

Complaint

IN THE MATTER OF

**FOCUS EDUCATION, LLC,
MICHAEL APSTEIN, AND JOHN ABLE**

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

*Docket No. C-4517; File No. 122 3153
Complaint, April 8, 2015 – Decision, April 8, 2015*

This consent order concerns unsupported claims made by Focus Education, LLC and its principals, Michael Apstein and John Able (collectively, “Focus Education”), regarding their Jungle Rangers “brain training” game. The complaint alleges that Focus Education advertised that its Jungle Rangers game had “scientifically proven memory and attention brain training exercises, designed to improve focus, concentration and memory” and touted the game as giving children “the ability to focus, complete school work, homework, and to stay on task.” Focus Education’s website implied that these benefits would be permanent. The complaint alleges that Focus Education misrepresented the efficacy of its product and lacked any scientific evidence to support its claims. The consent order prohibits Focus Education from making claims about its brain training games (or any substantially similar product), unless the claims are non-misleading and are supported by competent and reliable scientific evidence. The order further prohibits the company from making unsubstantiated claims about the benefits, performance, or efficacy of products or services that supposedly alter the brain’s structure or function, improve cognitive abilities, behavior, or academic performance, or treat or reduce the symptoms of cognitive disorders, including ADHD.

Participants

For the *Commission*: *Annette Soberats.*

For the *Respondents*: *Not Represented by Counsel.*

COMPLAINT

The Federal Trade Commission, having reason to believe that Focus Education, LLC, a limited liability company, Michael Apstein, individually and as an officer of Focus Education, LLC, and John Able, individually and as an officer of Focus Education, LLC (collectively, “Respondents”), have violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

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1. Respondent Focus Education, LLC (“Focus Education”) is a Texas limited liability company with its principal office or place of business in Houston, Texas.

2. Respondent Michael Apstein is the co-founder and Chief Executive Officer of Focus Education. Individually or in concert with others, he controlled or had the authority to control and participated in the acts and practices of Focus Education, including the acts and practices alleged in this complaint. His principal office or place of business is in Malibu, CA.

3. Respondent John Able is the co-founder and Chief Financial Officer of Focus Education. Individually or in concert with others, he controlled or had the authority to control and participated in the acts and practices of Focus Education, including the acts and practices alleged in this complaint. His principal office or place of business is in Houston, Texas.

4. Respondents have advertised, labeled, offered for sale, sold, and distributed products to consumers, including the “ifocus System,” which consists of the Jungle Rangers computer software and comic book and information on children’s behavior, exercise, and diet. The ifocus System is a “device,” within the meaning of Sections 12 and 15 of the Federal Trade Commission Act.

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

IFOCUS SYSTEM

6. Since 2012, Respondents have sold the ifocus System directly to consumers for \$214.75, plus tax, via a long-form television commercial (“infomercial”), and the company’s websites, www.focuseducation.com, www.ifocussystem.com, www.ifocusgame.com, and www.junglerangers.com.

7. The centerpiece of the ifocus System is the Jungle Rangers computer software. Jungle Rangers is intended for children between the ages of six and twelve and purportedly offers adaptive cognitive training, so that the difficulty level of the

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software's games continuously self-adjusts to the player. Focus Education recommends that children play Jungle Rangers for a total of twelve to twenty hours. Children play Jungle Rangers on their own without any supervision by a trained clinician, and parents can track their child's game performance through the Jungle Rangers "Dashboard."

8. The Jungle Rangers computer software is available for Apple and Microsoft operating systems and consists of nine games where children begin as "cadets" and train through three "worlds" to become "Jungle Rangers." The three worlds include exercises with embedded cognitive tasks, including simple span tasks (repeating a pattern in the order presented), backwards span tasks (repeating a pattern in the reverse order presented), complex span tasks (repeating a pattern even when faced with visual or sound interferences), n-back tasks (focusing on a list of items and making a specific response each time the currently presented item matches the item presented n times ago), and continuous performance tasks (paying attention to a low-frequency activity and responding to pre-defined action).

9. Respondents have advertised Jungle Rangers through an infomercial, radio spots, social media, and the company's websites. Respondents have represented, among other things, through express and implied claims and consumer endorsements, that Jungle Rangers permanently improves children's focus, memory, attention, behavior, and school performance, including in children with Attention Deficit Hyperactivity Disorder ("ADHD"). Respondents have also represented that Jungle Rangers is scientifically proven to improve children's cognitive abilities, behavior, and academic performance.

10. Sales of Jungle Rangers, minus returns, from 2012 through May 31, 2013 totaled approximately \$4.5 million.

11. To induce consumers to purchase the ifocus System, Respondents have disseminated or have caused to be disseminated advertisements, including but not necessarily limited to the attached Exhibits A through F. These materials contain the following statements:

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- A. MALE ANNOUNCER: “Do you know your child is bright, but that struggles with focus or [sic] dragging down grades and self esteem?”

UNIDENTIFIED FEMALE: “Because she gets bored so easily, then she has a very difficult time focusing.”

MALE ANNOUNCER: “What if you could give your child the ability to focus, complete school work, homework and to stay on task, to reach the promise of his or her potential simply by playing a fun and easy computer game? Now you can with ifocus. Ifocus has hidden[,] powerful brain training exercises inside the fun and easy Jungle Rangers game and the results are astounding.”

[On screen depictions omitted]

* * *

“Ifocus is a powerful new approach developed to help kids focus in a groundbreaking new way. The secret is integrated neuro technology. Every challenge and sequence built into the ifocus game was scientifically engineered to strengthen important neuron connections, helping your child to filter, focus, absorb and remember.”

[On screen depictions omitted]

* * *

ON SCREEN: “Connie
Jacquelyn’s Mom”

CONNIE: “We just got done his [sic] parent-teacher conference and
Jacquelyn’s one of the highest one [sic] in her classes in reading. . . .”

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UNIDENTIFIED FEMALE: “He’s actually going into a higher level in reading. He has - - he gets more comprehension.”

* * *

ON SCREEN: “John Able
Parent, ifocus Co-Founder. . . .”

JOHN ABLE: “It’s taking their brain and opening up the neuro pathways and their ability to focus and pay attention is improved.”

(Ex. A, Infomercial version 1, at p. 5-8, 11, 23, 41-42)

- B. FEMALE ANNOUNCER: “Here to tell us more is brain specialist and ifocus scientific advisor, Dr. Daniel Amen. He’s a child psychiatrist and brain imaging specialist and he’s authored 28 books on the brain. Dr. Amen is also a father and a grandfather.”

DR. DANIEL AMEN: “As a child psychiatrist, I’ve not been all that excited about video games for children because children have developing brains. Here, we had developers, in a thoughtful way, develop a game to actually strengthen the connections in the brain. It’s a very interesting term called ‘long-term potentiation.’ So, what that means is the connections between cells actually become stronger. So, to have the opportunity to actually study it and show that it is, in fact, helpful was very exciting for me. So, we had a group of 45 children. What we found was their ability to regulate themselves[,] so self regulation and emotion statistically significantly increased after the kids played the game. If you can help a child with their emotions[,] regulate themselves, they’re more successful in their lives. Not only are they happier, but they’re able to stay on task. So, I think any kid will benefit from this.”

[On screen depictions omitted]

Complaint

* * *

MALE ANNOUNCER: “[B]ecause hidden within every level of the nine innovative ifocus Jungle Rangers games are scientifically proven memory and attention brain training exercises, designed to improve focus, concentration and memory[,] strengthening important neuron connections like these span sequences[,] which ask players to remember complex information, even while distracted. So, many kids who play Jungle Rangers span games feel a jump in math and reading comprehension.”

[On screen depictions omitted]

ON SCREEN: “CONTINUOUS PERFORMANCE
PAY ATTENTION
LEARN PATIENCE
FOCUS”

MALE ANNOUNCER: “Continuous performance games are all about paying attention and learning patience. Research proves kids who play continuous performance games are able to stay alert, be less distracted and really focus on what’s going on around them.”

ON SCREEN: “N-BACK
HOLD INFORMATION
UPDATE INFORMATION
REMEMBER AND FOCUS”

MALE ANNOUNCER: “And N-Back requires players to hold information and update that information. It’s practice for real life, helping kids to think about what they’ve learned and to focus and remember what they need to do. It’s this innovative[,] groundbreaking combination of proven science and increasingly challenging fun that has kids hooked from the very first time they play.”

[On screen depictions omitted]

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FEMALE ANNOUNCER: “Zak and Zane are identical twins. Think busy times two. Their dad knows how important exercise is for young boys, so he makes sure they spend a lot of time outside working off their energy. And while they’re great when it comes to sports, both Zak and Zane had trouble focusing at school.”

GARTH: “But to try to focus to do homework, there’d be times where it would take me a half-hour to just do one math problem.”

FEMALE ANNOUNCER: “But since playing the Jungle Rangers game and using the ifocus System, Zak and Zane are able to focus, filter out distractions and homework has become much more productive.”

ON SCREEN: “Garth
Zak and Zane’s Dad
Individual Result - your child may not be as
successful”

(disclosure appears in fine print at the bottom of the
TV screen)

GARTH: “Well, they’re doing better in school. We just got their report cards, and we were shocked, all As and Bs. They’ve never had that before.”

On SCREEN: “Zak and Zane
age 9 www.ifocusSystem.com”

CHILD: “Every time we come home from school, we can do our math all by ourselves.”

* * *

FEMALE ANNOUNCER: “Parents and teachers notice a difference in attention, behavior and focus

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when kids use the ifocus system. But we wanted to see for ourselves, so we put ifocus to the real test, real kids at a real school.”

FEMALE ANNOUNCER: “The ifocus Jungle Rangers game isn’t available at schools, so elementary school principal Lori Jensen jumped at the opportunity to test it as part of her curriculum.”

LORI JENSEN: “It fit into what we were trying to do with our students, engage them in the learning process, but also expand what their brains were going to be able to do.”

FEMALE ANNOUNCER: “The teachers were enthusiastic.”

JANE MARSHALL: “And, actually, as educators, that’s what we’re trying to do. We’re trying to create new pathways in the brain.”

FEMALE ANNOUNCER: “So, students played the ifocus Jungle Rangers game in computer lab and teachers noticed a difference in their classrooms.”

JANE MARSHALL: “A typical third grade class you’re really working to keep them focused.”

LORI JENSEN: “She can tell a difference in their attention span in the classroom.”

LAVONNE RIGGS: “I have seen a vast improvement. This class seems to be motivated and focused, and the only thing we’re doing differently is Jungle Rangers.”

JANE MARSHALL: “I love finding ways to help the children learn and Jungle Rangers does play a part in helping the children learn how to focus and to retrieve information and they enjoy doing it, so half the battle’s gone right there. . . .”

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LORI JENSEN: “It will help them with their attention span and their focus.”

[On screen depictions omitted]

* * *

FEMALE ANNOUNCER: “Isaac is a busy nine-year-old and Isaac had trouble paying attention in school until his mom discovered the ifocus System.”

[On screen depictions omitted]

FEMALE ANNOUNCER: “He started playing Jungle Rangers and she learned easy ways to help him change his behavior, to get organized and to get focused.”

ON SCREEN: “Alitza
Issac’s Mom www.ifocusSystem.com”

ALITZA: “The teacher actually has told me that this couple weeks [sic], she’s noticed big, big change.”

FEMALE ANNOUNCER: “Now, instead of spending hours on homework, Isaac is able to stay on task.”

* * *

FEMALE ANNOUNCER: “Trista is a bubbly six-year-old who is very bright. . . .”

ON SCREEN: “Taffie
Trista’s Mom www.ifocusSystem.com”

TAFFIE: “Trista is very intelligent, but because she gets bored so easily, then she has a very difficult time focusing. Every parent-teacher conference, it’s always, you know, she’s a little chatterbox, we have a hard time keeping her in her seat.”

FEMALE ANNOUNCER: “That was before Trista starting playing the ifocus Jungle Rangers game.”

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TAFFIE: “So, we went to this parent-teacher conference this last time and I said to her teacher, you know, how are things going? She said, I don’t know what you’re doing at home, but you need to keep it up because it’s helping her.”

FEMALE ANNOUNCER: “Playing Jungle Rangers really has made a difference for Trista and she knows exactly why.”

TRISTA: “It does help me pay attention.”

[On screen depictions omitted]

(Ex. B, Infomercial version 4, at p. 16-18, 20-21, 29-30, 33-35, 41, 46-47)

- C. MALE ANNOUNCER: “Jungle Rangers game is cutting edge science [with] proven memory and attention brain training exercises, every one of them designed to help improve your child’s concentration and memory.”

TIFFANY: “When I got that game, I started doing really, really good in school.”

FORRESTER: “I pay attention to my teacher a lot more.”

CHAZZ: “I have better grades.”

JACKSON: “I’ve been getting a lot more 100 percents.”

[On screen depictions omitted]

(Ex. C, Infomercial version 7, at p. 8-9)

- D. MALE ANNOUNCER: “But what if there was a way to fight that summer brain drain by sharpening your child’s memory and attention skills so that the very first day of class he or she is alert on task and ready to

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learn? Well, now you can. Introducing the ifocus Jungle Rangers Brain Training System. What looks like a simple computer game is really much more. You're actually looking at cutting edge science[,] a series of proven memory and attention brain training exercises integrated into this fun, challenging game, every one of them designed to help ensure kids stay sharp and focused over the brain draining summer."

[On screen depictions omitted]

* * *

ON SCREEN: "Research has shown self-regulation is far more important than IQ"

MALE ANNOUNCER: "And studies say that ability to pay attention, to sit and focus can be even more important to a child's academic success than a high IQ. And the more kids play the ifocus Jungle Rangers game over the summer, the stronger those memory and attention muscles can become. That can mean an advantage when school starts in the falls. [sic]"

(Ex. D, Infomercial version 11, at p. 5-6, 9)

E. **"Will this help with ADD or AD/HD?"**

While the ifocus system can help any child improve their focus and attention, much of its design was based upon cognitive training for children with impairments including AD/HD, so it will be highly beneficial for them."

"Will my child's improvements from ifocus / Jungle Rangers last or will they fade?"

Research shows that once neuro pathways have been opened or strengthened they do not recede unless there is either a disease or until the onset of issues later with aging."

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(Ex. E, Focus Education website – FAQs, at p. 2)

- F. ANNC: “Does your child struggle with focus and concentration? Do they spend hours trying to finish their homework? Are you disappointed with your child’s report card, because you know they can do better?

Because now there’s an easy solution. No tutors. No classes. Remarkably... it’s a video game. One that’s already helped kids get good grades who’d never seen it happen before.”

[script note omitted]

(Ex. F, Game Time radio ad script)

12. Daniel Amen, M.D. appears in Focus Education’s infomercial describing a pilot study he conducted on Jungle Rangers in 2011. In that study, forty-five children between the ages of six and twelve trained during a twelve-week period with Jungle Rangers for an average of five hours total and were evaluated before and after the testing period using WebNeuro, an online neuro-psychological evaluation containing four outcome measures: Self-Regulation, Emotion, Feeling, and Thinking. Dr. Amen reported “statistically significant” improvements only in the Self-Regulation and Emotion outcome measures, but not in the Feeling or Thinking measures. This study was not randomized, blinded, or controlled; the children’s performance in the Self-Regulation and Emotion outcome measures was in the normal range before and after using Jungle Rangers; the Self-Regulation, Emotion, and Feeling outcome measures do not measure focus, attention, or behavior; and the study did not conduct any follow-up testing to measure any permanent effects of Jungle Rangers training or collect any data on the children’s existing diagnoses or academic performance.

COUNT I

FALSE OR UNSUBSTANTIATED EFFICACY CLAIMS

13. In connection with the advertising, promotion, offering for sale, or sale of the ifocus System, including through the use of the

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product name, Respondents have represented, directly or indirectly, expressly or by implication, that:

- A. Playing the ifocus System's Jungle Rangers computer game improves children's focus, memory, attention, behavior, and/or school performance, including in children with ADHD; and
- B. Playing the ifocus System's Jungle Rangers computer game causes permanent improvements in children's focus, memory, attention, behavior, and/or school performance, including in children with ADHD.

14. The representations set forth in Paragraph 13 are false or misleading, or were not substantiated at the time the representations were made.

COUNT II
FALSE ESTABLISHMENT CLAIMS

15. In connection with the advertising, promotion, offering for sale, or sale of the ifocus System, Respondents have represented, directly or indirectly, expressly or by implication, that scientific studies prove:

- A. Playing the ifocus System's Jungle Rangers computer game improves children's focus, memory, attention, behavior, and/or school performance, including in children with ADHD; and
- B. Playing the ifocus System's Jungle Rangers computer game causes permanent improvements in children's focus, memory, attention, behavior, and/or school performance, including in children with ADHD.

16. In fact, scientific studies do not prove the representations set forth in Paragraph 15. Therefore, the representations set forth in Paragraph 15 are false or misleading.

Complaint

VIOLATIONS OF SECTIONS 5 AND 12

17. The acts and practices of Respondents 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 eighth day of April, 2015, has issued this Complaint against Respondents.

By the Commission.

Complaint

EXHIBIT A**EXHIBIT A**

1

1 OFFICIAL TRANSCRIPT PROCEEDING
2 FEDERAL TRADE COMMISSION
3
4
5 MATTER NO. 1223153
6 TITLE iFOCUS EDUCATION, LLC
7 DATE RECORDED: FEBRUARY 17, 2012
TRANSCRIBED: NOVEMBER 12, 2013
8
9 PAGES 1 THROUGH 63
10
11
12 JUNGLE RANGERS BRAIN TRAINING SYSTEM
IFOCUS EDUCATION
INFOMERCIAL (IPV1)
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24 For The Record, Inc.
25 (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT A

EXHIBIT A

2

1 FEDERAL TRADE COMMISSION
2 I N D E X
3
4 RECORDING: PAGE:
5 Jungle Rangers Infomercial 3
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Complaint

EXHIBIT A

EXHIBIT A

3

1 FEDERAL TRADE COMMISSION
2
3 In the Matter of:)
4 iFocus Education, LLC) Matter No. 1223153
5)
6 -----)

7 February 17, 2012
8
9
10

11 The following transcript was produced from a
12 CD-Rom provided to For The Record, Inc. on October 24,
13 2013.
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EXHIBIT A**EXHIBIT A**

4

1 P R O C E E D I N G S
2 - - - - -
3 JUNGLE RANGERS INFOMERCIAL
4 ON SCREEN: Excellence in Post-Production
5 and Customization
6 NORTH COUNTRY
7 CLIENT: FOCUS EDUCATION
8 AGENCY: MEDIA DESIGN GROUP
9 TITLE: IFOCUS V.1/MDG
10 CODE: IFOC
11 MISC: CLOSED CAPTIONED/VEIL ENCODED
12 PHONE NUMBER: 1-800-624-0625
13 DATE: FRIDAY, FEBRUARY 17, 2012 @ 2:00:50 P.M.
14 EDITOR: KC AUDIO: STEREO
15 MASTER: 97309 LENGTH: 28:30
16 LAKE McDONALD - GLACIER NATIONAL PARK
17 ON SCREEN: ifocus
18 The following is a paid presentation for the
19 ifocus system
20 MALE ANNOUNCER: The following is a paid
21 presentation for the ifocus System.
22 ON SCREEN: CONSTANTLY
23 Nagging your child?
24 MALE ANNOUNCER: Are you frustrated reminding
25 your kids to finish daily tasks?

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EXHIBIT A**EXHIBIT A**

1 UNIDENTIFIED FEMALE: I can say, go brush your
2 teeth or go get your homework or go do this, and five
3 minutes later, it's still not done or even began.

4 ON SCREEN: SPENDING HOURS
5 on basic homework?

6 MALE ANNOUNCER: Are you spending hours every
7 night desperately trying to help your child finish basic
8 homework assignments?

9 UNIDENTIFIED FEMALE: Homework took him like
10 four to five hours and for me to sit down with him.

11 ON SCREEN: PROBLEMS
12 at School?

13 MALE ANNOUNCER: Do you dread getting those
14 calls from school?

15 UNIDENTIFIED FEMALE: Every single day I was
16 getting calls from the teacher or he was getting sent to
17 the office.

18 ON SCREEN: Bright but
19 STRUGGLES
20 with grades?

21 MALE ANNOUNCER: Do you know your child is
22 bright, but that struggles with focus or dragging down
23 grades and self esteem?

24 UNIDENTIFIED FEMALE: Because she gets bored so
25 easily, then she has a very difficult time focusing.

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EXHIBIT A**EXHIBIT A**

6

1 ON SCREEN: FOCUS
2 COMPLETE SCHOOLWORK
3 COMPLETE HOMEWORK
4 STAY ON TASK
5 REACH POTENTIAL
6 MALE ANNOUNCER: What if you could give your
7 child the ability to focus, complete school work,
8 homework and to stay on task, to reach the promise of his
9 or her potential simply by playing --
10 ON SCREEN: Fun Easy
11 COMPUTER GAME
12 MALE ANNOUNCER: -- a fun and easy computer
13 game?
14 Now you can with ifocus.
15 ON SCREEN: Powerful
16 BRAIN TRAINING
17 MALE ANNOUNCER: Ifocus has hidden powerful
18 brain training exercises inside the fun and easy Jungle
19 Rangers Game --
20 ON SCREEN: Incredible
21 RESULTS
22 MALE ANNOUNCER: -- and the results are
23 astounding.
24 ON SCREEN: Jennifer
25 Kaida's Mom

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EXHIBIT A**EXHIBIT A**

7

1 JENNIFER: I really didn't expect to see that
2 big of change that quickly.
3 ON SCREEN: Susan
4 Forrester's Mom
5 SUSAN: It worked for our family. In two weeks
6 time, we noticed.
7 ON SCREEN: Marissa
8 Chazz's Mom
9 MARISSA: Ifocus gave me the tools to help my
10 child do better in school.
11 ON SCREEN: Powerful
12 NEW APPROACH!
13 MALE ANNOUNCER: Ifocus is a powerful new
14 approach developed to help kids focus in a groundbreaking
15 new way.
16 ON SCREEN: The Secret...
17 INTEGRATED NEURO TECHNOLOGY
18 MALE ANNOUNCER: The secret is integrated neuro
19 technology. Every challenge and sequence built into the
20 ifocus game was --
21 ON SCREEN: Scientifically
22 ENGINEERED
23 MALE ANNOUNCER: -- scientifically engineered
24 to strengthen important neuron connections, helping your
25 child to --

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EXHIBIT A**EXHIBIT A**

8

1 ON SCREEN: Filter
2 Focus
3 Absorb
4 Remember
5 MALE ANNOUNCER: -- filter, focus, absorb and
6 remember.
7 ON SCREEN: Tiffany
8 age 11
9 TIFFANY: When I got that game, I started doing
10 really, really good in school.
11 ON SCREEN: Forrester
12 age 10
13 FORRESTER: I pay attention to my teacher a lot
14 more.
15 ON SCREEN: Lindsey
16 age 9
17 LINDSEY: I noticed that I can focus more.
18 ON SCREEN: Anna
19 age 10
20 ANNA: I have more confidence in myself.
21 ON SCREEN: Chazz
22 age 10
23 CHAZZ: I have better grades.
24 ON SCREEN: Jackson
25 age 11

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EXHIBIT A**EXHIBIT A**

9

1 JACKSON: I've been getting a lot more 100
2 percents.
3 ON SCREEN: DEVELOPED BY
4 Scientists Educators Teachers
5 MALE ANNOUNCER: Ifocus was developed by
6 scientists, educators, and concerned parents who saw that
7 the difference between success and failure for some
8 children is often simply their ability to pay attention.
9 ON SCREEN: FOCUSING "MUSCLE"
10 Becomes Stronger
11 MALE ANNOUNCER: For children, the ability to
12 focus is like a muscle that becomes stronger with
13 repeated use.
14 ON SCREEN: BRAIN TRAINING EXERCISES
15 JUNGLE RANGERS
16 EVERYONE E CONTENT RATED BY ESRB
17 SCIENTIFICALLY ENGINEERED
18 MALE ANNOUNCER: The ifocus Jungle Rangers Game
19 is really a sophisticated series of brain training
20 exercises, scientifically engineered so the players
21 actually --
22 ON SCREEN: Strengthens
23 FOCUSING MUSCLE!
24 MALE ANNOUNCER: -- strengthen their focusing
25 muscle, all while playing a --

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EXHIBIT A**EXHIBIT A**

10

1 ON SCREEN: Fun Easy
2 GAME!
3 MALE ANNOUNCER: -- fun and easy game.
4 ON SCREEN: Chazz
5 age 10
6 CHAZZ: It's called ifocus and the game is
7 Jungle Rangers.
8 ON SCREEN: Anna
9 age 10
10 ANNA: You go in as a cadet and you train and
11 you play games so you can become a jungle ranger.
12 ON SCREEN: JUNGLE RANGERS
13 CHAZZ: It's fun. It helps you learn, remember
14 and make you concentrate more.
15 ANNA: I can concentrate and I can focus and
16 it's a lot easier than it was.
17 MALE ANNOUNCER: Parents and teachers say that
18 children who play the ifocus game are able to --
19 ON SCREEN: STAY ON TASK
20 ABSORB INFORMATION
21 IMPROVE GRADES
22 ifocus
23 MALE ANNOUNCER: -- stay on task, absorb
24 information, improve their grades. In short, they
25 improve their focus, sometimes dramatically.

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EXHIBIT A**EXHIBIT A**

11

1 ON SCREEN: Garth
2 Zak and Zane's Dad
3 GARTH: Well, they're doing better in school.
4 We just got their report card and we were shocked, all As
5 and Bs.
6 ON SCREEN: Kelly
7 Cami and Kemp's Mom
8 KELLY: And this was the first time -- well, he
9 got all As and one A minus.
10 ON SCREEN: Connie
11 Jacquelyn's Mom
12 CONNIE: We just got done his parent-teacher
13 conference and Jacquelyn's one of the highest one in her
14 classes in reading.
15 ON SCREEN: Alitza
16 Issac's Mom
17 ALITZA: Say that is a game that gives you
18 results, that once the kids are into it, they're hooked,
19 they stay there, and I would recommend it.
20 ON SCREEN: Jennifer Beals
21 Actress, Mother
22 MALE ANNOUNCER: Actress and mother Jennifer
23 Beals is convinced of the ifocus difference after
24 learning about the game and talking with parents just
25 like you.

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EXHIBIT A**EXHIBIT A**

12

1 ON SCREEN: COMING UP
2 The Science Behind
3 MALE ANNOUNCER: Join her as she interviews
4 brain specialist, Dr. Daniel Amen, about the science
5 behind ifocus.
6 ON SCREEN: Daniel Amen, M.D.
7 ifocus Scientific Advisor
8 DR. DANIEL AMEN: They were thoughtful about
9 different brain processes. So, those things are built
10 into the game.
11 ON SCREEN: COMING UP
12 The JUNGLE RANGERS Game Developer
13 MALE ANNOUNCER: Go behind the scenes with the
14 ifocus award-winning game developer --
15 ON SCREEN: COMING UP
16 The Importance of ifocus
17 MALE ANNOUNCER: -- and find out what former
18 U.S. Secretary of Education William Bennett has to say
19 about the importance of ifocus.
20 ON SCREEN: Dr. William Bennett
21 Former U.S. Secretary of Education
22 DR. WILLIAM BENNETT: Smart people using
23 technology develop things which can help kids learn and
24 develop their mental muscle.
25 ON SCREEN: COMING UP

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EXHIBIT A**EXHIBIT A**

13

1 The ifocus Difference!

2 MALE ANNOUNCER: And coming up, find out how

3 ifocus can help make a difference for your child, too.

4 This is an exclusive television offer.

5 ON SCREEN: Try it

6 RISK FREE!

7 PARENT TO PARENT PROMISE

8 6 MONTH

9 100% MONEY BACK GUARANTEE

10 EXCLUSIVE TV OFFER

11 MALE ANNOUNCER: Try ifocus in your home risk-

12 free with our six-month money back guarantee. It's the

13 ifocus parent to parent promise. Our promise that with

14 ifocus, you'll see a difference in your child at home and

15 at school.

16 And, now, actress and mother, Jennifer Beals.

17 ON SCREEN: Jennifer Beals

18 Actress, Mother

19 JENNIFER BEALS: I value education. So, the

20 idea of children learning to focus so they can focus on

21 learning caught my attention. But the more I saw kids

22 play the game and the more I learned about all of the

23 materials that make up ifocus, the more I realized that

24 ifocus was one of the --

25 ON SCREEN: Groundbreaking

Complaint

EXHIBIT A**EXHIBIT A**

14

1 EDUCATIONAL SYSTEM

2 JENNIFER BEALS: -- most groundbreaking,

3 educational systems available to kids.

4 ON SCREEN: Jackson

5 age 11

6 JACKSON: It's a game that helps kids

7 concentrate.

8 ON SCREEN: Forrester

9 age 10

10 FORRESTER: It helps me focus.

11 ON SCREEN: Zach

12 age 11

13 ZACH: It gives you confidence.

14 ON SCREEN: Trista

15 age 6

16 TRISTA: It does help me pay attention.

17 JENNIFER BEALS: Ifocus is easy to use and it's

18 fun, and it will bring you and your child into a world

19 that you never before would have imagined.

20 ON SCREEN: Marissa

21 Chazz's Mom

22 MARISSA: It's helped a lot at the house even,

23 not just at school. His behavior with his chores,

24 helping out.

25 ON SCREEN: Colleen

Complaint

EXHIBIT A**EXHIBIT A**

15

1 Michael and Nelson's Mom

2 COLLEEN: I've seen a lot more focus, a lot of

3 motivation.

4 ON SCREEN: Kristin

5 Anna's Mom

6 KRISTIN: She seems to be trying harder to want

7 to do what I asked.

8 ON SCREEN: Julie

9 Zach's Mom

10 JULIE: This is a great way to strengthen their

11 brain, which is their biggest asset in life.

12 ON SCREEN: ifocus

13 Jennifer Beals

14 Actress, Mother

15 JENNIFER BEALS: The secret to the success of

16 ifocus is integrated neuro technology. And here to tell

17 us more is brain specialist and ifocus scientific

18 advisor, Dr. Daniel Amen. He's a child psychiatrist and

19 brain imaging specialist and he's authored 28 books on

20 the brain including four New York Times bestsellers. Dr.

21 Amen is also a father and a grandfather.

22 ON SCREEN: Daniel Amen, M.D.

23 Brain Imaging Specialist

24 DR. DANIEL AMEN: As a child psychiatrist, I've

25 not been all that excited about video games for children

Complaint

EXHIBIT A**EXHIBIT A**

16

1 because children have developing brains.

2 JENNIFER BEALS: And how is -- how are most
3 video games different than ifocus' Jungle Rangers?

4 DR. DANIEL AMEN: Here, we had developers, in a
5 thoughtful way, develop a game to actually strengthen the
6 connections in the brain. It's a very interesting term
7 called "long-term potentiation." So, what that means is
8 the connections between cells actually become stronger.

9 ON SCREEN: Daniel Amen, M.D.

10 Author, 28 books on the brain

11 DR. DANIEL AMEN: So, to have the opportunity
12 to actually study it and show that it is, in fact,
13 helpful was very exciting for me.

14 ON SCREEN: ifocus

15 GROUP STUDY

16 Pre. vs. Post Comparison

17 (Bar Graph)

18 THINKING SELF REGULATION EMOTION FEELING

19 DR. DANIEL AMEN: So, we had a group of 45
20 children. What we found was their ability to regulate
21 themselves, so self regulation, and emotion,
22 statistically significantly --

23 ON SCREEN: Bar Graph on screen

24 After average 5 hours gametime

25 Recommended gametime: 12-15 hours

Complaint

EXHIBIT A**EXHIBIT A**

17

1 DR. DANIEL AMEN: -- increased after the kids
2 played the game.
3 ON SCREEN: Jennifer Beals
4 Actress, Mother
5 JENNIFER BEALS: Why is self regulation so
6 important when it comes to focus?
7 DR. DANIEL AMEN: If you can help a child with
8 their emotions, regulate themselves, they're more
9 successful in their lives. Not only are they happier,
10 but they're able to stay on task.
11 JENNIFER BEALS: What kind of kids will benefit
12 from the ifocus system?
13 ON SCREEN: Daniel Amen, M.D.
14 Brain Imaging Specialist
15 DR. DANIEL AMEN: So, I think any kid will
16 benefit from this, and the reason I say that is I love
17 the approach. It's a brain training exercise. None of
18 it's hard. I mean, that's sort of the exciting thing.
19 None of it's hard and it can give you a big benefit. And
20 as a parent, you feel confident that this is helping my
21 child and not hurting my child.
22 JENNIFER BEALS: Right.
23 ON SCREEN: ifocus
24 ON SCREEN: Julie
25 Zach's Mom

Complaint

EXHIBIT A**EXHIBIT A**

18

1 JULIE: My kids love to play video games and
2 this is a great way to strengthen their brain.
3 ON SCREEN: Taffie
4 Trista's Mom
5 TAFFIE: And it settles them in and it helps
6 them to learn to focus.
7 ON SCREEN: Kristin
8 Anna's Mom
9 KRISTIN: She's doing better in school and
10 doing better at tasks and that gives her self esteem and
11 self confidence, and that's been good to see.
12 JENNIFER BEALS: Parents and teachers notice a
13 difference in attention, behavior, and focus when kids
14 use the ifocus system. But we wanted to see for
15 ourselves, so we put ifocus to the real test, real kids
16 at a real school.
17 ON SCREEN: JUNGLE RANGERS
18 NOT AVAILABLE AT SCHOOLS!
19 JENNIFER BEALS: The ifocus Jungle Rangers game
20 isn't available at schools, so elementary school
21 principal Lori Jensen jumped at the opportunity to test
22 it as part of her curriculum.
23 ON SCREEN: Lori Jensen
24 Principal, 30 years in education
25 LORI JENSEN: It fit into what we were trying

Complaint

EXHIBIT A**EXHIBIT A**

19

1 to do with our students, engage them in the learning
2 process, but also expand what their brains were going to
3 be able to do.

4 JENNIFER BEALS: The teachers were
5 enthusiastic.

6 ON SCREEN: Karen DelVecchio
7 Teacher

8 KAREN DELVECCHIO: Any kind of a task where
9 they're sitting in one place and they're using that part
10 of their brain that they have to focus on something and
11 improve on something is an excellent tool for them.

12 ON SCREEN: Jane Marshall
13 Teacher

14 JANE MARSHALL: And, actually, as educators,
15 that's what we're trying to do. We're trying to create
16 new pathways in the brain.

17 JENNIFER BEALS: So, students played the ifocus
18 Jungle Rangers game in computer lab and teachers noticed
19 a difference in their classrooms.

20 JANE MARSHALL: A typical third grade class,
21 you're really working to keep them focused.

22 LORI JENSEN: She can tell a difference in
23 their attention span in the classroom.

24 JANE MARSHALL: I love finding ways to help the
25 children learn and Jungle Rangers does play a part in

Complaint

EXHIBIT A**EXHIBIT A**

20

1 helping the children learn how to focus --

2 ON SCREEN: Jane Marshall

3 Teacher

4 JANE MARSHALL: -- and to retrieve information,

5 and they enjoy doing it, so half the battle's gone right

6 there.

7 ON SCREEN: Lavonne Riggs

8 Teacher

9 LAVONNE RIGGS: I have seen a vast improvement.

10 This class seems to be motivated and focused and the only

11 thing we're doing differently is Jungle Rangers. Pretty

12 amazing.

13 JENNIFER BEALS: With ifocus, your child can

14 learn to focus so that your child --

15 ON SCREEN: This is a paid advertisement for

16 the ifocus System

17 JENNIFER BEALS: -- can focus on learning, to

18 succeed in the classroom and beyond.

19 ON SCREEN: ifocus

20 ON SCREEN: FOCUS

21 COMPLETE SCHOOLWORK

22 COMPLETE HOMEWORK

23 STAY ON TASK

24 REACH POTENTIAL

25 MALE ANNOUNCER: What if you could give your

Complaint

EXHIBIT A**EXHIBIT A**

21

1 child the ability to focus, complete school work, home
2 work, and to stay on task, achieve his or her potential,
3 simply by playing --

4 ON SCREEN: Fun

5 Easy

6 COMPUTER GAME

7 MALE ANNOUNCER: -- a fun and easy computer
8 game? Now, you can with ifocus.

9 ON SCREEN: DEVELOPED BY

10 Scientists

11 Educators

12 Parents

13 MALE ANNOUNCER: ifocus was developed by
14 scientists, educators, and concerned parents who saw
15 that --

16 ON SCREEN: THE DIFFERENCE BETWEEN

17 Success Failure

18 Their Ability

19 TO PAY ATTENTION!

20 MALE ANNOUNCER: -- the difference between
21 success and failure for some children is often simply
22 their ability to pay attention.

23 For children, the ability to focus is like a
24 muscle that becomes stronger with repeated use.

25 ON SCREEN: ifocus

Complaint

EXHIBIT A**EXHIBIT A**

22

1 JUNGLE RANGERS
2 EVERYONE E CONTENT RATED BY ESRB
3 Available for Windows Mac
4 MALE ANNOUNCER: The cornerstone of the ifocus
5 system is the Jungle Rangers game, rated E for everyone,
6 and available for PC and Mac.
7 ON SCREEN: More than
8 JUST A GAME!
9 MALE ANNOUNCER: Kids think they're just
10 playing a fun and easy game --
11 ON SCREEN: BRAIN TRAINING EXERCISES
12 SCIENTIFICALLY ENGINEERED
13 JUNGLE RANGERS
14 MALE ANNOUNCER: -- but Jungle Rangers is
15 really a sophisticated series of brain training
16 exercises scientifically engineered so that children can
17 actually --
18 ON SCREEN: Strengthens
19 FOCUSING MUSCLE!
20 20 minutes A DAY 3X A WEEK
21 MALE ANNOUNCER: -- strengthen their focusing
22 muscle in as little as 20 minutes a day, three times a
23 week.
24 ON SCREEN: PARENT'S DASHBOARD
25 MONITOR PROGRESS

Complaint

EXHIBIT A**EXHIBIT A**

23

1 MALE ANNOUNCER: And parents can track their
2 progress through the innovative ifocus parent's
3 dashboard.
4 ON SCREEN: Taffie
5 Trista's Mom
6 TAFFIE: Well, the dashboard explains to the
7 parent how much time they have spent in what -- in which
8 areas.
9 ON SCREEN: Jennifer
10 Kaida's Mom
11 JENNIFER: It helps you be able to track what
12 he's doing, his progress.
13 TAFFIE: And it tells you exactly what part of
14 the game they've been playing and for how long.
15 UNIDENTIFIED FEMALE: He's actually going into
16 a higher level in reading. He has -- he gets more
17 comprehension.
18 ON SCREEN: The Secret...
19 INTEGRATED NEURO TECHNOLOGY
20 MALE ANNOUNCER: The secret is integrated neuro
21 technology.
22 ON SCREEN: Stimulates
23 THE CORTEX
24 MALE ANNOUNCER: Key areas of the cortex are
25 stimulated in careful order --

Complaint

EXHIBIT A**EXHIBIT A**

24

1 ON SCREEN: KEY NEURONS
2 Fire together
3 Wire together
4 MALE ANNOUNCER: -- first, firing neurons and
5 then creating connections that get stronger, literally
6 wiring them together the more your child plays the game.
7 ON SCREEN: Challenged,
8 NOT FRUSTRATED
9 MALE ANNOUNCER: Children who play Jungle
10 Rangers are challenged, but not frustrated, because
11 Jungle Rangers --
12 ON SCREEN: Game Adapts
13 TO EACH PLAYER
14 MALE ANNOUNCER: -- constantly adapts and
15 readjusts the level of difficulty for each player --
16 ON SCREEN: Kids Love
17 JUNGLE RANGERS
18 MALE ANNOUNCER: -- and kids are hooked the
19 very first time they play.
20 ON SCREEN: FIRST TIME PLAYERS!
21 JUNGLE RANGERS
22 CHILD: It was really fun.
23 CHILD: It was challenging, but then I would
24 really want to play it again.
25 CHILD: It's like a puzzle.

Complaint

EXHIBIT A**EXHIBIT A**

25

1 CHILD: It's fun.
2 CHILD: It's just an awesome game.
3 ON SCREEN: HOW MUCH
4 Wasted Money?
5 DO NOTHING GAMES
6 BORING TUTORING SESSIONS
7 AFTER SCHOOL PROGRAMS
8 MALE ANNOUNCER: How much time and money have
9 you wasted on do nothing video games for your child,
10 boring tutoring sessions or after school programs that
11 simply don't make a difference?
12 ON SCREEN: PARENT TO PARENT PROMISE
13 6 MONTH 100% MONEY BACK GUARANTEE
14 JUNGLE RANGERS
15 MALE ANNOUNCER: The Jungle Rangers game and
16 ifocus system are 100 percent guaranteed.
17 ON SCREEN: ifocus
18 \$14.95 PLUS S&H
19 30 DAY OFFER
20 EXCLUSIVE TV OFFER
21 Play JUNGLE RANGERS in your home!
22 CALL NOW 1-800-624-0625 ifocusSystem.com
23 MALE ANNOUNCER: And, right now, your family
24 has an extraordinary opportunity to try ifocus and play
25 Jungle Rangers in your home for 30 days for just \$14.95.

Complaint

EXHIBIT A**EXHIBIT A**

26

1 That's right. It's a very special ifocus Jungle
2 Rangers --
3 ON SCREEN: Product information shown above
4 Quick Start System
5 AVAILABLE FOR Mac Windows
6 MALE ANNOUNCER: -- quick start offer. Use it
7 in your own home for a full 30 days for just \$14.95.
8 ON SCREEN: Product information shown above
9 Not all children will achieve this result.
10 UNIDENTIFIED FEMALE: He says, Mom, I can focus
11 in class.
12 UNIDENTIFIED MALE: I can't see any reason I
13 would not recommend this.
14 UNIDENTIFIED FEMALE: I would really encourage
15 parents to do it.
16 ON SCREEN: CALL or Click
17 TO ORDER NOW!
18 ifocus
19 \$14.95 PLUS S&H
20 30 DAY OFFER
21 EXCLUSIVE TV OFFER
22 THE ENTIRE ifocus Quick Start System
23 CALL NOW 1-800-624-0625 ifocusSystem.com
24 MALE ANNOUNCER: Call or click ifocussystem.com
25 right now and try the incredible new ifocus Jungle

Complaint

EXHIBIT A**EXHIBIT A**

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1 Rangers Quick Start System for 30 days for just \$14.95.

2 ON SCREEN: Product information shown above

3 JUNGLE RANGERS

4 Brain Training Game

5 Checklist

6 MALE ANNOUNCER: You'll receive the ifocus

7 brain training Jungle Rangers game and user-friendly

8 checklist.

9 ON SCREEN: Product information shown above

10 Science Behind the Game AUDIO CD

11 MALE ANNOUNCER: Plus, our audio CD explains

12 the science behind the game --

13 ON SCREEN: Product information shown above

14 5 ways in 5 days

15 QUICK START CARDS

16 MALE ANNOUNCER: -- and increase your child's

17 focus and attention five ways in five days with our

18 exclusive quick start cards.

19 ON SCREEN: Product information shown above

20 Focus on Behavior HANDBOOK

21 Behavior Advice from Experts AUDIO CD

22 Focus on Behavior QUICK START CARDS

23 MALE ANNOUNCER: You'll also get our Focus on

24 Behavior Handbook and get behavior tips from experts on

25 our audio CD, again with easy-to-follow quick start

Complaint

EXHIBIT A**EXHIBIT A**

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1 cards.

2 ON SCREEN: Product information shown above

3 FIRST EDITION JUNGLE RANGERS Comic Book

4 MALE ANNOUNCER: And because kids love the

5 Jungle Rangers game, we'll even give them our first

6 edition Jungle Rangers comic book.

7 UNIDENTIFIED FEMALE: I was really impressed

8 with the CDs that were included.

9 UNIDENTIFIED FEMALE: I was just expecting a

10 Jungle Rangers game.

11 UNIDENTIFIED FEMALE: The informational discs

12 that you sent helped me to be able to understand him and

13 help him out.

14 ON SCREEN: ifocus

15 \$14.95 PLUS S&H

16 30 DAY OFFER

17 EXCLUSIVE TV OFFER

18 THE ENTIRE ifocus Quick Start System

19 CALL NOW 1-800-624-0625 ifocusSystem.com

20 MALE ANNOUNCER: That's the entire ifocus Quick

21 Start System, including the Jungle Rangers game,

22 checklist and comic book, plus the five ways in five days

23 cards and behind the science audio CD, the Focus on

24 Behavior Handbook, quick start cards, and audio CD, all

25 yours to try for just \$14.95.

Complaint

EXHIBIT A**EXHIBIT A**

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1 ON SCREEN: CALL in the next 18 MINUTES!

2 Product information shown above

3 FREE SHIPPING

4 MALE ANNOUNCER: Call or click ifocussystem.com

5 in the next 18 minutes and we'll even include free

6 shipping.

7 ON SCREEN: ifocus

8 \$14.95 PLUS S&H

9 30 DAY OFFER

10 EXCLUSIVE TV OFFER

11 THE ENTIRE ifocus Quick Start System

12 CALL NOW 1-800-624-0625 ifocusSystem.com

13 MALE ANNOUNCER: Remember, the ifocus Jungle

14 Rangers Quick Start System is not available in any stores

15 or at any schools. This is an exclusive television

16 offer. You have absolutely nothing to lose and your

17 child has everything to gain.

18 We're so certain you'll see positive

19 improvements in your child's ability to focus at school

20 and at home with ifocus, we want you to use it in your

21 home, have your child play the game for six months

22 guaranteed.

23 ON SCREEN: ifocus

24 \$14.95 PLUS S&H

25 30 DAY OFFER

Complaint

EXHIBIT A**EXHIBIT A**

30

1 EXCLUSIVE TV OFFER
2 PARENT TO PARENT PROMISE
3 6 MONTH 100% MONEY BACK GUARANTEE
4 CALL NOW 1-800-624-0625 ifocusSystem.com
5 MALE ANNOUNCER: It's the ifocus parent to
6 parent promise. If you aren't completely happy, send it
7 back any time within those six months and we'll refund
8 your money, period.
9 ON SCREEN: Product information shown above
10 \$70 VALUE
11 Keep your FREE GIFTS!
12 MALE ANNOUNCER: But keep the behavior
13 handbook, audio CD, cards, and the Jungle Rangers comic
14 book, a \$70 value as your free gifts.
15 ON SCREEN: Product information shown above
16 Not all children will achieve this result.
17 UNIDENTIFIED FEMALE: I'm happy to have a tool
18 that helps my daughter focus and helps her to do better
19 in school.
20 UNIDENTIFIED FEMALE: The game has -- is
21 teaching my boys how to focus and how to filter out
22 distractions.
23 UNIDENTIFIED FEMALE: It makes me very, very
24 happy. Happy mom.
25 ON SCREEN: CALL or Click

Complaint

EXHIBIT A**EXHIBIT A**

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1 TO ORDER NOW!
2 ifocus
3 \$14.95 PLUS S&H
4 30 DAY OFFER
5 EXCLUSIVE TV OFFER
6 THE ENTIRE ifocus Quick Start System
7 CALL NOW 1-800-624-0625 ifocusSystem.com
8 MALE ANNOUNCER: Call or click ifocussystem.com
9 and order right now and you could be hearing these words,
10 too.
11 CHILD: Jungle Rangers helps me pay attention.
12 ON SCREEN: CALL or Click
13 TO ORDER NOW!
14 ifocus
15 \$14.95 PLUS S&H
16 30 DAY OFFER
17 EXCLUSIVE TV OFFER
18 THE ENTIRE ifocus Quick Start System
19 CALL NOW 1-800-624-0625 ifocusSystem.com
20 MALE ANNOUNCER: Call 1-800-624-0625 for the
21 ifocus system. Call 1-800-624-0625 now.
22 ON SCREEN: Zak and Zane
23 age 9
24 JENNIFER BEALS: Zak and Zane are identical
25 twins. Think busy times two. Their dad knows how

Complaint

EXHIBIT A**EXHIBIT A**

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1 important exercise is for young boys, so he makes sure
2 they spend a lot of time outside working off their
3 energy.

4 GARTH: The boys keep me going. They're fun.

5 ON SCREEN: Garth

6 Zak and Zane's Dad

7 GARTH: They keep me busy, but they are a lot
8 of fun and they're good, good kids.

9 JENNIFER BEALS: And while they're great when
10 it comes to sports, both Zak and Zane had trouble
11 focusing at school.

12 GARTH: But to try to focus to do homework,
13 there'd be times where it would take me a half-hour to
14 just do one math problem.

15 JENNIFER BEALS: But since playing the Jungle
16 Rangers game and using the ifocus system --

17 ON SCREEN: 1-800-624-0625

18 ifocusSystem.com

19 JENNIFER BEALS: -- Zak and Zane are able to
20 focus, filter out distractions, and homework has become
21 much more productive.

22 GARTH: Well, they're doing better in school.

23 ON SCREEN: Garth 1-800-624-0625

24 Zak and Zane's Dad ifocusSystem.com

25 GARTH: We just got their report cards, and we

Complaint

EXHIBIT A**EXHIBIT A**

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1 were shocked, all As and Bs. They've never had that
2 before. Their focus is un -- it's the biggest key, is
3 their focus, they can focus on doing their work.

4 ON SCREEN: Zak and Zane
5 age 9

6 CHILD: We're getting better on math and stuff.
7 CHILD: Yeah.
8 CHILD: And we got three As.

9 ON SCREEN: Garth
10 Zak and Zane's Dad

11 GARTH: And now, they come home and do their
12 homework. It's -- you see the difference. You see the
13 difference. One game, hmm, makes a difference.

14 JENNIFER BEALS: Kids think they're just
15 playing a game, but this game is so much more than just a
16 game. It's designed to stimulate their brain in new
17 ways.

18 ON SCREEN: The Secret...
19 INTEGRATED NEURO TECHNOLOGY

20 JENNIFER BEALS: It uses integrated neuro
21 technology designed to --

22 ON SCREEN: KEY NEURONS
23 Fire together
24 Wire together

25 JENNIFER BEALS: -- get key neurons to fire

Complaint

EXHIBIT A**EXHIBIT A**

34

1 together and then wire together. This creates pathways
2 that helps kids to --
3 ON SCREEN: Filter, Focus, Absorb, Remember
4 JENNIFER BEALS: -- filter, focus, absorb and
5 remember.
6 ON SCREEN: Game Adapts
7 TO PLAYER!
8 JENNIFER BEALS: And the game adapts as your
9 child improves, and as a parent you can track those
10 improvements through the game's dashboard.
11 ON SCREEN: PARENT'S DASHBOARD
12 MONITOR PROGRESS
13 JENNIFER BEALS: You'll see at a glance how
14 your child is progressing through the game, and best of
15 all --
16 ON SCREEN: 1-800-624-0625
17 ifocusSystem.com
18 JENNIFER BEALS: -- you'll know ifocus is
19 working because you'll see it working in your child's
20 daily life.
21 ON SCREEN: Marissa 1-800-624-0625
22 Chazz's Mom ifocusSystem.com
23 MARISSA: When he brings home his paperwork
24 from school and they're As, they're 100 percent, 95
25 percents versus the 65 percents.

Complaint

EXHIBIT A**EXHIBIT A**

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1 ON SCREEN: Chazz 1-800-624-0625
2 age 10 ifocusSystem.com
3 CHAZZ: Yeah, I have better grades. I used to
4 blurt out in class and now I don't do that as much
5 anymore.
6 ON SCREEN: Marissa 1-800-624-0625
7 Chazz's Mom ifocusSystem.com
8 MARISSA: I would have never in a million years
9 thought that a video game, ifocus Jungle Rangers, would
10 have been able to do that for us.
11 JENNIFER BEALS: Former Secretary of Education
12 Bill Bennett agrees.
13 ON SCREEN: Dr. William Bennett
14 Former U.S. Secretary of Education
15 DR. WILLIAM BENNETT: Well, there are games and
16 there are games. There are games that you learn from and
17 games that you don't.
18 ON SCREEN: Jennifer Beals
19 Actress, Mother
20 JENNIFER BEALS: Dr. Bennett understands how
21 deeply important it is for America's parents to give kids
22 the tools and skills they need to succeed during their
23 school years and beyond.
24 DR. WILLIAM BENNETT: Smart people using
25 technology develop things which can help kids learn and

Complaint

EXHIBIT A**EXHIBIT A**

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1 develop their mental muscle. Supposing you had something
2 which would help kids increase their focus and attention
3 and parents could confidently --

4 ON SCREEN: Dr. William Bennett
5 Former U.S. Secretary of Education
6 DR. WILLIAM BENNETT: -- that's a very
7 important word -- confidently say, sit here, do this, you
8 have given a great gift to that parent and that child and
9 you may even have restored greater measures of harmony at
10 home.

11 ON SCREEN: Jennifer 1-800-624-0625
12 Kaida's Mom ifocusSystem.com
13 JENNIFER: He seems to come home and jump right
14 in, get his schoolwork done that he's supposed to.

15 ON SCREEN: Kristin 1-800-624-0625
16 Anna's Mom ifocusSystem.com
17 KRISTIN: We had the best parent-teacher
18 conference that we've ever had.

19 ON SCREEN: Marissa 1-800-624-0625
20 Chazz's Mom ifocusSystem.com
21 MARISSA: I don't get phone calls anymore.

22 ON SCREEN: 1-800-624-0625
23 ifocusSystem.com

24 DR. WILLIAM BENNETT: What a blessing that is.

25 JENNIFER BEALS: Trista is a bubbly six-year

Complaint

EXHIBIT A**EXHIBIT A**

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1 old who's very bright, but who had problems in school.

2 ON SCREEN: Taffie 1-800-624-0625

3 Trista's Mom ifocusSystem.com

4 TAFFIE: Trista is very intelligent, but

5 because she gets bored so easily, then she has a very

6 difficult time focusing.

7 JENNIFER BEALS: That was before Trista

8 starting playing the ifocus Jungle Rangers game.

9 ON SCREEN: 1-800-624-0625

10 ifocusSystem.com

11 TAFFIE: The wonderful thing about the ifocus

12 and the Jungle Rangers game is that they can go at their

13 own pace. And as a pediatric RN and as a mother of nine

14 and as a grandmother of three and a foster mom, I was

15 thrilled. I just thank you for a wonderful product.

16 JENNIFER BEALS: Playing Jungle Rangers really

17 has made a difference for Trista and she knows exactly

18 why.

19 ON SCREEN: Trista 1-800-624-0625

20 age 6 ifocusSystem.com

21 TRISTA: It helps me focus at school.

22 ON SCREEN: 1-800-624-0625

23 ifocusSystem.com

24 JENNIFER BEALS: With ifocus, your child can

25 learn to focus so that your child can focus on learning,

Complaint

EXHIBIT A**EXHIBIT A**

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1 to succeed in the classroom and in life.

2 UNIDENTIFIED FEMALE: Oh, my gosh, this game is

3 amazing, 100 percent recommend it.

4 ON SCREEN: Garth 1-800-624-0625

5 Zak and Zane's Dad ifocusSystem.com

6 GARTH: This is one thing that I'm very glad my

7 wife and I decided to do. I think it's been beneficial

8 for our boys. Thank you.

9 ON SCREEN: This is a paid advertisement for

10 the ifocus System

11 GARTH: That's about what I want to say, thank

12 you for ifocus.

13 ON SCREEN: CALL or Click

14 TO ORDER NOW!

15 ifocus

16 \$14.95 PLUS S&H

17 30 DAY OFFER

18 EXCLUSIVE TV OFFER

19 THE ENTIRE ifocus Quick Start System

20 CALL NOW 1-800-624-0625 ifocusSystem.com

21 MALE ANNOUNCER: Call or click ifocussystem.com

22 right now and try the incredible new ifocus Jungle

23 Rangers Quick Start System for 30 days for just \$14.95.

24 ON SCREEN: Product information shown above

25 JUNGLE RANGERS

Complaint

EXHIBIT A**EXHIBIT A**

39

1 Brain Training Game
2 Checklist
3 MALE ANNOUNCER: You'll receive the ifocus
4 brain training Jungle Rangers game and user-friendly
5 checklist.
6 ON SCREEN: Product information shown above
7 Science Behind the Game AUDIO CD
8 MALE ANNOUNCER: Plus, our audio CD explains
9 the science behind the game --
10 ON SCREEN: Product information shown above
11 5 ways in 5 days
12 QUICK START CARDS
13 MALE ANNOUNCER: -- and increase your child's
14 focus and attention five ways in five days with our
15 exclusive quick start cards.
16 ON SCREEN: Product information shown above
17 Focus on Behavior HANDBOOK
18 Behavior Advice from Experts AUDIO CD
19 Focus on Behavior QUICK START CARDS
20 MALE ANNOUNCER: You'll also get our Focus on
21 Behavior Handbook and get behavior tips from experts on
22 our audio CD, again with easy-to-follow quick start
23 cards.
24 ON SCREEN: Product information shown above
25 FIRST EDITION JUNGLE RANGERS Comic Book

Complaint

EXHIBIT A**EXHIBIT A**

40

1 MALE ANNOUNCER: And because kids love the
2 Jungle Rangers game, we'll even give them our first
3 edition Jungle Rangers comic book.

4 ON SCREEN: ifocus
5 \$14.95 PLUS S&H
6 30 DAY OFFER
7 EXCLUSIVE TV OFFER
8 THE ENTIRE ifocus Quick Start System
9 CALL NOW 1-800-624-0625 ifocusSystem.com

10 MALE ANNOUNCER: That's the entire ifocus Quick
11 Start System, including the Jungle Rangers game,
12 checklist and comic book, plus the five ways in five days
13 cards and behind the science audio CD, the Focus on
14 Behavior Handbook, quick start cards, and audio CD, all
15 yours to try for just \$14.95.

16 ON SCREEN: CALL in the next 10 MINUTES!
17 Product information shown above
18 FREE SHIPPING

19 MALE ANNOUNCER: Call or click ifocussystem.com
20 in the next 10 minutes and we'll even include free
21 shipping.

22 ON SCREEN: ifocus
23 \$14.95 PLUS S&H
24 30 DAY OFFER
25 EXCLUSIVE TV OFFER

Complaint

EXHIBIT A**EXHIBIT A**

41

1 THE ENTIRE ifocus Quick Start System
2 CALL NOW 1-800-624-0625 ifocusSystem.com
3 MALE ANNOUNCER: Call or click ifocussystem.com
4 and order right now.
5 MALE ANNOUNCER: Call 1-800-624-0625 for the
6 ifocus system. Call 1-800-624-0625 now.
7 ON SCREEN: Jennifer Beals
8 Actress, Mother ifocusSystem.com
9 JENNIFER BEALS: Behind ifocus is a team of
10 scientists, doctors, educators, child psychologists,
11 award-winning game designers, and parents. The result,
12 something truly unique and remarkable that children love
13 to play.
14 ON SCREEN: John Able
15 Parent, ifocus Co-Founder
16 JOHN ABLE: It's really wonderful. It's a
17 little bit like Sesame Street brought education to TV.
18 Children were going to watch TV, Sesame Street brought
19 them something that they liked watching, and the same
20 thing's going on with Jungle Rangers.
21 JASON LEON: Well, we made it really
22 approachable for them. You're going to become a Jungle
23 Rangers.
24 ON SCREEN: JUNGLE RANGERS
25 GAME: Good day, I need your help.

Complaint

EXHIBIT A**EXHIBIT A**

42

1 ON SCREEN: Jason Leon
2 ifocus Game Developer
3 JASON LEON: Each and every game is adaptive.
4 So, it's actually designed to scale up in difficulty so
5 that it keeps your brain energy up as high as it possibly
6 can. That's one of the aspects that sets our game apart
7 from other games is that it's constantly challenging you
8 to get better.
9 JOHN ABLE: It's taking their brain and opening
10 up the neuro pathways and their ability to focus and pay
11 attention is improved.
12 ON SCREEN: CALL or Click
13 TO ORDER NOW!
14 ifocus
15 \$14.95 PLUS S&H
16 30 DAY OFFER
17 EXCLUSIVE TV OFFER
18 THE ENTIRE ifocus Quick Start System
19 CALL NOW 1-800-624-0625 ifocusSystem.com
20 MALE ANNOUNCER: Call or click ifocussystem.com
21 right now and try the incredible new ifocus Jungle
22 Rangers Quick Start System for 30 days for just \$14.95.
23 ON SCREEN: Product information shown above
24 JUNGLE RANGERS
25 Brain Training Game

Complaint

EXHIBIT A**EXHIBIT A**

43

1 Checklist

2 MALE ANNOUNCER: You'll receive the ifocus

3 brain training Jungle Rangers game and user-friendly

4 checklist.

5 ON SCREEN: Product information shown above

6 Science Behind the Game AUDIO CD

7 MALE ANNOUNCER: Plus, our audio CD explains

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9 ON SCREEN: Product information shown above

10 5 ways in 5 days

11 QUICK START CARDS

12 MALE ANNOUNCER: -- and increase your child's

13 focus and attention five ways in five days with our

14 exclusive quick start cards.

15 ON SCREEN: Product information shown above

16 Focus on Behavior HANDBOOK

17 Behavior Advice from Experts AUDIO CD

18 Focus on Behavior QUICK START CARDS

19 MALE ANNOUNCER: You'll also get our Focus on

20 Behavior Handbook and get behavior tips from experts on

21 our audio CD, again with easy-to-follow quick start

22 cards.

23 ON SCREEN: Product information shown above

24 FIRST EDITION JUNGLE RANGERS Comic Book

25 MALE ANNOUNCER: And because kids love the

Complaint

EXHIBIT A**EXHIBIT A**

44

1 Jungle Rangers game, we'll even give them our first
2 edition Jungle Rangers comic book.

3 UNIDENTIFIED FEMALE: I was really impressed
4 with the CDs that were included.

5 UNIDENTIFIED FEMALE: I was just expecting a
6 Jungle Rangers game.

7 UNIDENTIFIED FEMALE: The informational discs
8 that you sent helped me to be able to understand him and
9 help him out.

10 ON SCREEN: ifocus
11 \$14.95 PLUS S&H
12 30 DAY OFFER
13 EXCLUSIVE TV OFFER
14 THE ENTIRE ifocus Quick Start System
15 CALL NOW 1-800-624-0625 ifocusSystem.com

16 MALE ANNOUNCER: That's the entire ifocus Quick
17 Start System, including the Jungle Rangers game,
18 checklist and comic book, plus the five ways in five days
19 cards and behind the science audio CD, the Focus on
20 Behavior Handbook, quick start cards, and audio CD, all
21 yours to try for just \$14.95.

22 ON SCREEN: CALL in the next 18 MINUTES!
23 Product information shown above
24 FREE SHIPPING
25 MALE ANNOUNCER: Call or click ifocussystem.com

Complaint

EXHIBIT A**EXHIBIT A**

44

1 Jungle Rangers game, we'll even give them our first
2 edition Jungle Rangers comic book.

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4 with the CDs that were included.

5 UNIDENTIFIED FEMALE: I was just expecting a
6 Jungle Rangers game.

7 UNIDENTIFIED FEMALE: The informational discs
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13 EXCLUSIVE TV OFFER
14 THE ENTIRE ifocus Quick Start System
15 CALL NOW 1-800-624-0625 ifocusSystem.com

16 MALE ANNOUNCER: That's the entire ifocus Quick
17 Start System, including the Jungle Rangers game,
18 checklist and comic book, plus the five ways in five days
19 cards and behind the science audio CD, the Focus on
20 Behavior Handbook, quick start cards, and audio CD, all
21 yours to try for just \$14.95.

22 ON SCREEN: CALL in the next 18 MINUTES!
23 Product information shown above
24 FREE SHIPPING
25 MALE ANNOUNCER: Call or click ifocussystem.com

Complaint

EXHIBIT A**EXHIBIT A**

45

1 in the next 18 minutes and we'll even include free
2 shipping.

3 ON SCREEN: ifocus
4 \$14.95 PLUS S&H
5 30 DAY OFFER
6 EXCLUSIVE TV OFFER
7 THE ENTIRE ifocus Quick Start System
8 CALL NOW 1-800-624-0625 ifocusSystem.com

9 MALE ANNOUNCER: Remember, the ifocus Jungle
10 Rangers Quick Start System is not available in any stores
11 or at any schools. This is an exclusive television
12 offer. You have absolutely nothing to lose and your
13 child has everything to gain.

14 We're so certain you'll see positive
15 improvements in your child's ability to focus at school
16 and at home with ifocus, we want you to use it in your
17 home, have your child play the game for six months
18 guaranteed.

19 ON SCREEN: ifocus
20 \$14.95 PLUS S&H
21 30 DAY OFFER
22 EXCLUSIVE TV OFFER
23 PARENT TO PARENT PROMISE
24 6 MONTH 100% MONEY BACK GUARANTEE
25 CALL NOW 1-800-624-0625 ifocusSystem.com

Complaint

EXHIBIT A**EXHIBIT A**

46

1 MALE ANNOUNCER: It's the ifocus parent to
2 parent promise. If you aren't completely happy, send it
3 back any time within those six months and we'll refund
4 your money, period.

5 ON SCREEN: Product information shown above
6 \$70 VALUE

7 Keep your FREE GIFTS!

8 MALE ANNOUNCER: But keep the behavior
9 handbook, audio CD, cards, and the Jungle Rangers comic
10 book, a \$70 value as your free gifts.

11 ON SCREEN: Product information shown above
12 Not all children will achieve this result.

13 UNIDENTIFIED FEMALE: I'm happy to have a tool
14 that helps my daughter focus and helps her to do better
15 in school.

16 UNIDENTIFIED FEMALE: The game has -- is
17 teaching my boys how to focus and how to filter out
18 distractions.

19 UNIDENTIFIED FEMALE: It makes me very, very
20 happy. Happy mom.

21 ON SCREEN: CALL or Click

22 TO ORDER NOW!

23 ifocus

24 \$14.95 PLUS S&H

25 30 DAY OFFER

Complaint

EXHIBIT A**EXHIBIT A**

47

1 EXCLUSIVE TV OFFER

2 THE ENTIRE ifocus Quick Start System

3 CALL NOW 1-800-624-0625 ifocusSystem.com

4 MALE ANNOUNCER: Call or click ifocussystem.com

5 and order right now and you could be hearing these words,

6 too.

7 CHILD: Jungle Rangers helps me pay attention.

8 ON SCREEN: 1-800-624-0625

9 ifocusSystem.com

10 JENNIFER BEALS: Kids think they're just

11 playing a game, but this game is so much more than just a

12 game. It's designed to stimulate their brain in new

13 ways.

14 ON SCREEN: The Secret...

15 INTEGRATED NEURO TECHNOLOGY

16 JENNIFER BEALS: It uses integrated neuro

17 technology designed to --

18 ON SCREEN: KEY NEURONS

19 Fire together

20 Wire together

21 JENNIFER BEALS: -- get key neurons to fire

22 together and then wire together. This creates pathways

23 that helps kids to --

24 ON SCREEN: Filter, Focus, Absorb, Remember

25 JENNIFER BEALS: -- filter, focus, absorb and

Complaint

EXHIBIT A**EXHIBIT A**

48

1 remember.

2 Dr. Daniel Amen is the ifocus scientific

3 advisor.

4 Can you tell us a little bit about the science

5 behind ifocus?

6 ON SCREEN: Daniel Amen, M.D.

7 Author, 28 books on the brain

8 DR. DANIEL AMEN: It was developed in a

9 thoughtful way to actually enhance brain development.

10 And, so, what we did is we did a very sophisticated neuro

11 psychological assessment of a big group of kids before

12 and then after they played the game.

13 ON SCREEN: ifocus

14 GROUP STUDY

15 Pre. vs. Post Comparison

16 (Bar Graph)

17 THINKING SELF REGULATION EMOTION FEELING

18 DR. DANIEL AMEN: And it was actually

19 very exciting to find in areas of emotion and self-

20 regulation --

21 ON SCREEN: Bar Graph on screen

22 After average 5 hours gametime

23 Recommended gametime: 12-15 hours

24 DR. DANIEL AMEN: -- that their scores improved

25 significantly.

Complaint

EXHIBIT A**EXHIBIT A**

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1 ON SCREEN: Jennifer Beals
2 Actress, Mother
3 JENNIFER BEALS: And how are the different
4 elements of thinking and emotion connected to self-
5 regulation?
6 ON SCREEN: 1-800-624-0625
7 ifocusSystem.com
8 DR. DANIEL AMEN: Self-regulation is really one
9 of the secrets to long-term success. The brain is so
10 interesting. It has many different abilities. So, the
11 ability to regulate itself comes from the front part of
12 your brain. It helps you with things like focus and
13 forethought, judgment, impulse control. And it's very
14 exciting. With ifocus there, in fact, is evidence that
15 it helps them especially in those areas of self-
16 regulation and emotion.
17 JENNIFER BEALS: Isaac is a busy nine-year-old
18 and Isaac had trouble paying attention in school until
19 his mom discovered the ifocus system. He started
20 playing Jungle Rangers and she learned easy ways to help
21 him change his behavior, to get organized, and to get
22 focused.
23 ON SCREEN: Alitza
24 Issac's Mom
25 ALITZA: The teacher actually has told me that

Complaint

EXHIBIT A**EXHIBIT A**

50

1 this couple weeks, she's noticed big, big change.

2 JENNIFER BEALS: Now, instead of spending hours

3 on homework, Isaac is able to stay on task.

4 ON SCREEN: Isaac

5 age 9

6 ISAAC: It's a good game. Everyone should play

7 if they have trouble listening or paying attention.

8 ALITZA: Oh, my gosh, this game is amazing, 100

9 percent recommend it. And he likes that, he enjoys it,

10 and that's what makes me very happy.

11 ON SCREEN: Dr. William Bennett

12 Former U.S. Secretary of Education

13 DR. WILLIAM BENNETT: What parents want to do

14 is the right thing by their children and what they need

15 are things that can help them. It can help children

16 develop focus and attention in a way that can pay great

17 dividends.

18 ON SCREEN: Colleen

19 Michael and Nelson's Mom

20 COLLEEN: I could see the improvement in him.

21 ON SCREEN: Susan 1-800-624-0625

22 Forrester's Mom www.ifocusSystem.com

23 SUSAN: Things come easier.

24 ON SCREEN: Kristin 1-800-624-0625

25 Anna's Mom www.ifocusSystem.com

Complaint

EXHIBIT A**EXHIBIT A**

51

1 KRISTIN: She's been better at being a self-
2 starter.
3 ON SCREEN: Connie 1-800-625-0625
4 Landon's Mom www.ifocusSystem.com
5 CONNIE: He was able to follow directions a lot
6 better.
7 ON SCREEN: Garth 1-800-625-0625
8 Zak and Zane's Mom www.ifocusSystem.com
9 GARTH: The fact that he came home and wanted
10 to do his homework.
11 ON SCREEN: Marissa 1-800-625-0625
12 Chazz's Mom www.ifocusSystem.com
13 MARISSA: When I come home from work, his
14 chores are done.
15 ON SCREEN: Adell 1-800-625-0625
16 Tiffany's Mom www.ifocusSystem.com
17 ADELL: I definitely would recommend it.
18 ON SCREEN: Trista 1-800-625-0625
19 age 6 www.ifocusSystem.com
20 TRISTA: It does help me pay attention.
21 ON SCREEN: Forrester 1-800-625-0625
22 age 10 www.ifocusSystem.com
23 FORRESTER: The best thing about Jungle Rangers
24 is everything.
25

Complaint

EXHIBIT A**EXHIBIT A**

52

1 ON SCREEN: Jennifer Beals 1-800-624-0625
2 Actress, Mother www.ifocusSystem.com
3 JENNIFER BEALS: When a child feels successful,
4 he or she can be successful in the areas that are most
5 important to them. It starts at home, they take it with
6 them to school, and then it comes right back around to
7 happier kids at home.
8 ON SCREEN: This is a paid advertisement for
9 the ifocus System.
10 JENNIFER BEALS: And happy kids make happy
11 families.
12 ON SCREEN: ifocus
13 FOCUS
14 COMPLETE SCHOOLWORK
15 COMPLETE HOMEWORK
16 STAY ON TASK
17 REACH POTENTIAL
18 MALE ANNOUNCER: What if you could give your
19 child the ability to focus, complete schoolwork, homework
20 and to stay on task, achieve his or her potential simply
21 by playing a --
22 ON SCREEN: Fun Easy
23 COMPUTER GAME
24 MALE ANNOUNCER: -- fun and easy computer game?
25 Now you can with ifocus.

Complaint

EXHIBIT A**EXHIBIT A**

53

1 ON SCREEN: DEVELOPED BY
2 Scientists Educators Parents
3 MALE ANNOUNCER: Ifocus was developed by
4 scientists, educators and concerned parents --
5 ON SCREEN: THE DIFFERENCE BETWEEN
6 Success Failure
7 Their Ability
8 TO PAY ATTENTION!
9 MALE ANNOUNCER: -- who saw that the difference
10 between success and failure for some children is often
11 simply their ability to pay attention. For children, the
12 ability to focus is like a muscle that becomes stronger
13 with repeated use.
14 ON SCREEN: ifocus
15 JUNGLE RANGERS
16 EVERYONE E CONTENT RATED BY ESRB
17 Available for Windows Mac
18 MALE ANNOUNCER: The cornerstone of the ifocus
19 system is the Jungle Rangers game, rated E for everyone
20 and available for PC and Mac.
21 ON SCREEN: More than
22 JUST A GAME!
23 MALE ANNOUNCER: Kids think they're just
24 playing a fun and easy game --
25 ON SCREEN: BRAIN TRAINING EXERCISES

Complaint

EXHIBIT A**EXHIBIT A**

54

1 JUNGLE RANGERS
2 MALE ANNOUNCER: -- but Jungle Rangers is
3 really a sophisticated series of brain training
4 exercises --
5 ON SCREEN: SCIENTIFICALLY ENGINEERED
6 JUNGLE RANGERS
7 MALE ANNOUNCER: -- scientifically engineered
8 so that children can actually --
9 ON SCREEN: Strengthens
10 FOCUSING MUSCLE!
11 3X A WEEK
12 20 minutes A DAY
13 MALE ANNOUNCER: -- strengthen their focusing
14 muscle in as little as 20 minutes a day, three times a
15 week.
16 ON SCREEN: Dr. William Bennett
17 Former U.S. Secretary of Education
18 DR. WILLIAM BENNETT: There are games that you
19 learn from and games that you don't. That's why it's
20 important to sort out the wheat from the chaff.
21 ON SCREEN: Lori Jensen
22 Principal, 30 years in education
23 LORI JENSEN: It will help their with their
24 attention span and their focus.
25 ON SCREEN: The Secret...

Complaint

EXHIBIT A**EXHIBIT A**

55

1 INTEGRATED NEURO TECHNOLOGY

2 MALE ANNOUNCER: The secret is integrated neuro

3 technology.

4 ON SCREEN: Stimulates

5 THE CORTEX

6 MALE ANNOUNCER: Key areas of the cortex are

7 stimulated in careful order --

8 ON SCREEN: KEY NEURONS

9 Fire together

10 Wire together

11 MALE ANNOUNCER: -- first, firing neurons and

12 then creating connections that get stronger, literally

13 wiring them together the more your child plays the game.

14 ON SCREEN: Challenged,

15 NOT FRUSTRATED!

16 MALE ANNOUNCER: Children who play Jungle

17 Rangers are challenged, but not frustrated because Jungle

18 Rangers --

19 ON SCREEN: Game Adapts

20 TO EACH PLAYER

21 MALE ANNOUNCER: -- constantly adapts and

22 readjusts the level of difficulty for each players --

23 ON SCREEN: Kids Love

24 JUNGLE RANGERS

25 MALE ANNOUNCER: -- and kids are hooked the

Complaint

EXHIBIT A**EXHIBIT A**

56

1 very first time they play.

2 ON SCREEN: FIRST TIME PLAYERS! JUNGLE RANGERS

3 CHILD: I like Jungle Rangers.

4 CHILD: Very cool, awesome game.

5 CHILD: Pretty challenging.

6 CHILD: A little easy, a little hard.

7 CHILD: You have to memorize a pattern in order

8 to go onto the next level.

9 CHILD: And you do all this fun stuff.

10 CHILD: I like Jungle Rangers.

11 ON SCREEN: HOW MUCH

12 Wasted Money?

13 DO NOTHING GAMES

14 BORING TUTORING SESSIONS

15 AFTER SCHOOL PROGRAMS

16 MALE ANNOUNCER: How much time and money have

17 you wasted on do nothing video games for your child,

18 boring tutoring sessions or after school programs that

19 simply don't make a difference?

20 ON SCREEN: PARENT TO PARENT PROMISE

21 6 MONTH 100% MONEY BACK GUARANTEE

22 JUNGLE RANGERS

23 MALE ANNOUNCER: The Jungle Rangers game and

24 ifocus system are 100 percent guaranteed.

25 ON SCREEN: ifocus

Complaint

EXHIBIT A**EXHIBIT A**

57

1 \$14.95 PLUS S&H
2 30 DAY OFFER
3 EXCLUSIVE TV OFFER
4 Play JUNGLE RANGERS in your home!
5 CALL NOW 1-800-624-0625 ifocusSystem.com
6 MALE ANNOUNCER: And, right now, your family
7 has an extraordinary opportunity to try ifocus and play
8 Jungle Rangers in your home for 30 days for just \$14.95.
9 That's right. It's a very special ifocus Jungle
10 Rangers --
11 ON SCREEN: Product information shown above
12 Quick Start System
13 AVAILABLE FOR Mac Windows
14 MALE ANNOUNCER: -- quick start offer. Use it
15 in your own home for a full 30 days for just \$14.95.
16 UNIDENTIFIED FEMALE: I definitely would
17 recommend this product.
18 ON SCREEN: Product information shown above
19 Not all children will achieve this result.
20 UNIDENTIFIED FEMALE: Jungle Rangers has helped
21 Forrester maximize his potential.
22 UNIDENTIFIED FEMALE: I definitely would
23 recommend it.
24 ON SCREEN: CALL or Click
25 TO ORDER NOW!

Complaint

EXHIBIT A**EXHIBIT A**

58

1 ifocus
2 \$14.95 PLUS S&H
3 30 DAY OFFER
4 EXCLUSIVE TV OFFER
5 THE ENTIRE ifocus Quick Start System
6 CALL NOW 1-800-624-0625 ifocusSystem.com
7 MALE ANNOUNCER: Call or click ifocussystem.com
8 right now and try the incredible ifocus Jungle Rangers
9 Quick Start System for 30 days for just \$14.95.
10 ON SCREEN: Product information shown above
11 JUNGLE RANGERS
12 Brain Training Game
13 Checklist
14 MALE ANNOUNCER: You'll receive the ifocus
15 brain training Jungle Rangers game and user-friendly
16 checklist.
17 ON SCREEN: Product information shown above
18 Science Behind the Game AUDIO CD
19 MALE ANNOUNCER: Plus, our audio CD explains
20 the science behind the game --
21 ON SCREEN: Product information shown above
22 5 ways in 5 days
23 QUICK START CARDS
24 MALE ANNOUNCER: -- and increase your child's
25 focus and attention five ways in five days with our

Complaint

EXHIBIT A**EXHIBIT A**

59

1 exclusive quick start cards.

2 ON SCREEN: Product information shown above

3 Focus on Behavior HANDBOOK

4 Behavior Advice from Experts AUDIO CD

5 Focus on Behavior QUICK START CARDS

6 MALE ANNOUNCER: You'll also get our Focus on

7 Behavior Handbook and get behavior tips from experts on

8 our audio CD, again with easy-to-follow quick start

9 cards.

10 ON SCREEN: Product information shown above

11 FIRST EDITION JUNGLE RANGERS Comic Book

12 MALE ANNOUNCER: And because kids love the

13 Jungle Rangers game, we'll even give them our first

14 edition Jungle Rangers comic book.

15 UNIDENTIFIED FEMALE: ifocus has given me

16 different tools to be more organized at home.

17 UNIDENTIFIED FEMALE: Like little steps for her

18 that would be easy for her to remember and write out and

19 keep on track.

20 ON SCREEN: Product information shown above

21 Not all children will achieve this result.

22 UNIDENTIFIED FEMALE: ifocus gave me the tools

23 to help my children do better in school.

24 ON SCREEN: ifocus

25 \$14.95 PLUS S&H

Complaint

EXHIBIT A**EXHIBIT A**

60

1 30 DAY OFFER
2 EXCLUSIVE TV OFFER
3 THE ENTIRE ifocus Quick Start System
4 CALL NOW 1-800-624-0625 ifocusSystem.com
5 MALE ANNOUNCER: That's the entire ifocus Quick
6 Start System, including the Jungle Rangers game,
7 checklist and comic book, plus the five ways in five days
8 cards and behind the science audio CD, the Focus on
9 Behavior Handbook, quick start cards, and audio CD, all
10 yours to try for just \$14.95.
11 ON SCREEN: CALL in the next 6 MINUTES!
12 Product information shown above
13 FREE SHIPPING
14 MALE ANNOUNCER: Call or click ifocussystem.com
15 in the next 6 minutes and we'll even include free
16 shipping.
17 ON SCREEN: ifocus
18 \$14.95 PLUS S&H
19 30 DAY OFFER
20 EXCLUSIVE TV OFFER
21 THE ENTIRE ifocus Quick Start System
22 CALL NOW 1-800-624-0625 ifocusSystem.com
23 MALE ANNOUNCER: Remember, the ifocus Jungle
24 Rangers Quick Start System is not available in any stores
25 or at any schools. This is an exclusive television

Complaint

EXHIBIT A**EXHIBIT A**

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1 offer. You have absolutely nothing to lose and your
2 child has everything to gain.
3 We're so certain you'll see positive
4 improvements in your child's ability to focus at school
5 and at home with ifocus, we want you to use it in your
6 home, have your child play the game for six months
7 guaranteed.
8 ON SCREEN: ifocus
9 \$14.95 PLUS S&H
10 30 DAY OFFER
11 EXCLUSIVE TV OFFER
12 PARENT TO PARENT PROMISE
13 6 MONTH 100% MONEY BACK GUARANTEE
14 CALL NOW 1-800-624-0625 ifocusSystem.com
15 MALE ANNOUNCER: It's the ifocus parent to
16 parent promise. If you aren't completely happy, send it
17 back any time within those six months and we'll refund
18 your money, period.
19 ON SCREEN: Product information shown above
20 \$70 VALUE
21 Keep your FREE GIFTS!
22 MALE ANNOUNCER: But keep the behavior
23 handbook, audio CD, cards, and the Jungle Rangers comic
24 book, a \$70 value as your free gifts.
25 CHILD: Last year, I would just daydream in

Complaint

EXHIBIT A**EXHIBIT A**

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1 class and now I'm more focused with my teacher.

2 ON SCREEN: Product information shown above

3 Not all children will achieve this result.

4 CHILD: I can read faster.

5 CHILD: It helps me in school and my homework.

6 ON SCREEN: CALL or Click

7 TO ORDER NOW!

8 ifocus

9 \$14.95 PLUS S&H

10 30 DAY OFFER

11 EXCLUSIVE TV OFFER

12 THE ENTIRE ifocus Quick Start System

13 CALL NOW 1-800-624-0625 ifocusSystem.com

14 MALE ANNOUNCER: Call or click ifocussystem.com

15 and order right now, and you could be hearing these

16 words, too.

17 CHILD: Jungle Rangers help me pay attention.

18 MALE ANNOUNCER: Call 1-800-624-0625 for the

19 ifocus system. Call 1-800-624-0625 now.

20 ON SCREEN: ifocus

21 The preceding was a paid presentation for the

22 ifocus system

23 MALE ANNOUNCER: The preceding was a paid

24 presentation for the ifocus system.

25 (The recording was concluded.)

Complaint

EXHIBIT A**EXHIBIT A**

63

1 C E R T I F I C A T I O N O F T Y P I S T

2

3 MATTER NUMBER: 1223153

4 CASE TITLE: IFOCUS EDUCATION, LLC

5 TAPING DATE: FEBRUARY 17, 2012

6 TRANSCRIPTION DATE: NOVEMBER 12, 2013

7

8 I HEREBY CERTIFY that the transcript contained
9 herein is a full and accurate transcript of the tapes
10 transcribed by me on the above cause before the FEDERAL
11 TRADE COMMISSION to the best of my knowledge and belief.

12

13 DATED: NOVEMBER 12, 2013

14

15

16 ELIZABETH M. FARRELL

17

18 C E R T I F I C A T I O N O F P R O O F R E A D E R

19

20 I HEREBY CERTIFY that I proofread the transcript for
21 accuracy in spelling, hyphenation, punctuation and
22 format.

23

24

25 SARA J. VANCE

Complaint

EXHIBIT B**EXHIBIT B**

1

1 OFFICIAL TRANSCRIPT PROCEEDING
2 FEDERAL TRADE COMMISSION
3
4
5 MATTER NO. 1223153
6 TITLE iFOCUS EDUCATION, LLC
7 DATE RECORDED: JUNE 18, 2012
TRANSCRIBED: NOVEMBER 12, 2013
8
9 PAGES 1 THROUGH 60
10
11

12 JUNGLE RANGERS BRAIN TRAINING SYSTEM
13 IFOCUS EDUCATION
14 INFOCOMMERCIAL (IFV4)
15
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17
18
19
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22
23

24 For The Record, Inc.
25 (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

2

1 FEDERAL TRADE COMMISSION

2 I N D E X

3

4 RECORDING: PAGE:

5 Jungle Rangers Infomercial 3

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26 (800) 921-5555

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EXHIBIT B

EXHIBIT B

3

1 FEDERAL TRADE COMMISSION
2
3 In the Matter of:)
4 iFocus Education, LLC) Matter No. 1223153
5)
6 -----)
7 June 18, 2012
8
9
10

11 The following transcript was produced from a
12 CD-Rom provided to For The Record, Inc. on October 24,
13 2013.
14
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24

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EXHIBIT B**EXHIBIT B**

4

1 P R O C E E D I N G S
2 - - - - -
3 JUNGLE RANGERS INFOMERCIAL
4 ON SCREEN: PRODUCT: ifocus System
5 COMPANY: focus education
6 TITLE: ifocus \$14.95 Trial Offer - No Host
7 6 Month Guarantee
8 TRT: 28:30
9 ISCI: FEIF0104
10 AGENCY: Script to Screen
11 DATE: 06/18/2012
12 AUDIO: 1 & 2 Stereo Mix
13 www.scripttoscreen.com
14 ON SCREEN: The following is a paid
15 presentation for the ifocus Jungle Rangers Brain Training
16 System brought to you by Focus Education
17 MALE ANNOUNCER: The following is a paid
18 presentation for the ifocus Jungle Rangers Brain Training
19 System, brought to you by Focus Education.
20 MALE ANNOUNCER: In today's modern world, kids
21 are bombarded by --
22 ON SCREEN: DISTRACTED
23 FRUSTRATED
24 UNABLE TO FINISH TASKS
25 MALE ANNOUNCER: -- so many distractions that
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

5

1 they often become frustrated and can't stay on track to
2 even finish the simplest of tasks.

3 UNIDENTIFIED FEMALE: I can say, go brush your
4 teeth or go get your homework or go do this, and five
5 minutes later, it's still not done or even began.

6 ON SCREEN: STRUGGLING
7 WITH GRADES AND HOMEWORK?

8 MALE ANNOUNCER: Efforts in the classroom or at
9 home can often become a tedious chore or even a constant
10 struggle.

11 UNIDENTIFIED FEMALE: Homework took him like
12 four to five hours and for me to sit down with him.

13 ON SCREEN: PROBLEMS AT SCHOOL?

14 MALE ANNOUNCER: And when the problem becomes
15 too overwhelming, that's when the phone calls start.

16 UNIDENTIFIED FEMALE: Every single day I was
17 getting calls from the teacher or he was getting sent to
18 the office.

19 ON SCREEN: Powerful

20 BREAKTHROUGH

21 Ages 6-12

22 MALE ANNOUNCER: Now, there's a brilliant
23 breakthrough, a powerful way to teach boys and girls,
24 ages 6 through 12, to effectively --

25 ON SCREEN: Filter, Focus, Absorb, Remember For

26 The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

61

1 MALE ANNOUNCER: -- filter, focus, absorb and
2 remember and have a great time doing it.
3 Introducing the ifocus Jungle Rangers Brain
4 Training System for your computer.
5 ON SCREEN: JUNGLE RANGERS
6 MALE ANNOUNCER: At first glance, Jungle
7 Rangers looks like a simple and basic video game --
8 ON SCREEN: Groundbreaking
9 BRAIN TRAINING PROGRAM
10 for attention
11 MALE ANNOUNCER: -- but it's really a
12 groundbreaking, state-of-the-art brain training program
13 for attention. Throughout all the levels and sequences
14 of the game, every action, interaction, and reaction is a
15 meticulously and carefully --
16 ON SCREEN: Strategies
17 HIDDEN IN GAME!
18 FILTER OUT DISTRACTIONS
19 FOCUS ON TASKS
20 REMEMBER INFORMATION
21 ifocus
22 MALE ANNOUNCER: -- designed hidden strategy to
23 train your child to filter out distractions, focus on
24 tasks at hand and absorb and remember important
25 information. For The Record, Inc. (301) 870-8025 -
26 www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

7

1 ON SCREEN: IMPROVEMENT
2 Thinking +93%
3 Self-Regulation +38%
4 Average Thinking Improvement 24% in 5 hours.
5 Average Self-Regulation Improvement 30% in 5
6 hours.
7 Tiffany
8 age 11
9 TIFFANY: When I got that game, I started doing
10 really, really good in school.
11 ON SCREEN: IMPROVEMENT
12 Sustained Attention +33%
13 Thinking +95%
14 Average Sustained Attention Improvement 14% in
15 5 hours.
16 Average Thinking Improvement 14% in 5 hours.
17 Forrester
18 age 10
19 FORRESTER: I pay attention to my teacher a lot
20 more.
21 ON SCREEN: IMPROVEMENT
22 Self-Regulation +105%
23 Feeling +44%
24 Average Self-Regulation Improvement 30% in 5
25 hours. For The Record, Inc. (301) 870-8025 -
26 www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

8

1 Average Feeling Improvement 36% in 5 hours.
2 Chazz
3 age 10
4 CHAZZ: I have better grades.
5 ON SCREEN: Jackson
6 age 11 Individual result - your child may not
7 be as successful
8 JACKSON: I've been getting a lot more 100
9 percents.
10 MALE ANNOUNCER: Based on years of advanced
11 scientific and pediatric neuro brain research, each level
12 of the Jungle Rangers game is designed to --
13 ON SCREEN: Stimulate, Strengthen
14 CONNECTIONS
15 MALE ANNOUNCER: -- stimulate and strengthen
16 neuron connections in the brain, using proven visual and
17 auditory --
18 ON SCREEN: BRAIN TRAINING Exercises
19 MALE ANNOUNCER: -- brain training exercises
20 imbedded within the game itself.
21 ON SCREEN: ifocus
22 MALE ANNOUNCER: Over the next half-hour, join
23 us as we talk with parents, teachers, and kids about how
24 the incredible ifocus system is improving young minds and
25 changing lives for the better. For The Record, Inc.
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EXHIBIT B**EXHIBIT B**

9

1 ON SCREEN: Jennifer
2 Kaida's Mom
3 JENNIFER: I really didn't expect to see that
4 big of a change that quickly.
5 ON SCREEN: Susan
6 Forrester's Mom
7 SUSAN: It worked for our family. In two
8 weeks' time, we noticed.
9 ON SCREEN: Marissa
10 Chazz's Mom
11 MARISSA: ifocus gave me the tools to help my
12 child do better in school.
13 ON SCREEN: COMING UP The Science Behind
14 MALE ANNOUNCER: Plus we'll speak with Dr.
15 Daniel Amen, medical doctor, brain specialist, and best-
16 selling author, about how the ifocus program works to
17 positively impact children's potential in life.
18 ON SCREEN: Daniel Amen, M.D.
19 Brain Imaging Specialist
20 DR. DANIEL AMEN: We did a very sophisticated
21 neuropsychological assessment and it was actually very
22 exciting.
23 ON SCREEN: EMOTION: +25%
24 Jackson age 11
25 Average Emotion Improvement 45% in 5 hours For
26 The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

10

1 MALE ANNOUNCER: After just a few hours of
2 playing ifocus Jungle Rangers --
3 ON SCREEN: THINKING: +63%
4 Anna age 10
5 Average Thinking Improvement 24% in 5 hours
6 MALE ANNOUNCER: -- these kids --
7 ON SCREEN: SUSTAINED ATTENTION: +250%
8 Zach age 11
9 Average Sustained Attention 14% in 5 hours
10 MALE ANNOUNCER: -- were able to significantly
11 increase --
12 ON SCREEN: SELF-REGULATION: +105%
13 Chazz age 10
14 Average Self-Regulation 30% in 5 hours
15 MALE ANNOUNCER: -- their focus and
16 attention --
17 ON SCREEN: FEELING: +54%
18 Jacquelyn age 11
19 Average Feeling Improvement 36% in 5 hours
20 MALE ANNOUNCER: -- some of them dramatically.
21 ON SCREEN: Connie
22 Jacquelyn's Mom
23 CONNIE: We just got done with parent-teacher
24 conference and Jacquelyn's one of the highest ones in her
25 classes in reading. For The Record, Inc. (301) 870-8025
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EXHIBIT B**EXHIBIT B**

11

1 ON SCREEN: EVERYONE E CONTENT RATED BY ESRB
2 JUNGLE RANGERS
3 MALE ANNOUNCER: And we'll meet with the award-
4 winning game designer who personally supervised the
5 creation and extraordinary development of the ifocus
6 Jungle Rangers video game adventure.
7 ON SCREEN: Jason Leon
8 ifocus Game Developer
9 JASON LEON: It was all about just innovating
10 to make it the best product it could be. It seemed like
11 every step of the way there was just a, wait, we can do
12 this better.
13 ON SCREEN: NEVER BEFORE!
14 SCIENCE & EDUCATION
15 COMBINED
16 JUNGLE RANGERS
17 MALE ANNOUNCER: Never before has science and
18 education been designed into a video game experience like
19 Jungle Rangers, one that is able to make such an
20 intelligent and beneficial impact on the minds of young
21 boys and girls.
22 And because many of the ifocus system
23 developers are also concerned parents, they've
24 established an unheard of guarantee --
25 ON SCREEN: PARENT TO PARENT For The Record,
26 Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

12

1 6 MONTH 100% MONEY BACK GUARANTEE
2 PROMISE
3 FOCUS
4 ATTENTION
5 MEMORY
6 SCHOOL WORK
7 SELF ESTEEM
8 Guarantee less return shipping
9 MALE ANNOUNCER: -- a six-month parent to
10 parent promise. If your child does not see an
11 improvement in focus, attention, memory, school work or
12 self esteem within six months, simply return the program
13 for a complete refund. That's how confident the people
14 at ifocus are that you will absolutely see a significant
15 difference in how your child acts and responds at school
16 and at home.
17 ON SCREEN: Scientifically Proven
18 BRAIN TRAINING EXERCISES
19 EVERYONE E CONTENT RATED BY ESRB
20 JUNGLE RANGERS
21 MALE ANNOUNCER: The ifocus Jungle Rangers game
22 features the same series of proven brain training
23 techniques used by neuropsychologists, therapists, and
24 scientists for years, now designed as a fun computer
25 video game. For The Record, Inc. (301) 870-8025 -
26 www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

13

1 ON SCREEN: Jason Leon
2 ifocus Game Developer
3 JASON LEON: We worked directly with the neuro
4 therapist that would tell us what was supposed to be in
5 and why it was supposed to be in. Oftentimes, when folks
6 try and mix these two worlds, they forget that you've got
7 to make it fun first. So, it was kind of this
8 convergence of science and fun.
9 ON SCREEN: Science:
10 BRAIN TRAINING TECHNIQUES
11 MALE ANNOUNCER: The science is using effective
12 brain training techniques and --
13 ON SCREEN: Fun:
14 EASY GAME!
15 MALE ANNOUNCER: -- the fun is turning them
16 into games. The Jungle Rangers adventure takes players
17 through --
18 ON SCREEN: 9 ADVANCING
19 Games
20 MALE ANNOUNCER: -- nine separate advancing
21 games --
22 ON SCREEN: 3 DIFFERENT
23 Worlds
24 MALE ANNOUNCER: -- in three different worlds,
25 all of which include exercises proven to -- For The
26 Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

14

1 ON SCREEN: GAMES IMPROVE
2 Focus, Concentration, Memory
3 MALE ANNOUNCER: -- improve focus,
4 concentration and memory --
5 ON SCREEN: SPAN SEQUENCES
6 REMEMBER AND RECALL
7 FILTER DISTRACTIONS
8 IMPROVE COMPREHENSION
9 MALE ANNOUNCER: -- like these span sequences
10 which ask players to remember complex information, even
11 while distracted. So, many kids who play Jungle Rangers
12 span games feel a jump in math and reading comprehension.
13 ON SCREEN: CONTINUOUS PERFORMANCE
14 PAY ATTENTION
15 LEARN PATIENCE
16 FOCUS
17 MALE ANNOUNCER: Continuous performance games
18 are all about paying attention and learning patience.
19 Research shows kids learn to stay alert and to really
20 focus on what's going on, even at times when they'd
21 normally zone out.
22 ON SCREEN: N-BACK
23 HOLD INFORMATION
24 UPDATE INFORMATION
25 REMEMBER AND FOCUS For The Record, Inc. (301)
26 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

15

1 MALE ANNOUNCER: And N-Back requires players to
2 hold information and to update that information. Adding
3 new levels of difficulty is practice for real life,
4 helping kids to focus and remember what they need to do.
5 Bottom line, kids who play Jungle Rangers
6 practice new skills so they learn to --
7 ON SCREEN: Filter, Focus, Absorb, Remember
8 MALE ANNOUNCER: -- filter, focus, absorb, and
9 remember.
10 ON SCREEN: Marissa
11 Chazz's Mom
12 MARISSA: It's helped a lot at the house even,
13 not just at school. His behavior with his chores,
14 helping out.
15 ON SCREEN: Colleen
16 Michael and Nelson's Mom
17 COLLEEN: I see a lot more focus, a lot more
18 motivation.
19 ON SCREEN: Kristin
20 Anna's Mom
21 KRISTIN: She seems to be trying harder to want
22 to do what I ask.
23 ON SCREEN: Julie
24 Zach's Mom
25 JULIE: This is a great way to strengthen their
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

16

1 brain, which is their biggest asset in life.

2 FEMALE ANNOUNCER: Here to tell us more is

3 brain specialist and ifocus scientific advisor, Dr.

4 Daniel Amen. He's a child psychiatrist and brain imaging

5 specialist and he's authored 28 books on the brain. Dr.

6 Amen is also a father and a grandfather.

7 ON SCREEN: Daniel Amen, M.D.

8 Brain Imaging Specialist

9 DR. DANIEL AMEN: As a child psychiatrist, I've

10 not been all that excited about video games for children

11 because children have developing brains. Here, we had

12 developers, in a thoughtful way, develop a game to

13 actually strengthen the connections in the brain. It's a

14 very interesting term called "long-term potentiation."

15 So, what that means is the connections between cells

16 actually become stronger.

17 ON SCREEN: Daniel Amen, M.D.

18 Author, 28 books on the brain

19 DR. DANIEL AMEN: So, to have the opportunity

20 to actually study it and show that it is, in fact,

21 helpful was very exciting for me.

22 So, we had a group of 45 children.

23 ON SCREEN: SELF REGULATION: +200%

24 Anna age 10

25 Average Self Regulation Improvement 30% in 5

For

26 The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

17

1 hours
2 DR. DANIEL AMEN: What we found was their
3 ability to --
4 ON SCREEN: SELF REGULATION: +38%
5 Tiffany age 11
6 Average Self Regulation Improvement 30% in 5
7 hours
8 DR. DANIEL AMEN: -- regulate themselves --
9 ON SCREEN: SELF REGULATION: +105%
10 Chazz age 10
11 Average Self Regulation Improvement 30% in 5
12 hours
13 DR. DANIEL AMEN: -- so self regulation and --
14 ON SCREEN: EMOTION: +25%
15 Jackson age 11
16 Average Emotion Improvement 45% in 5 hours
17 DR. DANIEL AMEN: -- emotion --
18 ON SCREEN: EMOTION: +29%
19 Zach age 11
20 Average Emotion Improvement 45% in 5 hours
21 DR. DANIEL AMEN: -- statistically
22 significantly increased --
23 ON SCREEN: EMOTION: +350%
24 Isaac age 9
25 Average Emotion Improvement 45% in 5 hours For
26 The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

18

1 DR. DANIEL AMEN: -- after the kids played the
2 game.
3 If you can help a child with their emotions --
4 ON SCREEN: Self Regulation
5 DR. DANIEL AMEN: -- regulate themselves,
6 they're more successful in their lives. Not only are
7 they happier, but they're able to stay on task. So, I
8 think any kid will benefit from this.
9 ON SCREEN: Daniel Amen, M.D.
10 Brain Imaging Specialist
11 DR. DANIEL AMEN: And the reason I say that is
12 I love the approach. It's a brain training exercise.
13 None of it's hard. I mean, that's sort of the exciting
14 thing. None of it's hard and it can give you a big
15 benefit. And as a parent, you feel confident --
16 ON SCREEN: This is a paid advertisement for
17 the ifocus System
18 DR. DANIEL AMEN: -- that this is helping my
19 child and not hurting my child.
20 ON SCREEN: Julie
21 Zach's Mom
22 JULIE: My kids love to play video games and
23 this is a great way to strengthen their brain.
24 ON SCREEN: Taffie
25 Trista's Mom For The Record, Inc. (301) 870-
26 8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

19

1 TAFFIE: And it settles them in and it helps
2 them to learn to focus.
3 UNIDENTIFIED FEMALE: He says, mom, I can focus
4 in class.
5 ON SCREEN: JUNGLE RANGERS
6 BRAIN TRAINING SYSTEM
7 for Attention!
8 MALE ANNOUNCER: Introducing the ifocus Jungle
9 Rangers Brain Training System. What looks like just a
10 video game is actually a --
11 ON SCREEN: Sophisticated
12 BRAIN TRAINING TOOL
13 MALE ANNOUNCER: -- sophisticated and highly
14 developed state-of-the-art brain training tool, designed
15 as a series of --
16 ON SCREEN: 9 COMPUTER GAME
17 Adventures
18 MALE ANNOUNCER: -- nine fun, exciting and
19 challenging computer game adventures.
20 ON SCREEN: EVERYONE E CONTENT RATED BY ESRB
21 JUNGLE RANGERS
22 AVAILABLE FOR Windows Mac
23 MALE ANNOUNCER: Rated E for everyone and
24 available for both PC and Mac, the ifocus Jungle Rangers
25 game is unlike any educational game you've ever seen, For
26 The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

20

1 because hidden within every level of the nine innovative
2 ifocus Jungle Rangers games are --
3 ON SCREEN: Scientifically Proven
4 BRAIN TRAINING EXERCISES
5 MALE ANNOUNCER: -- scientifically proven
6 memory and attention brain training exercises, designed
7 to improve --
8 ON SCREEN: Focus
9 Concentration
10 Memory
11 MALE ANNOUNCER: -- focus, concentration and
12 memory --
13 ON SCREEN: Stimulate, Strengthen
14 CONNECTIONS
15 MALE ANNOUNCER: -- strengthening important
16 neuron connections --
17 ON SCREEN: SPAN SEQUENCES
18 REMEMBER AND RECALL
19 FILTER DISTRACTIONS
20 IMPROVE COMPREHENSION
21 MALE ANNOUNCER: -- like these span sequences
22 which ask players to remember complex information, even
23 while distracted. So, many kids who play Jungle Rangers
24 span games feel a jump in math and reading comprehension.
25 ON SCREEN: CONTINUOUS PERFORMANCE For The
26 Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

21

1 PAY ATTENTION
2 LEARN PATIENCE
3 FOCUS
4 MALE ANNOUNCER: Continuous performance games
5 are all about paying attention and learning patience.
6 Research proves kids who play continuous performance
7 games are able to stay alert, be less distracted and
8 really focus on what's going on around them.
9 ON SCREEN: N-BACK
10 HOLD INFORMATION
11 UPDATE INFORMATION
12 REMEMBER AND FOCUS
13 MALE ANNOUNCER: And N-Back requires players to
14 hold information and update that information. It's
15 practice for real life, helping kids to think about what
16 they've learned and to focus and remember what they need
17 to do.
18 ON SCREEN: INNOVATIVE
19 COMBINATION!
20 PROVEN CHALLENGING
21 Science Fun
22 MALE ANNOUNCER: It's this innovative
23 groundbreaking combination of proven science and
24 increasingly challenging fun that has kids hooked from
25 the very first time they play. For The Record, Inc.
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EXHIBIT B**EXHIBIT B**

22

1 ON SCREEN: FIRST TIME PLAYERS! JUNGLE RANGERS
2 CHILD: It was really fun.
3 CHILD: It's like a puzzle.
4 CHILD: It's fun.
5 CHILD: It's just an awesome game.
6 MALE ANNOUNCER: While kids enjoy the games,
7 parents will love the dashboard tracking system.
8 ON SCREEN: PARENT
9 DASHBOARD
10 MALE ANNOUNCER: This exclusive feature records
11 your child's progress and reveals how they're improving
12 in key cognitive areas like sequencing, performance and
13 memory.
14 ON SCREEN: Taffie
15 Trista's Mom
16 TAFFIE: Well, the dashboard explains to the
17 parent how much time they have spent in what -- in which
18 areas.
19 ON SCREEN: Jennifer
20 Kaida's Mom
21 JENNIFER: It helps you be able to track what
22 he's doing, his progress.
23 TAFFIE: And it tells you exactly what part of
24 the game they've been playing and for how long.
25 ON SCREEN: ifocus For The Record, Inc. (301)
26 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

23

1 \$14.95 PLUS S&H
2 30 DAY TRIAL
3 EXCLUSIVE INTRODUCTORY OFFER
4 Entire ifocus BRAIN TRAINING SYSTEM
5 CALL NOW www.ifocusSystem.com
6 MALE ANNOUNCER: Now, through this
7 extraordinary and exclusive introductory offer, you can
8 get the entire ifocus Jungle Rangers Brain Training
9 System --
10 ON SCREEN: ifocus
11 \$14.95 PLUS S&H
12 30 DAY TRIAL
13 EXCLUSIVE INTRODUCTORY OFFER
14 INCLUDES JUNGLE RANGERS GAMES
15 CALL NOW www.ifocusSystem.com
16 MALE ANNOUNCER: -- including all nine Jungle
17 Rangers games, and find out for yourself how effective it
18 really is by simply trying it for a full 30 days for just
19 \$14.95.
20 It comes with everything your child needs to
21 succeed --
22 ON SCREEN: ifocus
23 \$14.95 PLUS S&H
24 30 DAY TRIAL
25 EXCLUSIVE INTRODUCTORY OFFER For The Record,
26 Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

24

1 JUNGLE RANGERS GAME CD Mac Windows
2 CALL NOW www.ifocusSystem.com
3 MALE ANNOUNCER: -- including the Jungle
4 Rangers game CD --
5 ON SCREEN: ifocus
6 \$14.95 PLUS S&H
7 30 DAY TRIAL
8 EXCLUSIVE INTRODUCTORY OFFER
9 INCLUDING Parent Dashboard
10 CALL NOW www.ifocusSystem.com
11 MALE ANNOUNCER: -- with a parent dashboard
12 tracker for monitoring their time and progress --
13 ON SCREEN: ifocus
14 \$14.95 PLUS S&H
15 30 DAY TRIAL
16 EXCLUSIVE INTRODUCTORY OFFER
17 Science Behind the Game AUDIO CD
18 CALL NOW www.ifocusSystem.com
19 MALE ANNOUNCER: -- this in-depth parent audio
20 CD that explains the science behind this groundbreaking
21 program --
22 ON SCREEN: ifocus
23 \$14.95 PLUS S&H
24 30 DAY TRIAL
25 EXCLUSIVE INTRODUCTORY OFFER For The Record,
26 Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

25

1 Focus on Behavior HANDBOOK + AUDIO CD
2 CALL NOW www.ifocusSystem.com
3 MALE ANNOUNCER: -- plus this Focus on Behavior
4 handbook and audio CD that helps both child and parent
5 to understand and recognize good and bad behavioral
6 patterns --
7 ON SCREEN: ifocus
8 \$14.95 PLUS S&H
9 30 DAY TRIAL
10 EXCLUSIVE INTRODUCTORY OFFER
11 Plus Additional BONUS EXTRAS!
12 CALL NOW www.ifocusSystem.com
13 MALE ANNOUNCER: -- and even more bonus items,
14 all yours included at no extra cost.
15 ON SCREEN: ifocus
16 \$14.95 PLUS S&H
17 30 DAY TRIAL
18 EXCLUSIVE INTRODUCTORY OFFER
19 Entire ifocus BRAIN TRAINING SYSTEM
20 CALL NOW www.ifocusSystem.com
21 MALE ANNOUNCER: You get this entire system
22 with everything you see here to simply try for a full
23 month for just \$14.95.
24 But listen to this, the creators at Focus
25 Education, who are also concerned parents, are so For The
26 Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

26

1 confident that you and your child will absolutely fall in
2 love with this amazing system that they're offering an
3 unheard of parent to parent promise.
4 ON SCREEN: ifocus
5 Guarantee less return shipping
6 \$14.95 PLUS S&H
7 30 DAY TRIAL
8 EXCLUSIVE INTRODUCTORY OFFER
9 PARENT TO PARENT PROMISE
10 6 MONTH 100%
11 MONEY BACK GUARANTEE
12 Play JUNGLE RANGERS in your home!
13 CALL NOW www.ifocusSystem.com
14 MALE ANNOUNCER: If you order today, ifocus
15 will give you up to six months -- yes, six full months to
16 put the ifocus Jungle Rangers Brain Training System to
17 the test and truly discover its ultimate potential for
18 you and your child, or your money back.
19 UNIDENTIFIED FEMALE: I'm happy to have a tool
20 that helps my daughter focus and helps her to do better
21 in school.
22 UNIDENTIFIED FEMALE: The game has -- is
23 teaching my boys how to focus and how to filter out
24 distractions.
25 ON SCREEN: CALL in the next 18 minutes! For The
26 Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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1 ifocus
2 \$14.95 PLUS S&H
3 30 DAY TRIAL
4 EXCLUSIVE INTRODUCTORY OFFER
5 FREE SHIPPING & HANDLING
6 CALL NOW www.ifocusSystem.com
7 MALE ANNOUNCER: And it gets even better. Call
8 and order in the next 18 minutes and we'll ship this
9 total and complete breakthrough system, with all the
10 extras and included bonus items right to your door for
11 free. That's right, absolutely free shipping and
12 handling, but only if you call and order right away.
13 UNIDENTIFIED FEMALE: I would say that it's a
14 game that gives you results.
15 ON SCREEN: Product information shown above
16 Individual result - your child may not be as
17 successful
18 UNIDENTIFIED MALE: Well, they're doing better
19 in school. We just got their report cards and we were
20 shocked, all As and Bs.
21 UNIDENTIFIED FEMALE: And this was the first
22 time -- well, he got all As and one A minus.
23 MALE ANNOUNCER: The ifocus Jungle Rangers
24 Brain Training System for attention is not available in
25 stores or schools. For The Record, Inc. (301) 870-8025
26 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

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1 ON SCREEN: CALL or Click
2 TO ORDER NOW!
3 ifocus
4 \$14.95 PLUS S&H
5 30 DAY TRIAL
6 EXCLUSIVE INTRODUCTORY OFFER
7 NOT AVAILABLE AT SCHOOLS!
8 CALL NOW www.ifocusSystem.com
9 MALE ANNOUNCER: It's only available online or
10 through this exclusive television offer. So, make the
11 commitment to help your child filter, focus, absorb and
12 remember. Call now or click on ifocusSystem.com.
13 ON SCREEN: ifocus
14 \$14.95 PLUS S&H
15 30 DAY TRIAL
16 EXCLUSIVE INTRODUCTORY OFFER
17 PARENT TO PARENT PROMISE
18 6 MONTH 100%
19 MONEY BACK GUARANTEE
20 Guarantee less return shipping
21 CALL NOW www.ifocusSystem.com
22 MALE ANNOUNCER: And, remember, with the ifocus
23 system, your child will achieve and succeed or your money
24 back. Call now.
25 UNIDENTIFIED FEMALE: 100 percent recommend it.
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

29

1 ON SCREEN: CALL or Click
2 TO ORDER NOW!
3 ifocus
4 \$14.95 PLUS S&H
5 30 DAY TRIAL
6 EXCLUSIVE INTRODUCTORY OFFER
7 CALL NOW www.ifocusSystem.com
8 ON SCREEN: Zak and Zane
9 age 9 www.ifocusSystem.com
10 FEMALE ANNOUNCER: Zak and Zane are identical
11 twins. Think busy times two. Their dad knows how
12 important exercise is for young boys, so he makes sure
13 they spend a lot of time outside working off their
14 energy. And while they're great when it comes to sports,
15 both Zak and Zane had trouble focusing at school.
16 GARTH: But to try to focus to do homework,
17 there'd be times where it would take me a half-hour to
18 just do one math problem.
19 FEMALE ANNOUNCER: But since playing the Jungle
20 Rangers game and using the ifocus System, Zak and Zane
21 are able to focus, filter out distractions and homework
22 has become much more productive.
23 ON SCREEN: Garth
24 Zak and Zane's Dad
25 Individual Result - your child may not be as For
26 The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

30

1 successful

2 GARTH: Well, they're doing better in school.

3 We just got their report cards, and we were shocked, all

4 As and Bs. They've never had that before.

5 ON SCREEN: Zak and Zane

6 age 9 www.ifocusSystem.com

7 CHILD: Every time we come home from school, we

8 can do our math all by ourselves.

9 ON SCREEN: Garth

10 Zak and Zane's Dad www.ifocusSystem.com

11 GARTH: And now, they come home and do their

12 homework. It's -- you see the difference. You see the

13 difference. One game, hnn, makes a difference.

14 FEMALE ANNOUNCER: Kids think they're just

15 playing a game, but this game is so much more than just a

16 game.

17 ON SCREEN: NEURON TECHNOLOGY

18 KEY NEURONS

19 Fire together

20 Wire together

21 FEMALE ANNOUNCER: It uses integrated neuro

22 technology designed to get key neurons to fire together

23 and then wire together.

24 ON SCREEN: Filter, Focus, Absorb, Remember

25 FEMALE ANNOUNCER: This creates pathways that

26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

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1 helps kids to filter, focus, absorb and remember --
2 ON SCREEN: SPAN SEQUENCES
3 www.ifocusSystem.com
4 REMEMBER AND RECALL
5 FILTER DISTRACTIONS
6 IMPROVE COMPREHENSION
7 FEMALE ANNOUNCER: -- using span sequences
8 which ask players to remember complex information, even
9 while distracted. So, many kids who play Jungle Rangers
10 span games feel a jump in math and in reading
11 comprehension.
12 ON SCREEN: CONTINUOUS PERFORMANCE
13 www.ifocusSystem.com
14 PAY ATTENTION
15 LEARN PATIENCE
16 FOCUS
17 FEMALE ANNOUNCER: Continuous performance games
18 are all about paying attention and learning patience.
19 Research proves kids who play continuous performance
20 games are able to stay alert, be less distracted, and
21 really focus on what's going on around them.
22 ON SCREEN: N-BACK
23 www.ifocusSystem.com
24 HOLD INFORMATION
25 UPDATE INFORMATION For The Record, Inc. (301)
26 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

32

1 REMEMBER AND FOCUS

2 FEMALE ANNOUNCER: And N-back requires players

3 hold information and update that information. It's

4 practice for real life, helping kids to think about what

5 they've learned and to focus and remember what they need

6 to do.

7 And the game adapts as your child improves, and

8 as a parent, you can track those improvements through the

9 game's dashboard.

10 ON SCREEN: PARENT'S DASHBOARD

11 MONITOR PROGRESS

12 FEMALE ANNOUNCER: You'll see at a glance how

13 your child is progressing through the game, and best of

14 all, you'll know ifocus is working because you'll see it

15 working in your child's daily life.

16 ON SCREEN: Marissa

17 Chazz's Mom

18 Individual Result - your child may not be as

19 successful

20 MARISSA: When he brings home his paperwork

21 from school and they're As, they're 100 percents, 95

22 percents versus the 65 percents.

23 ON SCREEN: Chazz

24 age 10 www.ifocusSystem.com

25 CHAZZ: Yeah, I have better grades. I used to

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1 blurt out in class and now I don't do that as much
2 anymore.

3 ON SCREEN: Marissa
4 Chazz's Mom www.ifocusSystem.com

5 MARISSA: I would have never in a million years
6 thought that a video game, ifocus Jungle Rangers, would
7 have been able to do that for us.

8 ON SCREEN: www.ifocusSystem.com

9 FEMALE ANNOUNCER: Parents and teachers notice
10 a difference in attention, behavior and focus when kids
11 use the ifocus system. But we wanted to see for
12 ourselves, so we put ifocus to the real test, real kids
13 at a real school.

14 ON SCREEN: JUNGLE RANGERS
15 NOT AVAILABLE AT SCHOOLS!

16 FEMALE ANNOUNCER: The ifocus Jungle Rangers
17 game isn't available at schools, so elementary school
18 principal Lori Jensen jumped at the opportunity to test
19 it as part of her curriculum.

20 ON SCREEN: Lori Jensen
21 Principal, 30 years in education
22 www.ifocusSystem.com

23 LORI JENSEN: It fit into what we were trying
24 to do with our students, engage them in the learning
25 process, but also expand what their brains were going to
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EXHIBIT B**EXHIBIT B**

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1 be able to do.

2 FEMALE ANNOUNCER: The teachers were

3 enthusiastic.

4 ON SCREEN: Jane Marshall

5 Teacher www.ifocusSystem.com

6 JANE MARSHALL: And, actually, as educators,

7 that's what we're trying to do. We're trying to create

8 new pathways in the brain.

9 FEMALE ANNOUNCER: So, students played the

10 ifocus Jungle Rangers game in computer lab and teachers

11 noticed a difference in their classrooms.

12 JANE MARSHALL: A typical third grade class

13 you're really working to keep them focused.

14 LORI JENSEN: She can tell a difference in

15 their attention span in the classroom.

16 ON SCREEN: Lavonne Riggs

17 Teacher www.ifocusSystem.com

18 LAVONNE RIGGS: I have seen a vast improvement.

19 This class seems to be motivated and focused, and the

20 only thing we're doing differently is Jungle Rangers.

21 JANE MARSHALL: I love finding ways to help the

22 children learn and Jungle Rangers does play a part in

23 helping the children learn how to focus and to retrieve

24 information --

25 ON SCREEN: Jane Marshall For The Record, Inc.

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1 Teacher www.ifocusSystem.com
2 JANE MARSHALL: -- and they enjoy doing it, so
3 half the battle's gone right there.
4 LAVONNE RIGGS: Pretty amazing.
5 FEMALE ANNOUNCER: With ifocus, your child can
6 learn to focus so that your child can focus on learning
7 to succeed in the classroom and beyond.
8 ON SCREEN: Lori Jensen
9 Principal, 30 years in education
10 www.ifocusSystem.com
11 LORI JENSEN: It will help them with their
12 attention span and their focus.
13 ON SCREEN: ifocus
14 ON SCREEN: Garth
15 Zak and Zane's Dad
16 GARTH: This is one thing that I'm very glad my
17 wife and I decided to do. I think it's been beneficial
18 for our boys.
19 ON SCREEN: This is a paid advertisement for
20 the ifocus System
21 GARTH: Thank you. That's about what I want to
22 say. Thank you for ifocus.
23 ON SCREEN: ifocus
24 \$14.95 PLUS S&H
25 30 DAY TRIAL For The Record, Inc. (301) 870-
26 8025 - www.itrinc.net - (800) 921-5555

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1 EXCLUSIVE INTRODUCTORY OFFER
2 Entire ifocus BRAIN TRAINING SYSTEM
3 CALL NOW www.ifocusSystem.com
4 MALE ANNOUNCER: Now, through this
5 extraordinary and exclusive introductory offer, you can
6 get the entire ifocus Jungle Rangers Brain Training
7 System --
8 ON SCREEN: ifocus
9 \$14.95 PLUS S&H
10 30 DAY TRIAL
11 EXCLUSIVE INTRODUCTORY OFFER
12 INCLUDES JUNGLE RANGERS GAMES
13 CALL NOW www.ifocusSystem.com
14 MALE ANNOUNCER: -- including all nine Jungle
15 Rangers games, and find out for yourself how effective it
16 really is by simply trying it for a full 30 days for just
17 \$14.95.
18 It comes with everything your child needs to
19 succeed --
20 ON SCREEN: ifocus
21 \$14.95 PLUS S&H
22 30 DAY TRIAL
23 EXCLUSIVE INTRODUCTORY OFFER
24 JUNGLE RANGERS GAME CD Mac Windows
25 CALL NOW www.ifocusSystem.com
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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1 MALE ANNOUNCER: -- including the Jungle
2 Rangers game CD --
3 ON SCREEN: ifocus
4 \$14.95 PLUS S&H
5 30 DAY TRIAL
6 EXCLUSIVE INTRODUCTORY OFFER
7 INCLUDING Parent Dashboard
8 CALL NOW www.ifocusSystem.com
9 MALE ANNOUNCER: -- with a parent dashboard
10 tracker for monitoring their time and progress --
11 ON SCREEN: ifocus
12 \$14.95 PLUS S&H
13 30 DAY TRIAL
14 EXCLUSIVE INTRODUCTORY OFFER
15 Science Behind the Game AUDIO CD
16 CALL NOW www.ifocusSystem.com
17 MALE ANNOUNCER: -- this in-depth parent audio
18 CD that explains the science behind this groundbreaking
19 program --
20 ON SCREEN: ifocus
21 \$14.95 PLUS S&H
22 30 DAY TRIAL
23 EXCLUSIVE INTRODUCTORY OFFER
24 Focus on Behavior HANDBOOK + AUDIO CD
25 CALL NOW www.ifocusSystem.com
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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1 MALE ANNOUNCER: -- plus this Focus on Behavior
2 handbook and audio CD that helps both child and parent
3 to understand and recognize good and bad behavioral
4 patterns --
5 ON SCREEN: ifocus
6 \$14.95 PLUS S&H
7 30 DAY TRIAL
8 EXCLUSIVE INTRODUCTORY OFFER
9 Plus Additional BONUS EXTRAS!
10 CALL NOW www.ifocusSystem.com
11 MALE ANNOUNCER: -- and even more bonus items,
12 all yours included at no extra cost.
13 ON SCREEN: ifocus
14 \$14.95 PLUS S&H
15 30 DAY TRIAL
16 EXCLUSIVE INTRODUCTORY OFFER
17 Entire ifocus BRAIN TRAINING SYSTEM
18 CALL NOW www.ifocusSystem.com
19 MALE ANNOUNCER: You get this entire system
20 with everything you see here to simply try for a full
21 month for just \$14.95.
22 ON SCREEN: ifocus
23 Guarantee less return shipping
24 \$14.95 PLUS S&H
25 30 DAY TRIAL For The Record, Inc. (301) 870-
26 8025 - www.ftrinc.net - (800) 921-5555

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1 EXCLUSIVE INTRODUCTORY OFFER
2 PARENT TO PARENT PROMISE
3 6 MONTH 100%
4 MONEY BACK GUARANTEE
5 Play JUNGLE RANGERS in your home!
6 CALL NOW www.ifocusSystem.com
7 MALE ANNOUNCER: And don't forget the
8 incredible parent to parent promise. If you order today,
9 ifocus will give you up to six months. Yes, six full
10 months to put the ifocus Jungle Rangers Brain Training
11 System to the test, or your money back.
12 ON SCREEN: ifocus
13 CALL in the next 10 MINUTES!
14 \$14.95 PLUS S&H
15 30 DAY TRIAL
16 EXCLUSIVE INTRODUCTORY OFFER
17 FREE SHIPPING & HANDLING
18 CALL NOW www.ifocusSystem.com
19 MALE ANNOUNCER: If you call and order in the
20 next ten minutes, we'll ship the entire system right to
21 your door for free. That's right, absolutely free
22 shipping and handling. But only if you call and order
23 right away.
24 ON SCREEN: CALL or Click
25 TO ORDER NOW! For The Record, Inc. (301) 870-
26 8025 - www.ftrinc.net - (800) 921-5555

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40

1 ifocus
2 \$14.95 PLUS S&H
3 30 DAY TRIAL
4 EXCLUSIVE INTRODUCTORY OFFER
5 NOT AVAILABLE AT SCHOOLS!
6 CALL NOW www.ifocusSystem.com
7 MALE ANNOUNCER: The ifocus Jungle Rangers
8 Brain Training System for attention is not available in
9 stores or schools. It's only available online or through
10 this exclusive television offer.
11 ON SCREEN: ifocus
12 \$14.95 PLUS S&H
13 30 DAY TRIAL
14 EXCLUSIVE INTRODUCTORY OFFER
15 CALL NOW www.ifocusSystem.com
16 MALE ANNOUNCER: So, make the commitment to
17 help your child filter, focus, absorb and remember. Call
18 now or click on ifocussystem.com.
19 ON SCREEN: CALL or Click
20 TO ORDER NOW!
21 ifocus
22 \$14.95 PLUS S&H
23 30 DAY TRIAL
24 EXCLUSIVE INTRODUCTORY OFFER
25 PARENT TO PARENT PROMISE For The Record, Inc.
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1 6 MONTH 100%
2 MONEY BACK GUARANTEE
3 Guarantee less return shipping
4 CALL NOW www.ifocusSystem.com
5 MALE ANNOUNCER: And, remember, with the ifocus
6 system, your child will achieve and succeed or your money
7 back. Call now.
8 FEMALE ANNOUNCER: Isaac is a busy nine-year-
9 old and Isaac had trouble paying attention in school
10 until his mom discovered the ifocus System.
11 ON SCREEN: www.ifocusSystem.com
12 FEMALE ANNOUNCER: He started playing Jungle
13 Rangers and she learned easy ways to help him change his
14 behavior, to get organized and to get focused.
15 ON SCREEN: Alitza
16 Issac's Mom www.ifocusSystem.com
17 ALITZA: The teacher actually has told me that
18 this couple weeks, she's noticed big, big change.
19 FEMALE ANNOUNCER: Now, instead of spending
20 hours on homework, Isaac is able to stay on task.
21 ALITZA: Oh, my gosh, this game is amazing, 100
22 percent recommend it. And he likes that, he enjoys it,
23 and that's what makes me very happy.
24 ON SCREEN: DEVELOPED BY
25 Scientists Educators Parents For The Record,
26 Inc. (301) 870-8025 - www.fttrinc.net - (800) 921-5555

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1 FEMALE ANNOUNCER: Behind ifocus is a team of
2 scientists, doctors, educators, child psychologists,
3 award-winning game designers and parents. The result,
4 something truly unique and remarkable that children love
5 to play.

6 ON SCREEN: FIRST TIME PLAYERS! JUNGLE RANGERS

7 CHILD: I like Jungle Rangers.

8 CHILD: Very cool, awesome game.

9 CHILD: Pretty challenging.

10 CHILD: A little easy, a little hard.

11 CHILD: You have to memorize the pattern in
12 order to go on to the next level.

13 CHILD: And you do all this fun stuff.

14 CHILD: I like Jungle Rangers.

15 ON SCREEN: www.ifocusSystem.com

16 JASON LEON: Well, we made it really
17 approachable for them. You're going to become a Jungle
18 Ranger.

19 GAME: Good day, I need your help.

20 ON SCREEN: Game Adapts
21 TO PLAYER!

22 JASON LEON: Each and every game is adaptive.

23 ON SCREEN: Jason Leon
24 ifocus Game Developer www.ifocusSystem.com

25 JASON LEON: So, it's actually designed to For
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1 scale up in difficulty so that it keeps your brain energy
2 up as high as it possibly can.
3 ON SCREEN: Lori Jensen
4 Principal, 30 years in education
5 www.ifocusSystem.com
6 LORI JENSEN: Being able to use the Jungle
7 Rangers and having the students actually learn how to
8 think through a problem because they don't have those
9 problem-solving skills, and Jungle Rangers has that
10 problem-solving portion built in.
11 JASON LEON: That's one of the aspects that
12 sets our game apart from other games is that it's
13 constantly challenging you to get better.
14 MALE ANNOUNCER: The creators of the ifocus
15 Jungle Rangers Brain Training System knew that the game
16 had to be a --
17 ON SCREEN: INNOVATIVE COMBINATION!
18 PROVEN CHALLENGING
19 Science Fun
20 www.ifocusSystem.com
21 MALE ANNOUNCER: -- careful balance of science
22 and fun.
23 ON SCREEN: EFFECTIVE TOOL FOR
24 Parents & Kids
25 Patience For The Record, Inc. (301) 870-8025 -
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1 Forethought
2 Discipline
3 Self-Regulations
4 MALE ANNOUNCER: That balance makes it an
5 effective tool for parents and an exciting way for kids
6 to learn patience, forethought, and discipline, and also
7 to self-regulate their emotions.
8 This is where brain specialist and ifocus
9 scientific advisor Dr. Daniel Amen realized the huge
10 positive potential of the Jungle Rangers' game.
11 ON SCREEN: Daniel Amen, M.D.
12 Brain Imaging Specialist www.ifocusSystem.com
13 DR. DANIEL AMEN: So, what we did is we did a
14 very sophisticated neuropsychological assessment of a big
15 group of kids before and then after they played the game.
16 ON SCREEN: EMOTION: +25%
17 Jackson age 11
18 Average Emotion Improvement 45% in 5 hours
19 DR. DANIEL AMEN: And it was actually very --
20 ON SCREEN: EMOTION: +29%
21 Zach age 11
22 Average Emotion Improvement 45% in 5 hours
23 DR. DANIEL AMEN: -- exciting to find in --
24 ON SCREEN: EMOTION: +350%
25 Isaac age 9 For The Record, Inc. (301) 870-
26 8025 - www.ftrinc.net - (800) 921-5555

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1 Average Emotion Improvement 45% in 5 hours
2 DR. DANIEL AMEN: -- areas of motion and --
3 ON SCREEN: SELF REGULATION: +200%
4 Anna age 10
5 Average Self Regulation Improvement 30% in 5
6 hours
7 DR. DANIEL AMEN: -- self-regulation that --
8 ON SCREEN: SELF REGULATION: +38%
9 Tiffany age 11
10 Average Self Regulation Improvement 30% in 5
11 hours
12 DR. DANIEL AMEN: -- their scores --
13 ON SCREEN: SELF-REGULATION: +105%
14 Chazz age 10
15 Average Self-Regulation 30% in 5 hours
16 DR. DANIEL AMEN: -- improved significantly.
17 ON SCREEN: www.ifocusSystem.com
18 DR. DANIEL AMEN: Self-regulation is really one
19 of the secrets to long-term success.
20 The brain is so interesting. It has many
21 different abilities. So, the ability to regulate itself
22 comes from the front part of your brain. It helps you
23 with things like focus and forethought, judgment, impulse
24 control. And it's very exciting. With ifocus, there, in
25 fact, is evidence that it helps them especially in those
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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1 areas of self-regulation and emotion.

2 ON SCREEN: ifocus

3 FEMALE ANNOUNCER: Trista is a bubbly six-year-

4 old who is very bright.

5 TRISTA: I'm a good reader. I'm a good -- I'm

6 good at math, I'm good at almost everything in school but

7 spelling. I'm not that good at spelling.

8 ON SCREEN: Taffie

9 Trista's Mom www.ifocusSystem.com

10 TAFFIE: Trista is very intelligent, but

11 because she gets bored so easily, then she has a very

12 difficult time focusing. Every parent-teacher

13 conference, it's always, you know, she's a little

14 chatterbox, we have a hard time keeping her in her seat.

15 FEMALE ANNOUNCER: That was before Trista

16 starting playing the ifocus Jungle Rangers game.

17 TAFFIE: So, we went to this parent-teacher

18 conference this last time and I said to her teacher, you

19 know, how are things going? She said, I don't know what

20 you're doing at home, but you need to keep it up because

21 it's helping her.

22 FEMALE ANNOUNCER: Playing Jungle Rangers

23 really has made a difference for Trista and she knows

24 exactly why.

25 ON SCREEN: Trista For The Record, Inc. (301)

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1 age 6 www.ifocusSystem.com
2 TRISTA: It does help me pay attention.
3 FEMALE ANNOUNCER: When a child feels
4 successful, he or she can be successful in the areas that
5 are most important to them. It starts at home. They
6 take it with them to school --
7 ON SCREEN: This is a paid advertisement for
8 the ifocus System
9 FEMALE ANNOUNCER: -- and then it comes right
10 back around to happier kids at home and happy kids make
11 happy families.
12 ON SCREEN: Colleen
13 Michael and Nelson's Mom
14 COLLEEN: I could see the improvement in him.
15 ON SCREEN: Susan
16 Forrester's Mom
17 SUSAN: Things come easier.
18 ON SCREEN: Kristin
19 Anna's Mom
20 KRISTIN: She's been better at being a self
21 starter.
22 ON SCREEN: Connie
23 Landon's Mom
24 LANDON: He was able to follow directions a lot
25 better. For The Record, Inc. (301) 870-8025 -
26 www.ftrinc.net - (800) 921-5555

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1 ON SCREEN: Garth
2 Zak and Zane's Dad
3 GARTH: The fact that he came home and wanted
4 to do his homework.
5 ON SCREEN: Marissa
6 Chazz's Mom
7 MARISSA: When I come home from work, his
8 chores are done.
9 ON SCREEN: Adell
10 Tiffany's Mom
11 ADELL: I definitely would recommend it.
12 ON SCREEN: Forrester
13 age 10
14 FORRESTER: The best thing about Jungle Rangers
15 is everything.
16 ON SCREEN: JUNGLE RANGERS
17 BRAIN TRAINING SYSTEM
18 for Attention!
19 MALE ANNOUNCER: Introducing the ifocus Jungle
20 Rangers Brain Training System.
21 ON SCREEN: JUNGLE RANGERS
22 MALE ANNOUNCER: What looks like just a video
23 game is actually a --
24 ON SCREEN: Sophisticated
25 BRAIN TRAINING TOOL For The Record, Inc. (301)
26 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

49

1 MALE ANNOUNCER: -- sophisticated and highly
2 developed state-of-the-art brain training tool, designed
3 as a series of --
4 ON SCREEN: 9 COMPUTER GAME
5 Adventures
6 MALE ANNOUNCER: -- nine fun, exciting and
7 challenging computer game adventures.
8 ON SCREEN: EVERYONE E CONTENT RATED BY ESRB
9 JUNGLE RANGERS
10 AVAILABLE FOR Windows Mac
11 MALE ANNOUNCER: Rated E for everyone and
12 available for both PC and Mac, the ifocus Jungle Rangers
13 game is unlike any educational game you've ever seen,
14 because hidden within every level of the nine innovative
15 ifocus Jungle Rangers games are --
16 ON SCREEN: Scientifically Proven
17 BRAIN TRAINING EXERCISES
18 MALE ANNOUNCER: -- scientifically proven
19 memory and attention brain training exercises, designed
20 to improve --
21 ON SCREEN: Focus
22 Concentration
23 Memory
24 MALE ANNOUNCER: -- focus, concentration and
25 memory -- For The Record, Inc. (301) 870-8025 -
26 www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

50

1 ON SCREEN: Stimulate, Strengthen
2 CONNECTIONS
3 MALE ANNOUNCER: -- strengthening important
4 neuron connections --
5 ON SCREEN: SPAN SEQUENCES
6 REMEMBER AND RECALL
7 FILTER DISTRACTIONS
8 IMPROVE COMPREHENSION
9 MALE ANNOUNCER: -- like these span sequences
10 which ask players to remember complex information, even
11 while distracted. So, many kids who play Jungle Rangers
12 span games feel a jump in math and reading comprehension.
13 ON SCREEN: CONTINUOUS PERFORMANCE
14 PAY ATTENTION
15 LEARN PATIENCE
16 FOCUS
17 MALE ANNOUNCER: Continuous performance games
18 are all about paying attention and learning patience.
19 Research proves kids who play continuous performance
20 games are able to stay alert, be less distracted and
21 really focus on what's going on around them.
22 ON SCREEN: N-BACK
23 HOLD INFORMATION
24 UPDATE INFORMATION
25 REMEMBER AND FOCUS For The Record, Inc. (301)
26 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

51

1 MALE ANNOUNCER: And N-Back requires players to
2 hold information and update that information. It's
3 practice for real life, helping kids to think about what
4 they've learned and to focus and remember what they need
5 to do.

6 ON SCREEN: INNOVATIVE
7 COMBINATION!

8 PROVEN CHALLENGING
9 Science Fun

10 MALE ANNOUNCER: It's this innovative
11 groundbreaking combination of proven science and
12 increasingly challenging fun that has kids hooked from
13 the very first time they play.

14 ON SCREEN: FIRST TIME PLAYERS! JUNGLE RANGERS

15 CHILD: It was really fun.

16 CHILD: It was challenging, but then I would
17 really want to play it again.

18 CHILD: It's like a puzzle.

19 CHILD: It's fun.

20 CHILD: It's just an awesome game.

21 MALE ANNOUNCER: While kids enjoy the games,
22 parents will love the dashboard tracking system.

23 ON SCREEN: PARENT
24 DASHBOARD

25 MALE ANNOUNCER: This exclusive feature records
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

52

1 your child's progress and reveals how they're improving
2 in key cognitive areas like sequencing, performance and
3 memory.

4 ON SCREEN: Taffie
5 Trista's Mom

6 TAFFIE: Well, the dashboard explains to the
7 parent how much time they have spent in what -- in which
8 areas.

9 ON SCREEN: Jennifer
10 Kaida's Mom

11 JENNIFER: It helps you be able to track what
12 he's doing, his progress.

13 TAFFIE: And it tells you exactly what part of
14 the game they've been playing and for how long.

15 ON SCREEN: ifocus

16 \$14.95 PLUS S&H

17 30 DAY TRIAL

18 EXCLUSIVE INTRODUCTORY OFFER

19 Entire ifocus BRAIN TRAINING SYSTEM

20 CALL NOW www.ifocusSystem.com

21 MALE ANNOUNCER: Now, through this
22 extraordinary and exclusive introductory offer, you can
23 get the entire ifocus Jungle Rangers Brain Training
24 System --

25 ON SCREEN: ifocus For The Record, Inc. (301)
26 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

53

1 \$14.95 PLUS S&H
2 30 DAY TRIAL
3 EXCLUSIVE INTRODUCTORY OFFER
4 INCLUDES JUNGLE RANGERS GAMES
5 CALL NOW www.ifocusSystem.com
6 MALE ANNOUNCER: -- including all nine Jungle
7 Rangers games, and find out for yourself how effective it
8 really is by simply trying it for a full 30 days for just
9 \$14.95.
10 It comes with everything your child needs to
11 succeed --
12 ON SCREEN: ifocus
13 \$14.95 PLUS S&H
14 30 DAY TRIAL
15 EXCLUSIVE INTRODUCTORY OFFER
16 JUNGLE RANGERS GAME CD Mac Windows
17 CALL NOW www.ifocusSystem.com
18 MALE ANNOUNCER: -- including the Jungle
19 Rangers game CD --
20 ON SCREEN: ifocus
21 \$14.95 PLUS S&H
22 30 DAY TRIAL
23 EXCLUSIVE INTRODUCTORY OFFER
24 INCLUDING Parent Dashboard
25 CALL NOW www.ifocusSystem.com
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

54

1 MALE ANNOUNCER: -- with a parent dashboard
2 tracker for monitoring their time and progress --
3 ON SCREEN: ifocus
4 \$14.95 PLUS S&H
5 30 DAY TRIAL
6 EXCLUSIVE INTRODUCTORY OFFER
7 Science Behind the Game AUDIO CD
8 CALL NOW www.ifocusSystem.com
9 MALE ANNOUNCER: -- this in-depth parent audio
10 CD that explains the science behind this groundbreaking
11 program --
12 ON SCREEN: ifocus
13 \$14.95 PLUS S&H
14 30 DAY TRIAL
15 EXCLUSIVE INTRODUCTORY OFFER
16 Focus on Behavior HANDBOOK + AUDIO CD
17 CALL NOW www.ifocusSystem.com
18 MALE ANNOUNCER: -- plus this Focus on Behavior
19 handbook and audio CD that helps both child and parent
20 to understand and recognize good and bad behavioral
21 patterns --
22 ON SCREEN: ifocus
23 \$14.95 PLUS S&H
24 30 DAY TRIAL
25 EXCLUSIVE INTRODUCTORY OFFER For The Record,
26 Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

55

1 Plus Additional BONUS EXTRAS!
2 CALL NOW www.ifocusSystem.com
3 MALE ANNOUNCER: -- and even more bonus items,
4 all yours included at no extra cost.
5 ON SCREEN: ifocus
6 \$14.95 PLUS S&H
7 30 DAY TRIAL
8 EXCLUSIVE INTRODUCTORY OFFER
9 Entire ifocus BRAIN TRAINING SYSTEM
10 CALL NOW www.ifocusSystem.com
11 MALE ANNOUNCER: You get this entire system
12 with everything you see here to simply try for a full
13 month for just \$14.95.
14 But listen to this, the creators at Focus
15 Education, who are also concerned parents, are so
16 confident that you and your child will absolutely fall in
17 love with this amazing system that they're offering an
18 unheard of parent to parent promise.
19 ON SCREEN: ifocus
20 Guarantee less return shipping
21 \$14.95 PLUS S&H
22 30 DAY TRIAL
23 EXCLUSIVE INTRODUCTORY OFFER
24 PARENT TO PARENT PROMISE
25 6 MONTH 100% For The Record, Inc. (301) 870-
26 8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

56

1 MONEY BACK GUARANTEE
2 Play JUNGLE RANGERS in your home!
3 CALL NOW www.ifocusSystem.com
4 MALE ANNOUNCER: If you order today, ifocus
5 will give you up to six months -- yes, six full months to
6 put the ifocus Jungle Rangers Brain Training System to
7 the test and truly discover its ultimate potential for
8 you and your child, or your money back.
9 UNIDENTIFIED FEMALE: I'm happy to have a tool
10 that helps my daughter focus and helps her to do better
11 in school.
12 UNIDENTIFIED FEMALE: The game has -- is
13 teaching my boys how to focus and how to filter out
14 distractions.
15 ON SCREEN: CALL in the next 6 minutes!
16 ifocus
17 \$14.95 PLUS S&H
18 30 DAY TRIAL
19 EXCLUSIVE INTRODUCTORY OFFER
20 FREE SHIPPING & HANDLING
21 CALL NOW www.ifocusSystem.com
22 MALE ANNOUNCER: And it gets even better. Call
23 and order in the next 6 minutes and we'll ship this total
24 and complete breakthrough system, with all the extras and
25 included bonus items right to your door for free. That's
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT B**EXHIBIT B**

57

1 right, absolutely free shipping and handling, but only if
2 you call and order right away.

3 UNIDENTIFIED FEMALE: I would say that it's a
4 game that gives you results.

5 ON SCREEN: Product information shown above
6 Individual result - your child may not be as
7 successful

8 UNIDENTIFIED MALE: Well, they're doing better
9 in school. We just got their report cards and we were
10 shocked, all As and Bs.

11 UNIDENTIFIED FEMALE: And this was the first
12 time -- well, he got all As and one A minus.

13 MALE ANNOUNCER: The ifocus Jungle Rangers
14 Brain Training System for attention is not available in
15 stores or schools.

16 ON SCREEN: CALL or Click
17 TO ORDER NOW!
18 ifocus
19 \$14.95 PLUS S&H
20 30 DAY TRIAL
21 EXCLUSIVE INTRODUCTORY OFFER
22 NOT AVAILABLE AT SCHOOLS!
23 CALL NOW www.ifocusSystem.com
24 MALE ANNOUNCER: It's only available online or
25 through this exclusive television offer. So, make the For
26 The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B**EXHIBIT B**

58

1 commitment to help your child filter, focus, absorb and
2 remember. Call now or click on ifocusSystem.com.
3 ON SCREEN: ifocus
4 \$14.95 PLUS S&H
5 30 DAY TRIAL
6 EXCLUSIVE INTRODUCTORY OFFER
7 PARENT TO PARENT PROMISE
8 6 MONTH 100%
9 MONEY BACK GUARANTEE
10 Guarantee less return shipping
11 CALL NOW www.ifocusSystem.com
12 MALE ANNOUNCER: And, remember, with the ifocus
13 system, your child will achieve and succeed or your money
14 back. Call now.
15 UNIDENTIFIED FEMALE: 100 percent recommend it.
16 ON SCREEN: CALL or Click
17 TO ORDER NOW!
18 ifocus
19 \$14.95 PLUS S&H
20 30 DAY TRIAL
21 EXCLUSIVE INTRODUCTORY OFFER
22 CALL NOW www.ifocusSystem.com
23 MALE ANNOUNCER: The preceding has been a paid
24 presentation for the ifocus Jungle Rangers Brain Training
25 System, brought to you by Focus Education. For The Record,
26 Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT B

EXHIBIT B

59

1 ON SCREEN: ifocus
2 The preceding was a paid presentation for the
3 ifocus Jungle Rangers Brain Training System brought to
4 you by Focus Education
5 (The recording was concluded.)
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25 For The Record, Inc. (301) 870-8025 - www.ftrinc.net -
26 (800) 921-5555

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EXHIBIT B**EXHIBIT B**

60

1 C E R T I F I C A T I O N O F T Y P I S T

2

3 MATTER NUMBER: 1223153

4 CASE TITLE: IFOCUS EDUCATION, LLC

5 TAPING DATE: JUNE 18, 2012

6 TRANSCRIPTION DATE: NOVEMBER 12, 2013

7

8 I HEREBY CERTIFY that the transcript contained
9 herein is a full and accurate transcript of the tapes
10 transcribed by me on the above cause before the FEDERAL
11 TRADE COMMISSION to the best of my knowledge and belief.

12

13 DATED: NOVEMBER 12, 2013

14

15

16 ELIZABETH M. FARRELL

17

18 C E R T I F I C A T I O N O F P R O O F R E A D E R

19

20 I HEREBY CERTIFY that I proofread the transcript for
21 accuracy in spelling, hyphenation, punctuation and
22 format.

23

24

25 SARA J. VANCE For The

26 Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT C**EXHIBIT C**

1

1 OFFICIAL TRANSCRIPT PROCEEDING
2 FEDERAL TRADE COMMISSION
3
4
5 MATTER NO. 1223153
6 TITLE iFOCUS EDUCATION, LLC
7 DATE RECORDED: NOVEMBER 21, 2012
8 TRANSCRIBED: NOVEMBER 13, 2013
9 PAGES 1 THROUGH 62
10
11
12 JUNGLE RANGERS BRAIN TRAINING SYSTEM
 IFOCUS EDUCATION
13 INFOMERCIAL (IFV7)
14
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18
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22
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24 For The Record, Inc.
25 (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT C

EXHIBIT C

2

1 FEDERAL TRADE COMMISSION

2 I N D E X

3

4 RECORDING: PAGE:

5 Jungle Rangers Infomercial 3

6

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EXHIBIT C

3

1 FEDERAL TRADE COMMISSION

2

3 In the Matter of:)

4 iFocus Education, LLC) Matter No. 1223153

5)

6 -----)

7 November 21, 2012

8

9

10

11 The following transcript was produced from a

12 CD-Rom provided to For The Record, Inc. on October 24,

13 2013.

14

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Complaint

EXHIBIT C**EXHIBIT C**

4

1 P R O C E E D I N G S
2 - - - - -
3 ON SCREEN: Product: ifocus System
4 Company: ifocus education
5 Title: Focus Education IFV #7
6 TRT: 28:30
7 ISCI: FEIF 0107
8 Agency: Script to Screen
9 Date: 12/21/12
10 Audio: 1 & 2 Stereo Mix
11 ON SCREEN: ifocus
12 The following is a paid presentation for the
13 ifocus Jungle Rangers Brain Training System brought to
14 you by Focus Education
15 MALE ANNOUNCER: The following is a paid
16 presentation for the iFocus Jungle Rangers Brain Training
17 System, brought to you by Focus Education.
18 MALE ANNOUNCER: As a parent, you know it, a
19 confident child is a successful child and a successful
20 child is a happy child. It's a critical domino that
21 begins early in their lives with the ability to focus,
22 and the ability to focus in class today can help your
23 children succeed in life tomorrow.
24 ON SCREEN: focus today means success tomorrow
25 MALE ANNOUNCER: But teachers say these days,

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EXHIBIT C**EXHIBIT C**

5

1 more and more kids have a tough time paying attention in
2 class.

3 ON SCREEN: Lori Jensen

4 Principal, 30 years in education

5 LORI JENSEN: I've been in education for almost
6 30 years and I have noticed that students are more
7 distracted today than when I first started in education.

8 ON SCREEN: Jane Marshall

9 Teacher

10 JANE MARSHALL: Many distractions inside the
11 classroom, many distractions in life. We need to teach
12 the children how to focus. I don't think it's -- it can
13 be done on command. I don't think you can tell children
14 focus now. I think they need to train their brain so
15 their brain knows what it feels like to focus.

16 MALE ANNOUNCER: What if there was a way to
17 train your child's brain so he or she did know what it
18 feels like --

19 ON SCREEN: Focus Succeed

20 MALE ANNOUNCER: -- to focus and succeed?

21 ON SCREEN: Fun Easy Effortless

22 MALE ANNOUNCER: And what if it was done in a
23 way that was fun, easy and effortless on your part? What
24 if we told you that just by playing this computer game,
25 your child could build up brain power --

Complaint

EXHIBIT C**EXHIBIT C**

6

1 ON SCREEN: Focus
2 Concentration
3 Memory
4 Incredible NEW GAME!
5 MALE ANNOUNCER: -- learn to focus, improve
6 concentration and memory? Because this is no ordinary
7 game.
8 ON SCREEN: Scientifically Based
9 BRAIN TRAINING EXERCISES
10 CHALLENGING Fun
11 MALE ANNOUNCER: It's actually a series of
12 scientifically based brain training exercises hidden
13 within challenging fun games.
14 ON SCREEN: Julie
15 Zach's Mom
16 JULIE: My kids love to play video games and
17 this is a great way to strengthen their brain.
18 ON SCREEN: Taffie
19 Trista's Mom
20 TAFFIE: And it settles them in and it helps
21 them to learn to focus.
22 ON SCREEN: Denise
23 Seth's mother
24 Individual Result - your child may not be as
25 successful

Complaint

EXHIBIT C**EXHIBIT C**

7

1 DENISE: He says, Mom, I can focus in class.

2 MALE ANNOUNCER: Introducing the iFocus Jungle

3 Rangers --

4 ON SCREEN: BRAIN TRAINING SYSTEM!

5 MALE ANNOUNCER: -- Brain Training System --

6 ON SCREEN: JUNGLE RANGERS

7 EVERYONE E CONTENT RATED BY ESRB

8 Ages 6-12

9 MALE ANNOUNCER: -- rated E for everyone, and

10 created especially for children aged 6 to 12.

11 ON SCREEN: Innovative Combination

12 Science Fun

13 MALE ANNOUNCER: Jungle Rangers is an amazing,

14 innovative combination of science and fun that can make a

15 big difference for your child at home and in the

16 classroom.

17 ON SCREEN: Lori Jensen

18 Principal, 30 years in education

19 LORI JENSEN: It will help them with their

20 attention span and their focus.

21 MALE ANNOUNCER: Kids think they're just

22 playing a fun and easy game, but hidden within each level

23 of the --

24 ON SCREEN: 9 ADVANCING Games

25 MALE ANNOUNCER: -- nine innovative ifocus

Complaint

EXHIBIT C**EXHIBIT C**

8

1 Jungle Rangers game is cutting edge science --
2 ON SCREEN: Scientifically Proven
3 BRAIN TRAINING EXERCISES
4 MALE ANNOUNCER: -- proven memory and attention
5 brain training exercises, every one of them designed to
6 help improve your --
7 ON SCREEN: Concentration
8 Memory
9 MALE ANNOUNCER: -- child's concentration and
10 memory.
11 ON SCREEN: IMPROVEMENT
12 Thinking +93%
13 Self-Regulation +38%
14 Average Thinking Improvement 24% in 5 hours.
15 Average Self-Regulation Improvement 30% in 5
16 hours.
17 Tiffany
18 age 11
19 TIFFANY: When I got that game, I started doing
20 really, really good in school.
21 ON SCREEN: IMPROVEMENT
22 Sustained Attention +33%
23 Thinking +95%
24 Average Sustained Attention Improvement 14% in
25 5 hours.

Complaint

EXHIBIT C**EXHIBIT C**

9

1 Average Thinking Improvement 14% in 5 hours.
2 Forrester
3 age 10
4 FORRESTER: I pay attention to my teacher a lot
5 more.
6 ON SCREEN: IMPROVEMENT
7 Self-Regulation +105%
8 Feeling +44%
9 Average Self-Regulation Improvement 30% in 5
10 hours.
11 Average Feeling Improvement 36% in 5 hours.
12 Chazz
13 age 10
14 CHAZZ: I have better grades.
15 ON SCREEN: Jackson
16 age 11 Individual result - your child may not
17 be as successful
18 JACKSON: I've been getting a lot more 100
19 percents.
20 MALE ANNOUNCER: Based on years of --
21 ON SCREEN: ADVANCED BRAIN RESEARCH
22 MALE ANNOUNCER: -- advanced scientific and
23 pediatric neuro brain research, each level of the Jungle
24 Rangers game is designed to --
25 ON SCREEN: Stimulate, Strengthen

Complaint

EXHIBIT C**EXHIBIT C**

10

1 CONNECTIONS

2 MALE ANNOUNCER: -- stimulate and strengthen

3 neuron connections in the brain, using proven visual and

4 auditory --

5 ON SCREEN: BRAIN TRAINING Exercises

6 MALE ANNOUNCER: -- brain training exercises

7 imbedded within the game itself. It's this innovative

8 groundbreaking combination of proven science and

9 challenging fun that has kids hooked from the very first

10 time they play.

11 ON SCREEN: FIRST TIME PLAYERS! JUNGLE RANGERS

12 CHILD: It was really fun.

13 CHILD: It's like a puzzle.

14 CHILD: It's fun.

15 CHILD: It's just an awesome game.

16 MALE ANNOUNCER: The ifocus Jungle Rangers game

17 features the same series of --

18 ON SCREEN: Neuropsychologists

19 Therapists

20 Scientists

21 BRAIN TRAINING EXERCISES

22 JUNGLE RANGERS

23 MALE ANNOUNCER: -- proven brain training

24 techniques used for years by neuropsychologists,

25 therapists and scientists.

Complaint

EXHIBIT C

EXHIBIT C

11

1 ON SCREEN: Strengthens FOCUSING MUSCLE!

2 MALE ANNOUNCER: They help children to

3 strengthen their memory and attention muscles, so playing

4 Jungle Rangers can give you child results that can be

5 astounding.

6 ON SCREEN: Jennifer

7 Kaida's Mom

8 JENNIFER: I really didn't expect to see that

9 big of a change that quickly.

10 ON SCREEN: Susan

11 Forrester's Mom

12 Individual Result - your child may not be as

13 successful

14 SUSAN: It worked for our family. In two

15 weeks' time, we noticed.

16 ON SCREEN: Marissa

17 Chazz's Mom

18 MARISSA: Ifocus gave me the tools to help my

19 child do better in school.

20 ON SCREEN: Focus Succeed

21 MALE ANNOUNCER: The ifocus Jungle Rangers game

22 can help kids to focus and succeed, to reach their full

23 potential in school and at home.

24 This is Dr. Daniel Amen. He's an expert who's

25 written dozens of books about how the brain works.

Complaint

EXHIBIT C**EXHIBIT C**

12

1 Ifocus scientific advisor, Dr. Amen, studied kids who
2 played ifocus Jungle Rangers and what he discovered was
3 amazing.

4 ON SCREEN: Daniel Amen, M.D.
5 ifocus Scientific Advisor

6 DR. DANIEL AMEN: So, what we did is we did a
7 very sophisticated neuropsychological assessment of a big
8 group of kids before and then after they played the game.

9 ON SCREEN: EMOTION: +25%
10 Jackson age 11
11 Average Emotional Improvement 28% in 5 hours

12 DR. DANIEL AMEN: And it was actually --

13 ON SCREEN: EMOTION: +29%
14 Zach age 11
15 Average Emotional Improvement 28% in 5 hours

16 DR. DANIEL AMEN: -- very exciting to find in
17 the areas of --

18 ON SCREEN: EMOTION: +350%
19 Isaac age 9
20 Average Emotional Improvement 28% in 5 hours

21 DR. DANIEL AMEN: -- emotion and --

22 ON SCREEN: SELF REGULATION: +25%
23 Anna age 10
24 Average Self Regulation Improvement 12% in 5
25 hours

Complaint

EXHIBIT C**EXHIBIT C**

13

1 DR. DANIEL AMEN: -- self-regulation that --
2 ON SCREEN: SELF REGULATION: +38%
3 Tiffany age 11
4 Average Self Regulation Improvement 12% in 5
5 hours
6 DR. DANIEL AMEN: -- their scores --
7 ON SCREEN: SELF REGULATION: +105%
8 Chazz age 10
9 Average Self Regulation Improvement 12% in 5
10 hours
11 DR. DANIEL AMEN: -- improved significantly.
12 ON SCREEN: Daniel Amen, M.D.
13 Self Regulation Secret to Success
14 ON SCREEN: Daniel Amen, M.D.
15 Self Regulation Secret to Success
16 DR. DANIEL AMEN: Self-regulation is really one
17 of the secrets to long-term success.
18 The brain is so interesting. It has many
19 different abilities. So, the ability to regulate itself
20 comes from the front part of your brain.
21 ON SCREEN: Focus
22 Forethought
23 Judgement
24 Impulse Control
25 DR. DANIEL AMEN: It helps you with things like

Complaint

EXHIBIT C**EXHIBIT C**

14

1 focus and forethought, judgment, impulse control.

2 ON SCREEN: Daniel Amen, M.D.

3 Evidence ifocus Helps Self Regulation

4 DR. DANIEL AMEN: And it's very exciting. With

5 ifocus, there, in fact, is evidence that it helps them,

6 especially in those areas of self-regulation and emotion.

7 ON SCREEN: Marissa

8 Chazz's Mom

9 MARISSA: It's helped a lot at the house even,

10 not just at school. His behavior with his chores,

11 helping out.

12 ON SCREEN: Colleen

13 Michael and Nelson's mom

14 COLLEEN: I see a lot more focus, a lot more

15 motivation.

16 ON SCREEN: Kristin

17 Anna's Mom

18 KRISTIN: She seems to be trying harder to want

19 to do what I ask.

20 ON SCREEN: Julie

21 Zach's Mom

22 JULIE: This is a great way to strengthen their

23 brain, which is their biggest asset in life.

24 ON SCREEN: Jane Marshall

25 Teacher

Complaint

EXHIBIT C**EXHIBIT C**

15

1 JANE MARSHALL: And, actually, as educators,
2 that's what we're trying to do. We're trying to create
3 new pathways in the brain. Oftentimes, the same pathways
4 are just used over and over again. The more we can
5 create, the better thinker they're going to be.

6 ON SCREEN: Daniel Amen, M.D.
7 Author, 28 books on the brain

8 DR. DANIEL AMEN: Which is what's good for the
9 brain, is when you do things you're not good at, but you
10 persist at it and you build skill, you're building new
11 connections in the brain, and that's a very exciting
12 thing.

13 MALE ANNOUNCER: Exciting for parents who
14 finally have an --

15 ON SCREEN: Effective
16 EASY TO USE

17 MALE ANNOUNCER: -- effective, easy-to-use tool
18 that can help their children --

19 ON SCREEN: Focus Succeed

20 MALE ANNOUNCER: -- to focus and succeed and
21 exciting for kids who don't care about the science, but
22 do care about the fun --

23 ON SCREEN: Fun

24 GAME!

25 MALE ANNOUNCER: -- and that's where the talent

Complaint

EXHIBIT C**EXHIBIT C**

16

1 and expertise of --

2 ON SCREEN: Award winning ifocus Game Designer

3 MALE ANNOUNCER: -- award-winning game designer

4 Jason Leon made all the difference, creating this

5 innovative blend of science and fun.

6 ON SCREEN: Jason Leon

7 ifocus Game Developer

8 JASON LEON: Well, we made it really

9 approachable for them. You're going to become a jungle

10 ranger.

11 ON SCREEN: JUNGLE RANGER

12 GAME: Good day, I need your help.

13 ON SCREEN: Game Adapts

14 TO PLAYER!

15 JASON LEON: Each and every game is adaptive,

16 so it's actually designed to scale up in difficulty so

17 that it keeps your brain energy up as high as it possibly

18 can.

19 CHILD: Pretty challenging.

20 CHILD: A little easy, a little hard.

21 ON SCREEN: Jason Leon

22 Constantly Challenges you to Improve

23 JASON LEON: That's one of the aspects that

24 sets our game apart from other games is that it's

25 constantly challenging you to get better.

Complaint

EXHIBIT C**EXHIBIT C**

17

1 GAME: Now, this one's a little tricky. You're
2 going to have to jump on the stumps in the reverse order
3 from how I do it.

4 CHILD: You have to memorize a pattern in order
5 to go on to the next level.

6 CHILD: And you do all this fun stuff.

7 ON SCREEN: Jason Leon

8 ifocus Game Developer

9 JASON LEON: We worked directly with a neuro
10 therapist that would tell us what was supposed to be in
11 and why it was supposed to be in. Oftentimes, when folks
12 try and mix these two worlds, they forget that you've got
13 to make it fun first. So, it was kind of this
14 convergence of science and fun.

15 ON SCREEN: Science:

16 BRAIN TRAINING TECHNIQUES

17 MALE ANNOUNCER: The science is using effective
18 brain training techniques and --

19 ON SCREEN: Fun:

20 EASY GAME!

21 MALE ANNOUNCER: -- the fun is the Jungle
22 Rangers adventure.

23 ON SCREEN: 9 ADVANCING

24 Games

25 MALE ANNOUNCER: Players advance through nine

Complaint

EXHIBIT C**EXHIBIT C**

18

1 games --

2 ON SCREEN: 3 DIFFERENT

3 Worlds

4 MALE ANNOUNCER: -- in three different worlds,

5 all of which include exercises designed to improve

6 focus --

7 ON SCREEN: GAMES IMPROVE

8 Focus, Concentration, Memory

9 MALE ANNOUNCER: -- concentration and memory --

10 ON SCREEN: SPAN SEQUENCES

11 REMEMBER AND RECALL

12 FILTER DISTRACTIONS

13 IMPROVE COMPREHENSION

14 MALE ANNOUNCER: -- like these span sequences

15 which ask players to remember complex information, even

16 while distracted, which is so important for kids

17 in math and reading comprehension.

18 ON SCREEN: CONTINUOUS PERFORMANCE

19 PAY ATTENTION

20 LEARN PATIENCE

21 FOCUS

22 MALE ANNOUNCER: Continuous performance games

23 are all about paying attention and learning patience.

24 Research shows kids learn to stay alert and to really

25 focus on what's going on, even at times when they'd

Complaint

EXHIBIT C**EXHIBIT C**

19

1 normally zone out.

2 ON SCREEN: N-BACK

3 HOLD INFORMATION

4 UPDATE INFORMATION

5 REMEMBER AND FOCUS

6 MALE ANNOUNCER: And N-Back requires players to

7 hold information and to update that information. Adding

8 new levels of difficulty is practice for real life,

9 helping kids to focus and remember what they need to do.

10 Bottom line, kids who play Jungle Rangers work

11 their memory and attention muscles, strengthen their

12 focus.

13 ON SCREEN: Strengthens

14 THEIR FOCUS

15 MALE ANNOUNCER: You'll see the difference.

16 ON SCREEN: Marissa

17 Chazz's Mom

18 Individual Result - your child may not be as

19 successful

20 MARISSA: When he brings home his paperwork

21 from school and they're As, they're 100 percents, 95

22 percents versus the 65 percents.

23 ON SCREEN: Chazz

24 age 10

25 CHAZZ: I have better grades. I used to blurt

Complaint

EXHIBIT C**EXHIBIT C**

20

1 out in class and now I don't do that as much anymore.

2 MARISSA: I would have never in a million years

3 thought that a video game --

4 ON SCREEN: This is a paid advertisement for

5 the ifocus System.

6 MARISSA: -- ifocus Jungle Rangers, would have

7 been able to do that for us.

8 ON SCREEN: ifocus

9 ON SCREEN: Jackson age 11 THINKING: +105%

10 Average Thinking Improvement 4% in 5 hours

11 Anna age 10 SELF REGULATION: +200%

12 Average Self Regulation Improvement 12% in 5

13 hours

14 Zach age 11 SUSTAINED ATTENTION: +250%

15 Average Sustained Attention Improvement 14% in

16 5 hours

17 Chazz age 10 SELF REGULATION: +105%

18 Average Self Regulation Improvement 12% in 5

19 hours

20 Isaac age 9 EMOTION: +305%

21 Average Emotional Improvement 28% in 5 hours

22 Tiffany age 11 EMOTION: +75%

23 Average Emotional Improvement 8% in 5 hours

24 Forrester age 10 THINKING: +95%

25 Average Thinking Improvement 4% in 5 hours

Complaint

EXHIBIT C

EXHIBIT C

21

1 FEMALE ANNOUNCER: Seeing the difference Jungle
2 Rangers makes for children and parents is what motivates
3 ifocus found John Able.

4 ON SCREEN: John Able
5 Parent, ifocus Founder

6 JOHN ABLE: I've been driven completely by the
7 thought that I'd help kids.

8 FEMALE ANNOUNCER: John has six children of his
9 own, so parent to parent he knows how difficult it can be
10 to help a child who's struggling.

11 ON SCREEN: John Able
12 Parent, ifocus Founder

13 JOHN ABLE: I learned through trial and error
14 and 31 years of parenting, I call them -- I call them
15 arrows in your quiver or tools in your toolbox. The more
16 tools you have, the better parenting you can do.

17 ON SCREEN: Powerful BRAIN TRAINING

18 FEMALE ANNOUNCER: John knows the ifocus Jungle
19 Rangers game can give you a powerful new parenting tool,
20 one that can help your children to --

21 ON SCREEN: Focus Succeed

22 FEMALE ANNOUNCER: -- focus and succeed.

23 ON SCREEN: Julie

24 Zach's Mom

25 JULIE: The game has -- is teaching my boys how

Complaint

EXHIBIT C**EXHIBIT C**

22

1 to focus and how to filter our distractions.

2 ON SCREEN: Colleen

3 Michael and Nelson's Mom

4 COLLEEN: To have a product like this is

5 exciting for me.

6 ON SCREEN: Connie

7 Jacquelyn's Mom

8 CONNIE: And this was so easy, too. It was

9 just, you know, let them go play and they enjoyed it.

10 So, it was a good thing.

11 MALE ANNOUNCER: It's a good thing that just

12 got better. Now, you can experience the same innovative

13 game thousands of families all over the country have

14 already discovered with the ifocus system, because ifocus

15 is giving you an unheard of promise, a parent to parent

16 guarantee that gives you up to six months to use Jungle

17 Rangers in your home.

18 ON SCREEN: PARENT TO PARENT PROMISE

19 6 MONTHS

20 100% MONEY BACK GUARANTEE

21 IMPROVE:

22 FOCUS

23 ATTENTION

24 MEMORY

25 SCHOOL WORK

Complaint

EXHIBIT C**EXHIBIT C**

23

1 SELF ESTEEM

2 MALE ANNOUNCER: Yes, six full months to put

3 the ifocus Jungle Rangers brain training system to the

4 test and truly discover its ultimate potential for you

5 and your child or your money back.

6 JOHN ABLE: That's the kind of company we are.

7 We're a human company, very human.

8 ON SCREEN: John Able

9 Parent, ifocus Founder

10 JOHN ABLE: The fact that children's lives are

11 changed is important to me.

12 ON SCREEN: ifocus

13 \$14.95 PLUS S&H

14 30 DAY TRIAL

15 EXCLUSIVE TV OFFER

16 Entire ifocus BRAIN TRAINING SYSTEM

17 CALL NOW www.ifocusSystem.com

18 MALE ANNOUNCER: Right now, through this

19 extraordinary and exclusive offer, you can get the entire

20 ifocus Jungle Rangers brain training system --

21 ON SCREEN: ifocus

22 \$14.95 PLUS S&H

23 30 DAY TRIAL

24 EXCLUSIVE TV OFFER

25 INCLUDES JUNGLE RANGERS GAMES

Complaint

EXHIBIT C**EXHIBIT C**

24

1 CALL NOW www.ifocusSystem.com

2 MALE ANNOUNCER: -- including all nine Jungle

3 Rangers games, and find out for yourself how effective it

4 really is by simply trying it for a full 30 days for just

5 \$14.95.

6 ON SCREEN: CALL or Click TO ORDER NOW!

7 ifocus

8 \$14.95 PLUS S&H

9 30 DAY TRIAL

10 EXCLUSIVE TV OFFER

11 CALL NOW www.ifocusSystem.com

12 MALE ANNOUNCER: Just call or click and order

13 right now and we'll send you the ifocus Jungle Rangers

14 brain training system --

15 ON SCREEN: Product information shown above

16 JUNGLE RANGERS BRAIN TRAINING SYSTEM

17 MALE ANNOUNCER: -- with everything your child

18 needs to success --

19 ON SCREEN: Product information shown above

20 JUNGLE RANGERS GAME CD

21 MALE ANNOUNCER: -- the Jungle Rangers game

22 CD --

23 ON SCREEN: Product information shown above

24 PARENT DASHBOARD

25 MALE ANNOUNCER: -- including the exclusive

Complaint

EXHIBIT C**EXHIBIT C**

25

1 parent dashboard tracker.

2 ON SCREEN: Product information shown above

3 Taffie

4 Trista's Mom

5 MONITOR PROGRESS

6 TAFFIE: Well, the dashboard explains to the

7 parent how much time they have spent in what -- in which

8 areas.

9 ON SCREEN: Product information shown above

10 Jennifer

11 Kaida's Mom

12 JENNIFER: It helps you be able to track what

13 he's doing, his progress.

14 TAFFIE: And it tells you exactly what part of

15 the game they've been playing and for how long.

16 ON SCREEN: Product information shown above

17 Science Behind the Game AUDIO CD

18 MALE ANNOUNCER: You'll also receive this in-

19 depth parent audio CD that explains the science behind

20 this groundbreaking program --

21 ON SCREEN: Product information shown above

22 Focus on Behavior

23 HANDBOOK + AUDIO CD

24 MALE ANNOUNCER: -- plus this Focus on Behavior

25 handbook and audio CD. It helps both child and parent to

Complaint

EXHIBIT C**EXHIBIT C**

26

1 understand and recognize good and bad behavior
2 patterns --
3 ON SCREEN: Product information shown above
4 Plus Additional BONUS EXTRAS!
5 MALE ANNOUNCER: -- and even more bonus items,
6 all yours included at no extra cost.
7 ON SCREEN: ifocus
8 \$14.95 PLUS S&H
9 30 DAY TRIAL
10 EXCLUSIVE TV OFFER
11 Entire ifocus BRAIN TRAINING SYSTEM
12 CALL NOW www.ifocusSystem.com
13 MALE ANNOUNCER: You get this entire system
14 with everything you see here to simply try for a full
15 month for just \$14.95.
16 ON SCREEN: CALL in the next 18 minutes!
17 ifocus
18 \$14.95 PLUS S&H
19 30 DAY TRIAL
20 EXCLUSIVE TV OFFER
21 FREE SHIPPING & HANDLING
22 CALL NOW www.ifocusSystem.com
23 MALE ANNOUNCER: And it gets even better. Call
24 and order in the next 18 minutes and we'll ship this
25 total and complete breakthrough system with all the

Complaint

EXHIBIT C**EXHIBIT C**

27

1 extras and included bonus items right to your door for
2 free. That's right, absolutely free shipping and
3 handling. Call and order right away.
4 UNIDENTIFIED FEMALE: I would say that it is a
5 game that gives you results.
6 ON SCREEN: Product information shown above
7 Individual Result - your child may not be as
8 successful
9 UNIDENTIFIED FEMALE: And this was the first
10 time -- well, he got all As and one A minus.
11 ON SCREEN: CALL or Click TO ORDER NOW!
12 ifocus
13 \$14.95 PLUS S&H
14 30 DAY TRIAL
15 EXCLUSIVE TV OFFER
16 NOT AVAILABLE AT SCHOOLS!
17 CALL NOW www.ifocusSystem.com
18 MALE ANNOUNCER: The ifocus Jungle Rangers
19 brain training system for attention is not available in
20 stores or schools, it's only available online or through
21 this exclusive television offer.
22 So, make the commitment now to help your child
23 reach his or her potential. Call now or click on
24 ifocusSystem.com.
25 ON SCREEN: Order Now

Complaint

EXHIBIT C**EXHIBIT C**

27

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2 free. That's right, absolutely free shipping and
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5 game that gives you results.
6 ON SCREEN: Product information shown above
7 Individual Result - your child may not be as
8 successful
9 UNIDENTIFIED FEMALE: And this was the first
10 time -- well, he got all As and one A minus.
11 ON SCREEN: CALL or Click TO ORDER NOW!
12 ifocus
13 \$14.95 PLUS S&H
14 30 DAY TRIAL
15 EXCLUSIVE TV OFFER
16 NOT AVAILABLE AT SCHOOLS!
17 CALL NOW www.ifocusSystem.com
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23 reach his or her potential. Call now or click on
24 ifocusSystem.com.
25 ON SCREEN: Order Now

Complaint

EXHIBIT C**EXHIBIT C**

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1 PARENT TO PARENT PROMISE
2 6 MONTHS
3 100% MONEY BACK GUARANTEE
4 ifocus
5 \$14.95 PLUS S&H
6 30 DAY TRIAL
7 EXCLUSIVE TV OFFER
8 Focus Succeed
9 CALL NOW www.ifocusSystem.com
10 MALE ANNOUNCER: And, remember, with the ifocus
11 system and our exclusive parent to parent promise, your
12 child will focus and succeed or your money back. Order
13 now.
14 UNIDENTIFIED FEMALE: 100 percent recommended.
15 CHILD: The best thing about Jungle Rangers is
16 everything.
17 ON SCREEN: CALL or Click TO ORDER NOW!
18 ifocus
19 \$14.95 PLUS S&H
20 30 DAY TRIAL
21 EXCLUSIVE TV OFFER
22 CALL NOW www.ifocusSystem.com
23 ON SCREEN: Zak and Zane
24 age 9
25 www.ifocusSystem.com

Complaint

EXHIBIT C**EXHIBIT C**

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1 FEMALE ANNOUNCER: Zak and Zane are identical
2 twins. Think busy times two. Their dad makes sure they
3 spend a lot of time outside working off their energy.
4 Even so, both Zak and Zane had trouble focusing at
5 school.

6 GARTH: But to try to focus to do homework,
7 there'd be times where it would take me a half-hour to
8 just do one math problem.

9 FEMALE ANNOUNCER: But since playing the Jungle
10 Rangers game and using the iFocus system, Zak and Zane
11 are able to focus, filter out distractions and homework
12 has become much more productive.

13 ON SCREEN: Garth
14 Zak and Zane's Dad
15 Individual Result - your child may not be as
16 successful

17 GARTH: Well, they're doing better in school.
18 We just got their report cards, and we were shocked, all
19 As and Bs. They've never had that before.

20 ON SCREEN: Zak and Zane
21 age 9 www.ifocusSystem.com

22 CHILD: Every time we come home from school, we
23 can do our math all by ourselves.

24 ON SCREEN: Garth
25 Zak and Zane's Dad www.ifocusSystem.com

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EXHIBIT C

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30

1 GARTH: And now, they come home and do their
2 homework. It's -- you see the difference. You see the
3 difference. One game, hmm.
4 ON SCREEN: ifocus
5 ON SCREEN: Cami
6 age 11
7 CAMI: In class, I usually daydream and then I
8 am -- with homework I'm like, ugh, I don't know how to do
9 this.
10 ON SCREEN: Kelly
11 Cami and Kemp's Mom
12 KELLY: My daughter, she's like, Mom, I really
13 noticed that it's really important to just, you know,
14 clue in on what I'm doing.
15 ON SCREEN: Individual Result - your child may
16 not be as successful www.ifocusSystem.com
17 CAMI: And I focus more on my homework.
18 KELLY: I really noticed a lot of positives.
19 CAMI: It's for kids; it's not for grown-ups,
20 it's just for us to play with and have fun.
21 MALE ANNOUNCER: The ifocus Jungle Rangers game
22 is designed for kids to have fun while also helping --
23 ON SCREEN: Focus Succeed
24 MALE ANNOUNCER: -- children to focus and
25 succeed.

Complaint

EXHIBIT C**EXHIBIT C**

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1 ON SCREEN: JUNGLE RANGERS
2 EVERYONE E CONTENT RATED BY ESRB
3 AVAILABLE FOR Windows Mac
4 MALE ANNOUNCER: Rated E for everyone and
5 available in both Mac and PC --
6 ON SCREEN: INNOVATIVE COMBINATION!
7 Science Fun
8 MALE ANNOUNCER: -- it's an innovative
9 combination of science and fun that works because hidden
10 within every level of the --
11 ON SCREEN: 9 COMPUTER GAME
12 Adventures
13 MALE ANNOUNCER: -- nine innovative ifocus
14 Jungle Rangers games are --
15 ON SCREEN: Sophisticated
16 BRAIN TRAINING TOOL www.ifocusSystem.com
17 MALE ANNOUNCER: -- sophisticated memory and
18 attention brain training exercises.
19 For instance, this is a span sequence.
20 GAME: You have to jump on the stumps in the
21 same order as me.
22 ON SCREEN: SPAN SEQUENCES
23 REMEMBER AND RECALL
24 FILTER DISTRACTIONS
25 IMPROVE COMPREHENSION www.ifocusSystem.com

Complaint

EXHIBIT C**EXHIBIT C**

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1 FEMALE ANNOUNCER: A span sequence requires
2 players to remember information even while distracted.
3 That helps in real life, to remember homework assignments
4 or what should go in the backpack.

5 ON SCREEN: CONTINUOUS PERFORMANCE
6 PAY ATTENTION www.ifocusSystem.com
7 LEARN PATIENCE
8 FOCUS

9 FEMALE ANNOUNCER: And continuous performance
10 games are all about paying attention and learning
11 patience, and that can mean the ability to sit quietly
12 and read, something so important for success in higher
13 education.

14 ON SCREEN: N-BACK
15 HOLD INFORMATION
16 UPDATE INFORMATION www.ifocusSystem.com
17 REMEMBER AND FOCUS

18 MALE ANNOUNCER: N-Back games have players hold
19 information and update that information over time, taking
20 what they know and assimilating new facts, making
21 connections. It's practice for real life.

22 ON SCREEN: Kimberly
23 Mother of nine www.ifocusSystem.com
24 KIMBERLY: When you give a child an
25 instruction, it may have three parts, like go upstairs,

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EXHIBIT C**EXHIBIT C**

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1 get dressed, and then come back down. And before, I was
2 seeing a lot of going upstairs and then I'd have to go
3 search for them. So, the improvement I've seen is they
4 actually can complete the two, three, five-part
5 instruction, which is huge.

6 ON SCREEN: 9 ADVANCING Games

7 Game Adapts

8 TO EACH PLAYER

9 MALE ANNOUNCER: Every one of the nine Jungle
10 Rangers games is designed to adapt to the ability of the
11 players --

12 ON SCREEN: Challenged, NOT FRUSTRATED

13 MALE ANNOUNCER: -- so the kids are challenged,
14 but not frustrated. And that's important. It means
15 they're always playing --

16 ON SCREEN: Peak Performance

17 MALE ANNOUNCER: -- at peak performance --

18 ON SCREEN: Stimulate, Strengthen

19 CONNECTIONS

20 MALE ANNOUNCER: -- strengthening those
21 important neuron connections --

22 ON SCREEN: Focus

23 Concentration

24 Memory

25 MALE ANNOUNCER: -- helping them to improve

Complaint

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1 focus, concentration and memory.
2 ON SCREEN: Jackson
3 age 11 www.ifocusSystem.com
4 JACKSON: It's a game that helps kids
5 concentrate.
6 ON SCREEN: Forrester
7 age 10 www.ifocusSystem.com
8 FORRESTER: You have to remember patterns.
9 ON SCREEN: Lindsey
10 age 9 www.ifocusSystem.com
11 LINDSEY: It's just fun.
12 ON SCREEN: Nelson
13 age 12 www.ifocusSystem.com
14 NELSON: It makes your brain work.
15 FEMALE ANNOUNCER: And teachers say that's
16 exactly what will help them to --
17 ON SCREEN: Focus Succeed
18 MALE ANNOUNCER: -- focus and succeed in the
19 classroom.
20 LORI JENSEN: Because you can't really teach a
21 child to think.
22 ON SCREEN: Lori Jensen
23 Principal, 30 years in education
24 www.ifocusSystem.com
25 LORI JENSEN: Being able to use the Jungle

Complaint

EXHIBIT C**EXHIBIT C**

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1 Rangers and having the students actually learn how to
2 think through a problem, we can show them --
3 ON SCREEN: Lori Jensen
4 Learn how to think through a problem
5 www.ifocusSystem.com
6 LORI JENSEN: -- but we're not actually
7 sometimes teaching them at a brain level of how to make
8 those choices and how to think for themselves.
9 ON SCREEN: Jane Marshall
10 Teacher www.ifocusSystem.com
11 JANE MARSHALL: And my observation of the
12 program, from what I've seen, is that it is trying to
13 create more branches in the brain for those higher-level
14 thinking skills.
15 ON SCREEN: JUNGLE RANGERS
16 NOT AVAILABLE IN SCHOOLS!
17 FEMALE ANNOUNCER: The ifocus Jungle Rangers
18 game isn't available at schools. So, elementary school
19 principal Lori Jensen jumped at the opportunity to test
20 it as part of her curriculum.
21 ON SCREEN: Lori Jensen
22 Principal, 30 years in education
23 www.ifocusSystem.com
24 LORI JENSEN: It fit into what we were trying
25 to do with our students, engage them in the learning

Complaint

EXHIBIT C**EXHIBIT C**

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1 process, but also expand what their brains were going to
2 be able to do.

3 FEMALE ANNOUNCER: The teachers were
4 enthusiastic.

5 JANE MARSHALL: I really think that the more
6 the children do the program, the better the results are
7 going to be.

8 FEMALE ANNOUNCER: So, students played the
9 Jungle Rangers game in computer lab and the --

10 ON SCREEN: Groundbreaking
11 Science Fun

12 www.ifocusSystem.com

13 FEMALE ANNOUNCER: -- innovative groundbreaking
14 combination of science and challenging fun had them
15 hooked from the very first time they played.

16 CHILD: You get to jump on logs.

17 CHILD: I'm talking to a man in a frog costume.

18 CHILD: I would play it every day.

19 CHILD: And I'm a trainee Jungle Rangers. This
20 game is really fun.

21 CHILD: Can we play this at home?

22 CHILD: This is the funnest game on earth.

23 FEMALE ANNOUNCER: Fun? Absolutely.

24 ON SCREEN: GAMES IMPROVE

25 Focus, Concentration, Memory

EXHIBIT C

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1 www.ifocusSystem.com

2 FEMALE ANNOUNCER: But Jungle Rangers also work

3 the memory and focus muscle for these students and the

4 teachers noticed a difference in their classrooms.

5 ON SCREEN: Lavonne Riggs

6 Teacher www.ifocusSystem.com

7 LAVONNE RIGGS: I have seen a vast improvement.

8 This class seems to be motivated and focused --

9 ON SCREEN: Lavonne Riggs

10 Class is motivated and focused

11 www.ifocusSystem.com

12 LAVONNE RIGGS: -- and the only thing we're

13 doing differently is Jungle Rangers.

14 JANE MARSHALL: A typical third grade class,

15 you're really working to keep them focused.

16 ON SCREEN: Lori Jensen

17 A difference in attention www.ifocusSystem.com

18 LORI JENSEN: She can tell a difference in

19 their attention span in the classroom.

20 JANE MARSHALL: I love finding ways to help the

21 children learn and Jungle Rangers does play a part in

22 helping the children learn how to focus --

23 ON SCREEN: Jane Marshall

24 Teacher www.ifocusSystem.com

25 JANE MARSHALL: -- and to retrieve information.

Complaint

EXHIBIT C**EXHIBIT C**

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1 LAVONNE RIGGS: Pretty amazing.
2 ON SCREEN: ifocus
3 ON SCREEN: Garth
4 Zak and Zane's Dad
5 GARTH: This is one thing that I'm very glad my
6 wife and I decided to do. I think it's been beneficial
7 for our boys.
8 ON SCREEN: This is a paid advertisement for
9 the ifocus System
10 GARTH: Thank you. That's about what I want to
11 say, thank you for ifocus.
12 ON SCREEN: ifocus
13 \$14.95 PLUS S&H
14 30 DAY TRIAL
15 EXCLUSIVE TV OFFER
16 Entire ifocus BRAIN TRAINING SYSTEM
17 CALL NOW www.ifocusSystem.com
18 MALE ANNOUNCER: Right now, through this
19 extraordinary and exclusive offer, you can get the entire
20 ifocus Jungle Rangers brain training system --
21 ON SCREEN: ifocus
22 \$14.95 PLUS S&H
23 30 DAY TRIAL
24 EXCLUSIVE TV OFFER
25 INCLUDES JUNGLE RANGERS GAMES

Complaint

EXHIBIT C**EXHIBIT C**

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1 CALL NOW www.ifocusSystem.com
2 MALE ANNOUNCER: -- including all nine Jungle
3 Rangers games, and find out for yourself how effective it
4 really is by simply trying it for a full 30 days for just
5 \$14.95.
6 It comes with everything your child needs to
7 succeed --
8 ON SCREEN: ifocus
9 \$14.95 PLUS S&H
10 30 DAY TRIAL
11 EXCLUSIVE TV OFFER
12 JUNGLE RANGERS GAME CD Mac Windows
13 CALL NOW www.ifocusSystem.com
14 MALE ANNOUNCER: -- including the Jungle
15 Rangers game CD --
16 ON SCREEN: ifocus
17 \$14.95 PLUS S&H
18 30 DAY TRIAL
19 EXCLUSIVE TV OFFER
20 INCLUDING Parent Dashboard
21 CALL NOW www.ifocusSystem.com
22 MALE ANNOUNCER: -- with a parent dashboard
23 tracker for monitoring their time and progress --
24 ON SCREEN: ifocus
25 \$14.95 PLUS S&H

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EXHIBIT C**EXHIBIT C**

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1 30 DAY TRIAL
2 EXCLUSIVE TV OFFER
3 Science Behind the Game AUDIO CD
4 CALL NOW www.ifocusSystem.com
5 MALE ANNOUNCER: -- this in-depth parent audio
6 CD that explains the science behind this groundbreaking
7 program --
8 ON SCREEN: ifocus
9 \$14.95 PLUS S&H
10 30 DAY TRIAL
11 EXCLUSIVE TV OFFER
12 Focus on Behavior HANDBOOK + AUDIO CD
13 CALL NOW www.ifocusSystem.com
14 MALE ANNOUNCER: -- plus this Focus on Behavior
15 handbook and audio CD that helps both child and parent
16 to understand and recognize good and bad behavioral
17 patterns --
18 ON SCREEN: ifocus
19 \$14.95 PLUS S&H
20 30 DAY TRIAL
21 EXCLUSIVE TV OFFER
22 Plus Additional BONUS EXTRAS!
23 CALL NOW www.ifocusSystem.com
24 MALE ANNOUNCER: -- and even more bonus items,
25 all yours included at no extra cost.

Complaint

EXHIBIT C**EXHIBIT C**

41

1 ON SCREEN: ifocus
2 \$14.95 PLUS S&H
3 30 DAY TRIAL
4 EXCLUSIVE TV OFFER
5 Entire ifocus BRAIN TRAINING SYSTEM
6 CALL NOW www.ifocusSystem.com
7 MALE ANNOUNCER: You get this entire system
8 with everything you see here to simply try for a full
9 month for just \$14.95.
10 FEMALE ANNOUNCER: Thousands of families have
11 already made the commitment to help their child focus and
12 succeed. Now, it's your turn to put this powerful
13 program to work in your home --
14 ON SCREEN: PARENT TO PARENT PROMISE
15 6 MONTHS
16 100% MONEY BACK GUARANTEE
17 ifocus
18 \$14.95 PLUS S&H
19 30 DAY TRIAL
20 EXCLUSIVE TV OFFER
21 CALL NOW www.ifocusSystem.com
22 FEMALE ANNOUNCER: -- because when you order
23 today, ifocus will give you up to six months -- yes, an
24 incredible six full months to put the ifocus Jungle
25 Rangers Brain Training System to the test or your money

Complaint

EXHIBIT C**EXHIBIT C**

42

1 back. It's an unprecedented parent to parent promise
2 from ifocus to you.
3 ON SCREEN: CALL in the next 10 MINUTES!
4 ifocus
5 \$14.95 PLUS S&H
6 30 DAY TRIAL
7 EXCLUSIVE TV OFFER
8 FREE SHIPPING & HANDLING
9 CALL NOW www.ifocusSystem.com
10 MALE ANNOUNCER: It gets better, because when
11 you call and order in the next 10 minutes, we'll ship the
12 entire system right to your door for free. That's right,
13 absolutely free shipping and handling. Call and order
14 right away.
15 ON SCREEN: CALL or Click TO ORDER NOW!
16 ifocus
17 \$14.95 PLUS S&H
18 30 DAY TRIAL
19 EXCLUSIVE TV OFFER
20 NOT AVAILABLE AT SCHOOLS!
21 CALL NOW www.ifocusSystem.com
22 MALE ANNOUNCER: The ifocus Jungle Rangers
23 Brain Training System for attention is not available in
24 stores or schools. It's only available online or through
25 this exclusive television offer.

Complaint

EXHIBIT C**EXHIBIT C**

43

1 So, make the commitment to help your child
2 focus and succeed. Call now or click on
3 ifocussystem.com.
4 ON SCREEN: CALL or Click TO ORDER NOW!
5 PARENT TO PARENT PROMISE
6 6 MONTHS
7 100% MONEY BACK GUARANTEE
8 ifocus
9 \$14.95 PLUS S&H
10 30 DAY TRIAL
11 EXCLUSIVE TV OFFER
12 CALL NOW www.ifocusSystem.com
13 MALE ANNOUNCER: And, remember, with the ifocus
14 system, your child will focus and succeed or your money
15 back. Call now.
16 FEMALE ANNOUNCER: Pediatric nurse and mother
17 of nine, Taffie Evans, was very skeptical about the
18 ifocus Jungle Rangers game.
19 ON SCREEN: Taffie
20 Trista's Mom
21 TAFFIE: I think video games are a waste of
22 time. I -- TV and video games, they just suck the life
23 out of children.
24 ON SCREEN: www.ifocusSystem.com
25 FEMALE ANNOUNCER: Her daughter Trista is a

Complaint

EXHIBIT C

EXHIBIT C

44

1 bubbly six-year-old who's very bright.

2 ON SCREEN: Trista

3 age 6 www.ifocusSystem.com

4 TRISTA: I'm good at math, I'm good at almost

5 everything in school but spelling.

6 FEMALE ANNOUNCER: But Trista was having

7 problems at school.

8 ON SCREEN: Taffie

9 Trista's Mom www.ifocusSystem.com

10 TAFFIE: Trista is very intelligent, but

11 because she gets bored so easily, then she has a very

12 difficult time focusing. Every parent-teacher

13 conference, it's always, you know, she's a little

14 chatterbox, we have a hard time keeping her in her seat.

15 FEMALE ANNOUNCER: That was before Trista

16 started playing the ifocus Jungle Rangers game.

17 TAFFIE: So, we went to this parent-teacher

18 conference this last time. She said, I don't know what

19 you're doing at home, but you need to keep it up because

20 it's helping her.

21 FEMALE ANNOUNCER: Playing Jungle Rangers

22 really has made a difference for Trista.

23 TAFFIE: I would recommend ifocus to anyone

24 who's having trouble keeping their children's attention.

25 ON SCREEN: Taffie

Complaint

EXHIBIT C

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45

1 Pediatric Nurse www.ifocusSystem.com
2 TAFFIE: Yeah, like I said before, I was
3 completely skeptical. I honestly and truly did not think
4 it was going to work for my children. And, now, I'm a
5 believer.
6 TRISTA: It does help me pay attention.
7 MALE ANNOUNCER: That's because Jungle Rangers
8 is no ordinary video game. It's an --
9 ON SCREEN: INNOVATIVE COMBINATION!
10 PROVEN Science CHALLENGING Fun
11 www.ifocusSystem.com
12 MALE ANNOUNCER: -- innovative combination of
13 challenging fun combined with cutting edge science. Kids
14 think they're just playing a game, but Jungle Rangers is
15 so much more.
16 ON SCREEN: NEURON
17 TECHNOLOGY
18 MALE ANNOUNCER: It uses integrated neuro
19 technology designed to get --
20 ON SCREEN: KEY NEURONS
21 Fire together
22 Wire together
23 MALE ANNOUNCER: -- key neurons to fire
24 together and then wire together. This is where brain
25 specialist --

Complaint

EXHIBIT C

EXHIBIT C

46

1 ON SCREEN: Daniel Amen, M.D.
2 ifocus Scientific Advisor www.ifocusSystem.com
3 MALE ANNOUNCER: -- and ifocus scientific
4 advisor Dr. Daniel Amen realized the huge positive
5 potential of the Jungle Rangers game.
6 DR. DANIEL AMEN: Here, we had developers, in a
7 thoughtful way, develop a game to actually strengthen the
8 connections in the brain. It's a very interesting term
9 called "long-term potentiation." So, what that means is
10 the connections between cells actually become stronger,
11 and what we've found is when your brain is healthy,
12 you're able to focus and regulate your emotion. You can
13 be happy, driven, motivated, successful.
14 MALE ANNOUNCER: And when he studied a group of
15 children before and after playing the Jungle Rangers
16 game, Dr. Amen discovered a pattern. Jungle Rangers
17 creates the kinds of measurable changes in the brain that
18 are key to success.
19 Anna age 10 SELF REGULATION: +200%
20 Average Self Regulation Improvement 12% in 5
21 hours
22 DR. DANIEL AMEN: What we found was --
23 ON SCREEN: SELF REGULATION: +38%
24 Tiffany age 11
25 Average Self Regulation Improvement 12% in 5

Complaint

EXHIBIT C**EXHIBIT C**

47

1 hours
2 DR. DANIEL AMEN: -- their ability to regulate
3 themselves --
4 ON SCREEN: SELF REGULATION: +105%
5 Chazz age 10
6 Average Self Regulation Improvement 12% in 5
7 hours
8 DR. DANIEL AMEN: -- so self-regulation and
9 emotion --
10 ON SCREEN: EMOTION: +25%
11 Jackson age 11
12 Average Emotional Improvement 28% in 5 hours
13 DR. DANIEL AMEN: -- statistically
14 significantly --
15 ON SCREEN: EMOTION: +29%
16 Zach age 11
17 Average Emotional Improvement 28% in 5 hours
18 DR. DANIEL AMEN: -- increased after the
19 kids --
20 ON SCREEN: EMOTION: +350%
21 Isaac age 9
22 Average Emotional Improvement 28% in 5 hours
23 DR. DANIEL AMEN: -- played the game.
24 MALE ANNOUNCER: Does that mean kids who play
25 Jungle Rangers are more likely to focus and succeed?

Complaint

EXHIBIT C**EXHIBIT C**

48

1 DR. DANIEL AMEN: Well, success for me is you
2 have a goal and you have an ability to stay on track in
3 order to reach your goal.

4 ON SCREEN: Anna
5 age 10

6 Individual Result - your child may not be as
7 successful

8 ANNA: In school, I have noticed that I can
9 focus better.

10 ON SCREEN: Kristin
11 Anna's Mom

12 Individual Result - your child may not be as
13 successful

14 KRISTIN: We had the best parent-teacher
15 conference that we've ever had.

16 ON SCREEN: www.ifocusSystem.com

17 ANNA: I just notice a lot of improvement.

18 KRISTIN: I've been happy with the results.
19 I've been happy with how she's felt about it.

20 ANNA: I have more confidence in myself.

21 ON SCREEN: Confidence

22 Improvement

23 Better Performance

24 www.ifocusSystem.com

25 MALE ANNOUNCER: Confidence, improvement,

Complaint

EXHIBIT C**EXHIBIT C**

49

1 better school performance.

2 ON SCREEN: Science Fun

3 MALE ANNOUNCER: With the ifocus system, this

4 innovative combination of fun and science really does

5 make a difference.

6 ON SCREEN: JUNGLE RANGERS

7 www.ifocusSystem.com

8 FEMALE ANNOUNCER: Like it did for Isaac.

9 ON SCREEN: Alitza

10 Issac's Mom

11 Individual Result - your child may not be as

12 successful

13 ALITZA: The teacher actually has told me that

14 this couple weeks, she's noticed big, big change.

15 FEMALE ANNOUNCER: Now, instead of

16 spending hours on homework, Isaac is able to stay on

17 task.

18 ALITZA: Oh, my gosh, this game is amazing, 100

19 percent recommended. And he likes that, he enjoys it,

20 and that's what makes me very happy.

21 FEMALE ANNOUNCER: Parents and teachers know

22 that ability to stay on task --

23 ON SCREEN: Focus

24 Succeed

25 www.ifocusSystem.com

Complaint

EXHIBIT C**EXHIBIT C**

50

1 FEMALE ANNOUNCER: -- to focus and pay
2 attention in class today can help your child to succeed
3 in life tomorrow.
4 ON SCREEN: Jane Marshall
5 Teacher www.ifocusSystem.com
6 JANE MARSHALL: They need to train their brain
7 so your brain knows what it feels like to focus.
8 MALE ANNOUNCER: The ifocus Jungle Rangers
9 Brain Training System is an amazing, innovative
10 combination of sophisticated science and challenging fun,
11 designed to strengthen children's ability to pay
12 attention. The result, kids who play Jungle Rangers know
13 what it feels like to --
14 ON SCREEN: Focus Succeed
15 www.ifocusSystem.com
16 MALE ANNOUNCER: -- focus and succeed at home,
17 at school and even in sports.
18 ON SCREEN: Daniel Amen, M.D.
19 Brain Imaging Specialist
20 www.ifocusSystem.com
21 DR. DANIEL AMEN: So, I think any kid will
22 benefit from this, and the reason I say that is I love
23 the approach. It's a brain training exercise. None of
24 it's hard. I mean, that's sort of the exciting thing.
25 None of it's hard and it can give you a big benefit. And

Complaint

EXHIBIT C

EXHIBIT C

51

1 as a parent, you feel confident --

2 ON SCREEN: This is a paid advertisement for

3 the ifocus System

4 DR. DANIEL AMEN: -- that this is helping my

5 child and not hurting my child.

6 ON SCREEN: Colleen

7 Michael and Nelson's Mom

8 COLLEEN: I could see the improvement in him.

9 ON SCREEN: Susan

10 Forrester's Mom

11 SUSAN: Things come easier.

12 ON SCREEN: Kristin

13 Anna's Mom

14 KRISTIN: She's been better at being a self-

15 starter.

16 ON SCREEN: Connie

17 Landon's Mom

18 CONNIE: He was able to follow directions a lot

19 better.

20 ON SCREEN: Garth

21 Zak and Zane's Dad

22 GARTH: The fact that he came home and wanted

23 to do his homework.

24 ON SCREEN: Marissa

25 Chazz's Mom

Complaint

EXHIBIT C

EXHIBIT C

52

1 CHAZZ: When I come home from work, his chores
2 are done.
3 ON SCREEN: Adell
4 Tiffany's Mom
5 ADELL: I definitely would recommend it.
6 ON SCREEN: Jackson age 11 THINKING: +105%
7 Average Thinking Improvement 4% in 5 hours
8 Arna age 10 SELF REGULATION: +200%
9 Average Self Regulation Improvement 12% in 5
10 hours
11 Zach age 11 SUSTAINED ATTENTION: +250%
12 Average Sustained Attention Improvement 14% in
13 5 hours
14 Chazz age 10 SELF REGULATION: +105%
15 Average Self Regulation Improvement 12% in 5
16 hours
17 Isaac age 9 EMOTION: +305%
18 Average Emotional Improvement 28% in 5 hours
19 Tiffany age 11 EMOTION: +75%
20 Average Emotional Improvement 8% in 5 hours
21 Forrester age 10 THINKING: +95%
22 Average Thinking Improvement 4% in 5 hours
23 FEMALE ANNOUNCER: Seeing the difference Jungle
24 Rangers makes for children and parents is what motivates
25 ifocus found John Able.

Complaint

EXHIBIT C

EXHIBIT C

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1 ON SCREEN: John Able
2 Parent, ifocus Founder
3 JOHN ABLE: I've been driven completely by the
4 thought that I'd help kids.
5 FEMALE ANNOUNCER: John has six children of his
6 own, so parent to parent he knows how difficult it can be
7 to help a child who's struggling.
8 ON SCREEN: John Able
9 Parent, ifocus Founder
10 JOHN ABLE: I learned through trial and error
11 and 31 years of parenting. I call them arrows in your
12 quiver or tools in your toolbox. The more tools you
13 have, the better parenting you can do.
14 ON SCREEN: Powerful BRAIN TRAINING
15 FEMALE ANNOUNCER: John knows the ifocus Jungle
16 Rangers game can give you a powerful new parenting tool,
17 one that can help your children to --
18 ON SCREEN: Focus Succeed
19 FEMALE ANNOUNCER: -- focus and succeed.
20 ON SCREEN: Julie
21 Zach's Mom
22 JULIE: The game has -- is teaching my boys how
23 to focus and how to filter our distractions.
24 ON SCREEN: Colleen
25 Michael and Nelson's Mom

Complaint

EXHIBIT C

EXHIBIT C

54

1 COLLEEN: To have a product like this is
2 exciting for me.
3 ON SCREEN: Connie
4 Jacquelyn's Mom
5 CONNIE: And this was so easy, too. It was
6 just, you know, let them go play and they enjoyed it.
7 So, it was a good thing.
8 MALE ANNOUNCER: It's a good thing that just
9 got better. Now, you can experience the same innovative
10 game thousands of families all over the country have
11 already discovered with the ifocus system, because ifocus
12 is giving you an unheard of promise, a parent to parent
13 guarantee that gives you up to six months to use Jungle
14 Rangers in your home.
15 ON SCREEN: PARENT TO PARENT PROMISE
16 6 MONTHS
17 100% MONEY BACK GUARANTEE
18 IMPROVE:
19 FOCUS
20 ATTENTION
21 MEMORY
22 SCHOOL WORK
23 SELF ESTEEM
24 MALE ANNOUNCER: Yes, six full months to put
25 the ifocus Jungle Rangers brain training system to the

Complaint

EXHIBIT C

EXHIBIT C

55

1 test and truly discover its ultimate potential for you
2 and your child or your money back.
3 JOHN ABLE: That's the kind of company we are.
4 We're a human company, very human.
5 ON SCREEN: John Able
6 Parent, ifocus Founder
7 JOHN ABLE: The fact that children's lives are
8 changed is important to me.
9 ON SCREEN: ifocus
10 \$14.95 PLUS S&H
11 30 DAY TRIAL
12 EXCLUSIVE TV OFFER
13 Entire ifocus BRAIN TRAINING SYSTEM
14 CALL NOW www.ifocusSystem.com
15 MALE ANNOUNCER: Right now, through this
16 extraordinary and exclusive offer, you can get the entire
17 ifocus Jungle Rangers brain training system --
18 ON SCREEN: ifocus
19 \$14.95 PLUS S&H
20 30 DAY TRIAL
21 EXCLUSIVE TV OFFER
22 INCLUDES JUNGLE RANGERS GAMES
23 CALL NOW www.ifocusSystem.com
24 MALE ANNOUNCER: -- including all nine Jungle
25 Rangers games, and find out for yourself how effective it

Complaint

EXHIBIT C

EXHIBIT C

56

1 really is by simply trying it for a full 30 days for just
2 \$14.95.
3 ON SCREEN: CALL or Click TO ORDER NOW!
4 ifocus
5 \$14.95 PLUS S&H
6 30 DAY TRIAL
7 EXCLUSIVE TV OFFER
8 CALL NOW www.ifocusSystem.com
9 MALE ANNOUNCER: Just call or click and order
0 right now and we'll send you the ifocus Jungle Rangers
1 brain training system --
2 ON SCREEN: Product information shown above
3 JUNGLE RANGERS BRAIN TRAINING SYSTEM
4 MALE ANNOUNCER: -- with everything your child
5 needs to success --
6 ON SCREEN: Product information shown above
7 JUNGLE RANGERS GAME CD
8 MALE ANNOUNCER: -- the Jungle Rangers game
9 CD --
10 ON SCREEN: Product information shown above
11 PARENT DASHBOARD
12 MALE ANNOUNCER: -- including the exclusive
13 parent dashboard tracker.
14 ON SCREEN: Product information shown above
15 Taffie

Complaint

EXHIBIT C

EXHIBIT C

57

1 Trista's Mom
2 MONITOR PROGRESS
3 TAFFIE: Well, the dashboard explains to the
4 parent how much time they have spent in what -- in which
5 areas.
6 ON SCREEN: Product information shown above
7 Jennifer
8 Kaida's Mom
9 JENNIFER: It helps you be able to track what
10 he's doing, his progress.
11 TAFFIE: And it tells you exactly what part of
12 the game they've been playing and for how long.
13 ON SCREEN: Product information shown above
14 Science Behind the Game AUDIO CD
15 MALE ANNOUNCER: You'll also receive this in-
16 depth parent audio CD that explains the science behind
17 this groundbreaking program --
18 ON SCREEN: Product information shown above
19 Focus on Behavior
20 HANDBOOK + AUDIO CD
21 MALE ANNOUNCER: -- plus this Focus on Behavior
22 handbook and audio CD. It helps both child and parent to
23 understand and recognize good and bad behavior
24 patterns --
25 ON SCREEN: Product information shown above

Complaint

EXHIBIT C

EXHIBIT C

58

1 Plus Additional BONUS EXTRAS!
2 MALE ANNOUNCER: -- and even more bonus items,
3 all yours included at no extra cost.
4 ON SCREEN: ifocus
5 \$14.95 PLUS S&H
6 30 DAY TRIAL
7 EXCLUSIVE TV OFFER
8 Entire ifocus BRAIN TRAINING SYSTEM
9 CALL NOW www.ifocusSystem.com
10 MALE ANNOUNCER: You get this entire system
11 with everything you see here to simply try for a full
12 month for just \$14.95.
13 ON SCREEN: CALL in the next 6 minutes!
14 ifocus
15 \$14.95 PLUS S&H
16 30 DAY TRIAL
17 EXCLUSIVE TV OFFER
18 FREE SHIPPING & HANDLING
19 CALL NOW www.ifocusSystem.com
20 MALE ANNOUNCER: And it gets even better. Call
21 and order in the next six minutes and we'll ship this
22 total and complete breakthrough system with all the
23 extras and included bonus items right to your door for
24 free. That's right, absolutely free shipping and
25 handling. Call and order right away.

Complaint

EXHIBIT C

EXHIBIT C

59

1 UNIDENTIFIED FEMALE: I would say that it is a
2 game that gives you results.
3 ON SCREEN: Product information shown above
4 Individual Result - your child may not be as
5 successful
6 UNIDENTIFIED FEMALE: And this was the first
7 time -- well, he got all As and one A minus.
8 ON SCREEN: CALL or Click TO ORDER NOW!
9 ifocus
10 \$14.95 PLUS S&H
11 30 DAY TRIAL
12 EXCLUSIVE TV OFFER
13 NOT AVAILABLE AT SCHOOLS!
14 CALL NOW www.ifocusSystem.com
15 MALE ANNOUNCER: The ifocus Jungle Rangers
16 brain training system for attention is not available in
17 stores or schools, it's only available online or through
18 this exclusive television offer.
19 So, make the commitment now to help your child
20 reach his or her potential. Call now or click on
21 ifocusSystem.com.
22 ON SCREEN: Order Now
23 PARENT TO PARENT PROMISE
24 6 MONTHS
25 100% MONEY BACK GUARANTEE

Complaint

EXHIBIT C

EXHIBIT C

60

1 ifocus
2 \$14.95 PLUS S&H
3 30 DAY TRIAL
4 EXCLUSIVE TV OFFER
5 Focus Succeed
6 CALL NOW www.ifocusSystem.com
7 MALE ANNOUNCER: And, remember, with the ifocus
8 system and our exclusive parent to parent promise, your
9 child will focus and succeed or your money back. Order
10 now.
11 UNIDENTIFIED FEMALE: 100 percent recommended.
12 CHILD: The best thing about Jungle Rangers is
13 everything.
14 ON SCREEN: CALL or Click TO ORDER NOW!
15 ifocus
16 \$14.95 PLUS S&H
17 30 DAY TRIAL
18 EXCLUSIVE TV OFFER
19 CALL NOW www.ifocusSystem.com
20 MALE ANNOUNCER: The preceding has been a paid
21 presentation for the ifocus Jungle Rangers Brain Training
22 System, brought to you by Focus Education.
23 ON SCREEN: ifocus
24 ON SCREEN: The preceding was a paid
25 presentation for the ifocus Jungle Rangers Brain Training

Complaint

EXHIBIT C

EXHIBIT C

61

1 System brought to you by Focus Education
2 (The recording was concluded.)
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Complaint

EXHIBIT C**EXHIBIT C**

62

1 C E R T I F I C A T I O N O F T Y P I S T

2

3 MATTER NUMBER: 1223153

4 CASE TITLE: iFOCUS EDUCATION, LLC

5 TAPING DATE: NOVEMBER 21, 2012

6 TRANSCRIPTION DATE: NOVEMBER 13, 2013

7

8 I HEREBY CERTIFY that the transcript contained
9 herein is a full and accurate transcript of the tapes
10 transcribed by me on the above cause before the FEDERAL
11 TRADE COMMISSION to the best of my knowledge and belief.

12

13 DATED: NOVEMBER 13, 2013

14

15

16 ELIZABETH M. FARRELL

17

18 C E R T I F I C A T I O N O F P R O O F R E A D E R

19

20 I HEREBY CERTIFY that I proofread the transcript for
21 accuracy in spelling, hyphenation, punctuation and
22 format.

23

24

25 SARA J. VANCE

Complaint

EXHIBIT D**EXHIBIT D**

1

1 OFFICIAL TRANSCRIPT PROCEEDING
2 FEDERAL TRADE COMMISSION
3
4
5 MATTER NO. 1223153
6 TITLE iFOCUS EDUCATION, LLC
7 DATE RECORDED: JUNE 28, 2013
 TRANSCRIBED: NOVEMBER 12, 2013
8
9 PAGES 1 THROUGH 63

10
11 JUNGLE RANGERS BRAIN TRAINING SYSTEM
12 IFOCUS EDUCATION
 INFOCOMMERCIAL (IFV11)

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24 For The Record, Inc.
25 (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT D

EXHIBIT D

2

1 FEDERAL TRADE COMMISSION
2 I N D E X
3
4 RECORDING: PAGE:
5 Jungle Rangers Infomercial 3
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25 For The Record, Inc. (301) 870-8025 - www.ftrinc.net -
26 (800) 921-5555

Complaint

EXHIBIT D**EXHIBIT D**

3

1 FEDERAL TRADE COMMISSION

2

3 In the Matter of:)

4 iFocus Education, LLC) Matter No. 1223153

5)

6 -----)

7 June 28, 2013

8

9

10

11 The following transcript was produced from a
12 CD-Rom provided to For The Record, Inc. on October 24,
13 2013.

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24

25 For The Record, Inc. (301) 870-8025 - www.ftrinc.net -

26 (800) 921-5555

Complaint

EXHIBIT D**EXHIBIT D**

4

1 P R O C E E D I N G S
2 - - - - -
3 JUNGLE RANGERS INFOMERCIAL
4 ON SCREEN: HAVAS EDGE
5 FOCUS Education LLC
6 IFOCUS V11
7 Closed Captioned
8 412881
9 28:30
10 06-28-2013
11 -
12 -
13 1-800-624-0737
14 ON SCREEN: ifocus
15 The following is a paid presentation for the
16 ifocus Jungle Rangers Brain Training System brought to
17 you by Focus Education.
18 MALE ANNOUNCER: The following is a paid
19 presentation for the ifocus Jungle Rangers Brain Training
20 System, brought to you by Focus Education.
21 ON SCREEN: HOW FAR BEHIND?
22 MALE ANNOUNCER: How far behind will your child
23 be when school starts in the fall, a month, two months?
24 It's an annual problem experts call the summer brain
25 drain. For The Record, Inc. (301) 870-8025 -
26 www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT D**EXHIBIT D**

5

1 ON SCREEN: SUMMER BRAIN DRAIN
2 ON SCREEN: Kelly Arnold
3 Teacher
4 KELLY ARNOLD: The first couple months of the
5 school year is spent reteaching a lot of information.
6 ON SCREEN: SUMMER BRAIN DRAIN
7 MALE ANNOUNCER: That's because over the
8 summer, school is the last thing on a kid's mind, and it
9 does affect their brain.
10 ON SCREEN: KIDS CAN'T FOCUS
11 MALE ANNOUNCER: Their focusing muscles become
12 rusty. It's harder for them to sit and pay attention,
13 and even more disturbing...
14 ON SCREEN: Kelly Arnold
15 Teacher
16 KELLY ARNOLD: They forget what they've
17 learned.
18 MALE ANNOUNCER: But what if there was a way to
19 fight that summer brain drain --
20 ON SCREEN: FIGHT
21 Summer Brain Drain
22 MALE ANNOUNCER: -- by sharpening your child's
23 memory and attention skills so that the very first day of
24 class he or she is alert --
25 ON SCREEN: Alert For The Record, Inc. (301)
26 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT D**EXHIBIT D**

6

1 READY TO LEARN!

2 MALE ANNOUNCER: -- on task and ready to learn?

3 Well, now you can. Introducing the ifocus

4 Jungle Rangers Brain Training System.

5 ON SCREEN: BRAIN TRAINING SYSTEM

6 MALE ANNOUNCER: What looks like a simple

7 computer game is really much more.

8 ON SCREEN: CUTTING EDGE SCIENCE

9 MALE ANNOUNCER: You're actually looking at

10 cutting edge science --

11 ON SCREEN: MEMORY AND ATTENTION EXERCISES

12 MALE ANNOUNCER: -- a series of proven memory

13 and attention brain training exercises integrated into

14 this --

15 ON SCREEN: Fun

16 CHALLENGING GAME!

17 MALE ANNOUNCER: -- fun, challenging game,

18 every one of them designed to help ensure kids --

19 ON SCREEN: SHARP AND FOCUSED

20 MALE ANNOUNCER: -- stay sharp and focused over

21 the brain draining summer.

22 ON SCREEN: Julie

23 Zach's Mom

24 JULIE: My kids love to play video games and

25 this is a great way to strengthen their brain. For The

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Complaint

EXHIBIT D**EXHIBIT D**

7

1 ON SCREEN: Taffie
2 Trista's Mom
3 TAFFIE: And it settles them in and it helps
4 them to learn to focus.
5 ON SCREEN: Denise
6 Seth's Mom
7 DENISE: He says, mom, I can focus.
8 ON SCREEN: JUNGLE RANGERS
9 EVERYONE E CONTENT RATED BY ESRB
10 Ages 6-12
11 MALE ANNOUNCER: Rated E for everyone and
12 created especially for kids aged 6 to 12. The ifocus
13 Jungle Rangers System is designed to --
14 ON SCREEN: DEVELOP Brain Muscle
15 MALE ANNOUNCER: -- develop brain muscle and --
16 ON SCREEN: STRENGTHENS Neuron Connections
17 MALE ANNOUNCER: -- strengthens critical neuron
18 connections. That can give kids who play the game over
19 the summer an advantage when school starts in the fall.
20 ON SCREEN: Tiffany
21 age 11
22 TIFFANY: From the game, it teaches me to
23 remember things.
24 ON SCREEN: Forrester
25 age 10 For The Record, Inc. (301) 870-8025 -
26 www.ftrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

8

1 FORRESTER: I always just say "focus."
2 ON SCREEN: Cami Individual Result
3 age 11 Your child may not be as successful.
4 CAMI: When I played Stump Jump and when I had
5 my first homework after I did Stump Jump, I'm like, wow,
6 I've actually memorized all the things my teacher has
7 told me.
8 ON SCREEN: Nelson
9 age 12
10 NELSON: By the first couple days I was like,
11 okay, what made that change? And then I thought maybe it
12 was Jungle Rangers and I really think it was.
13 ON SCREEN: Award winning
14 MALE ANNOUNCER: The award-winning ifocus
15 Jungle Rangers system helped these kids the way it can
16 help yours, with the same series of proven --
17 ON SCREEN: BRAIN TRAINING EXERCISES
18 Neuropsychologists
19 Therapists
20 Scientists
21 JUNGLE RANGERS
22 EVERYONE E CONTENT RATED BY ESRB
23 MALE ANNOUNCER: -- brain training techniques
24 that neuropsychologists, therapists and scientists have
25 used for years -- For The Record, Inc. (301) 870-8025 -
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EXHIBIT D**EXHIBIT D**

9

1 ON SCREEN: Strengthens FOCUSING MUSCLE!

2 MALE ANNOUNCER: -- to strengthen memory and

3 attention muscles.

4 ON SCREEN: Research has shown self-regulation

5 is far more important than IQ

6 MALE ANNOUNCER: And studies say that ability

7 to pay attention, to sit and focus can be even more

8 important to a child's academic success than a high IQ.

9 And the more kids play the ifocus Jungle Rangers game

10 over the summer, the stronger those memory and attention

11 muscles can become. That can mean an advantage when

12 school starts in the falls.

13 ON SCREEN: Robin Dury

14 Teacher of the Year

15 ROBIN DURY: ifocus would be great for parents

16 to have their kids use during the summertime.

17 ON SCREEN: Kelly Arnold

18 Teacher

19 KELLY ARNOLD: We want them to get out and

20 exercise and play, but we also want them to continue to

21 exercise their brains so that when they start the school

22 year next year, they're, you know, right where they left

23 off.

24 ON SCREEN: Ready to Learn!

25 MALE ANNOUNCER: Kids who play Jungle Rangers

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EXHIBIT D

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10

1 are sharp, primed, and ready to learn.

2 ON SCREEN: Award winning ifocus Game Designer

3 MALE ANNOUNCER: Award-winning game designer

4 Jason Leon says that's exactly what the game was designed

5 to do.

6 ON SCREEN: Game Adapts

7 TO PLAYER!

8 JASON LEON: Each and every game is adaptive,

9 so it's actually designed to scale up in difficulty --

10 ON SCREEN: KEEPS BRAIN WORKING!

11 JASON LEON: -- so that it keeps your brain

12 energy up as high as it possibly can.

13 ON SCREEN: Jason Leon

14 Constantly Challenges You to Improve

15 JASON LEON: That's one of the aspects that

16 sets our game apart from other games is that it's

17 constantly challenging you to get better.

18 ON SCREEN: FIRST TIME PLAYERS! JUNGLE RANGERS

19 CHILD: Pretty challenging.

20 CHILD: A little easy, a little hard.

21 CHILD: You have to memorize a pattern in order

22 to go on to the next level.

23 CHILD: And you do all this fun stuff.

24 ON SCREEN: Jason Leon

25 ifocus Game Developer For The Record, Inc.

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EXHIBIT D**EXHIBIT D**

11

1 JASON LEON: Well, we made it really
2 approachable for them. You're going to become a Jungle
3 Ranger.
4 ON SCREEN: JUNGLE RANGERS
5 GAME: Good day, I need your help.
6 ON SCREEN: Jason Leon
7 ifocus Game Developer
8 JASON LEON: We worked directly with a neuro
9 therapist that would tell us what was supposed to be in
10 and why it was supposed to be in. Oftentimes, when folks
11 try and mix these two worlds, they forget that you've got
12 to make it fun first. So, it was kind of this
13 convergence of science and fun.
14 ON SCREEN: Science: BRAIN TRAINING TECHNIQUES
15 MALE ANNOUNCER: The science is using effective
16 brain training techniques --
17 ON SCREEN: Fun: EASY GAME!
18 MALE ANNOUNCER: -- and the fun is the Jungle
19 Rangers adventure.
20 ON SCREEN: 9 ADVANCING Games
21 MALE ANNOUNCER: Players advance through nine
22 games --
23 ON SCREEN: 3 DIFFERENT Worlds
24 MALE ANNOUNCER: -- in three different worlds,
25 all of which include exercises -- For The Record, Inc.
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EXHIBIT D**EXHIBIT D**

12

1 ON SCREEN: GAMES IMPROVE
2 Focus, Concentration, Memory
3 MALE ANNOUNCER: -- designed to improve focus,
4 concentration and memory.
5 ON SCREEN: SPAN SEQUENCES
6 REMEMBER AND RECALL
7 FILTER DISTRACTIONS
8 IMPROVE COMPREHENSION
9 MALE ANNOUNCER: Like these span sequences,
10 which ask players to remember complex information, even
11 while distracted, which is so important in math and
12 reading comprehension.
13 ON SCREEN: CONTINUOUS PERFORMANCE
14 PAY ATTENTION
15 LEARN PATIENCE
16 FOCUS
17 MALE ANNOUNCER: Continuous performance games
18 are all about paying attention and learning patience.
19 Research shows kids learn to stay alert and to really
20 focus on what's going on, even at times when they'd
21 normally zone out.
22 ON SCREEN: N-BACK
23 HOLD INFORMATION
24 UPDATE INFORMATION
25 REMEMBER AND FOCUS For The Record, Inc. (301)
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EXHIBIT D**EXHIBIT D**

13

1 MALE ANNOUNCER: And N-Back requires players to
2 hold information and to update that information, adding
3 new levels of difficulty is practice for real life,
4 helping kids to remember what they need to do and helping
5 them to retain what they learn.

6 ON SCREEN: Kim Sinclair
7 Teacher Aide

8 KIM SINCLAIR: Jungle Rangers helps children be
9 successful by allowing them to repeat different patterns
10 and the patterns that they repeat are difficult and
11 challenging. And the more that they can do that, the
12 longer they can stay on that, then the better their
13 brains will connect and be successful in other things as
14 well.

15 MALE ANNOUNCER: Bottom line, kids who play
16 Jungle Rangers, especially over the summer when so many
17 simply forget --

18 ON SCREEN: Strengthens THEIR FOCUS

19 MALE ANNOUNCER: -- what it feels like to learn
20 and remember, can be attentive and focused --

21 ON SCREEN: Alert
22 READY TO LEARN!

23 MALE ANNOUNCER: -- ready to learn the very
24 first day class begins in the fall.

25 Here's something you should know, ifocus is a
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT D

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14

1 proud partner of the National PTA.
2 ON SCREEN: National Member Benefits Provider
3 of PTA
4 MALE ANNOUNCER: It's a huge thumbs-up for the
5 millions of parents and teachers who are all about
6 helping kids to learn.
7 ON SCREEN: Amazing RESULTS
8 MALE ANNOUNCER: But parents can tell you, the
9 benefits of this extraordinary game flow well beyond the
10 classroom.
11 ON SCREEN: Marissa
12 Chazz's Mom
13 MARISSA: It's helped a lot at the house even,
14 not just at school. His behavior with his chores,
15 helping out.
16 ON SCREEN: Colleen
17 Michael and Nelson's Mom
18 COLLEEN: I see a lot more focus, a lot more
19 motivation.
20 ON SCREEN: Kristin
21 Anna's Mom
22 KRISTIN: She seems to be trying harder to want
23 to do what I ask.
24 ON SCREEN: Daniel Amen, M.D.
25 ifocus Scientific Advisor For The Record, Inc.
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EXHIBIT D

15

1 MALE ANNOUNCER: That doesn't surprise Dr.
2 Daniel Amen. He's a leading expert who's written dozens
3 of books about how the brain works. And when Dr. Amen
4 studied kids who played ifocus Jungle Rangers, what he
5 discovered was fascinating.

6 ON SCREEN: Daniel Amen, M.D.
7 ifocus Scientific Advisor

8 DR. DANIEL AMEN: So, what we did is we did a
9 very sophisticated neuropsychological assessment of a big
10 group of kids before and then after they played the game.

11 ON SCREEN: EMOTION: +25%
12 Jackson age 11
13 Average Emotional Improvement 28% in 5 hours

14 DR. DANIEL AMEN: And it was actually --

15 ON SCREEN: EMOTION: +29%
16 Zach age 11
17 Average Emotional Improvement 28% in 5 hours

18 DR. DANIEL AMEN: -- very exciting to find in
19 the areas of --

20 ON SCREEN: EMOTION: +350%
21 Isaac age 9
22 Average Emotional Improvement 28% in 5 hours

23 DR. DANIEL AMEN: -- emotion and --

24 ON SCREEN: SELF REGULATION: +25%
25 Anna age 10 For The Record, Inc. (301) 870-
26 8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

16

1 Average Self Regulation Improvement 12% in 5
2 hours
3 DR. DANIEL AMEN: -- self-regulation that --
4 ON SCREEN: SELF REGULATION: +38%
5 Tiffany age 11
6 Average Self Regulation Improvement 12% in 5
7 hours
8 DR. DANIEL AMEN: -- their scores --
9 ON SCREEN: SELF REGULATION: +105%
10 Chazz age 10
11 Average Self Regulation Improvement 12% in 5
12 hours
13 DR. DANIEL AMEN: -- improved significantly.
14 ON SCREEN: Daniel Amen, M.D.
15 Self Regulation Secret to Success
16 DR. DANIEL AMEN: Self-regulation is really one
17 of the secrets to long-term success.
18 The brain is so interesting. It has many
19 different abilities. So, the ability to regulate itself
20 comes from the front part of your brain.
21 ON SCREEN: Focus
22 Forethought
23 Judgement
24 Impulse Control
25 DR. DANIEL AMEN: It helps you with things like
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EXHIBIT D**EXHIBIT D**

17

1 focus and forethought, judgment, impulse control.

2 ON SCREEN: Daniel Amen, M.D.

3 Evidence ifocus Helps Self Regulation

4 DR. DANIEL AMEN: And it's very exciting. With

5 ifocus, there, in fact, is evidence that it helps them,

6 especially in those areas of self-regulation and emotion.

7 ON SCREEN: Self-Regulation Abilities, Beyond

8 Intelligence, Play Major Role in Early Achievement

9 MALE ANNOUNCER: And, remember, studies say

10 self-regulation, the ability to sit still and focus --

11 ON SCREEN: academic success

12 MALE ANNOUNCER: -- can be a more powerful

13 predictor of academic success than even your child's IQ.

14 ON SCREEN: This is a paid advertisement for

15 the ifocus System

16 MALE ANNOUNCER: So, simply by adding Jungle

17 Rangers to play time during the summer, your child

18 can build the kinds of connections in the brain so

19 important --

20 ON SCREEN: SUCCESS

21 MALE ANNOUNCER: -- for success in school and

22 beyond.

23 ON SCREEN: ifocus

24 ON SCREEN: HOW FAR BEHIND?

25 MALE ANNOUNCER: How far behind will your child

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EXHIBIT D**EXHIBIT D**

18

1 be when school starts in the fall, a month, two months?
2 It's an annual problem experts call --
3 ON SCREEN: SUMMER BRAIN DRAIN
4 MALE ANNOUNCER: -- the summer brain drain.
5 ON SCREEN: Robin Dury
6 Teacher of the Year
7 ROBIN DURY: We do testing at the end of the
8 year and the beginning of the year and you'll see a lot
9 of kids drop between June and September.
10 ON SCREEN: Kelly Arnold
11 Teacher
12 KELLY ARNOLD: Because of all the information
13 that they've lost over the summer. So, it's the same
14 test, it's just because of that two-month, three-month
15 gap, they're performing a lot worse.
16 ON SCREEN: FIGHT
17 Summer Brain Drain
18 MALE ANNOUNCER: But, now, there's a brand new
19 way to help fight summer brain drain. Give your child an
20 advantage when school starts in the fall, and it's as
21 easy as playing --
22 ON SCREEN: Fun
23 CHALLENGING GAME!
24 MALE ANNOUNCER: -- a fun, challenging computer
25 game called Jungle Rangers. Kids love it. For The Record,
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EXHIBIT D**EXHIBIT D**

19

1 ON SCREEN: JUNGLE RANGERS
2 GAME: Jungle Rangers.
3 ON SCREEN: FIRST TIME PLAYERS! JUNGLE RANGERS
4 CHILD: It was really fun.
5 CHILD: It's like a puzzle.
6 CHILD: It's fun.
7 CHILD: It's just an awesome game.
8 MALE ANNOUNCER: Imagine how you'll feel seeing
9 your child --
10 ON SCREEN: Focus Succeed
11 MALE ANNOUNCER: -- focus and success simply by
12 having fun.
13 ON SCREEN: JUNGLE RANGERS
14 EVERYONE E CONTENT RATED BY ESRB
15 Ages 6-12
16 MALE ANNOUNCER: Rated E for everyone and
17 created especially for children aged 6 to 12. The ifocus
18 Jungle Rangers system has won more than a dozen awards
19 for its innovative approach and --
20 ON SCREEN: National Member Benefits Provider
21 of PTA
22 MALE ANNOUNCER: -- proudly partners with the
23 National PTA to benefit its millions of parent and
24 teacher members.
25 ON SCREEN: Julie For The Record, Inc. (301)
26 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

20

1 Zach's Mom
2 JULIE: This is a great way to strengthen their
3 brain, which is their biggest asset in life.
4 MALE ANNOUNCER: Now, it's your turn to
5 experience what thousands of families all over the
6 country have already discovered with the award-winning
7 innovative ifocus system.
8 ON SCREEN: Alitza
9 Isaac's Mom
10 ALITZA: I would say that it's a game that
11 gives you results.
12 ON SCREEN: Kelly Individual Result
13 Cami and Kemp's Mom
14 Your child may not be as successful
15 KELLY: And this was the first time -- well, he
16 got all As and one A minus.
17 ON SCREEN: Jackson age 11 THINKING: +105%
18 Average Thinking Improvement 4% in 5 hours
19 Anna age 10 SELF REGULATION: +200%
20 Average Self Regulation Improvement 12% in 5
21 hours
22 Zach age 11 SUSTAINED ATTENTION: +250%
23 Average Sustained Attention Improvement 14% in
24 5 hours
25 Chazz age 10 SELF REGULATION: +105% For The
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EXHIBIT D**EXHIBIT D**

21

1 Average Self Regulation Improvement 12% in 5
2 hours
3 Isaac age 9 EMOTION: +305%
4 Average Emotional Improvement 28% in 5 hours
5 Tiffany age 11 EMOTION: +75%
6 Average Emotional Improvement 8% in 5 hours
7 Forrester age 10 THINKING: +95%
8 Average Thinking Improvement 4% in 5 hours
9 MALE ANNOUNCER: And seeing kids like yours
10 succeed simply by playing this powerful innovative game
11 is what motivates ifocus founder John Able.
12 ON SCREEN: John Able
13 Parent, ifocus Founder
14 JOHN ABLE: I've been driven completely by the
15 thought that I'd help kids.
16 MALE ANNOUNCER: John has six children of his
17 own, so parent to parent he knows the value of a product
18 that can give your child an advantage.
19 ON SCREEN: John Able
20 Parent, ifocus Founder
21 JOHN ABLE: I call them -- I call them arrows
22 in your quiver or tools in your toolbox. The more tools
23 you have, the better parenting you can do.
24 MALE ANNOUNCER: And John wants every parent to
25 experience the power of the ifocus Jungle Rangers Brain
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EXHIBIT D**EXHIBIT D**

22

1 Training System, so he's making you an incredible parent
2 to parent promise.

3 ON SCREEN: PARENT TO PARENT PROMISE

4 6 MONTHS

5 100% MONEY BACK GUARANTEE

6 IMPROVE:

7 FOCUS

8 ATTENTION

9 MEMORY

10 SCHOOL WORK

11 SELF ESTEEM

12 MALE ANNOUNCER: Order now, put ifocus to the
13 test in your own home. Take six months, yes, six full
14 months to put the ifocus system to the test and truly
15 discover its ultimate potential for you and your children
16 or your money back.

17 JOHN ABLE: That's the kind of company we are.
18 We're a human company. Very human. The fact that
19 children's lives are changed is important to me.

20 ON SCREEN: PARENT TO PARENT PROMISE

21 6 MONTHS

22 100% MONEY BACK GUARANTEE

23 MALE ANNOUNCER: And with his personal parent
24 to parent promise, you have a money back guarantee. Your
25 child will be -- For The Record, Inc. (301) 870-8025 -
26 www.ftrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

23

1 ON SCREEN: Focused
2 On Task
3 Attentive
4 MALE ANNOUNCER: -- focused, on task, attentive
5 or your money back.
6 ON SCREEN: Order Now
7 ifocus
8 \$14.95 PLUS S&H
9 30 DAY TRIAL
10 EXCLUSIVE TV OFFER
11 JUNGLE RANGERS
12 CALL NOW 1-800-624-0737 www.junglerangers.com
13 MALE ANNOUNCER: Order right now and try ifocus
14 for only \$14.95.
15 ON SCREEN: Product Information shown above
16 BRAIN TRAINING SYSTEM
17 MALE ANNOUNCER: We'll send you the ifocus
18 Jungle Rangers Brain Training System --
19 ON SCREEN: Product Information shown above
20 FIGHT Summer Brain Drain
21 MALE ANNOUNCER: -- with everything your child
22 needs to stay sharp and focused over the summer.
23 ON SCREEN: Product Information shown above
24 INCLUDES 9 JUNGLE RANGERS GAMES
25 GAME CD For The Record, Inc. (301) 870-8025 -
26 www.fttrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

24

1 MALE ANNOUNCER: Of course, you'll get the
2 incredible Jungle Rangers game CD.
3 ON SCREEN: Product Information shown above
4 First 500 Orders
5 FREE BONUS
6 FREE
7 Science Behind the Game AUDIO CD
8 MALE ANNOUNCER: But the first 500 orders also
9 receive this terrific bonus, an in-depth parent audio CD
10 detailing the science behind the groundbreaking ifocus
11 program.
12 ON SCREEN: Product Information shown above
13 FREE
14 There's More
15 Focus on Behavior
16 HANDBOOK + AUDIO CD
17 MALE ANNOUNCER: And there's more. Learn and
18 recognize good and bad behavioral problems with this free
19 Focus on Behavior handbook and accompanying audio CD.
20 ON SCREEN: Product Information shown above
21 FREE
22 Plus Additional BONUS EXTRAS!
23 MALE ANNOUNCER: Plus these additional Jungle
24 Rangers extras, all at absolutely no extra cost.
25 For The Record, Inc. (301) 870-8025 - www.ftrinc.net -
26 (800) 921-5555

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EXHIBIT D**EXHIBIT D**

25

1 ON SCREEN: Product Information shown above
2 PARENT DASHBOARD
3 MALE ANNOUNCER: And look at this, with our
4 exclusive parent dashboard tracker, you'll be able to
5 watch your child progress through all nine Jungle Rangers
6 brain training games.
7 ON SCREEN: Production Information shown above
8 Taffie
9 Trista's Mom
10 PARENT'S DASHBOARD
11 MONITOR PROGRESS
12 TAFFIE: Well, the dashboard explains to the
13 parent how much time they have spent in what -- in which
14 areas.
15 ON SCREEN: Production Information shown above
16 Jennifer
17 Kaida's Mom
18 JENNIFER: It helps you be able to track what
19 he's doing, his progress.
20 TAFFIE: And it tells you exactly what part of
21 the game they've been playing and for how long.
22 ON SCREEN: CALL OR Click
23 TO ORDER NOW!
24 ifocus
25 \$14.95 PLUS s&h For The Record, Inc. (301)
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EXHIBIT D**EXHIBIT D**

26

1 30 DAY TRIAL
2 EXCLUSIVE TV OFFER
3 CALL NOW 1-800-624-0737 www.JungleRangers.com
4 Entire ifocus BRAIN TRAINING SYSTEM
5 MALE ANNOUNCER: Call or click to order now and
6 we'll send you this entire system with everything you see
7 here to simply try for a full month in your own home for
8 just \$14.95.
9 ON SCREEN: Product Information Shown Above
10 And It Gets Better!
11 CALL in the next 18 MINUTES!
12 FREE SHIPPING & HANDLING
13 MALE ANNOUNCER: And it gets even better.
14 Order in the next 18 minutes and we'll ship this total
15 and complete breakthrough system, including all the free
16 extras and bonus items right to your door for free.
17 That's right, absolutely free shipping and handling when
18 you call and order right away.
19 ON SCREEN: Product Information Shown Above
20 Brandon Sportel
21 Teacher
22 BRANDON SPORTEL: I think it's important for my
23 students to play Jungle Rangers over the summer so we
24 keep those neurons firing.
25 ON SCREEN: Product Information Shown Above For
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EXHIBIT D**EXHIBIT D**

27

1 Kelly Arnold
2 Teacher
3 KELLY ARNOLD: I definitely think that using
4 Jungle Rangers over the summer would be very beneficial
5 for kids.
6 ON SCREEN: ifocus
7 \$14.95 PLUS s&h
8 30 DAY TRIAL
9 EXCLUSIVE TV OFFER
10 NOT AVAILABLE IN STORES!
11 CALL NOW 1-800-624-0737 www.JungleRangers.com
12 MALE ANNOUNCER: The ifocus Jungle Rangers
13 brain training system is not available in stores. It's
14 only available online or through this exclusive
15 television offer. So, call or click on
16 JungleRangers.com. Make the commitment right now to help
17 your child's brain stay sharp and alert over the summer.
18 ON SCREEN: PARENT TO PARENT PROMISE
19 6 MONTHS
20 100% MONEY BACK GUARANTEE
21 ifocus
22 \$14.95 PLUS s&h
23 30 DAY TRIAL
24 EXCLUSIVE TV OFFER
25 CALL NOW 1-800-624-0737 www.JungleRangers.com
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EXHIBIT D**EXHIBIT D**

28

1 MALE ANNOUNCER: And, remember, with the ifocus
2 system and our exclusive parent to parent promise, your
3 child will be focused --
4 ON SCREEN: Production information shown above
5 Focus
6 Succeed
7 Order Now
8 MALE ANNOUNCER: -- on task and ready to
9 succeed in the fall or your money back. Order right now.
10 ON SCREEN: ifocus
11 \$14.95 PLUS s&h
12 30 DAY TRIAL
13 EXCLUSIVE TV OFFER
14 CALL NOW 1-800-624-0737 www.JungleRangers.com
15 UNIDENTIFIED FEMALE: 100 percent recommend it.
16 CHILD: The best thing about Jungle Rangers is
17 everything.
18 ON SCREEN: CALL or Click
19 TO ORDER NOW!
20 ifocus
21 \$14.95 PLUS s&h
22 30 DAY TRIAL
23 EXCLUSIVE TV OFFER
24 CALL NOW 1-800-624-0737 www.JungleRangers.com
25 MALE ANNOUNCER: Call 1-800-624-0737 for the
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EXHIBIT D**EXHIBIT D**

29

1 ifocus system. That's 1-800-624-0737. Call now, 1-800-
2 624-0737.

3 ON SCREEN: IS YOUR CHILD READY TO LEARN?

4 MALE ANNOUNCER: Will your child be ready to
5 learn when school starts again in the fall? Studies
6 prove it.

7 ON SCREEN: child's brain shrink
8 students return to school after a long summer
9 vacation, they've lost one to three months worth of
10 learning.

11 MALE ANNOUNCER: Over the summer, kids become
12 rusty. Their memory and attention muscles weaken.

13 ON SCREEN: BORED
14 DISTRACTED
15 DISRUPTIVE

16 MALE ANNOUNCER: That can mean they're bored in
17 class, easily distracted and sometimes disruptive.

18 ON SCREEN: 1-800-624-0737
19 www.JungleRangers.com

20 TAFFIE: Every parent-teacher conference it's
21 always --

22 ON SCREEN: Taffie 1-800-624-0737
23 Trista's Mom www.JungleRangers.com

24 TAFFIE: -- you know, she's a little
25 chatterbox, we have a hard time keeping her in her seat.

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1 ON SCREEN: Denise 1-800-624-0737
2 Seth's Mom www.JungleRangers.com
3 DENISE: Every single day I was getting calls
4 from the teacher or he was getting sent to the office.
5 ON SCREEN: Gwen 1-800-624-0737
6 Carter's Grandmother www.JungleRangers.com
7 GWEN: Text messages about, you know, the
8 classroom behaviors.
9 ON SCREEN: Robin Dury 1-800-624-0737
10 Teacher of the Year www.JungleRangers.com
11 ROBIN DURY: I see it, plain as day, those kids
12 are so distracted that really keeps them behind, and the
13 longer they go in school, the further behind they get.
14 ON SCREEN: 1-800-624-0737
15 www.JungleRangers.com
16 MALE ANNOUNCER: We knew that since teachers
17 have a front row to students with summer attention and
18 focus problems, they would be the toughest critics of the
19 ifocus Jungle Rangers system. And we were right.
20 ON SCREEN: Robin Dury 1-800-624-0737
21 Teacher of the Year www.JungleRangers.com
22 ROBIN DURY: I had never heard of something
23 that actually builds your focus.
24 ON SCREEN: Brandon Sportel 1-800-624-0737
25 Teacher www.JungleRangers.com
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

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1 BRANDON SPORTEL: My reaction was, can a video
2 game do this?

3 MALE ANNOUNCER: So, we asked several
4 elementary school teachers to incorporate the game into
5 their weekly schedule --

6 ON SCREEN: Honest Feedback
7 1-800-624-0737
8 www.JungleRangers.com

9 MALE ANNOUNCER: -- and to give us their honest
10 feedback about what they noticed.

11 ON SCREEN: Barbara Shaw 1-800-624-0737
12 Computer Teacher www.JungleRangers.com

13 BARBARA SHAW: I'm kind of shocked. I've been
14 trying to talk to them a little bit, but I'm their
15 distraction. So, they don't want to talk to me right
16 now. They just want to focus on what they're doing.

17 ON SCREEN: Intense
18 FOCUS AND CONCENTRATION

19 MALE ANNOUNCER: That intense focus and
20 concentration didn't end when the computers were turned
21 off.

22 ON SCREEN: Positive Changes

23 MALE ANNOUNCER: Teachers quickly saw the
24 positive changes Jungle Rangers made, even for the most
25 distracted students. For The Record, Inc. (301) 870-8025
26 - www.ftrinc.net - (800) 921-5555

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1 ON SCREEN: 1-800-624-0737
2 www.JungleRangers.com
3 LAVONNE RIGGS: I have seen a vast improvement.
4 ON SCREEN: Lavonne Riggs 1-800-624-0737
5 Class is Motivated and Focus
6 www.JungleRangers.com
7 LAVONNE RIGGS: This class seems to be
8 motivated and focused and the only thing we're doing
9 differently is Jungle Rangers.
10 ON SCREEN: Kelly Arnold 1-800-624-0737
11 Definitely Recommend Jungle Rangers
12 www.JungleRangers.com
13 KELLY ARNOLD: I definitely recommend it. I've
14 already recommended it to several teachers at my school
15 and other parents.
16 ON SCREEN: Barbara Shaw 1-800-624-0737
17 Engaging Their Brains
18 www.JungleRangers.com
19 BARBARA SHAW: They're actually learning
20 something and having to engage different parts of their
21 brain, but they're having a good time doing it.
22 ON SCREEN: Focus Succeed
23 1-800-624-0737
24 www.JungleRangers.com
25 MALE ANNOUNCER: And teachers say engaging For
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1 different parts of the brain, making new connections is
2 exactly what will help students to focus and succeed in
3 the classroom, especially during those critical first few
4 months of the school year when so many are already
5 behind.

6 ON SCREEN: Lori Jensen 1-800-624-0737
7 Principal, 30 Years in Education
8 www.JungleRangers.com

9 LORI JENSEN: Because you can't really teach a
10 child to think. Being able to use the Jungle Rangers and
11 having the students actually learn how to think through a
12 problem of how to make those choices and how to think for
13 themselves.

14 ON SCREEN: Jane Marshall 1-800-624-0737
15 Teacher www.JungleRangers.com

16 JANE MARSHALL: And my observation of the
17 program, from what I've seen, is that it is trying to
18 create more branches in the brain for those higher level
19 thinking skills.

20 ON SCREEN: HIGHER LEVEL THINKING SKILLS
21 THINK THROUGH PROBLEMS
22 FILTER OUT DISTRACTIONS
23 Focus

24 Absorb

25 Remember For The Record,
26 Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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1 MALE ANNOUNCER: Higher level thinking skills,
2 the ability to think through a problem, to filter out
3 distractions, focus on the task at hand, to absorb and
4 remember important information.

5 ON SCREEN: Focus
6 AND MEMORY MUSCLES
7 1-800-624-0737
8 www.JungleRangers.com

9 MALE ANNOUNCER: Kids who play Jungle Rangers
10 flex their focus and memory muscle. That's a critical
11 advantage, especially over the summer when so many
12 students lose focus.

13 ON SCREEN: Kelly Arnold 1-800-624-0737
14 Teacher www.JungleRangers.com

15 KELLY ARNOLD: We want to continue to have them
16 exercise their brain over the summer so that, you know,
17 those neurons are continuing to fire so that when they
18 start the school year next year, they're, you know, right
19 where they left off.

20 ON SCREEN: 1-800-624-0737
21 www.JungleRangers.com

22 MALE ANNOUNCER: And keeping their brain
23 exercised, ready to learn is easy and fun --

24 ON SCREEN: Fun:

25 EASY GAME! For The Record, Inc. (301) 870-8025
26 - www.ftrinc.net - (800) 921-5555

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1 1-800-624-0737
2 www.JungleRangers.com
3 MALE ANNOUNCER: -- with the Jungle Rangers
4 game because, plain and simple, kids love playing it.
5 ON SCREEN: Kids Love
6 JUNGLE RANGERS
7 1-800-624-0737
8 www.JungleRangers.com
9 CHILD: You get to jump on logs.
10 CHILD: I'm talking to a man in a frog costume.
11 CHILD: I would play it every day.
12 CHILD: And I'm a trainee Jungle Ranger. This
13 game is really fun.
14 CHILD: This is the funnest game on earth.
15 MALE ANNOUNCER: Kids love playing ifocus
16 Jungle Rangers. Parents, teachers and even the kids love
17 the results. It's one reason ifocus has partnered with
18 the National PTA --
19 ON SCREEN: National Member Benefits Provider
20 of PTA
21 MALE ANNOUNCER: -- to benefit its millions of
22 parent and teacher members.
23 ON SCREEN: Kelly Arnold 1-800-624-0737
24 Teacher www.JungleRangers.com
25 KELLY ARNOLD: The PTA is a very big deal. For
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1 ON SCREEN: Robin Dury 1-800-624-0737
2 Teacher of the Year www.JungleRangers.com
3 ROBIN DURY: It really shows me, as a teacher,
4 that, hey, this is a product that I would be really
5 interested in looking at.
6 ON SCREEN: 1-800-624-0737
7 www.JungleRangers.com
8 MALE ANNOUNCER: From teachers who tried the
9 ifocus Jungle Rangers system in their own classrooms to
10 the parents who see the --
11 ON SCREEN: Incredible RESULTS
12 MALE ANNOUNCER: -- incredible results, we hear
13 it over and over again.
14 ON SCREEN: Attentive
15 Focused
16 On Task
17 MALE ANNOUNCER: Kids who play Jungle Rangers
18 are attentive, focused and able to stay on task.
19 And, remember, it's that ability to stay focused that
20 studies --
21 ON SCREEN: Self-regulation key to academic
22 success
23 directly related to academic performance
24 MALE ANNOUNCER: -- say can be even more
25 important than IQ when it comes to success in the For The
26 Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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1 classroom.

2

3 ON SCREEN: Brandon Sportel

4 Jungle Rangers Makes a Difference

5 BRANDON SPORTEL: So, Jungle Rangers is really

6 important because if we can even get 10, 15, 20, 25 more

7 minutes out of a student attentive-wise and focus, that

8 can make all the difference.

9 ON SCREEN: Jennifer 1-800-624-0737

10 Kaida's Mom www.JungleRangers.com

11 JENNIFER: I really didn't expect to see that

12 big of a change that quickly.

13 ON SCREEN: 1-800-624-0737

14 www.JungleRangers.com

15 BRANDON SPORTEL: I did not expect the

16 overwhelming response from the parents that this game

17 made a difference in their kids' lives.

18 ON SCREEN: Alitza 1-800-624-0737

19 Issac's Mom www.JungleRangers.com

20 ALITZA: Oh, my gosh, this game is amazing, 100

21 percent recommend it. And he likes that, he enjoys it.

22 And that's what makes me very happy.

23 ON SCREEN: Gwen 1-800-624-0737

24 Carter's Grandmother www.JungleRangers.com

25 GWEN: As a grandmother, yes, I would For The

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1 definitely recommend Jungle Rangers to other parents.
2 ON SCREEN: 1-800-624-0737
3 www.JungleRangers.com
4 BRANDON SPORTEL: I'm totally convinced.
5 ON SCREEN: Carter 1-800-624-0737
6 I Concentrate More www.JungleRangers.com
7 CARTER: I kind of feel the same, just I
8 concentrate more.
9 ON SCREEN: Cami 1-800-624-0737
10 I Focus More www.JungleRangers.com
11 CAMI: And I focus more on my homework.
12 ON SCREEN: C.J. 1-800-624-0737
13 You Just Remember www.JungleRangers.com
14 C.J.: And you just remember a bunch of things.
15 ON SCREEN: Nelson 1-800-624-0737
16 It Makes Your Brain Work www.JungleRangers.com
17 NELSON: It makes your brain work.
18 ON SCREEN: Lindsey 1-800-624-0737
19 It's Just Fun www.JungleRangers.com
20 LINDSEY: It's just fun.
21 ON SCREEN: This is a paid advertisement for
22 the ifocus System
23 UNIDENTIFIED MALE: This is one thing that I'm
24 very glad my wife and I decided to do. I think it's been
25 beneficial for our boys. Thank you. That's about what I
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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1 want to say. Thank you for ifocus.
2 ON SCREEN: ifocus
3 \$14.95 PLUS S&H
4 30 DAY TRIAL
5 EXCLUSIVE TV OFFER
6 Entire ifocus BRAIN TRAINING SYSTEM
7 CALL NOW 1-800-624-0737 www.junglerangers.com
8 MALE ANNOUNCER: Right now, through this
9 extraordinary and exclusive offer, you can get the entire
10 ifocus Jungle Rangers Brain Training System --
11 ON SCREEN: ifocus
12 \$14.95 PLUS S&H
13 30 DAY TRIAL
14 EXCLUSIVE TV OFFER
15 INCLUDES 9 JUNGLE RANGERS GAMES
16 CALL NOW 1-800-624-0737 www.junglerangers.com
17 MALE ANNOUNCER: -- including all nine Jungle
18 Rangers games. Find out for yourself how effective it
19 really is by simply trying it for a full 30 days for just
20 \$14.95.
21 ON SCREEN: Order Now
22 ifocus
23 \$14.95 PLUS S&H
24 30 DAY TRIAL
25 EXCLUSIVE TV OFFER For The Record, Inc. (301)
26 870-8025 - www.ftrinc.net - (800) 921-5555

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1 Entire ifocus BRAIN TRAINING SYSTEM
2 CALL NOW 1-800-624-0737 www.junglerangers.com
3 MALE ANNOUNCER: Order right now and we'll send
4 you the ifocus Jungle Rangers brain training system --
5 ON SCREEN: ifocus
6 \$14.95 PLUS S&H
7 30 DAY TRIAL
8 EXCLUSIVE TV OFFER
9 FIGHT Summer Brain Drain
10 CALL NOW 1-800-624-0737 www.junglerangers.com
11 MALE ANNOUNCER: -- with everything your child
12 needs to stay sharp and focused over the summer and ready
13 to learn when school begins in the fall.
14 ON SCREEN: ifocus
15 \$14.95 PLUS S&H
16 30 DAY TRIAL
17 EXCLUSIVE TV OFFER
18 JUNGLE RANGERS GAME CD
19 CALL NOW 1-800-624-0737 www.junglerangers.com
20 MALE ANNOUNCER: Of course, you'll get the
21 Jungle Rangers Game CD.
22 ON SCREEN: Product Information shown above
23 First 500 Orders
24 FREE BONUS
25 FREE For The Record, Inc. (301) 870-8025 -
26 www.ftrinc.net - (800) 921-5555

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1 Science Behind the Game AUDIO CD
2 MALE ANNOUNCER: But the first 500 orders will
3 also receive this important bonus, an in-depth parent
4 audio CD detailing the science behind the groundbreaking
5 ifocus program.
6 ON SCREEN: Product Information shown above
7 FREE
8 There's More
9 Focus on Behavior
10 HANDBOOK + AUDIO CD
11 MALE ANNOUNCER: And there's more. You'll
12 learn to recognize good and bad behavioral problems with
13 this free focus on behavior handbook and accompanying
14 audio CD --
15 ON SCREEN: Product Information shown above
16 FREE
17 Plus Additional BONUS EXTRAS!
18 MALE ANNOUNCER: -- plus these additional
19 Jungle Rangers extras all at absolutely no extra cost.
20 ON SCREEN: CALL OR Click
21 TO ORDER NOW!
22 ifocus
23 \$14.95 PLUS s&h
24 30 DAY TRIAL
25 EXCLUSIVE TV OFFER For The Record, Inc. (301)
26 870-8025 - www.ftrinc.net - (800) 921-5555

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1 CALL NOW 1-800-624-0737 www.JungleRangers.com
2 MALE ANNOUNCER: Call or click to order now and
3 we'll send you this entire system with everything you see
4 here to simply try for a full month in your own home for
5 just \$14.95.
6 ON SCREEN: Product Information Shown Above
7 And It Gets Better!
8 CALL in the next 18 MINUTES!
9 FREE SHIPPING & HANDLING
10 MALE ANNOUNCER: And it gets even better.
11 Order in the next 10 minutes and we'll ship this total
12 and complete breakthrough system, including all the free
13 extras and bonus items, right to your door for free.
14 That's right, absolutely free shipping and handling when
15 you call and order right away.
16 ON SCREEN: Product information shown above
17 NOT AVAILABLE IN STORES!
18 MALE ANNOUNCER: The ifocus Jungle Rangers
19 Brain Training System is not available in stores. It's
20 only available online or through this exclusive
21 television offer. Call or click on JungleRangers.com and
22 make the commitment now --
23 ON SCREEN: Product information shown above
24 FIGHT Summer Brain Drain
25 MALE ANNOUNCER: -- to keep your child's brain
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

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1 sharp and alert over the summer.

2 ON SCREEN: PARENT TO PARENT PROMISE

3 6 MONTHS

4 100% MONEY BACK GUARANTEE

5 ifocus

6 \$14.95 PLUS s&h

7 30 DAY TRIAL

8 EXCLUSIVE TV OFFER

9 Focus

10 Succeed

11 CALL NOW 1-800-624-0737 www.JungleRangers.com

12 MALE ANNOUNCER: And, remember, with the ifocus

13 system and our exclusive parent to parent promise, your

14 child will be focused, on task and ready to succeed in

15 the fall or your money back. Order now.

16 ON SCREEN: CALL or Click

17 PARENT TO PARENT PROMISE

18 6 MONTHS

19 100% MONEY BACK GUARANTEE

20 ifocus

21 \$14.95 PLUS s&h

22 30 DAY TRIAL

23 EXCLUSIVE TV OFFER

24 CALL NOW 1-800-624-0737 www.JungleRangers.com

25 MALE ANNOUNCER: Call 1-800-624-0737 for the For

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1 ifocus system. That's 1-800-624-0737. Call now, 1-800-
2 624-0737.

3 MALE ANNOUNCER: Over the summer break --
4 ON SCREEN: CAN'T FOCUS
5 CAN'T PAY ATTENTION
6 MALE ANNOUNCER: -- school is the last thing on
7 a kid's mind, and it literally does affect their brain.
8 Their focusing muscles become rusty. It's harder for
9 them to sit and pay attention.

10 ON SCREEN: SUMMER BRAIN DRAIN
11 MALE ANNOUNCER: Teachers call it the summer
12 brain drain. They see it in kids who just can't seem to
13 catch up after the summer break.

14 ON SCREEN: Brandon Sportel
15 Teacher
16 BRANDON SPORTEL: I think the toughest call
17 that a teacher has to make to a parent is that their
18 child is failing.

19 MALE ANNOUNCER: But, now, you can help ensure
20 your child stays --

21 ON SCREEN: FIGHT
22 Summer Brain Drain
23 MALE ANNOUNCER: -- sharp and focused over the
24 summer so once school begins in the fall, he or she is --

25 ON SCREEN: Alert For The Record, Inc. (301)
26 870-8025 - www.ftrinc.net - (800) 921-5555

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1 READY TO LEARN!

2 MALE ANNOUNCER: -- alert and ready to learn

3 with the ifocus Jungle Rangers Brain Training System.

4 Parents, teachers and experts love the ifocus approach,

5 awarding it top honors from more than a dozen highly

6 prestigious organizations.

7 BRANDON SPORTEL: Jungle Rangers did everything

8 right.

9 DR. DANIEL AMEN: Here, we had developers, in a

10 thoughtful way --

11 ON SCREEN: Daniel Amen, M.D.

12 ifocus Scientific Advisor

13 1-800-624-0737

14 www.JungleRangers.com

15 DR. DANIEL AMEN: -- develop a game to actually

16 strengthen the connections in the brain.

17 ON SCREEN: 1-800-624-0737

18 www.JungleRangers.com

19 MALE ANNOUNCER: Brain specialists and ifocus

20 scientific advisor, Dr. Daniel Amen, is impressed with

21 the way the ifocus system works. He saw results from

22 kids who played Jungle Rangers for only a few hours.

23 DR. DANIEL AMEN: It's a very interesting term

24 called "long-term potentiation." So, what that means is

25 the connections between cells -- For The Record, Inc.

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1 ON SCREEN: CONNECTIONS BECOME STRONGER
2 DR. DANIEL AMEN: -- actually become stronger.
3 ON SCREEN: 1-800-624-0737
4 www.JungleRangers.com
5 MALE ANNOUNCER: And when he studied a group of
6 children before and after playing the Jungle Rangers
7 game, Dr. Amen discovered a pattern. Jungle Rangers
8 creates the kinds of measurable changes in the brain that
9 are key to success.
10 ON SCREEN: SELF REGULATION: +25%
11 Anna age 10
12 Average Self Regulation Improvement 12% in 5
13 hours
14 DR. DANIEL AMEN: What we found was their
15 ability to --
16 ON SCREEN: SELF REGULATION: +38%
17 Tiffany age 11
18 Average Self Regulation Improvement 12% in 5
19 hours
20 DR. DANIEL AMEN: -- regulate themselves, so
21 self-regulation --
22 ON SCREEN: SELF REGULATION: +105%
23 Chazz age 10
24 Average Self Regulation Improvement 12% in 5
25 hours For The Record, Inc. (301) 870-8025 -
26 www.ftrinc.net - (800) 921-5555

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1 DR. DANIEL AMEN: -- and emotion --
2 ON SCREEN: EMOTION: +25%
3 Jackson age 11
4 Average Emotional Improvement 28% in 5 hours
5 DR. DANIEL AMEN: -- statistically
6 significantly, increased --
7 ON SCREEN: EMOTION: +29%
8 Zach age 11
9 Average Emotional Improvement 28% in 5 hours
10 DR. DANIEL AMEN: -- after the kids --
11 ON SCREEN: EMOTION: +350%
12 Isaac age 9
13 Average Emotional Improvement 28% in 5 hours
14 DR. DANIEL AMEN: -- played the game.
15 ON SCREEN: Self-Regulation Supports Student
16 Learning and Achievement
17 MALE ANNOUNCER: And, remember, studies say
18 it's self-regulation, not necessarily IQ, that helps
19 ensure academic success.
20 ON SCREEN: Anna Individual Result
21 age 10 Your child may not be as successful.
22 ANNA: In school, I have noticed that I can
23 focus better.
24 ON SCREEN: Kristin Individual Result
25 Anna's Mom Your child may not be as successful.
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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1 KRISTIN: We had the best parent-teacher
2 conference that we've ever had.
3 ON SCREEN: 1-800-624-0737
4 www.JungleRangers.com
5 ANNA: I just notice a lot of improvement.
6 KRISTIN: I've been happy with the results.
7 I've been happy with how she's felt about it.
8 ANNA: I have more confidence in myself.
9 ON SCREEN: Confidence
10 Improvement
11 Better Performance
12 1-800-624-0737
13 www.JungleRangers.com
14 MALE ANNOUNCER: Confidence, improvement,
15 better school performance. With the ifocus system, we
16 hear it over and over again.
17 ON SCREEN: Science Fun
18 1-800-624-0737
19 www.JungleRangers.com
20 MALE ANNOUNCER: This innovative combination of
21 challenging fun and sophisticated science really does
22 make a difference --
23 ON SCREEN: JUNGLE RANGERS
24 1-800-624-0737
25 www.JungleRangers.com For The Record, Inc.
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1 MALE ANNOUNCER: -- keeping young brains sharp
2 and focused, especially over the summer when so many kids
3 suffer --
4 ON SCREEN: SUMMER BRAIN DRAIN
5 1-800-624-0737
6 www.JungleRangers.com
7 MALE ANNOUNCER: -- from summer brain drain.
8 Even so, pediatric nurse and mother of nine,
9 Taffie Evans, was very skeptical about the ifocus Jungle
10 Rangers system.
11 ON SCREEN: Taffie 1-800-624-0737
12 Trista's Mom www.JungleRangers.com
13 TAFFIE: I think video games are a waste of
14 time. TV and video games, they just suck the life out of
15 children.
16 ON SCREEN: 1-800-624-0737
17 www.JungleRangers.com
18 MALE ANNOUNCER: Her daughter Trista is a
19 bubbly six-year-old who's very bright.
20 ON SCREEN: Trista 1-800-624-0737
21 age 6 www.JungleRangers.com
22 TRISTA: I'm good at math. I'm good at almost
23 everything at school but spelling.
24 MALE ANNOUNCER: But Trista was having problems
25 at school. For The Record, Inc. (301) 870-8025 -
26 www.ftrinc.net - (800) 921-5555

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1 ON SCREEN: 1-800-624-0737
2 www.JungleRangers.com
3 TAFFIE: Every parent-teacher conference it's
4 always, you know, she's a little chatterbox, we have a
5 hard time keeping her in her seat.
6 MALE ANNOUNCER: That was before Trista started
7 playing the ifocus Jungle Rangers game.
8 ON SCREEN: 1-800-624-0737
9 www.JungleRangers.com
10 TAFFIE: So, we went to this parent-teacher
11 conference this last time. She said, I don't know what
12 you're doing at home, but you need to keep it up because
13 it's helping her.
14 MALE ANNOUNCER: Playing Jungle Rangers really
15 has made a difference for Trista.
16 TAFFIE: I would recommend ifocus to anyone
17 who's having trouble keeping their children's attention.
18 Like I said before, I was completely skeptical.
19 ON SCREEN: Taffie 1-800-624-0737
20 Pediatric Nurse www.JungleRangers.com
21 TAFFIE: I honestly and truly did not think it
22 was going to work for my children. And, now, I'm a
23 believer.
24 ON SCREEN: 1-800-624-0737
25 www.JungleRangers.com For The Record, Inc.
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1 TRISTA: It does help me pay attention.
2 ON SCREEN: Daniel Amen, M.D. 1-800-624-0737
3 Brain Imaging Specialist
4 www.JungleRangers.com
5 DR. DANIEL AMEN: So, I think any kid will
6 benefit from this, and the reason I say that is I love
7 the approach.
8 ON SCREEN: 1-800-624-0737
9 www.JungleRangers.com
10 DR. DANIEL AMEN: It's a brain training
11 exercise. None of it's hard. I mean, that's sort of
12 the exciting thing. None of it's hard. And it can give
13 you a big benefit. And as a parent, you feel confident
14 that --
15 ON SCREEN: This is a paid advertisement for
16 the ifocus System.
17 DR. DANIEL AMEN: -- this is helping my child
18 and not hurting my child.
19 ON SCREEN: Colleen
20 Michael and Nelson's Mom
21 COLLEEN: I could see the improvement in him.
22 ON SCREEN: Susan 1-800-624-0737
23 Forrester's Mom www.JungleRangers.com
24 SUSAN: Things come easier.
25 ON SCREEN: Kristin 1-800-624-0737 For
26 The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT D**EXHIBIT D**

52

1 Anna's Mom www.JungleRangers.com
2 KRISTIN: She's been better at being a self-
3 starter.
4 ON SCREEN: Connie 1-800-624-0737
5 Landon's Mom www.JungleRangers.com
6 CONNIE: He was able to follow directions a lot
7 better.
8 ON SCREEN: Garth 1-800-624-0737
9 Zak and Zane's Dad www.JungleRangers.com
10 GARTH: The fact that he came home and wanted
11 to do his homework.
12 ON SCREEN: Marissa 1-800-624-0737
13 Chazz's Mom www.JungleRangers.com
14 MARISSA: When I come home from work, his
15 chores are done.
16 ON SCREEN: Adell 1-800-624-0737
17 Tiffany's Mom www.JungleRangers.com
18 ADELL: I definitely would recommend it.
19 ON SCREEN: You've Seen It
20 You've Heard It
21 Attentive Focused On Task
22 1-800-624-0737
23 www.JungleRangers.com
24 MALE ANNOUNCER: You've seen it, you've heard
25 it. Kids who play Jungle Rangers are attentive, focused
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT D**EXHIBIT D**

53

1 and able to stay on task.

2 ON SCREEN: Research has shown self-regulation

3 is far more important than IQ

4 MALE ANNOUNCER: And, remember, it's that

5 ability to stay focused that studies say is even more

6 important than IQ when it comes to success in the

7 classroom. Don't wait another second to help ensure your

8 child is focused and prepared to learn once school begins

9 again in the fall.

10 ON SCREEN: Final Opportunity TO ORDER

11 MALE ANNOUNCER: This is your final opportunity

12 to order the incredible ifocus Brain Training System, the

13 brand new way to help --

14 ON SCREEN: FIGHT

15 Summer Brain Drain

16 MALE ANNOUNCER: -- fight summer brain drain.

17 And it's as easy as having your child play a --

18 ON SCREEN: Fun

19 CHALLENGING COMPUTER GAME

20 MALE ANNOUNCER: -- fun, challenging computer

21 game called Jungle Rangers. Kids love it.

22 ON SCREEN: JUNGLE RANGERS

23 GAME: Jungle Rangers.

24 ON SCREEN: FIRST TIME PLAYERS! JUNGLE RANGERS

25 CHILD: It is really fun. For The Record, Inc.

26 (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

54

1 CHILD: It's like a puzzle.
2 CHILD: It's fun.
3 CHILD: It's just an awesome game.
4 MALE ANNOUNCER: Imagine how you'll feel seeing
5 your child focus and succeed simply by having fun.
6 ON SCREEN: JUNGLE RANGERS
7 EVERYONE E CONTENT RATED BY ESRB
8 Ages 6-12
9 MALE ANNOUNCER: Rated E for everyone and
10 created especially for children aged 6 to 12, the ifocus
11 Jungle Rangers system has won more than a dozen awards
12 for its innovative approach and proudly partners --
13 ON SCREEN: National Member Benefits Provider
14 of PTA
15 MALE ANNOUNCER: -- with the National PTA to
16 benefit its millions of parent and teacher members.
17 ON SCREEN: Julie
18 Zach's Mom
19 JULIE: This is a great way to strengthen their
20 brain which is their biggest asset in life.
21 MALE ANNOUNCER: Now, it's your turn to
22 experience what thousands of families all over the
23 country have already discovered with the award-winning
24 innovative ifocus system.
25 UNIDENTIFIED FEMALE: I would say that it's a
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

55

1 game that gives you results.

2 ON SCREEN: Individual Result

3 Your child may not be as successful.

4 UNIDENTIFIED FEMALE: And this was the first

5 time -- well, he got all As and one A minus.

6 ON SCREEN: Jackson age 11 THINKING: +105%

7 Average Thinking Improvement 4% in 5 hours

8 Anna age 10 SELF REGULATION: +200%

9 Average Self Regulation Improvement 12% in 5

10 hours

11 Zach age 11 SUSTAINED ATTENTION: +250%

12 Average Sustained Attention Improvement 14% in

13 5 hours

14 Chazz age 10 SELF REGULATION: +105%

15 Average Self Regulation Improvement 12% in 5

16 hours

17 Isaac age 9 EMOTION: +305%

18 Average Emotional Improvement 28% in 5 hours

19 Tiffany age 11 EMOTION: +75%

20 Average Emotional Improvement 8% in 5 hours

21 Forrester age 10 THINKING: +95%

22 Average Thinking Improvement 4% in 5 hours

23 MALE ANNOUNCER: And seeing kids like yours

24 succeed simply by playing this powerful innovative game

25 is what motivates ifocus founder John Able. For The

26 Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

56

1 ON SCREEN: John Able
2 Parent, ifocus Founder
3 JOHN ABLE: I've been driven completely by the
4 thought that I'd help kids.
5 MALE ANNOUNCER: John has six children of his
6 own, so parent to parent he knows the value of a product
7 that can give your child an advantage.
8 ON SCREEN: John Able
9 Parent, ifocus Founder
10 JOHN ABLE: I call them -- I call them arrows
11 in your quiver or tools in your toolbox. The more tools
12 you have, the better parenting you can do.
13 MALE ANNOUNCER: And John wants every parent to
14 experience the power of the ifocus Jungle Rangers Brain
15 Training System, so he's making you an incredible parent
16 to parent promise.
17 ON SCREEN: PARENT TO PARENT PROMISE
18 6 MONTHS
19 100% MONEY BACK GUARANTEE
20 IMPROVE:
21 FOCUS
22 ATTENTION
23 MEMORY
24 SCHOOL WORK
25 SELF ESTEEM For The Record, Inc. (301) 870-
26 8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

57

1 MALE ANNOUNCER: Order now, put ifocus to the
2 test in your own home. Take six months, yes, six full
3 months to put the ifocus system to the test and truly
4 discover its ultimate potential for you and your children
5 or your money back.
6 JOHN ABLE: That's the kind of company we are.
7 We're a human company. Very human. The fact that
8 children's lives are changed is important to me.
9 ON SCREEN: PARENT TO PARENT PROMISE
10 6 MONTHS
11 100% MONEY BACK GUARANTEE
12 MALE ANNOUNCER: And with his personal parent
13 to parent promise, you have a money back guarantee. Your
14 child will be focused, on task, attentive or your money
15 back.
16 ON SCREEN: Order Now
17 ifocus
18 \$14.95 PLUS S&H
19 30 DAY TRIAL
20 EXCLUSIVE TV OFFER
21 BRAIN TRAINING SYSTEM
22 FIGHT
23 Summer Brain Drain
24 CALL NOW 1-800-624-0737 www.junglerangers.com
25 MALE ANNOUNCER: Order right now and try ifocus
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT D**EXHIBIT D**

58

1 for only \$14.95. We'll send you the ifocus Jungle
2 Rangers Brain Training System with everything your child
3 needs to stay sharp and focused over the summer.
4 ON SCREEN: Product Information shown above
5 INCLUDES 9 JUNGLE RANGERS GAMES
6 GAME CD
7 MALE ANNOUNCER: Of course, you'll get the
8 incredible Jungle Rangers game CD.
9 ON SCREEN: Product Information shown above
10 First 500 Orders
11 FREE BONUS
12 FREE
13 Science Behind the Game AUDIO CD
14 MALE ANNOUNCER: But the first 500 orders also
15 receive this terrific bonus, an in-depth parent audio CD
16 detailing the science behind the groundbreaking ifocus
17 program.
18 ON SCREEN: Product Information shown above
19 FREE
20 There's More
21 Focus on Behavior
22 HANDBOOK + AUDIO CD
23 MALE ANNOUNCER: And there's more. Learn and
24 recognize good and bad behavioral problems with this free
25 Focus on Behavior handbook and accompanying audio CD.
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

59

1 ON SCREEN: Product Information shown above
2 FREE
3 Plus Additional BONUS EXTRAS!
4 MALE ANNOUNCER: Plus these additional Jungle
5 Rangers extras, all at absolutely no extra cost.
6 ON SCREEN: Product Information shown above
7 PARENT DASHBOARD
8 MALE ANNOUNCER: And look at this, with our
9 exclusive parent dashboard tracker, you'll be able to
10 watch your child progress through all nine Jungle Rangers
11 brain training games.
12 ON SCREEN: Production Information shown above
13 Taffie
14 Trista's Mom
15 PARENT'S DASHBOARD
16 MONITOR PROGRESS
17 TAFFIE: Well, the dashboard explains to the
18 parent how much time they have spent in what -- in which
19 areas.
20 ON SCREEN: Production Information shown above
21 Jennifer
22 Kaida's Mom
23 JENNIFER: It helps you be able to track what
24 he's doing, his progress.
25 TAFFIE: And it tells you exactly what part of
26 For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

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EXHIBIT D**EXHIBIT D**

60

1 the game they've been playing and for how long.

2 ON SCREEN: CALL OR Click

3 TO ORDER NOW!

4 ifocus

5 \$14.95 PLUS s&h

6 30 DAY TRIAL

7 EXCLUSIVE TV OFFER

8 CALL NOW 1-800-624-0737 www.JungleRangers.com

9 Entire ifocus BRAIN TRAINING SYSTEM

10 MALE ANNOUNCER: Call or click to order now and

11 we'll send you this entire system with everything you see

12 here to simply try for a full month in your own home for

13 just \$14.95.

14 ON SCREEN: Product Information Shown Above

15 CALL in the next 6 MINUTES!

16 FREE SHIPPING & HANDLING

17 MALE ANNOUNCER: And it gets even better.

18 Order in the next six minutes and we'll ship this total

19 and complete breakthrough system, including all the free

20 extras and bonus items right to your door for free.

21 That's right, absolutely free shipping and handling, but

22 only when you call and order right away.

23 ON SCREEN: Product Information Shown Above

24 Brandon Sportel

25 Teacher For The Record, Inc. (301) 870-8025 -

26 www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT D**EXHIBIT D**

61

1 BRANDON SPORTEL: I think it's important for my
2 students to play Jungle Rangers over the summer, so we
3 keep those neurons firing.

4 ON SCREEN: Product Information Shown Above
5 Kelly Arnold
6 Teacher

7 KELLY ARNOLD: I definitely think that using
8 Jungle Rangers over the summer would be very beneficial
9 for kids.

10 ON SCREEN: ifocus
11 \$14.95 PLUS S&H
12 30 DAY TRIAL
13 EXCLUSIVE TV OFFER
14 NOT AVAILABLE IN STORES!
15 CALL NOW 1-800-624-0737 www.junglerangers.com

16 MALE ANNOUNCER: The ifocus Jungle Rangers
17 Brain Training System is not available in stores. It's
18 only available online or through this exclusive
19 television offer. So, call or click on Jungle
20 Rangers.com. Make the commitment right now to help keep
21 your child's brain sharp and alert over the summer.

22 ON SCREEN: Product information shown above
23 PARENT TO PARENT PROMISE
24 6 MONTHS
25 100% MONEY BACK GUARANTEE For The Record, Inc.
26 (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT D**EXHIBIT D**

62

1 Focus
2 Succeed
3 MALE ANNOUNCER: And, remember, with the ifocus
4 system and our exclusive parent to parent promise, your
5 child will be focused, on task and ready to succeed in
6 the fall or your money back. Order right now.
7 ON SCREEN: ifocus
8 \$14.95 PLUS S&H
9 30 DAY TRIAL
10 EXCLUSIVE TV OFFER
11 CALL NOW 1-800-624-0737 www.junglerangers.com
12 UNIDENTIFIED FEMALE: 100 percent recommend it.
13 CHILD: The best thing about Jungle Rangers is
14 everything.
15 MALE ANNOUNCER: Call 1-800-624-0737 for the
16 ifocus system. That's 1-800-624-0737. Call now, 1-800-
17 624-0737.
18 ON SCREEN: The preceding was a paid
19 presentation for the ifocus Jungle Rangers Brian Training
20 System brought to you by Focus Education
21 MALE ANNOUNCER: The preceding has been a paid
22 presentation for the ifocus Jungle Rangers Brain Training
23 System, brought to you by Focus Education.
24 (The video was concluded.)
25 For The Record, Inc. (301) 870-8025 - www.ftrinc.net -
26 (800) 921-5555

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EXHIBIT D**EXHIBIT D**

63

1 C E R T I F I C A T I O N O F T Y P I S T

2

3 MATTER NUMBER: 1223153

4 CASE TITLE: IFOCUS EDUCATION, LLC

5 TAPING DATE: JUNE 28, 2013

6 TRANSCRIPTION DATE: NOVEMBER 12, 2013

7

8 I HEREBY CERTIFY that the transcript contained
9 herein is a full and accurate transcript of the tapes
10 transcribed by me on the above cause before the FEDERAL
11 TRADE COMMISSION to the best of my knowledge and belief.

12

13 DATED: NOVEMBER 12, 2013

14

15

16 ELIZABETH M. FARRELL

17

18 C E R T I F I C A T I O N O F P R O O F R E A D E R

19

20 I HEREBY CERTIFY that I proofread the transcript for
21 accuracy in spelling, hyphenation, punctuation and
22 format.

23

24

25 SARA J. VANCE For The

26 Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

Complaint

EXHIBIT E

Frequently Asked Questions | ifocus System

<http://www.focuseducation.com/page.html>

ifocus™ FAQ's

[How do I know if this will work for my child?](#)
[Will I need to do this with my child?](#)
[What if I don't see the results I want?](#)
[How long and how often should my child be playing Jungle Rangers?](#)
[Will this help with ADD or ADHD?](#)
[What about Autism, Asperger's, or other issues?](#)
[What about Medications?](#)
[Will my child's improvements from ifocus/Jungle Rangers last or will they fade?](#)
[What if the game is too easy for my child? Or what if the game is too difficult?](#)
[What is the purpose of the Dashboard?](#)
[What if my child becomes frustrated because they are having difficulty progressing to different lands within the Jungle Rangers game?](#)
[What is a "Span Task"?](#)
[What is an "N-Back Task"?](#)
[What is a "CPT"?](#)
[Are there video instructions?](#)
[What is the significance of the Map, and how do I review it?](#)
[What is the significance of the Monkey Shrine \(Trophy Room\)?](#)
[Does the game play from the CD or do I have to install anything?](#)
[How do I install the game?](#)
[When I put the disc in the computer, nothing happens.](#)
[What are the minimum system requirements for the Jungle Rangers Game?](#)
[Can I install the game on multiple computers?](#)
[Is it possible to resize the game window to full screen?](#)
[Why do I get this Adobe Air Updater pop-up?](#)
[How many players can play Jungle Rangers at the same time?](#)
[Why did the program lock up during playing?](#)

How do I know if this will work for my child?

Because it's based upon years of research, data, and experience from leading doctors and scientists in their fields of expertise. Because it's been tested by a nationally recognized specialist in Child Psychiatry and Brain Imaging. Because it's worked for so many children and helped so many families. All of that points to it improving the lives of children and families. ifocus truly provides a holistic approach to improving focus, attention, and memory in your child. And as a parent, you are free to get as involved with your child's improvement as you like. The game provides your child with a platform for improvement in focus, attention, and memory that they can do all on their own. But the additional materials are a great way for you, the parent, to get involved in your child's improvement through cognitive behavioral strategies, fitness programs, and nutritional guidelines—all geared toward helping your child FILTER, FOCUS, ABSORB, and REMEMBER.

Feel free to review some of our product testimonials [here](#)

Will I need to do this with my child?

As a parent, you can choose to get as involved as you would like, but even with minimal involvement, you will see positive results in your child's ability to focus, pay attention, and remember.

The Jungle Rangers computer game is a component of the ifocus system designed specifically for children to do on their own. Simply by playing the computer game, new pathways in their brain are being created so that results in your child's behavior will become obvious within a few weeks of playing. To see results within a few weeks, we recommend playing for at least 30 minutes a day, 5 days a week.

If you, as the parent, did want to get more involved, the additional materials in the ifocus system enable the parent to take a holistic approach to their child's improvement in focus and attention. These materials are like a toolbox for the parent so that you can enhance your child's improvement through cognitive behavioral strategies, fitness programs, and nutritional guidelines—all geared toward helping your child FILTER, FOCUS, ABSORB, and REMEMBER.

What if I don't see the results I want?

In case you do not see the results you want, we offer a deep and honest 6-month Parent-To-Parent Promise. Within 6 months you will (1) actually notice improvements in your child's behavior day-to-day and in their performance at school and (2) be able to measure their progress on our Jungle

EXHIBIT E (1)

Complaint

EXHIBIT E

Frequently Asked Questions | ifocus System

<http://www.focuseducation.com/page.html>

Rangers Dashboard—or your money back. We absolutely guarantee this product.

How long and how often should my child be playing Jungle Rangers?

The more time your child plays the more improvement you will see. Focus Education recommends at a minimum 20 minutes 3 times per week, but 30 minutes 5 times per week is better. The aim is for your child to receive at least 12 to 20 total hours to get the benefit of game play as it relates to their focus and attention. If they want to keep going after that, great, and there is about 45 hours of gameplay in Jungle Rangers. Of course, the game is designed so they can continue to play for many more hours to have additional gains in focus and attention, win additional trophies and garner further achievements. Although parts of the game can be a struggle, it is not always how well you do in each of the tasks but the amount of time, focus and attention your child has given to the tasks. You can track the hours of game play in the dashboard.

Will this help with ADD or ADHD?

While the ifocus system can help any child improve their focus and attention, much of its design was based upon cognitive training for children with impairments including ADHD, so it will be highly beneficial for them.

What about Autism, Asperger's, or other issues?

We have not tested the ifocus system on children with any issues beyond ADHD, however we believe if your child has the ability to play a computer game, ifocus and Jungle Rangers is likely to benefit them.

What about Medications?

Focus Education does not take a position either for or against medications. The decision about medications for your child is something between your family and your doctor. The ifocus System and Jungle Rangers are not necessarily designed to replace medication.

Will my child's improvements from ifocus/Jungle Rangers last or will they fade?

Research shows that once neuro pathways have been opened or strengthened they do not recede unless there is either a disease or until the onset of issues later with aging.

What if the game is too easy for my child? Or what if the game is too difficult?

The game technology has been designed to automatically adjust itself to the level of difficulty at which the player can succeed and then slowly challenges the player to higher levels of focus and attention. To avoid frustration, the game will come back down to a lower level when necessary. Initially, it may take the game "train" 10 to 30 minutes to learn the player and adjust to the appropriate level.

What is the purpose of the Dashboard?

The Dashboard keeps a record of how much time your child has played the game and tracks your child's results.

If you have already purchased the ifocus System, which includes the Jungle Rangers game, please refer to the pop-up information boxes and the About sections to learn more about each of the tasks reflected in the Dashboard. To visit the Dashboard, select "Dashboard" from the home screen of the Jungle Rangers game. If the game is already started, restart the game, select "Dashboard" with the arrows. Select the player with your mouse.

What if my child becomes frustrated because they are having difficulty progressing to different lands within the Jungle Rangers game?

Some children can experience some difficulty in moving on to different lands in the Jungle Rangers game if they have not played a sufficient amount of time in each game. This is completely normal, especially when a child is just starting out. If your child is becoming frustrated because they are unable to explore the different lands and new games, we have some suggestions.

In the first land of "Acoria" there are 3 games, each of which has time restrictions before the player can move on to the next land, "Big Rock," where the games become more interesting and a little more difficult. The land of "Spite Factory" continues this progression. The scale at the top of the game gives a rough idea of how close your child is to moving on to a new land.

If you go to the Dashboard, you will be given an exact count of how much time your child has played in each game and can figure out how much is left in each game. To visit the Dashboard, restart the game, select "Dashboard" with the arrows. Select the player with your mouse. The Dashboard will give you a total amount of time your child has played in each of the three games as well as each individual task.

In "Acoria" the time requirements are as follows:

Stump Jump (Span Task) requires a player to play a minimum of 45 minutes before moving on in the game.

Dasha's Drop (N-back Task) requires a player to play a minimum of 30 minutes before moving on in the game.

Books Crooks (CPT) requires a player either complete the game with a high accuracy (90%) or spend a minimum of 30 minutes playing the game.

EXHIBIT E (2)

Complaint

EXHIBIT E

Frequently Asked Questions | iFocus System

<http://www.focuseducation.com/page.html>

In "Big Rock" the time requirements are as follows:

Rock Hopper (Span Task) requires a player to play a minimum of 60 minutes before moving on in the game.
 Headshot Pass (CPT) requires a player either complete the game with a high accuracy (80%) or spend a minimum of 45 minutes playing the game.
 Patch's Peak (N-back Task) requires a player to play a minimum of 45 minutes before moving on in the game.
 In "Spide Factory" the time requirements are as follows:

Industrial Intrusion (Span Task) requires a player to play a minimum of 90 minutes before moving on in the game.
 Conveyor Conflict (CPT) requires a player either complete the game with a high accuracy (70%) or spend a minimum of 45 minutes playing the game.
 Dr. Bearhead's Office (N-back Task) requires a player to play a minimum of 90 minutes before moving on in the game.

What is a "Span Task"?

Working Memory Span Tasks require increasingly greater abilities to hold more information in mind during a short period of time and to be able to reorganize and manipulate that information as needed. Working memory has considerable effects on reading and mathematics skills.

More specifically, working memory (WM) refers to the process of temporary (short-term) storage and management of information. While similar to the idea of 'short-term memory', WM typically conveys an additional emphasis on the active manipulation of the information being held in mind. Similar to RAM memory in a computer (versus hard drive memory), this type of memory is important as it is felt to be important in activities such as guiding goal-directed thoughts or behaviors. WM is typically considered a limited capacity 'specialized' subsystem, distinct from actual perception, and with specific capacity for both visual and auditory information. Research models and studies point to the importance of WM for several cognitive abilities including logical reasoning and problem-solving. Some researchers have suggested that WM is a bit like the 'gas' for the cognitive 'engine' required for many abilities. Research studies have found it to be crucial for school readiness and academic achievement (such as aspects of reading comprehension & mathematics). Likewise, many developmental and acquired disorders are associated with lower WM ability. Research suggests that improvements can be made in WM with specific cognitive exercises aiming to increase this important capacity. The 'span tasks' in Jungle Rangers provides such exercises to enhance WM. Improvements in WM have been related to increases in a number of abilities, including intellectual ability.

What is an "N-Back Task"?

N-Back tasks require sustained working memory use over a longer period of time than is typical in a Working Memory Task. It requires continuous attention to the task, ability to hold greater amounts of information in memory, and to continuously update the relevant information being maintained, while monitoring one's performance.

These tasks require that an individual monitor a number of stimuli (objects, sounds, places/collisions) on a screen and respond if the 'current' event in the sequence is the same as that which occurred 'n' (where 'n' is a number) before it. That is, for a 1-back task, if the event the same as the one that occurred just previously (1 before it), your child would respond (by hitting the space bar or up key). Likewise, on a 2-back task, if the event presented is the same as the one that occurred 2 events before it in the sequence, your child would respond. These n-back tasks place demands on your child's ability to hold the task-related information as well as continuously update it in their minds. Research suggests that training on these types of tasks increases both Working Memory abilities and attention skills.

What is a "CPT"?

Continuous Performance Tasks require a high level of attention and concentration. The task demands are to attend and respond to particular target objects, while ignoring other objects (distractors). Sustaining attention on this task is challenging for many children, especially those with attention issues.

Sustained attention is considered a primary element or component in current neuropsychological models of attention. Most people can easily relate to sustained attention as part of their everyday experience. For example, instructions from a parent or teacher to 'pay attention' are essentially efforts to get a child to sustain their attention to the task at hand. Sustained attention is influenced many things. First it requires some elementary processes of sensory selective attention, ability to remember the reason you are attending, and a level of mental control. Selective attention depends on a relatively stable attentional capacity, enabling adequate focus over time. Attention training is based on the feeling that attentional abilities can be improved by activating attention through a stimulus drill approach. The repeated stimulation of attentional systems via graded attention exercises appears to facilitate changes in attention capacity. Most attention training programs assume that aspects of cognition can be isolated and discretely targeted with training exercises including functions related to sustaining attention over time (vigilance), shifting attention, speed of processing, and screening out distractors. The CPT tasks in Jungle Rangers are exercises designed to increase your child's capacity to attend for greater and greater durations of time, to be less distracted by irrelevant information, and increase their reaction time and accuracy of response. The exercises are designed to require higher levels of attention, and to keep this high level of attention sustained for longer and longer periods of time during the game. Better performance is indicated by longer sustained durations of game play at higher accuracy rates.

Are there video instructions?

Yes. Every game begins with a video instruction, hosted by one of the Jungle Rangers. If your child needs to re-visit these instructions, they can be viewed multiple times in the Movie Theater located in the world of Arcadia on the ground level.

What is the significance of the Map, and how do I review it?

At any point during the game, your child can use the "M" key on the keyboard to see which lands have been unlocked. This is also a fast and easy way to warp to the different worlds without having to walk through each of the worlds to get where you need to be. Each of the lands represents an exciting story-based platform for your child to complete different types of task-based challenges.

What is the significance of the Monkey Shrine (Trophy Room)?

EXHIBIT E (3)

Complaint

EXHIBIT E

Frequently Asked Questions | ifocus System

<http://www.focuseducation.com/fage.html>

As your child plays the game, he or she will unlock trophies that are held in the Monkey Shrine. Your child will be able to see what trophies have been won and which ones are left to conquer.

Does the game play from the CD or do I have to install anything?

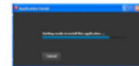
The CD provided is the game installation CD. Once you have installed the components onto your computer, the game will be played from your computer, giving you optimal performance. However, the CD is required to be in the CD drive as the key to unlocking the ability to play the game, every time your child plays.

How do I install the game?

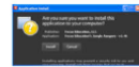
MAC or PC:

Quit or Exit all Programs

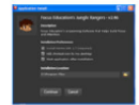
Insert the Jungle Rangers Game disc into the CD Drive



After a few moments, if the game does not automatically begin installing as shown above, please double-click your CD drive, then double-click on the "WIN" or "MAC" folder, then double-click on "Jungle Rangers Installer"



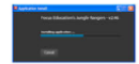
Click "Install" button.



Choose Preferences and Location or just click "Continue" button to let the game be installed in the default Programs folder.



Click "I Agree" button.



Game will begin installing.

When I put the disc in the computer, nothing happens.

If your computer has two disc drives, please make sure you have put the game in the CD drive and not the DVD drive.

Try opening up "My Computer" and finding the CD Drive. Confirm the drive says "Jungle Rangers Installation CD". Double click the CD. Then double-click the WIN folder. Find the red icon called Jungle Rangers Installer and double-click. This should begin the installation.

What are the minimum system requirements for the Jungle Rangers Game

PC: Intel Pentium 4 2 GHz or faster with 1 GB Ram

EXHIBIT E (4)

4-25-07

4800013 12-14-08

Complaint

EXHIBIT E

Frequently Asked Questions | ifocus System

<http://www.focuseducation.com/page.html>

Operating System: Microsoft Windows XP Home, Professional, or Tablet PC edition with Service Pack 2 or 3 (including 64 bit editions), Windows Server 2003, Windows Vista Home Premium, Business, Ultimate, or Enterprise (including 64 bit editions) with Service Pack 1, or Windows 7 (including 64 bit editions)

Mac: Intel Core Duo 1.83GHz or faster with 1 GB Ram

Operating System: Mac OS 10.4, 10.5, 10.6 (Snow Leopard), or Mac OS X (Lion)

Can I install the game on multiple computers?

Yes, you can install the game on multiple computers, however, the CD is required to be in your CD drive in order to play the game. So, you may install it on a home computer and a laptop, for example, but the original CD must be in the computer that the game is being played on.

Is it possible to resize the game window to full screen?

Yes. If you'd like to resize the game window, or have the game in full screen, you can change your screen resolution in the computer. For Windows, please refer to your Control Panel for Display Properties. For Mac, please refer to your System Preferences.

Why do I get this Adobe Air Updater pop-up?

Every now and then, the game may pause and a message box will appear alerting you that an update to Adobe AIR is ready to be installed.

How many players can play Jungle Rangers at the same time?

Only one person can play Jungle Rangers at a time, but you can log up to 5 player profiles in the game, and keep their data in the dashboard in order to track each player's individual improvements. In order to add another player beyond 5, you will have to delete a player profile to add another.

Why did the program lock up during playing?

Jungle Rangers has been programmed to the highest standards of reliability, but occasionally computers just "get tired" or "confused" and any program can lock up.

Press CONTROL+ALT+DELETE and a task manager window will appear. Find the Jungle Rangers program. If it says "not responding" then press "end task" to stop the program and clear the problem.

PS: This works for all programs when they lock up your computer!

Clear Distractions
Improve Memory
Absorb More Information
Develop Higher Levels of Focus & Attention

EXHIBIT E (5)

Complaint

EXHIBIT F

1140 Oakridge Lane Suite 200 Morrisville, NC 27560		Tel: 1-800-449-2000 Fax: 1-336-444-2001 Web: marketingarchitects.com		Script Game Time :60
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marketing architects

Advertiser:	Focus Education, LLC
Product:	iFocus
Date:	03-07-2013
Spot:	A6D-004 Game Time
Version:	13 - Production Approved

1 ANNC: Does your child struggle with focus and concentration? Do they
 2 spend hours trying to finish their homework? Are you disappointed with
 3 your child's report card, because you know they can do better?

4
 5
 6 MUSIC UP

7
 8 Because now there's an easy solution. No tutors. No classes. Remarkably...
 9 It's a video game. One that's already helped kids get good grades who'd
 10 never seen it happen before.

11
 12 It's a cutting-edge brain-training method turned into a captivating game for
 13 elementary school students. Discover what a difference it can make with an
 14 absolutely free demo from ifocus. Just call 1-800-XXX-XXXX.

15
 16 It's the award winning game kids can't wait to play... and parents feel good
 17 about. It automatically adjusts to your child's learning speed, giving kids an
 18 action packed game, and parents a surprise...

19
 20 GARTH: We just got their report card and we were shocked. All As and Bs.
 21 They've never had that before.

22
 23 For your absolutely free demo, call toll free. 1-800-XXX-XXXX. If lines are
 24 busy, please try again. 1-800-XXX-XXXX.

25
 26 DISCLAIMER: Your child may not be as successful.
 27
 28

EXHIBIT F

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FTC-FocusEducation0000619

Decision and Order

DECISION AND ORDER

The Federal Trade Commission (“Commission”) having initiated an investigation of certain acts and practices of the respondents named in the caption hereof, and the respondents having been furnished thereafter with a copy of a draft complaint that the Bureau of Consumer Protection proposed to present to the Commission for its consideration and which, if issued by the Commission, would charge the respondents with violation of the Federal Trade Commission Act, 15 U.S.C. § 45 *et seq.*; and

The respondents and counsel for the Commission having thereafter executed an agreement containing a consent order (“consent agreement”) that includes: a statement that the agreement is for settlement purposes only and does not constitute an admission that the law has been violated as alleged in the draft complaint, or that the facts as alleged in the draft complaint, other than the 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 has reason to believe that the respondents have violated the Federal Trade Commission Act, and that a complaint should issue stating its charges in that respect, and having thereupon accepted the executed consent agreement and placed such consent agreement on the public record for a period of thirty (30) days for the receipt and consideration of public comments, and having duly considered the comments filed thereafter by interested persons pursuant to Commission Rule 2.34, 16 C.F.R. § 2.34, now in further conformity with the procedure prescribed in Commission Rule 2.34, the Commission hereby issues its complaint, makes the following jurisdictional findings, and enters the following order:

- 1a. Respondent Focus Education, LLC (“Focus Education”) is a Texas limited liability company with its principal office or place of business in Houston, Texas.
- 1b. Respondent Michael Apstein is the co-founder and Chief Executive Officer of Focus Education. Individually or in concert with others, he formulates,

Decision and Order

directs, or controls the policies, acts, or practices of Focus Education.

- 1c. Respondent John Able is the co-founder and Chief Financial Officer of Focus Education. Individually or in concert with others, he formulates, directs, or controls the policies, acts, or practices of Focus Education.
2. The Commission has jurisdiction of the subject matter of this proceeding and of the respondents, and the proceeding is in the public interest.

ORDER**DEFINITIONS**

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

1. Unless otherwise specified, “respondents” shall mean Focus Education, LLC, a limited liability company, its successors and assigns, and officers; Michael Apstein, individually and as an officer of Focus Education, LLC; John Able, individually and as an officer of Focus Education, LLC.
2. “Commerce” shall mean as defined in Section 4 of the Federal Trade Commission Act, 15 U.S.C. § 44.
3. “Covered Product” shall mean any product, program, device, or service that purports to alter the brain’s structure or function, improve cognitive abilities, behavior or academic performance, or treat or lessen the symptoms of cognitive abnormalities or disorders, including Attention Deficit Hyperactivity Disorder (“ADHD”).
4. “ifocus System” means the Jungle Rangers computer software and any related kits, accessories, or supplies.

Decision and Order

5. “Reliably Reported,” for a human clinical test or study (“test”), means a report of the test has been published in a peer-reviewed journal, and such published report provides sufficient information about the test for experts in the relevant field to assess the reliability of the results.
6. The term “including” in this order shall mean “without limitation.”
7. The terms “and” and “or” in this order shall be construed conjunctively or disjunctively as necessary, to make the applicable phrase or sentence inclusive rather than exclusive.

I.

IT IS ORDERED that respondents and their officers, agents, representatives, and employees, directly or through any corporation, partnership, subsidiary, division, trade name, or other device, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of the ifocus System or any substantially similar product, in or affecting commerce, shall not make any representation, in any manner, expressly or by implication, including through the use of a trade name, product name, endorsement, depiction, illustration, or trademark, that such product or component thereof:

- A. improves children’s focus, memory, attention, behavior, and/or school performance, including in children with ADHD; or
- B. causes permanent improvements in children’s focus, memory, attention, behavior, and/or school performance, including in children with ADHD,

unless the representation is non-misleading and, at the time of making such representation, respondents possess and rely upon competent and reliable scientific evidence to substantiate that the representation is true.

Decision and Order

For purposes of this Part, competent and reliable scientific evidence shall consist of human clinical testing of such product that is sufficient in quality and quantity, based on standards generally accepted by experts in the relevant field, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that the representation is true. Such testing shall be (1) randomized, double-blind, and adequately controlled; and (2) conducted by researchers qualified by training and experience to conduct such testing. In addition, all underlying or supporting data and documents generally accepted by experts in the relevant field as relevant to an assessment of such testing as described in Part IV must be available for inspection and production to the Commission.

II.

IT IS FURTHER ORDERED that respondents and their officers, agents, representatives, and employees, directly or through any corporation, partnership, subsidiary, division, trade name, or other device, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of any Covered Product, in or affecting commerce, shall not make any representation in any manner, expressly or by implication, including through the use of a trade name, product name, endorsement, depiction, illustration, or trademark, other than representations covered under Part I of this order, about the benefits, performance, or efficacy of any Covered Product, unless the representation is non-misleading, and, at the time of making such representation, respondents possess and rely upon competent and reliable scientific evidence that is sufficient in quality and quantity based on standards generally accepted in the relevant scientific fields, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that the representation is true.

For purposes of this Part, competent and reliable scientific evidence means tests, analyses, research, or studies (1) that have been conducted and evaluated in an objective manner by qualified persons; (2) that are generally accepted in the profession to yield accurate and reliable results; and (3) as to which, when they are human clinical tests or studies, all underlying or supporting data and documents generally accepted by experts in the field as

Decision and Order

relevant to an assessment of such testing as set forth in Part IV are available for inspection and production to the Commission.

III.

IT IS FURTHER ORDERED that respondents and their officers, agents, representatives, and employees, directly or through any corporation, partnership, subsidiary, division, trade name, or other device, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of any Covered Product, in or affecting commerce, shall not misrepresent, in any manner, expressly or by implication, the existence, contents, validity, results, conclusions, or interpretations of any test, study, or research, or that the benefits of any Covered Product are scientifically proven.

IV.

IT IS FURTHER ORDERED that, with regard to any human clinical test or study (“test”) upon which respondents rely to substantiate any claim covered by this order, respondents shall secure and preserve all underlying or supporting data and documents generally accepted by experts in the field as relevant to an assessment of the test, including, but not necessarily limited to:

- A. All protocols and protocol amendments, reports, articles, write-ups, or other accounts of the results of the test, and drafts of such documents reviewed by the test sponsor or any other person not employed by the research entity;
- B. All documents referring or relating to recruitment; randomization; instructions, including oral instructions, to participants; and participant compliance;
- C. Documents sufficient to identify all test participants, including any participants who did not complete the test, and all communications with any participants relating to the test; all raw data collected from participants enrolled in the test, including any participants who did not complete the test; source

Decision and Order

documents for such data; any data dictionaries; and any case report forms;

- D. All documents referring or relating to any statistical analysis of any test data, including, but not limited to, any pretest analysis, intent-to-treat analysis, or between-group analysis performed on any test data; and
- E. All documents referring or relating to the sponsorship of the test, including all communications and contracts between any sponsor and the test's researchers.

Provided, however, the preceding preservation requirement shall not apply to a Reliably Reported test, unless the test was conducted, controlled, or sponsored, in whole or in part by: (1) any respondent; (2) any respondent's officers, agents, representatives, or employees; (3) any other person or entity in active concert or participation with any respondent; (4) any person or entity affiliated with or acting on behalf of any respondent; (5) any supplier of any ingredient contained in the product at issue to any of the foregoing or to the product's manufacturer; or (6) the supplier or manufacturer of such product.

For any test conducted, controlled, or sponsored, in whole or in part, by respondents, respondents must establish and maintain reasonable procedures to protect the confidentiality, security, and integrity of any personal information collected from or about participants. These procedures shall be documented in writing and shall contain administrative, technical, and physical safeguards appropriate to respondent Focus Education's size and complexity, the nature and scope of respondent Focus Education's activities, and the sensitivity of the personal information collected from or about the participants.

V.

IT IS FURTHER ORDERED that respondents 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:

Decision and Order

- A. All advertisements and promotional materials containing the representation;
- B. All materials that were relied upon in disseminating the representation; and
- C. All tests, reports, studies, surveys, demonstrations, or other evidence in its 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.

VI.

IT IS FURTHER ORDERED that respondents shall, for five (5) years, deliver a copy of this order to all current and future principals, officers, directors, managers, 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. Acknowledgment by electronic mail or similar means will be deemed a signature for purposes of this order. Respondents shall deliver this order to current personnel within thirty (30) days after date of service of this order, and to future personnel within thirty (30) days after the person assumes such position or responsibilities.

VII.

IT IS FURTHER ORDERED that respondent Focus Education, LLC, and its successors and assigns, shall notify the Commission at least thirty (30) days prior to any change in the corporation that may affect compliance obligations arising under this order, including, but not limited to, a dissolution, assignment, sale, merger, or other action that would result in the emergence of a successor corporation; the creation or dissolution of a subsidiary, parent, or affiliate that engages in any acts or practices subject to this order; the proposed filing of a bankruptcy petition; or a change in the corporate name or address.

Decision and Order

Provided, however, that, with respect to any proposed change in the corporation about which respondent learns less than thirty (30) days prior to the date such action is to take place, respondent shall notify the Commission as soon as is practicable after obtaining such knowledge. Unless otherwise directed by a representative of the Commission in writing, all notices required by this Part shall be emailed to Debrief@ftc.gov or sent by overnight courier to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin: Focus Education, LLC, FTC File No. 122 3153.

VIII.

IT IS FURTHER ORDERED that respondents John Able and Michael Apstein, for a period of ten (10) years after the date of issuance of the order, shall notify the Commission of the discontinuance of their current business or employment, or of their affiliation with any new business or employment, which may affect their compliance obligations arising under this order. The notice shall include respondent's new business address and telephone number and a description of the nature of the business or employment and his 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.

IX.

IT IS FURTHER ORDERED that respondents within sixty (60) days after the date of service of this order, shall each file with the Commission a true and accurate report, in writing, setting forth in detail the manner and form of their own compliance with this order. Within ten (10) days of receipt of written notice from a representative of the Commission, they shall submit additional true and accurate reports.

X.

This order will terminate on April 8, 2035, or twenty (20) years from the most recent date that the United States or the

Decision and Order

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 respondents 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.

Analysis to Aid Public Comment

ANALYSIS OF CONSENT ORDER TO AID PUBLIC COMMENT

The Federal Trade Commission (“FTC” or “Commission”) has accepted, subject to final approval, an agreement containing a consent order from Focus Education, LLC (“Focus Education”), Chief Executive Officer, Michael Apstein, and Chief Financial Officer, John Able (“Respondents”).

The proposed consent order (“proposed order”) has been placed on the public record for thirty (30) days for receipt 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 involves Focus Education’s advertising for the ifocus System, which included the Jungle Rangers computer game and comic book, and information on children’s behavior, exercise, and diet. The Commission’s complaint alleges that the Respondents violated Sections 5(a) and 12 of the Federal Trade Commission Act by making false or unsubstantiated representations that playing the ifocus System’s Jungle Rangers computer game improves children’s focus, memory, attention, behavior, and/or school performance, including in children with ADHD, and that these improvements were permanent. The complaint also alleges that Respondents violated Sections 5(a) and 12 by making false representations that scientific studies prove these claims.

The proposed order includes injunctive relief that prohibits these alleged violations and fences in similar and related violations. For purposes of the order, “Covered Product” means any product, program, device, or service that purports to alter the brain’s structure or function, improve cognitive abilities, behavior, or academic performance, or treat or lessen the symptoms of cognitive abnormalities or disorders, including ADHD.

Part I of the Order prohibits the Respondents from making any representation that the ifocus System or any substantially

Analysis to Aid Public Comment

similar product improves children's cognitive abilities, behavior, or academic performance, including in children with ADHD unless any such representation is non-misleading and the Respondents possess and rely upon competent and reliable scientific evidence. For purposes of this Part, competent and reliable scientific evidence is defined as "human clinical testing of such product that is sufficient in quality and quantity, based on standards generally accepted by experts in the relevant field, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that the representation is true. Such testing shall be (1) randomized, double-blind, and adequately controlled; and (2) conducted by researchers qualified by training and experience to conduct such testing." In addition, competent and reliable scientific evidence is subject to the preservation requirements set forth in Part IV.

Part II is a fencing-in provision. It prohibits the Respondents from making any claim about the benefits, performance, or efficacy of any Covered Product unless the claim is non-misleading and the Respondents possess competent and reliable scientific evidence that is sufficient in quality and quantity, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that the representation is true. For purposes of this Part, Covered Product is defined as any product, program, device, or service that purports to alter the brain's structure or function, improve cognitive abilities, behavior, or academic performance, or treat or lessen the symptoms of cognitive abnormalities or disorders, including ADHD. Competent and reliable scientific evidence means "tests, analyses, research, or studies (1) that have been conducted and evaluated in an objective manner by qualified persons; (2) that are generally accepted in the profession to yield accurate and reliable results; and (3) as to which, when they are human clinical tests or studies, all underlying or supporting data and documents generally accepted by experts in the field as relevant to an assessment of such testing as set forth Part IV are available for inspection and production to the Commission."

Part III prohibits the Respondents from misrepresenting, in relation to the advertising of any Covered Product, (1) the results of any test, study, or research; or (2) that the benefits of any such Covered Product are scientifically proven.

Analysis to Aid Public Comment

Part IV requires the Respondents, for human clinical tests or studies, to secure and preserve all underlying or supporting data and documents generally accepted by experts in the field as relevant to an assessment of the test. There is an exception for a “Reliably Reported” test, defined as a test published in a peer-reviewed journal that was not conducted, controlled, or sponsored by Respondents, affiliates, or others in the manufacturing and supply chain. Also, the published report must provide sufficient information about the test for experts in the relevant field to assess the reliability of the results.

Part V contains recordkeeping requirements for advertisements and substantiation relevant to representations covered by Parts I through III of the order.

Parts VI through IX of the proposed order require Respondents to: deliver a copy of the order to principals, officers, directors, managers, employees, agents, and representatives having responsibilities with respect to the subject matter of the order; notify the Commission of changes in corporate structure, discontinuance of current business or employment, or affiliation with any new business or employment that might affect compliance obligations under the order; and file compliance reports with the Commission.

Part X provides that the order will terminate after twenty (20) years, with certain exceptions.

The purpose of this analysis is to facilitate public comment on the proposed order, and it is not intended to constitute an official interpretation of the complaint or proposed order, or to modify the proposed order’s terms in any way.

Complaint

IN THE MATTER OF

**AMERIFREIGHT, INC.
AND MARIUS LEHMANN**CONSENT ORDER, ETC. IN REGARD TO ALLEGED VIOLATIONS OF
SECS. 5 AND 12 OF THE FEDERAL TRADE COMMISSION ACT

*Docket No. C-4518; File No. 142 3249
Complaint, April 13, 2015 – Decision, April 13, 2015*

This consent order addresses allegations that AmeriFreight, Inc. and Marius Lehmann, an officer for AmeriFreight (collectively “Respondents”), misrepresented their services to consumers. AmeriFreight is an automobile shipment broker that arranges automobile shipments through third-party freight carriers. The complaint alleges that AmeriFreight misled consumers by posting online reviews of satisfied customers as unbiased, but failing to disclose that AmeriFreight compensated the reviewers with discounts and incentives. The consent order requires the Respondents to clearly and prominently disclose a material connection, if one exists, between the person providing the endorsement and Respondents, when using an endorsement to advertise any product or service.

Participants

For the *Commission*: Victor DeFrancis.

For the *Respondents*: P. Justin Thraikill, Miller & Brown, P.C.

COMPLAINT

The Federal Trade Commission (“FTC” or “Commission”), having reason to believe that AmeriFreight, Inc. and Marius Lehmann (collectively, “Respondents”) have 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 AmeriFreight, Inc. is a Georgia corporation with its principal office or place of business at 417 Dividend Drive #D, Peachtree City, GA 30269.