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IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

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CLERK U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES OF AMERICA,
 UNITED STATES POSTAL SERVICE,
 Plaintiffs,
 v.
 HEALTH CARE PRODUCTS, INC.
 d/b/a Anderson Pharmacals,
 BARBARA W. LARKINS,
 ELBERT C. ANDERSON
 a/k/a Carl Anderson,
 RONALD E. ANDERSON,
 Defendants.

Civil Action No.

90-839-Civ-T-17c

VERIFIED COMPLAINT FOR INJUNCTIVE
RELIEF AND FOR CIVIL PENALTIES

Jurisdiction and Venue

1. This Court has jurisdiction under 18 U.S.C. § 1345, 28 U.S.C. §§ 1339, 1345, and 39 U.S.C. § 3012.
2. Venue lies in this district under 39 U.S.C. § 3012(b)(1) and 28 U.S.C. § 1391(b).

Parties

3. Plaintiff United States of America is a sovereign entity with the power to sue in its official name.

4. Plaintiff United States Postal Service is an independent establishment of the executive branch of the Government of the United States with the power to sue in its official name. 39 U.S.C. §§ 201, 401(1).

5. Defendant Health Care Products, Inc. ("Health Care") is a Florida corporation with its principal place of business at 19245 North Highway US 41, Lutz, Florida 33549 and a mailing address of P.O. Box 271448, Tampa, Florida 33688. Health Care does business as Anderson Pharmacals.

6. Defendant Barbara Larkins is an individual with a business address of 19245 North Highway US 41, Lutz, Florida 33549 and a mailing address of P.O. Box 271448, Tampa, Florida 33688. Ms. Larkins is the president, secretary, and majority shareholder of Health Care. She is also a director of Health Care.

7. Defendant Elbert C. Anderson, who sometimes uses the name Carl Anderson, is an individual with a business address of 19245 North Highway US 41, Lutz, Florida 33549 and a residence address of 15414 East Burrell Drive, Luta, Florida 33549. Elbert C. Anderson is the vice-president and registered agent of Health Care. He is also a director of Health Care.

8. Defendant Ronald E. Anderson is an individual with a business address of 19245 North Highway US 41, Lutz, Florida 33549 and a mailing address of P.O. Box 271448, Tampa, Florida 33688. He is the minority shareholder in Health Care. Until sometime between December 26, 1989, and the date of this

Complaint, he was the vice-president and a director of Health Care. On information and belief, some of the violations of 39 U.S.C. § 3012 described below occurred while Ronald E. Anderson was vice-president of Health Care.

Prior Proceedings

9. On September 3, 1987, the General Counsel of the United States Postal Service filed an administrative complaint charging Health Care, Barbara Larkins, Carl Anderson, and Ronald Anderson with falsely representing in mail-order advertisements that:

- (a) Ingestion of Cal-Ban 3000 will cause significant weight loss in virtually all users.
- (b) Ingestion of Cal-Ban 3000 will cause significant weight loss without discipline, calorie restricted diets, or exercise.
- (c) Cal-Ban 3000 prevents foods from being converted into stored fat.
- (d) The weight loss claims for Cal-Ban 3000 are supported by the results of scientifically sound clinical studies.
- (e) An obese person who takes Cal-Ban 3000 may reasonably expect to lose a significant amount of weight while continuing to eat all he or she wants.

10. On September 4, 1987, the United States Postal Service sought and obtained from this Court a temporary restraining order under 39 U.S.C. § 3007 detaining Health Care's incoming mail. Case No. 87-1310-Civ-T-13 (M.D. Fla.) (Carr, J.).

11. On October 6, 1987, this Court held a hearing on the Postal Service's motion for a preliminary injunction; and the

following day, it enjoined Health Care from receiving orders for Cal-Ban 3000 while administrative proceedings were pending.

12. An administrative law judge presided over a hearing on the administrative charges on December 15-17, 1987. In an Initial Decision dated May 5, 1988, the administrative law judge sustained all of the false representation charges and recommended that an order returning mail to sender ("Mail Stop Order") and an order requiring defendants to cease and desist from making false representations ("Cease And Desist Order") be issued.

13. Defendants appealed the Initial Decision to the Postal Service Judicial Officer. On March 3, 1989, the Judicial Officer rendered a Final Agency Decision upholding the Initial Decision, and he issued the orders recommended by the administrative law judge.

14. On March 16, 1989, defendants filed a Motion For Reconsideration Of The Final Agency Decision. On June 27, 1990, the Judicial Officer issued a decision finding the arguments made in this motion to be without merit and denying the motion.

15. On April 5, 1990, defendants filed for judicial review of the Final Agency Decision in the United States District Court for the District of Columbia. Health Care Products, Inc. v. United States Postal Service, Civil Action No. 90-0795 (D.D.C.). This action is currently pending.

Current Scheme

16. On information and belief, Health Care has continuously advertised Cal-Ban 3000 since 1987 as a dramatic new scientific breakthrough in weight loss. Currently, Health Care advertises Cal-Ban 3000 on television and in newspapers and magazines. It accepts orders for Cal-Ban 3000 by mail and by phone.^{1/} Attached as Exhibit 1 to this Complaint is an example of a recent advertisement for Cal-Ban 3000.

17. Health Care's current advertisements make the representations prohibited by the Cease And Desist Order issued on March 3, 1989.

18. Furthermore, Health Care encourages and assists others to become distributors of Cal-Ban 3000; and Cal-Ban 3000 is sold by distributors in retail stores, through mail-order, and by phone. A copy of a distributor's recent advertisement for Cal-Ban 3000 is attached to this Complaint as Exhibit 2.

^{1/} Health Care does not accept orders from residents of the State of Iowa. To settle an action brought by the State of Iowa alleging false and misleading advertising, defendants executed a Stipulation And Agreement on February 16, 1990. A Consent Decree issued pursuant to the agreement forbids defendants from promoting, selling, or advertising for sale Cal-Ban 3000 or any other weight loss product or plan in the State of Iowa. It further requires defendants to pay restitution to Iowans who were victims of their scheme, and to pay \$20,000 to the State of Iowa for its costs of investigating and litigating the action and administering restitution. State of Iowa v. Health Care Products, Inc., C.E. No. 30-17365 (Iowa District Court, Polk County).

Count 1

(For Injunctive Relief Under 18 U.S.C.
§ 1345 Against Health Care Products, Inc.)

19. This Count incorporates the allegations set forth in paragraphs 1 through 18.

20. Pursuant to 18 U.S.C. § 1345 (Supp. IV 1986), the United States may bring an action for injunction relief "[w]henver it shall appear that any person is engaged or is about to engage in any act which constitutes or will constitute" mail fraud (18 U.S.C. § 1341) or wire, radio, and television fraud (18 U.S.C. § 1343).

21. Health Care is engaged in an ongoing scheme to defraud members of the public through the promotion and sale of Cal-Ban 3000 by means of false representations. Health Care knows or should know these representations are false because it is aware of the Initial Decision, Final Agency Decision, and Decision On Motion For Reconsideration finding these representations to be false. Health Care is also aware of the decision of this court in Case No. 87-1310-Civ-T-13 finding probable cause to believe that its advertisements for Cal-Ban 3000 make false representations.

22. Health Care's fraudulent scheme involves the use of the mails to disseminate newspaper and magazine advertisements and to receive orders from consumers.

23. Health Care's fraudulent scheme involves the use of television to advertise Cal-Ban 3000 and involves the use of telephone wires to receive orders from consumers.

24. Therefore, preliminary and permanent injunctive relief against Health Care is warranted under 18 U.S.C. § 1345.

Count 2

**(For Civil Penalties Under 39 U.S.C.
§ 3012 Against All Four Defendants)**

25. This Count incorporates the allegations set forth in paragraphs 1 through 18.

26. Through the use of the mail, defendants have violated 39 U.S.C. § 3012(a)(1) by evading or attempting to evade the effect of the Mail Stop Order. After the Mail Stop Order was issued, defendants rented a new post office box and began to solicit orders for Cal-Ban 3000 to this box by means of advertisements that are substantially the same as the advertisements that prompted the issuance of the Mail Stop Order. Furthermore, defendants have encouraged and assisted distributors to market Cal-Ban 3000 through mail order advertisements that are substantially the same as--if not more egregious than--the advertisements that prompted the issuance of the Mail Stop Order.

27. Defendants have violated 39 U.S.C. § 3012(a)(2) by failing to comply with the Cease And Desist Order. Specifically, defendants have disseminated mail-order advertisements for Cal-Ban 3000 that make the representations prohibited by this order; and defendants have encouraged and assisted others to market Cal-Ban 3000 through mail-order advertisements that make the representations prohibited by this order.

28. Pursuant to 39 U.S.C. § 3012(a)(1), for evading or attempting to evade the Mail Stop Order, each defendant is liable

to the United States for a civil penalty not to exceed \$10,000 per day of violation, taking into account the factors listed in 39 U.S.C. § 3012(b).

29. Pursuant to 39 U.S.C. § 3012(a)(2), for failing to comply with the Cease And Desist Order, each defendant is liable to the United States for a civil penalty not to exceed \$10,000 per day of violation, taking into account the factors listed in 39 U.S.C. § 3012(b).

Request for Relief

30. Plaintiff United States of America respectfully requests the Court to:

- Grant the attached motion for temporary restraining order, and issue the proposed temporary restraining order attached to this verified complaint;
- Set a time for a hearing on the attached motion for preliminary injunction;
- After such a hearing, issue the proposed preliminary injunction attached to this verified complaint; and
- At the conclusion of proceedings in this matter, issue a permanent injunction prohibiting defendants from using the mails, television, and telephone wires to perpetrate their fraudulent scheme.

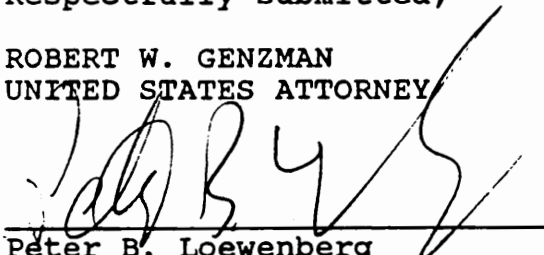
31. Plaintiff United States Postal Service respectfully requests the Court to award civil penalties against defendants pursuant to 39 U.S.C. § 3012.

32. Plaintiffs jointly request the Court to award them their costs in bringing this action, and any other relief the Court deems appropriate.

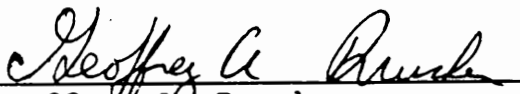
Respectfully submitted,

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June '90

Swanson Health Products

Health Shopper

\$1.95

1318 39th St. NW, Box 2803, Fargo, ND 58108 ORDER TOLL FREE 1-800-437-4148

MAILING LABEL
NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

ADDRESS CORRECTION REQUESTED
Box 2803, 1318 39th St. NW, Fargo, ND 58102

Part II of Swanson's Exclusive Interview: Gary Null On Wellness, Diet And Nutrition In America



Gary Null

Gary Null is America's leading radio advocate for alternative health and the environment. Weekdays he hosts and produces *The Natural Living Show* from noon to 1 p.m. on listener-sponsored radio station WBAI in New York City. On Saturday he can be heard on a large number of stations throughout the United States on WMCA radio from 6 to 8 p.m. Eastern Time.

The topics covered on *The Natural Living Show* are designed to wake people up and make them aware of environmental threats, alternative health practices and the latest developments in the fields of health,

nutrition and exercise.

Gary Null has been a regular guest on such popular TV talk shows as Phil Donahue, Oprah Winfrey and the Mike Douglas Show, and is a regular contributor to "Bestways," "Family Circle" and many other popular consumer magazines.

He has also written over 40 books, several of them best sellers, on nutrition and related topics. Two of his best-selling books have been "The Complete Guide to Health and Nutrition" and "Gary Null's Complete Guide to Healing Your Body Naturally."

In the "Complete Guide to Healing Your Body Naturally," Null gives readers the information they need to get the most out of modern, establishment medicine, alerting them to key steps and prescriptions that might be overlooked, overprescribed or underdiagnosed in traditional procedures. Most importantly, he describes for the first time revolutionary

Continued on p. 3

Swanson Health Products Exclusive Interview: DR. STEPHEN LANGER...

'SOLVED: THE RIDDLE OF ILLNESS'



Dr. Stephen Langer

Many of us suffer from "so-

called sickness," with such symptoms as fatigue, overweight, slow thinking, depression and sexual problems...without a clear-cut apparent reason.

For most of these symptoms, there is a single, often overlooked origin...a condition that is easily treatable once diagnosed correctly...and one which can be conclusively tested for at home, quickly, simply, and economically by yourself.

Dr. Stephen Langer is the author of "Solved: The Riddle of

Continued on p.3

Revolutionary Research Offers New Hope For Arthritis!



Gene Williams

Do you have that tired, worn-out feeling? Have you been suffering

from arthritis pain and misery? Do you have damaged joints due to accident or sports injury?

If so, then read on because this revolutionary research can change your life.

In a thirst to discover new ways to improve on successful arthritis formulas, the research scientists of GM International, Inc. (GMI) have been guided to recent important studies that have been written by doctors and specialists in the field of medicine, from

Continued on p.7

Tension Headache? Stomach Jitters? Irritability?

At Last! A Non-Drug, Natural Approach!

Although summer is usually the time for vacation, travel, relaxation, going to the lake, spending time with family, friends, and relatives, the hectic schedule can easily wear one out. Tension headaches, stomach jitters, irritability, fatigue, and difficulty sleeping are a few of the common effects experienced due to the exertion and strain from problems at work,

home or school, with money, car, or family.

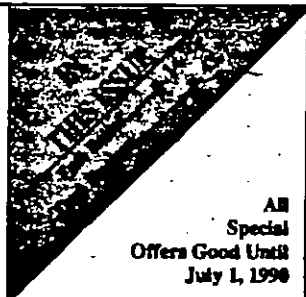
Introducing Valeridin, a non-drug, natural approach for relief!

When there just doesn't seem to be enough hours in a day, Valeridin, a non-drug, non-addicting nutrient, mineral, herbal supplement from Great Life Labs, can help you "keep your cool" in even the most nerve-wracking

conditions. Valeridin can even help you work more effectively when under pressure so that you can have more time for enjoyable summer activities.

Swanson Health Shopper recently spoke with Dr. Arnold Sasser, who developed the Valeridin formula, to find out more about it. Dr. Sasser is a licensed neurophysicist, and

Continued on p.9



All Special Offers Good Until July 1, 1990

EXHIBIT 2

Cal-Ban 3000: Solution To The Diet Dilemma



Barbara Lartila

Most people know how hard it is to lose weight. Diet products (pills, drinks, etc.), books about dieting, exercise equipment, fitness club memberships, aerobic class, exercise videos, and other weight-loss products are some of the hottest selling items on the market today.

Most of us have tried many of these products, with little to no success. (If you had success, you probably would not be reading this article.) Cutting down on food intake is simply not very easy. In the first few days of dieting, a few pounds may fall off without too much difficulty, but then, your metabolism runs slow down because your body fears that you are trying to starve it to death. It seems the less you eat the slower the metabolism gets. Eventually, it's impossible to lose any more weight. The more things you eat, your energy level has dropped so low, exercise is out of the question.

Now, available for the first time through mail order, is Cal-Ban 3000, the answer to the diet dilemma. Cal-Ban 3000 is an all-natural, simple and effective approach to weight-loss. With Cal-Ban, there are no hunger pangs, no special diet, no counting calories, no giving up foods you love, no additional anything.

Cal-Ban 3000 is exactly what the name indicates. Cal, meaning "calorie," and Ban, meaning "ban from absorption." Cal-Ban 3000 actually prevents a portion of your caloric intake from being absorbed in the body. In addition, it makes you feel fuller so that you naturally tend to eat less.

Swanson's Health Shopper recently interviewed Barbara Lartila, president of Anderson Pharmaceuticals, about the success of Cal-Ban 3000.

SWANSON'S: What is the active ingredient in Cal-Ban 3000?

Answer: Cal-Ban 3000 is 100 percent soluble fiber from guar gum (Cyanopeltis Tetragonoloba). Other soluble fibers include oat bran and pectin. These have a quality when they will form a gel substance when combined with liquid. Soluble fibers do not wear the blood stream so they stay confined within the walls of the digestive tract and pass through it.

Guar gum is derived from the cluster bean, a totally natural plant source. Guar gum has been studied extensively by nutritionists and

clinicians for its merit as an aid in weight-loss, as well as other beneficial effects on the body.

SWANSON'S: How does guar gum work in the body?

Lartila: When combined with a liquid, in the stomach, guar gum thickens the stomach content. This allows the food to remain in the stomach longer before emptying into the small intestine. The increased gastric emptying time signals "fullness" and tends to decrease hunger and subsequent food intake.

Guar increases the viscosity and volume of the food mass. It traps nutrients in and the slows diffusion of nutrients out of the gut matrix, thereby inhibiting the release of various dietary components, including calorie nutrients, from the intestinal tract into the blood stream. In other words, some of the caloric material, especially fat and oil, are prevented from absorption and simply pass through.

SWANSON'S: What effect does guar gum have on fat in the digestive tract?

Lartila: Guar gum has a high affinity for fat, whether of dietary or biliary origin. It therefore inhibits the absorption of dietary or reabsorbed fat and cholesterol.

This has been proven in studies conducted on people who were and were not taking guar supplements. The results revealed a much higher fat content in the feces of individuals taking supplemental guar. (There is no fat in guar.)

This is one of the major factors contributing to the weight-loss effectiveness of guar gum. Our dietary fat intake is much more detrimental to our weight than sugar or starches. Anyone with sedentary activity can burn up most of the sugar and starches they consume, while fat consumed goes directly into storage.

SWANSON'S: What other clinical studies have been conducted on guar gum?

Lartila: Numerous studies have been conducted on the positive effects of guar gum on weight loss. Four individual studies, published in reputable scientific journals, have documented significant weight-loss by individuals who consumed guar gum. One study reported an average of 5.5 pounds and another reported an average loss of 9.5 pounds. It should be pointed out that these individuals did not alter their diet in any way nor alter their amount of physical activity in any way.

In addition, these individuals also significantly reduced their total serum cholesterol levels.

Guar gum has been studied for the following applications:

- Weight control
- Slowing stomach-emptying time

- Appetite reduction
- Slowing of absorption of sugars
- Release of the hormones insulin
- Lowering of serum cholesterol levels

SWANSON'S: What studies have been conducted on the safety of guar gum?

Lartila: Guar gum is a remarkably non-toxic substance. Guar intake in the range of 10-30 grams per day appear to be safe for many months of sustained use and free from serious gastrointestinal and metabolic side-effects.

SWANSON'S: Have there been studies conducted on the relationship of fiber and mineral absorption in the body?

Lartila: Yes, a study conducted by McIver, Cummings and Mendeloff, in the American Journal of Clinical Nutrition, reported that an intake of 30 grams of guar gum for 16 weeks, demonstrated that guar gum does not alter the balance of minerals in the blood stream. This intake is twice the dosage that we recommend with Cal-Ban 3000.

SWANSON'S: What is the suggested use of Cal-Ban 3000?

Lartila: Approximately 20 or 30 minutes before each meal, take the suggested number of tablets with a large glass of water. For the first three days, take four capsules before each meal. In the next four days, take six capsules before each meal. In the next seven days, take eight capsules before each meal. Therefore, take 10 capsules before each meal.

The tablet before each meal is equivalent to a daily total of 15 grams, which is what the clinical studies used. We want individuals to achieve the same results or better than the individuals in the studies obtained.

Remember to drink a full glass of liquid each time you take tablets and swallow the tablet one at a time.

SWANSON'S: What is the significance of the large glass of water?

Lartila: The water serves more than one purpose. A glass of water consumed before a meal will help decrease the appetite to some degree. Also, the guar gum requires fluid to absorb to form the gel in addition to the gastric juices already present in the stomach.

SWANSON'S: Why do you suggest individuals start at a lower dosage and build up to the 10 tablet per-meal dosage?

Lartila: Some individuals, if unaccustomed to a diet high in fiber, may experience some flatulence. If they suddenly start taking the full dosage, the production to the full dosage allows the body to adjust, eliminating this problem

some people may experience.

SWANSON'S: How effective is Cal-Ban 3000 as a weight-loss product?

Lartila: We have affidavits from several dozen individuals who have have over 100 pounds. Most of our customers claim they do not change their diet or amount that they exercise.

It is very difficult for people to change their dietary habits and this is why we tell people they do not have to do so. Cal-Ban 3000 is effective without, dieting, exercise or any other additional modes of dieting.

If an individual does make an attempt to cut down on food intake while taking Cal-Ban 3000 and he will lose weight faster.

SWANSON'S: In addition to weight loss, are there other benefits of increased intake of dietary fiber?

Lartila: Fiber has numerous benefits in health and nutrition. Fiber diets have been advocated to treat or decrease the risk of colorectal cancer, cardiovascular disease, diabetes and obesity. Fiber supplements have been shown conclusively to be important adjuncts to weight-loss programs. Gum-like fibers such as guar gum are particularly useful to increase satiety, decrease food intake, and inhibit the absorption of caloric nutrients.

The American Cancer Society is beginning to promote the use of high-fiber diets in order to reduce the risk of cancer, particularly the colorectal variety.

Ingestion of fiber-rich diets appear to be beneficial in reducing the amount of cardiovascular disease by lowering serum cholesterol. Fiber has long been known to lower low-density lipoprotein (LDL or "bad") cholesterol while leaving the high-density lipoprotein (HDL or "good") cholesterol unaffected.

Fiber-rich diets are also useful in modulating the secretion of insulin and prevent wide fluctuations in blood glucose levels.

References are available upon request.



Have a Healthy Day!

DESTROY FAT FAST!

"I went from 231 lbs. to 146 lbs. in no time flat... WITHOUT DIETING!"
You can too! GUARANTEED!

DIET DISCOVERY ASTOUNDS SCIENTIFIC COMMUNITY!

In what is being acclaimed a "major breakthrough", a group of European scientists have recently discovered a powerful new weight-loss formula that causes rapid weight loss without restriction of diet. The discovery was made while researchers at the University of Kuopio, in Finland, were searching for a compound to lower cholesterol. In a test group of people who took the formula, cholesterol levels remained unchanged but doctors were astounded to find that every patient had lost a significant amount of weight!

ACTUALLY SUPPRESSES ABSORPTION OF CALORIES!

Medical researchers quickly discovered that this new formula actually alters the way your body digests food. When taken before meals it bonds with the food you eat and "ties up" calories, preventing their absorption. So a substantial portion of the ingested calories pass through and out of the digestive system unabsorbed. Even though you eat as much as you want, a rapid weight loss occurs, as your body burns fat to replace these lost (unabsorbed) calories.

CLINICALLY TESTED

Further medical tests of the new formula have been made in Sweden at Sahlgrenska Hospital, University of Göteborg. Results published in the BRITISH JOURNAL OF NUTRITION stated: "Body weight was significantly reduced during the study even though the patients were specifically asked not to alter their dietary habits." This new compound is so powerful, so effective and so relentless in its attack on bulging deposits of fatty tissue that it has virtually eliminated the need for fasting or strenuous exercise."

PROVEN SAFE/EFFECTIVE

After exhaustive testing, the new compound was determined to be safe and was formulated into one of the most effective weight-reducing pills of all time. This revolutionary formulation is being marketed in the United States under the trade name Cal-Ban 3000™. It is now available without a prescription from Swanson Pharmaceuticals, which holds exclusive North American rights to Cal-Ban 3000™. Cal-Ban 3000™ is derived from a 100% natural plant source and contains no drugs or stimulants.

Important: Because Cal-Ban 3000™ is so effective, at removing ugly deposits of fat and cellulite and because Cal-Ban 3000™ has absolutely no harmful side effects, some people tend to over-do it. Do not allow yourself to become too thin. If you start to lose weight too rapidly, reduce your tablet intake or skip a day or two. Also, before starting your weight-loss program you should check with your physician to be sure you are in normal health.

EAT ALL YOU WANT AND KEEP LOSING!

Cal-Ban 3000™ allows you to continue to eat and enjoy as much of your favorite foods as you want. All you have to do is to remember to take your Cal-Ban 3000™! Within hours your body's fat cells will start to shrink. You'll be amazed at how fast measurable results can be seen! Some best case histories report losing up to 8 pounds of fat and fluid in the first 72 hours! Dissolving away up to 16 pounds the first week and dropping up to 46 pounds of fat the first month! Others have continued to lose up to 98, 99 and 99 or more pounds.

ACT NOW TO CHANGE YOUR LIFE!

Now you can transform your body into a slender, more youthful figure with ease. You can become the trim, attractive man or woman who is admired by everyone! Some Cal-Ban 3000™ users have reported losing a full dress size in one week... 2 dress sizes in 14 days! You'll feel great about yourself when you see how good you look in stylish new clothes! And you will see your social life improve dramatically as you enjoy the self confidence your slender, firm body brings!

GUARANTEED RESULTS!

Users of this new pill is exceeding the expectancy! Thousands of people are using Cal-Ban 3000™ to quickly get rid of fat, flab and cellulite. With Cal-Ban 3000™ you will reach your weight loss goal no matter how many diets, diet programs, or diet pills you may have tried before. We guarantee it! You have nothing to lose but pounds and inches!

Don't let this golden opportunity to change your life get away. Order right now and let this be the first day of your exciting new life!



NO LOSS OF ENERGY!
LOST 85 LBS.
JOIN THE WINNERS

"A few months ago I weighed 231 lbs. and wore a size 22. Now, thanks to Cal-Ban 3000™, I lost 85 pounds and am a size 18. I love wearing the new fashions. No matter how much I ate I just kept losing! I feel terrific and I've never had so much energy!"
 Allen M. Allen, Kansas



LOST 82 LBS. "FEEL GREAT!"



LOST 58 LBS. "AND STILL LOSING!"

"I weighed 288 lbs. before I started taking Cal-Ban 3000™. I lost 23 lbs. in 21 days, 62 lbs. in 3 months! I feel great and still eat like I always have."
 James C. Broadwater, South Carolina

"Before taking Cal-Ban I weighed 188 lbs. and wore a size 18. I've tried many diets and this is the only thing that really worked. I've lost 50 lbs. so far!"
 Karen J. Harrington, California



100% GUARANTEE

If you do not lose more weight with Cal-Ban 3000™ than you ever thought possible, just return the empty bottle and we will promptly refund 100% of your purchase price.

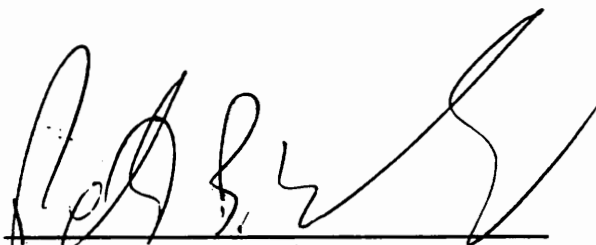
LIMITED TIME OFFER!
 3 weeks supply \$29.95 (SAVE \$10.00) \$19.95

Use your VISA/Mastercard or Mail Your Check or Moneyorder to:
SWANSON HEALTH PRODUCTS
 1318 39th St. NW Box 2803 Fargo, ND 58108

Name _____
 Address _____
 City _____ ST _____ Zip _____
 VISA MasterCard Signature _____
 Card No. _____
 Expiration Date _____ Coupon Must Accompany Order

VERIFICATION

I, Peter B. Loewenberg, am the attorney who is chiefly responsible for this litigation, and I am familiar with the contents of the attached Verified Complaint For Injunctive Relief. I declare under 28 U.S.C. § 1746 and under the penalties of perjury that the information contained in this pleading was furnished to me by appropriate government sources, and, based on information and belief, that the Complaint's allegations are true.

A handwritten signature in black ink, appearing to read 'P. B. Loewenberg', written over a horizontal line.

Peter B. Loewenberg
Assistant United States Attorney