

ANALYSIS OF PROPOSED CONSENT ORDER
TO AID PUBLIC COMMENT

17 The Commission has accepted an agreement to a proposed consent order

from Western Direct Marketing Group ("WDMG") and Western International Media Corporation ("WIMC").

The proposed consent order has been placed on the public record for sixty (60) days for

Part II prohibits respondents from making any representation about the efficacy, performance, safety or benefits of any food, dietary supplement or drug unless they possess and rely upon competent and reliable scientific evidence that substantiates the representation.

Part III prohibits the respondents from misrepresenting the existence, contents, validity, results, conclusions or interpretations of any test, study, or research.

Part IV prohibits the respondents from representing that the experience represented by a user testimonial or endorsement of the product is the typical or ordinary experience of users of the product unless the representation is substantiated or they disclose what the generally expected results would be or that consumers should not expect the same results.

Part V allows the respondents to make representations for any drug that are permitted in

labeling for that drug under any tentative final or final Food and Drug Administration ("FDA")