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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
San Francisco Division

12 FEDERAL TRADE COMMISSION,

13 Plaintiff,

14 v.

15 WELLNESS SUPPORT NETWORK,  
16 INC., a corporation,

17 ROBERT HELD, individually and as  
18 an officer of WellnessSupport  
Network, Inc., and

19 ROBYN HELD, individually and as  
20 an officer of WellnessSupport  
Network, Inc.,

21 Defendants.  
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Case No.: 3:10-c

1 relief, rescission or reformation of contracts, restitution, the refund of monies  
2 paid, disgorgement of ill-gotten monies, and other equitable relief for  
3 Defendants' acts or practices in violation of Sections 5(a) and 12 of the FTC Act,  
4 15 U.S.C. §§ 45(a) and 52, in connection with the advertising, marketing, and  
5 sale of two dietary supplements that they claim prevent, treat, or ameliorate the  
6 symptoms of diabetes: WSN<sup>®</sup> Diabetic Pack ("Diabetic Pack") and WSN<sup>®</sup> Insulin  
7 ResistancePack ("Insulin ResistancePack").

8 JURISDICTION AND VENUE

9 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C.  
10 §§ 1331, 1337(a) and 1345, and 15 U.S.C. §§ 45(a), 52, and 53(b).

11 3. Venue in the United States District Court for the Northern District of California is proper under 28 U.S.C. §§ 1391(a) and 1392(a).

1 Ste. 400, Glendale, CA 91203. At times material to this Complaint, WSN has  
2 advertised, marketed, distributed, or sold a variety of dietary supplements,  
3 including the Diabetic Pack and Insulin Resistance Pack to consumers throughout  
4 the United States. WSN tra

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COMMERCE

9. At all times material to this Complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

DEFENDANTS’ PRODUCTS

The WSN<sup>®</sup> Diabetic Pack

10. Since at least 2004, and continuing thereafter, Defendants WSN, Robert Held, and Robyn Held (collectively, “Defendants”) have advertised, promoted, offered for sale, sold, or distributed a group of dietary supplements called the WSN<sup>®</sup> Diabetic Pack to consumers throughout the United States.

11. The Diabetic Pack consists of three different products: (1) Glucose Support Formula; (2) Calcium-Magnesium Formula; and (3) Vitamin & Mineral Formula.

12. The Glucose Support Formula purportedly contains a variety of dietary ingredients, including Vitamin A, Vitamin D, biotin, chromium, vanadium, and banaba leaf extract. Users are instructed to take three capsules of the Glucose Support Formula each day.

13. The Calcium-Magnesium Formula purportedly contains Vitamin D, calcium, magnesium, and other ingredients. Users are instructed to take one capsule of the Calcium-Magnesium Formula per day.

14. The Vitamin & Mineral Formula purportedly contains a variety of vitamins, minerals and other ingred

1 Resistance Pack to consumers throughout the United States.

2 17. Insulin resistance is a condition in which a person's body produces  
3 insulin, but does not use it properly. Insulin resistance can increase the chance of  
4 developing Type 2 diabetes and heart disease.

5 18. The Insulin Resistance Pack is comprised of the same three products  
6 that are in the Diabetic Pack: (1) the Glucose Support

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Maintain normal blood sugar levels, safely and effectively with absolutely NO SIDE EFFECTS !! GUARANTEED !!

Ex. B, p. 1 (Excerpt from webste)

- c. Nobel Prize winning technology validates WSN® Diabetic Pack ingredients! Studies show a 31.9% drop in blood sugar levels!

Ex. A, p. 1 (Excerpt from webste)

Include:

- d. The WSN® Diabetic Pack Breakthrough Benefits\*

- T Lower Blood Glucose Levels
- T Higher Energy Levels
- T Easier Weight Loss
- T Lower Cholesterol Levels
- T Higher Quality of Sleep
- T Less Dependency on Medications

Ex. A, p. 2 (Excerpt from webste)

- e. The WSN® Diabetic Pack Breakthrough Benefits Include:

- T Helps Maintain Normal Blood Glucose Levels
- T Higher Energy Levels
- T Lose Weight More Easily
- T Helps Maintain Lower Cholesterol Levels
- T Higher Quality of Sleep

Ex. B, p. 2 (Excerpt from webste)

- f. The WSN® Diabetic Pack also contains important botanical extracts. A recent independent clinical trial was done on one of these herbal ingredients from this amazing product. This study was done on type 2 diabetics (mildly insulin dependent) and reported an average drop of blood glucose levels of 31.9% and average weight loss of 4.8 pounds in just 30 days!

Ex. A, p. 2 (Excerpt from webste)

- g. Nobel Prize Winning Technology Validates WSN® Diabetic Pack Ingredients!

The good news is that cutting-edge science and nutrition have come together to create a truly monumental and natural breakthrough for diabetics.

Nobel Prize winning science and over 60 independent American university studies confirm the superiority of Foodform® [Diabetic Pack] nutrients.

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The reason the WSN® Diabetic Pack works is because it operates at the cellular level and addresses a key problem that every type 2 diabetic has . . . All type 2 diabetics have a deficiency of key nutrients the body needs to support healthy blood sugar levels. Your cells simply do not process blood sugar like they should. The WSN® Diabetic Pack helps your body metabolize blood sugar more efficiently.

Ex. B, pp. 2-4 (Excerpt from website)

h.

Ex. A, p. 1 (Excerpt from website)  
Ex. B, p. 1 (Excerpt from website)

i. From Bar

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resistance

Reverse Insulin Resistance, safely and effectively with  
absolutely NO SIDE EFFECTS !! GUARANTEED !!

Ex. C, p. 1 (Excerpt from webste)

- b. Nobel Prize winning technology validates WSN® Insulin  
ely



1 anywhere and was validated by the 1999 Nobel Prize for  
2 physiology.

3 Ex. C, p. 3 (Except from website)

4 DEFENDANTS' VIOLATIONS OF THE FTC ACT

5 22. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits “unfair or  
6 deceptive acts or practices in or affecting commerce.” Section 12(a) of the FTC  
7 Act, 15 U.S.C. § 52(a), prohibits the dissemination of any false advertisement in  
8 or affecting commerce for the purposes of inducing, or which is likely to induce,  
9 the purchase of food, drugs, devices, services, or cosmetics.

10 23. For the purposes of Section 12 of the FTC Act, 15 U.S.C. § 52,  
11 Defendants’ products are either “foods” or “drugs,” as “food” and “drug” are  
12 defined in Section 15(b) and (c) of the FTC Act, 15 U.S.C. § 55(b), (c).


13 COUNT ONE

14 Deceptive Claims for Diabetic Pack

15 24. Through the means described in Paragraph 20, including the  
16 statements ONE 8400 0.0000 TD (i)Tj 3.82

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1 Court to grant injunctive and such other relief as the Court may deem appropriate  
2 to halt and redress violations of any provision of law enforced by the FTC. The



Attorneys for Plaintiff  
Federal Trade Commission

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