all aspects of your medical treatment work together. Things that seem safe, such as certain foods, herbs, or pills, may interfere or affect your cancer or other medical treatment, or other medicines you might be taking. Some herbs or other complementary or alternative treatments may keep your medicines from doing what they are supposed to do, or could be harmful when taken with other medicines or in high doses. It also is very important that you talk to your doctor or health care provider before you decide to take any alternative or herbal product, including Cleansing Time Pro Black Salve & Tablets, instead of taking conventional cancer treatments that have been scientifically proven to be safe and effective in humans.

If you would like further information about complementary and alternative treatments for cancer, the following Internet web sites may be helpful:

1. The National Cancer Institute; [www.cancer.gov/cancertopics/pdq](http://www.cancer.gov/cancertopics/pdq); or
2. The National Center for Complementary and Alternative Medicines; [www.nccam.nih.gov](http://www.nccam.nih.gov)

You also can contact the National Cancer Institute's Cancer Information Service at 1-800-4-CANCER or 1-800-422-6237.

Sincerely,

## Analysis to Aid Public Comment

**ANALYSIS OF CONSENT ORDER TO AID PUBLIC COMMENT**

The Federal Trade Commission has accepted, subject to final approval, an agreement containing a consent order from Holly A. Bacon, doing business as Cleansing Time Pro (“respondent”).

The proposed consent order has been placed on the public record for thirty (30) days for reception of comments by interested persons. Comments received during this period will become part of the public record. After thirty (30) days, the Commission will again review the agreement and the comments received and will decide whether it should withdraw from the agreement or make final the agreement’s proposed order.

This matter concerns the advertising and promotion of products known as Cleansing Time Pro Black Salve & Tablets. According to their labels, these products contain “blood root, galangal & zinc chloride in a base of blended synergistic herbs (+ calcium in the tablets).” Cleansing Time Pro Black Salve is an ointment that respondent recommends for external use. Alternatively, respondent recommends that consumers take the product internally by purchasing Black Salve Tablets or by placing an amount of the Black Salve ointment into a gelatin capsule.

The Commission’s complaint charges that respondent claimed that Cleansing Time Pro Black Salve & Tablets were effective to treat, prevent, or cure numerous forms of cancer and various viral infections, including hepatitis, HIV, SARS, West Nile Virus, and Avian Bird Flu. The complaint alleges that respondent did not have a reasonable basis for these claims. The Commission’s complaint also challenges respondent’s testimonial advertising. The complaint alleges that respondent failed to disclose adequately that one of the endorsers was respondent Holly A. Bacon herself. The complaint alleges that this was a deceptive act or practice, because the fact that one of the endorsers had a

## Analysis to Aid Public Comment

material connection with Cleansing Time Pro would materially affect the weight and credibility given by consumers to the endorsement and would be material to consumers in their purchase or use of the products.

The proposed consent order contains provisions designed to prevent respondent from engaging in similar acts and practices in the future. Part I requires respondent to have competent and reliable scientific evidence substantiating any claim that Cleansing Time Pro Black Salve & Tablets, or any other covered product or service, is effective in the prevention, treatment or cure of cancer, cancer, hepatitis, HIV, SARS, West Nile Virus, or Avian Bird Flu. A “covered product or service” is defined as any food, dietary supplement, or drug, including, but not limited to, Cleansing Time Pro Black Salve & Tablets, or any other health-related product, service, or program. Part II requires that any future claim about the absolute or comparative benefits, performance, efficacy, safety or side effects of any covered product or service be truthful and supported by competent and reliable scientific evidence.

Part III of the proposed order addresses the deceptive endorsement claim by requiring that respondent disclose any material connection between an endorser and respondent, if such a connection exists. “Material connection” is defined as any relationship that materially affects the weight or credibility of the user testimonial or endorsement and that would not reasonably be expected by consumers.

Part IV of the proposed order provides that the order does not prohibit respondent from making representations for any drug that are permitted in labeling for the drug under any tentative or final Food and Drug Administration (“FDA”) standard or under any new drug application approved by the FDA; and representations for any product that are specifically permitted in labeling for that

## Analysis to Aid Public Comment

product by regulations issued by the FDA under the Nutrition Labeling and Education Act of 1990.

Part V of the proposed order requires respondent to compile a list of all consumers who purchased Cleansing Time Pro Black Salve & Tablets from respondent since July 1, 2005, and to mail a letter (Attached to the proposed order as Attachment A) to each purchaser describing the scientific evidence related to these products. Part VI prohibits respondent from providing any identifying information about her purchasers to anyone other than the Commission, another law enforcement agency, or as required by law.

Parts VII through X of the proposed order require respondent to keep copies of relevant advertisements and materials that substantiate claims made in the advertisements; to provide copies of the order to certain of her employees; to notify the Commission of her affiliation with any new health-related business or employment; and to file compliance reports with the Commission. Part XI of the proposed order is a “sunset” provision, dictating that the order will terminate twenty years from the date it is issued or twenty years after a complaint is filed in federal court, by either the United States or the FTC, alleging any violation of the order.

The purpose of this analysis is to facilitate public comment on the proposed order. It is not intended to constitute an official interpretation of the agreement and proposed order or to modify in any way their terms.

## Complaint

## IN THE MATTER OF

**DARYL C. JENKS,  
D/B/A PREMIUM ESSIAC TEA 4LESS**CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATIONS  
OF SEC. 5 OF THE FEDERAL TRADE COMMISSION ACT*Docket C-4239; File No. 082 3116**Complaint, October 23, 2008 – Decision, October 23, 2008*

This consent order concerns the advertising and promotion of Premium Essiac Tea. The respondent claimed that Premium Essiac Tea was effective in treating, preventing, or curing cancer and other serious diseases, without a reasonable basis for this claim. The order requires the respondent to have competent and reliable scientific evidence substantiating any claim that any covered product or service is effective in the treatment, cure, or prevention of any disease or condition, or is superior to other similar products or services. The order requires that any future claim about the absolute or comparative benefits, performance, efficacy, safety, or side effects of any covered product or service be truthful and supported by competent and reliable scientific evidence. The order prohibits the misrepresentation of the results of any test, study, or research in connection with the advertising, promotion, or sale of any covered product or service. The order does not prohibit the respondent from making representations for any drug that are permitted by the Food and Drug Administration. The order requires the respondent to provide a list of all purchasers of Premium Essiac Tea to the Commission and to mail each purchaser a letter describing the scientific evidence related to essiac tea. The order prohibits the respondent from providing any identifying information about his purchasers to anyone other than a law enforcement agency or as required by law. Other provisions require the respondent to keep copies of relevant advertisements and materials that substantiate claims made in the advertisements; to provide copies of the order to certain of his employees; to notify the Commission of any changes in employment that might affect compliance obligations under the order; and to file compliance reports with the Commission.

*Participants*

For the Commission: *Loretta Kraus and Michael Milgrom*