

of Sections 5 and 12 of the FTC Act, 15 U.S.C. §§ 45 and 52, and for violations of CAN-

SPAM, 15 U.S.C. § 7701

22. Defendants have advertised, offered for sale, sold, and/or distributed their products via dozens of Internet Web sites. Four of the Web sites Defendants have used to market their products are healthylife.com, formulacell.com, brainoguard.com, and

26. To induce consumers to purchase HGHPlus, Defendants' Web sites make the following statements:

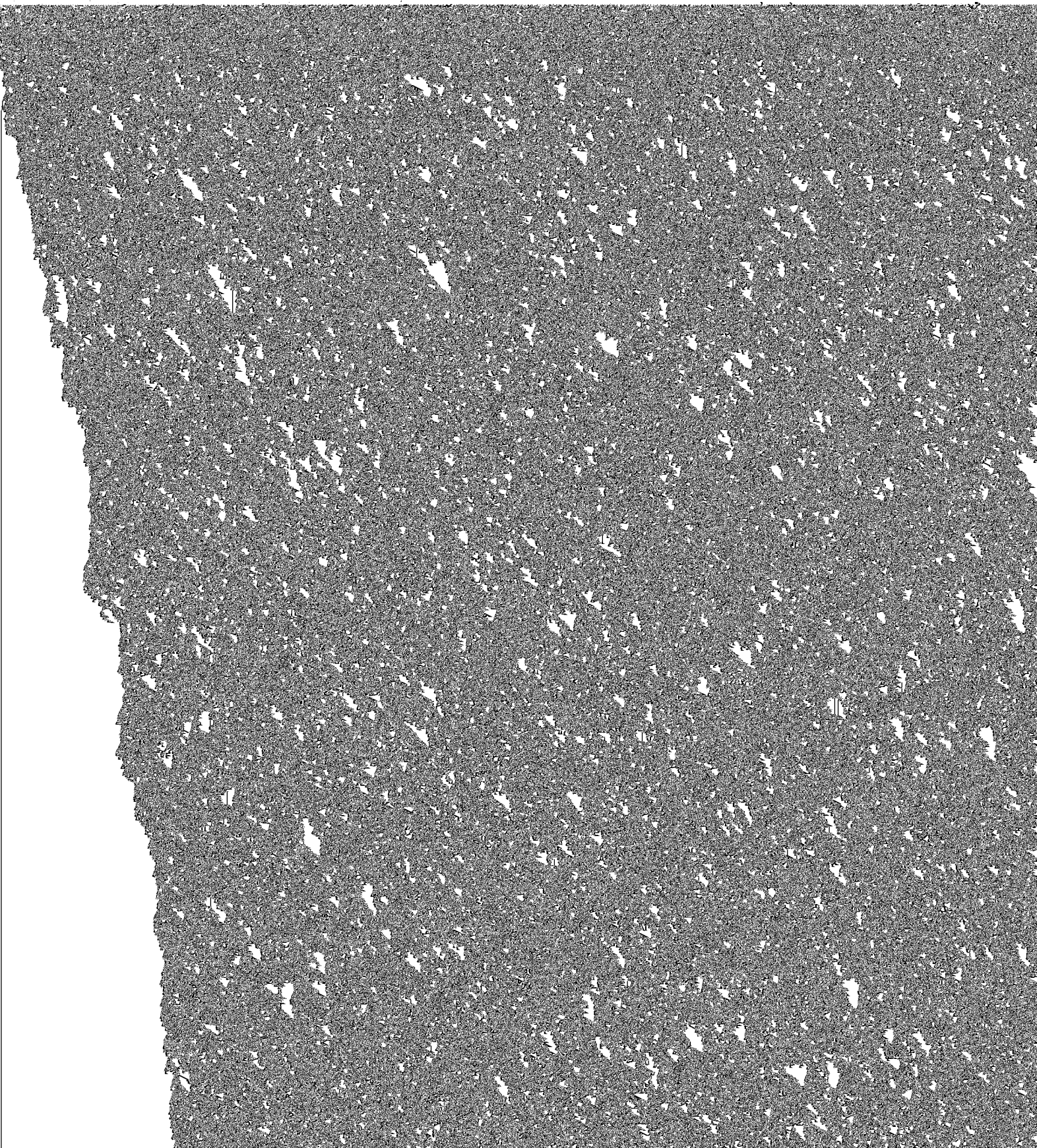
HGHPlus: Making you look and feel younger, naturally...

* * *

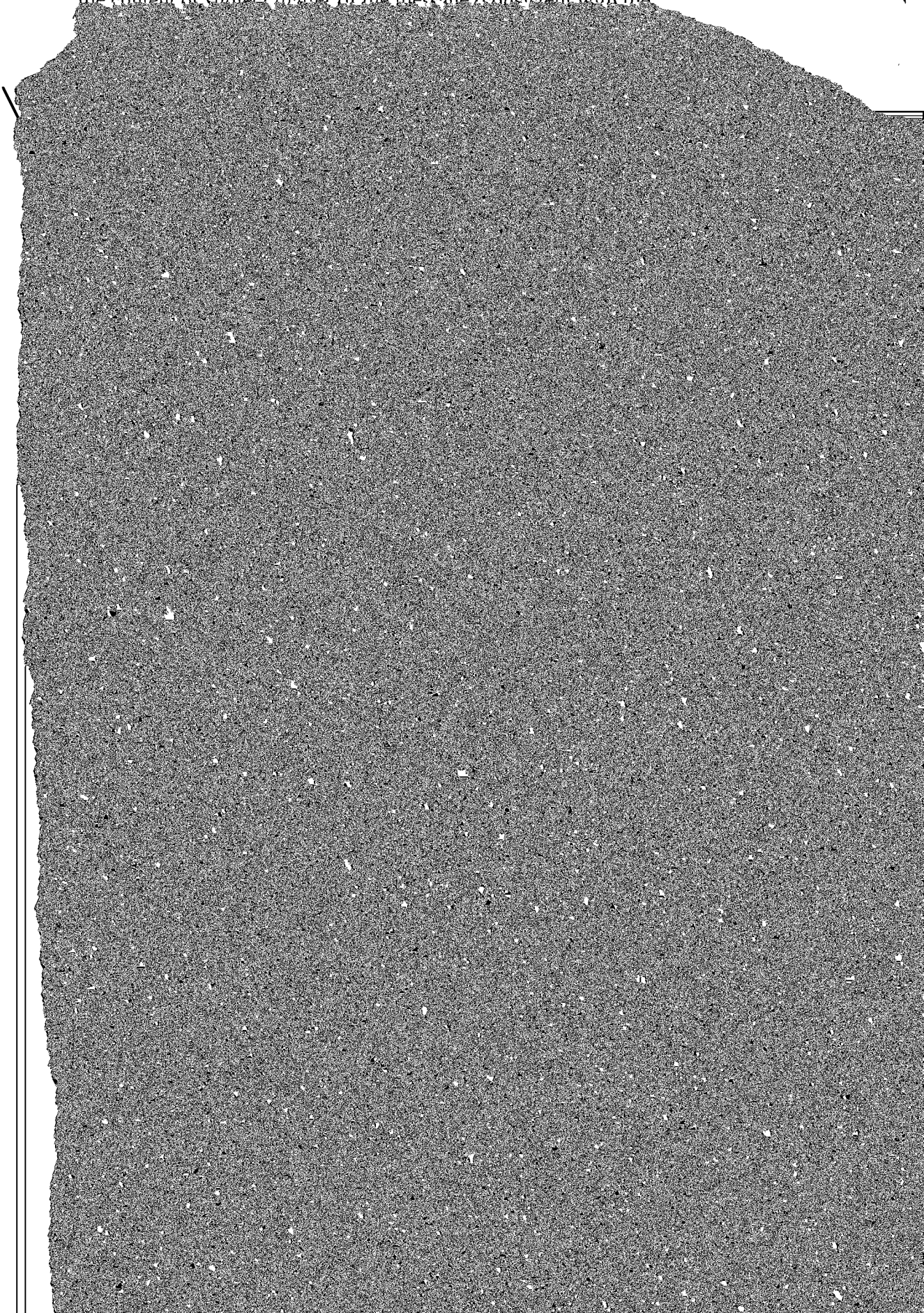
Why Choose HGHPlus™

- Grow new muscle mass
- Reduce fat stores in the body
- Metabolize fat faster

HGH Plus™ will aid your body in almost every function that it performs, from regulating metabolism and burning fat to maintaining bone density, muscle mass, mental functions, digestive functions, immuno-defense activity and skin and organ repair. You will have a whole new body in only a few short months.



the content or subject matter of the message (consistent with the



Court, Defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

including, but not limited to, rescission or reformation of contracts, restitution, the refund