

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Deborah Platt Majoras, Chairman**
 Pamela Jones Harbour
 Jon Leibowitz
 William E. Kovacic
 J. Thomas Rosch

_____)
In the Matter of)
)
SHELLY BLACK,)
an individual trading and doing business) **DOCKET NO. C-**
as PROGESTERONE ADVOCATES)
NETWORK.)
_____)

COMPLAINT

The Federal Trade Commission, having reason to believe that Shelly Black, an individual trading and doing business as Progesterone Advocate Network (“respondent”), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

While progestagens decrease a woman's risk of estrogen-induced endometrial cancer, progestins have been found to increase a woman's risk of developing breast cancer.

4. Respondent has advertised, offered for sale, sold, and distributed products to the public throughout the United States, including Nature's Precise Cream. Respondent primarily advertises and offers the products for sale through the Internet site www.progestnet.com.

5. For the purposes of Section 12 of the FTC Act, 15 U.S.C. § 52, Nature's Precise Cream is a "drug" as defined in Section 15(c) of the FTC Act, 15 U.S.C. § 55(c).

6. Nature's Precise Cream is a drug labeled as containing USP Natural Progesterone (960 mg per 2 ounce tube) and other ingredients. A two fluid ounce tube costs \$19.95 plus shipping and handling. Nature's Precise Cream is applied transdermally.

7. To induce consumers to purchase Nature's Precise Cream, respondent has disseminated or has caused to be disseminated advertisements, including but not necessarily limited to those contained in the attached Exhibit A. These advertisements contain the following statements and depictions, among others, on respondent's website:

**A. NPC-Nature's Precise Cream (Formally known as Natural Progesterone)
Product Information**

* * *

A topical dietary supplement, designed for women of all ages who experience symptoms relating to PMS, Menopause and Osteoporosis. This completely natural product provides a safe and effective alternative to synthetic Hormone Replacement Therapies (also known as HRT or estrogen replacement) and their undesirable side effects. Menopausal and pre-menopausal women may experience hot flashes due to hormonal imbalance and in some cases, more severe symptoms including Endometriosis, Fibroid Tumors, Fibrocystic Breast Disease and Breast Cancer. Awareness of women's health concerns and the demand for natural treatments is at an all time high. Dr. John R. Lee's best selling book: "What your doctor may not tell you about Menopause", outlines the remarkable benefits provided by natural progesterone.

Who Needs Natural Progesterone?

Women who have symptoms of hormone imbalances:

* * *

progesterone deserves far more attention than is generally given in the prevention and care o

G. “Estrogen dominance” is a term coined by Dr. John R. Lee. It describes a condition where a woman can have deficient, normal, or excessive estrogen but

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of estrogen dominance include:

* * *

Breast cancer

* * *

Uterine cancer

* * *

Pre-menopausal bone loss

* * *

Estrogen “deficiency” that is quite often used as an explanation of menopausal symptoms or health problems is not supported by sound research. When a woman’s menstrual cycle is functioning normally, estrogen is the dominant hormone for the first two weeks and is balanced by progesterone, which is the dominant hormone for the latter two weeks. After menopause, estrogen is still present and continues to be manufactured in fat cells. Most menopausal women have too little estrogen to support pregnancy, but sufficient amounts for other

monthly cycle, estrogen is the dominant hormone for the first two weeks and is balanced by progesterone, which is the dominant hormone for the latter two weeks. When our progesterone levels are in balance, the body better handles excess estrogen.

Natural Progesterone Cream is a topical dietary supplement designed for women of all ages who experience symptoms relating to PMS & Menopause.

Benefits of Natural Progesterone include:

* * *

Helps protect against endometrial, breast, ovarian, and prostate cancer

* * *

Increases new bone formation

* * *

Synthetic Progestins are not the same as Natural Progesterone

Medical literature tends to equate natural progesterone/progesterone with synthetic progestins. This assumption is altogether incorrect. Progesterone is a specific molecule made by the adrenal glands and by the ovary during of ovulation. Synthetic progestins are drugs that are manufactured by pharmaceutical companies and are normally available by prescription only. Synthetic progestins are not natural to the body and are known to cause undesirable side effects. . . .

(Exhibit A at 19.)

- K. Progesterone protects against the undesirable side effects of hormonal imbalance caused by unopposed estrogen.

* * *

If you choose to continue using synthetic estrogen, it is impera60 0.0.0000 00000 1.j .88 y

* * *

Prevents endometrial cancer
Helps prevent breast cancer
Stimulates osteoblast bone building

* * *

(Exhibit A at 22.)

* * *

Increases risk of endometrial cancer
Increases risk of breast cancer
Slightly restrains osteoclast function

* * *

M. Medical literature tends to equate progesterone with synthetic progestins. This assumption is altogether incorrect.

Synthetic progestins are drugs that are manufactured by drug companies and are normally available by prescription only. Synthetic progestins are not natural to the body and can cause undesirable side effects. Some of the side effects from synthetic progestins include; cardiovascular complications, suspected links to uterine and breast cancer, blood clots, insomnia, menstrual irregularities, depression, masculinizing effects, breast tenderness, fluid retention and edema.

* * *

Progesterone is a specific molecule made by the adrenal glands or by the ovary during ovulation. Natural progesterone cream is derived from organic compounds found in nature and is molecularly identical to progesterone manufactured by the human body. Synthetic progestins are molecularly altered and have negative side effects when placed in the human body. For example: Progesterone is essential through out pregnancy, whereas synthetic progestins carry a warning that their use in early pregnancy may increase the risk of miscarriage.

Natural Progesterone Cream contains the natural hormone, which has been accurately synthesized from wild yams. Supplementing with natural progesterone has NO side effects - even during pregnancy.

Compare Effects - Natural Progesterone to Synthetic

Conditions	Natural Progesterone (real)	Progestins (synthetic)
* * *		
Protects against endometrial cancer	X	X
Protects against ovarian cancer	X	
Protects against breast cancer	X	
* * *		
Improves new bone formation	X	

* * *

(Exhibit A at 25-26.)

8. Through the means described in Paragraphs 6 and 7, respondent has represented, expressly or by implication, that:

- A. Nature's Precise Cream is effective in preventing, treating, or curing osteoporosis;
- B. Nature's Precise Cream is effective in preventing or reducing the risk of estrogen-induced endometrial (uterine) cancer; and
- C. Nature's Precise Cream does not increase the user's risk of developing breast cancer and/or is effective in preventing or reducing the user's risk of developing breast cancer.

9. Through the means described in Paragraphs 6 and 7, respondent has represented, expressly or by implication, that she 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, respondent 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. Therefore, the representation set forth in Paragraph 9 was, and is, false or misleading.

11. The acts and practices 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, on this ____ day of _____, 2007, has issued this complaint against respondent.

By the Commission

Donald S. Clark
Secretary