

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

In the Matter of)	
)	
ROBERT C. SPENCER)	DOCKET NO.
individually and d/b/a)	
Aaron Company, and)	
)	
LISA M. SPENCER)	
individually and d/b/a)	
Aaron Company)	
)	
)	

COMPLAINT

The Federal Trade Commission, having reason to believe that Robert C. Spencer and Lisa M. Spencer ("respondents"), individually and doing business as Aaron Company 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. Respondents Robert C. Spencer and Lisa M. Spencer are residents of Florida. Their principal office or place of business is 1580 Masters Road, N.W., Palm Bay, FL 32907. Together, individually, or in concert with others, they formulate, direct, or control the policies, acts, or practices of the business operating under the trade name "Aaron Company," including the acts and practices alleged in this complaint.

- 2.a. Respondents have promoted, advertised, labeled, offered for sale, sold and distributed directly to the public a colloidal silver liquid product called *Colloidal Silver*, and various vitamin and herbal products including *Chitosan with vitamin C*, and *Ultimate Energizer*, including by means of an Internet Web site, www.colloidalsilver.net, that provides product and purchase information and advertising and promotional claims.

- 2.b. Respondents' *Colloidal Silver* is purportedly a liquid containing 15-20 ppm of super-fine particles of silver in a water solution, that can be used for various therapeutic purposes through oral ingestion, nasal spray, or topical application. Respondents' *Chitosan with vitamin C* is a tablet purportedly containing chitin from the exoskeletons of crustaceans, that can be used for the purposes of weight loss and lowering of cholesterol. Respondents' *Ultimate Energizer* is a tablet purportedly containing mahuang and other substances, that can

be used as a safe stimulant. *Colloidal Silver*, *Chitosan with vitamin C*, and *Ultimate Energizer* are either "foods" or "drugs" within the meaning of Sections 12 and 15 of the FTC Trade Commission Act.

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

4. Respondents have disseminated or have caused to be disseminated advertisements or promotional materials for *Colloidal Silver*, *Chitosan with vitamin C*, and *Ultimate Energizer*, through, among other media, websites on the Internet, including but not necessarily limited to the attached Exhibits 1 to 8. These advertisements contain the following statements, among others:

A.

Aaron Co. Brings You The Most Important And Most Used Dietary Food Supplements On The Market Today

For The Treatment Of:

Osteoarthritis
Urinary Infections
Prostate Enlargement
Memory Loss
Vitamin Deficiencies

Degenerative Diseases
Overweight
Coronary Diseases
Exhaustion And Depression
All Types Of Infections

* * *

CHITOSAN (400 mg.) WITH VITAMIN C (20 mg.) If you want to **lose weight** without changing your eating habits, this is the product for you. Chitin (a polysaccharide) is a natural biopolymer found in the exoskeletons of crustaceans (such as crab, lobster, and shrimp). This product is not digestible, has no caloric value but **absorbs 5 times its weight in fats and oils**. There are no known side effects, it is extremely low in toxicity and is 100% natural fiber. This powerful **fat-absorber** also plays a significant role in lowering cholesterol. **PROD. NO. 557, QTY. 120, PRICE \$11.20**

* * *

ULTIMATE ENERGIZER For those of you who are **exhausted , tired and depressed** from running around most of the day, tending to home chores, work, school, children, sick and--- you name it. This product is a special blend of Mahuang, Citrus, Kola Nut, Yohimbe, Green tea and Ginseng extracts, and 77 colloidal minerals. Mahuang has been used in Chinese medicine for thousands of years as a **stimulant** to the sympathetic nervous system. There are **no known side effects** to this natural dietary supplement. **PROD. NO. 605, QTY. 100, PRICE \$18.50**

* * *

COLLOIDAL SILVER (15-20 ppm.) FOR EVERYONE !!! For the **prevention and treatment of all known internal and external infections** caused by disease causing organisms. This includes germs, viruses, algae, and fungus. Taken daily this product may prevent respiratory infections which may lead to serious and sometimes incurable diseases. We cannot say enough about this product. A full report with testimonials is available upon request. **PROD. NO. 100, QTY. 8 oz. PRICE \$14.95, PROD. NO. 101, QTY. 16 oz. PRICE \$24.95, PROD. NO. 102, NASAL DISPENSER, PRICE \$4.00 (FREE WITH PROD. NO. 101)**

* * *

More About Colloidal Silver

* * *

MEDICAL PROOF OF EFFECTIVENESS

First, be aware that the modern artificial antibiotics kill, on average 6 different disease causing organisms. A researcher at Brigham Young University sent colloidal silver to two different labs including the UCLA Medical Center. Dr. Larry C. Ford, of the School of Medicine made **the startling discovery** that within 6 minutes, of contact, colloidal silver killed over 650 different disease causing organisms. It also killed every virus to which it was subjected . . **NOW THAT IS POWERFUL MEDICINE.**

Quote Dr. Harry Margraf, a biochemist and pioneering silver research who worked for the late Carl Moyer, M.D., chairman of Washington University's Department of Surgery **"SILVER IS THE BEST ALL AROUND GERM FIGHTER WE HAVE"**

According to the E.P.A.'S POISON CONTROL CENTER, colloidal silver is considered non-toxic and there is no recorded reaction with other medications.

OTHER BENEFITS OF COLLOIDAL SILVER

Generally speaking colloidal silver helps promote rapid healing and subdue inflammation. It is a remedy for infections, even the non-apparent low grade general type. It can be taken internally for general prevention applied topically for rashes, burns, cuts and fungus infections, or sprayed into the ears, nose, throat and eyes for colds, allergies and other infections to those parts of the body.

We can not list all 650 diseases that colloidal silver is effective against but here is a list of some common ones: Common cold, stomach ulcers, acne, burns, shingles, arthritis, strep, tuberculosis, athlete's foot, virus warts, tonsillitis, herpes virus, allergies etc. etc.

* * *

DISCLAIMER SINCE EACH INDIVIDUAL MAY RESPOND DIFFERENTLY TO THIS PRODUCT, WE CANNOT GUARANTEE THE CLAIMS MADE

HEREIN, SPECIFIC OR IMPLIED.

DISCLAIMER: The information contained herein has not been evaluated by the Food and Drug Administration and is not intended to diagnose, treat, cure or prevent any disease. Experiences and stories from users and articles are for educational purposes only. Aaron Co. makes no health or medical claims for the use of colloidal silver.

* * *

www.colloidalsilver.net/vitamins.htm

Exhibit 1

B.

Colloidal Silver For The Treatment Of Fungal Infections

Free Special Offer

Aaron Co., Manufacturer Of Colloidal Silver Wishes To Make This Free Special Offer. Purchase One Bottle Of Colloidal Silver For The Treatment Of Fungal Infections. If Not Completely Satisfied, Return The Unused Portion For A Full Refund. To Order Please Go To <http://www.colloidalsilver.net>

Colloidal Silver Is A Pure Natural Antibacterial, Antifungal, And Antiviral Solution With No Side Effects When Taken As Directed!

Below are stories submitted to our bulletin board by people using colloidal silver.

* * *

Submitted by (ALONZAJ@aol.com)

1. I have arrested my itchy scalp condition which had even spread to my eyebrows - also it has arrested my psoriasis (mild condition) . whether or not cured remains to be seen.
2. it has arrested and put into remission a couple of warts.
3. it has arrested and is in process of healing my grandson's athletes foot.
4. it has cured, overnight, my wife's cracked lips (corners of mouth).
5. it has cured a couple of stubborn spots on my 69 year old brothers arms.
6. it has cured SKIN CANCER on my sons father in law. He has (or had) to have it burned off every month or so and he was able to cancel his last appointment for this due to this colloidal silver.
7. it has arrested and put into remission several warty like conditions of raised skin lesions which were itchy. These were not warts but thats about the best condition I can explain.
8. My sons mother in law is using it to treat her arthritis. She believes it may be helping as it did get better after starting but she can't be sure thats what caused it to get better.

In other words - THIS IS GREAT STUFF

* * *

For Additional Article On Fungal Infections Click [More2](#) [More3](#)

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www.colloidalsilver.net/fungal_infections.htm

Exhibit B

C.

Colloidal Silver vs Pharmaceutical Antibiotics

Interest in Colloidal Silver has increased most recently, probably because illness causing organisms do not seem to build up a resistance to Colloidal Silver the way they do to pharmaceutical antibiotics. Antibiotics are becoming less effective as resistance to them grows.

The Los Angeles Times states "but in the last decade, a broad resistance to antibiotics has begun to emerge. And because bacteria can transfer genes among themselves, experts only expect the resistance to grow. The potential nightmare is an Andromeda strain, which is immune to all antibiotics and could wreak havoc. ("Arsenal of Antibiotics Failing as Resistant Bacteria Develop," October 23, 1994).

An ordinary antibiotic kills perhaps a half dozen different disease organisms, but Colloidal Silver is known to be successful against more than 650 illness-causing microorganisms (bacteria, viruses, fungi) Colloidal Silver can be taken indefinitely because the body does not develop a tolerance to it.

How It works...

... Unlike pharmaceutical antibiotics which destroy beneficial enzymes, Colloidal Silver leaves these tissue cell enzymes intact. Thus, Colloidal Silver is absolutely safe for humans, reptiles and plants, and all living matter.

Ingesting Colloidal Silver...

...

It is impossible for germs to mutate into silver resistant forms, as happens with conventional antibiotics. Also, Colloidal Silver cannot interact or interfere with other medicine being taken. Colloidal Silver is truly a safe, natural remedy for many of

mankind's ills.

* * *

www.colloidalsilver.net/staph_infections.htm

Exhibit 3

D.

Colloidal Silver For The Treatment Of Skin Infections

Free Special Offer

Aaron Co., Manufacturer Of Colloidal Silver Wishes To Make You This Special Offer. Purchase One Bottle Of Colloidal Silver For The Treatment Of Any Type Of Skin Infection. If You Are Not Completely Satisfied, Return The Unused Portion For A Full Refund. To Order Please Go To <http://www.colloidalsilver.net>

**Colloidal Silver Is A Pure Natural Antibacterial, Antifungal,
And Antiviral Solution With No Side Effects When Taken As Directed!**

Below are stories written into the bulletin board by people using colloidal silver.

* * *

Submitted by Bob Donan (bigbob@sound.net) on Thursday, June 25, 1998

I tried a small bottle of colloidal silver in spray form purchased at a local health food store and had such good results on jock itch. A co-worker of mine has sugar diabetes. He developed some ulcers on his lower leg and after a year of treatment with salves and pills his Dr. told him to get used to the sores and to keep them clean or they would get infected and he would loose his legs. I gave him a small spray bottle of colloidal silver. He sprayed his legs twice a day, after 3 days the red angry look of the sores subsided, By day 5 the sores dried up and scabs formed. Then came about 4 days of intense itching. By day 10 the scabs fell of during a shower. Another week of treatment and the pink skin under the scabs normalized. He is still diabetic,! still takes insulin, but his concern for amputation is relived, and he's grateful about that. So that's my story, nothing earth shattering, but one person has been made very happy, and that's a start.

* * *

For Additional Article On Skin Infections Click [HERE2](#) [HERE3](#)

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medical claims for the use of colloidal silver.

www.colloidalsilver.net/skin_infections.htm

Exhibit 4

E.

Colloidal Silver For The Treatment Of Lyme Diseases

Free Special Offer

Aaron Co., Manufacturer Of Colloidal Silver Wishes To Make You This Special Offer. Purchase One Bottle Of Colloidal Silver For The Treatment Of Lyme Diseases. IF You Are Not Completely Satisfied, Return The Unused Portion For A Full Refund. To Order Go To <http://www.colloidalsilver.net>

Colloidal Silver Is A Pure Natural Antibacterial, Antifungal, And Antiviral Solution With No Side Effects When Taken As Directed!

Below are stories written into the bulletin board by people using colloidal silver.

Submitted by Erin (mouser@mailcity.com) on Sunday, April 26, 1998:

Our 8 year old daughter was diagnosed with Lyme Disease after a lengthy and baffling illness. She was put on oral antibiotics for several years with fairly good results (they knocked the symptoms down from 40 to 4) but, as soon as she got off of the antibiotics, all the symptoms would return. We heard about Colloidal Silver through a newsletter we subscribed to and decided to give it a try. Within 4 weeks there was a tremendous improvement and not long after that, all symptoms were gone! This was almost 3 years ago, she has just turned 14 and remains symptom free.

* * *

For More Information On Lyme Disease Click [Lyme2](#) [Lyme3](#) [Lyme4](#) [Lyme5](#)

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www.colloidalsilver.net/lyme.htm

Exhibit 5

F.

Colloidal Silver For The Treatment Of Herpes

Free Special Offer

Aaron Co., Manufacturer Of Colloidal Silver Wishes To Make This Special Offer. Purchase One Bottle Of Colloidal Silver For The Treatment Of Herpes. If You Are Not Completely Satisfied, Return The Unused Portion For A Full Refund. To Order Please Go To <http://www.colloidalsilver.net>

Colloidal Silver Is A Pure Natural Antibacterial, Antifungal, And Antiviral Solution With No Side Effects When Taken As Directed!

Below are stories written into the bulletin board by people using colloidal silver.

Submitted by Donna Thursday, August 6, 1998

I had contracted genital herpes a few years before I heard about Colloidal Silver. I would break out at least every 3 months, and along with a very painful lesion, experience low-grade fever and flu-like symptoms. I heard about Colloidal Silver through a friend, who told me it cured her sister's herpes of the eye. With nothing to lose, I bought a bottle from her. The next time I broke out with a lesion, I immediately started drinking 1 oz. every four hours. Within 24 hours, the sore was completely gone (usually it would take up to 3-4 weeks for a sore to go away). It seemed like a small miracle to me. I have not broken out since, and that was over 3 years ago. In fact, I consider myself cured of genital herpes. I don't understand why the medical profession does not know or let people know about the great benefits of Colloidal Silver. I am a firm believer. I keep colloidal silver around the house for anything that comes up, since I have four children.

For More Information On Herpes, Click [MORE2](#) [MORE3](#) [MORE4](#) [MORE5](#)

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www.colloidalsilver.net/herpes.htm

Exhibit 6

G.

Colloidal Silver For Animals

Free Special Offer

Aaron Co., Manufacturer Of Colloidal Silver Wishes To Make This Free Special

Offer. Purchase One Bottle Of Colloidal Silver For The Treatment Of Your Animals As Indicated Below. If You Are Not Completely Satisfied, Return The Unused Bottle For A Full Refund. To Order Please Go To <http://www.colloidalsilver.net>

Colloidal Silver Is A Pure Natural Antibacterial, Antifungal, And Antiviral Solution With No Side Effects When Taken As Directed!

Below are stories written into the bulletin board by people using colloidal silver.

Submitted by SHN (snd@lodelink.com) on Friday, August 28, 1998

Our cat occasionally tangles with the neighborhood cats, as cats will. My daughter brought it to my attention that one of his eyes seemed droopy as it was late I said I'd look in the morning, the following morning his eye had completely closed the lid was showing the conjunctive tissue beneath and was literally foaming a green pus and smelled nasty. I took him to the vet and was told he might lose the eye before the infection could be knocked down. He had been swatted in the face and a claw had penetrated through the lid and into the tissue to the side and rear of the eyeball. I had just months prior had one of those nasty abscesses surgically repaired as it would not heal, it had cost a mere \$100. the vet said it would cost less to remove the eye than to fight the infection. My wife had come home with this new "stuff" she had been told was wonderful and would cure anything, something called colloidal silver. I figured it wouldn't hurt as he would lose the eye! anyway, I cleaned the area around the eye and opened the lids, putting two drops in allowed it to close and used my finger to gently rotate it, then opened it again and put two more drops in holding the lid up away from the eye then allowed it to close. the next morning I expected the infection to be larger, however the cat was up and staring at me with two eyes. granted the one was still "slightly swollen". I Was Sold!!!. I repeated the procedure and the eye the following morning was completely normal in appearance and the claw hole was closed! I repeated the procedure once more for general principles. I have since introduced more animal owners and friends to colloidal silver, Great "stuff".

Submitted by HAROLD G. (HGALIT@AOL.COM) on Saturday, October 17, 1998

I have been using c s for about 2 ½ years. I have found it work well on a tremendous amount of ailments... My dog came down with a infection in his prostate. He was dripping blood from his penis. The doctor wanted to operate and remove the prostate. I took the dog home and gave him 2 tablespoons . The next morning the dog was fit as a fiddle. My family uses c s for any viral or bacterial infection that attacks them. At present most of the people I know are using colloidal silver.

* * *

C.M. from Iowa writes:

"I have a pet cat that started throwing up everything it ate. Upon taking it to a veterinarian, it was found to have swollen intestines and the foods couldn't pass through properly. So the vet gave me antibiotics which were supposed to help. He also said I would probably have to put it on steroids after using the antibiotics up. Steroids

when used on cats cause feline leukemia. When the antibiotics were used up the cat was still throwing up frequently. So I started giving him some colloidal silver several times a day. Now he is getting better and rarely throws up after eating."

* * *

Submitted by Barbara (Bfland7374@aol.com)

I have used colloidal silver for many things, but my main use was on an Arabian gelding that I own. He had contracted a disease called EPM. I had taken him to a veterinarian that does acupuncture and uses a lot of homeopathy on horses as well as traditional veterinarian medicine. She had me put him on the colloidal silver. It has done wonders for him. He had severe muscle atrophy due to the EPM. Today, his muscles are almost back to normal in his croup and he has not regressed like many other horses in our area that I know have EPM. He has been off of it for about 6 months, but I still need a supply for him if needed. The regular vet that I use was against me using the colloidal silver, but I feel it really helped Knight fight the protozoa that attacks the horses spine and neurological system.

* * *

For More Articles On Animals, Go To [More2](#) [More3](#) [More4](#)

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www.colloidalsilver.net/animals.htm

Exhibit 7

H. META tags for Aaron company

<meta name="keywords" content="colloidal silver research research periodicals medical reports instruction Robert Becker body electric alternative health colloidal silver antibiotic antibacterial antifungal germicidal mild silver protein ms cancer lymes AIDS colds flu candida aids disease virus bacteria illness HIV injuries burns infection holistic medicinal article alternative medicine natural complementary preventive medicine herbal medicines holistic medical alternative HealthCare journals clinical trials healing disinfectant colloidal silver water Collodial Colloidal colodall colodal colodel collodel detoxification healthy alternatives homeopathic remedies herbal remedy oriental ayurvedic holistic health natural health care naturopathic colloidal minerals book manual colloidal silver generator supplies pure .9999 silver solution Colloidal silver research research periodicals medical reports instruction Robert Becker body electric alternative health colloidal silver antibiotic antibacterial antifungal germicidal mild silver protein ms cancer lymes AIDS colds flu candida aids disease virus bacteria illness HIV injuries burns infection holistic medicinal article, alternative

medicine natural complementary preventive medicine herbal medicines holistic medical alternative HealthCare journals clinical trials healing disinfectant colloidal silver water, Colloidal Colloidal colodall colodal colodel collodel detoxification healthy alternatives homeopathic remedies, herbal remedy oriental ayurvedic holistic health natural health care naturopathic colloidal minerals book manual colloidal silver generator supplies pure .9999 silver solution">

Keyword Metatags from www.colloidalsilver.net Web site

Exhibit 8

5. In addition to the representations detailed above, respondents have embedded specific disease references in the “metatags” of respondents’ Internet Web site, www.colloidalsilver.net. A metatag is a word or words embedded in an Internet Web site, which are not normally displayed visually to the consumer, that may be used by an Internet search engine for the purpose of selecting sites in response to an Internet user’s search request. References appearing only in the metatags and not in the Web pages displayed visually to the consumer include, among others, the following terms: “MS,” “cancer,” “HIV/AIDS,” and “candida.”

Respondents’ use of these metatag references increases the likelihood that consumers who research the terms “MS,” “cancer,” “HIV/AIDS,” and “candida” on the Internet will find information about Aaron’s products.

Colloidal Silver

6. Through the means described in Paragraph 4, respondents have represented, expressly or by implication, that:

A. Colloidal silver has been medically proven to kill over 650 disease-causing organisms in the body.

B. Colloidal silver successfully treats all known infections caused by disease-causing organisms, including germs, viruses, algae and fungus.

7. In truth and in fact, colloidal silver has not been medically proven to kill over 650 disease-causing organisms in the body and colloidal silver does not successfully treat all known infections caused by disease causing organisms. Therefore the representations set forth on Paragraph 6 were, and are, false and misleading.

8. Through the means described in Paragraphs 4 and 5, taken together, respondents have represented, expressly or by implication, that:

A. Colloidal silver is effective in treating or curing cancer, multiple sclerosis, HIV/AIDS, flu, candida, Lyme’s disease, psoriasis, the common cold, stomach ulcers, burns, arthritis, strep, tuberculosis, tonsillitis, herpes virus, virus warts, athlete’s foot, shingles, allergies and infections associated with diabetes.

- B. Colloidal silver promotes healing and cures infections.
 - C. Colloidal silver is superior to antibiotics in killing disease-causing organisms.
 - D. Colloidal silver is safe for human consumption and has no side effects.
 - E. Colloidal silver is effective in treating various medical and health conditions in animals, including serious eye infection, prostate infection, and swollen intestine.
9. Through the means described in Paragraphs 4 and 5, taken together, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representations set forth in Paragraph 8, at the time the representations were made.

10. In truth and in fact, respondents did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 8 at the time the representations were made. For example, there is no competent and reliable scientific evidence that colloidal silver is effective in treating or curing cancer, multiple sclerosis, HIV/AIDS, flu, candida, Lyme's disease, psoriasis, the common cold, stomach ulcers, burns, arthritis, strep, tuberculosis, tonsillitis, herpes virus, virus warts, athlete's foot, shingles, allergies and infections associated with diabetes or that colloidal silver is superior to antibiotics in killing disease causing organisms. In addition, the FDA issued a final rule, effective September 16, 1999, finding and establishing that all OTC drug products containing colloidal silver ingredients or silver salts for internal or external use are not generally recognized as safe and effective. Therefore, the representation set forth in Paragraph 9 was, and is, false or misleading.

Chitosan

11. Through the means described in Paragraph 4 respondents have represented, expressly or by implication, that use of the recommended daily dose of the *Chitosan with vitamin C* enables consumers to lose substantial weight without the need for a restricted calorie diet.
12. Through the means described in Paragraph 4, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representation set forth in Paragraph 11, at the time the representation was made.
13. In truth and in fact, respondents did not possess and rely upon a reasonable basis that substantiated the representation set forth in Paragraph 11, at the time the representation was made. Therefore, the representation set forth in Paragraph 12 was, and is, false or misleading.

Ultimate Energizer

14. Through the means described in Paragraph 4 respondents have represented, expressly or by implication, that the *Ultimate Energizer*, containing Mahuang, among other substances,

is safe and has no side effects.

15. Through the means described in Paragraph 4, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representation set forth in Paragraph 14, at the time the representation was made.

16. In truth and in fact, respondents did not possess and rely upon a reasonable basis that substantiated the representation set forth in Paragraph 14, at the time the representation was made. Therefore, the representation set forth in Paragraph 15 was, and is, false or misleading.

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

THEREFORE, the Federal Trade Commission this ___ day of _____, 2001, has issued this complaint against respondents.

By the Commission.

Donald S. Clark
Secretary

SEAL: