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**Linguistic Strategies in Weight-Loss Advertising:
Telltale Signs of a Scam**

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“Advertising is legalized lying”

H.G. Wells

Table of Contents

Index of Figures.....	iv
Abstract.....	v
1. Introduction.....	1
2. Research Line.....	2
2.1. The Discourse of Advertising.....	2
2.2. A Legislative Background on the Dietary Supplements Industry.....	3
2.3. Deceptive Claims.....	4
2.3.1. The case of <i>Acai Berry</i> and <i>Herbalife</i>	6
3. Analysis.....	6
3.1. Jeffrey Schrank’s Classification.....	7
3.1.1. The weasel claim.....	8
3.1.2. The “we’re different and unique” claim.....	8
3.1.3. The “water is wet” claim.....	8
3.1.4. The testimonial or “success story”.....	8
3.1.5. The scientific claim.....	9
3.1.6. The “compliment the consumer” claim.....	9
3.1.7. The rhetorical question.....	9
3.2. Claims by Typology.....	10
3.2.1. Fast results.....	11
3.2.2. Guaranteed results.....	11
3.2.3. Long-term or permanent results.....	11
3.2.4. Consumer testimonials.....	11
3.2.5. Before-and-after photographs.....	11
3.2.6. No diet or physical exercise.....	12
3.2.7. Clinically proven.....	12
3.2.8. Natural and safe.....	13
3.3. Big Things Come in Small Packages.....	13
4. Conclusions.....	14
5. References.....	15
Appendix A: Brands List.....	17
Appendix B: Claims.....	18
Appendix C: Samples.....	22

Index of Figures

<i>Figure 1.</i> Claims rate (number).....	10
<i>Figure 2.</i> Claims rate (percentage).....	10
<i>Figure 3.</i> Sample before-and-after photographs.....	12
<i>Figure 4.</i> Most persuasive words in weight-loss advertising.....	13

Abstract

Words are the most powerful tool ever developed since they have not only the ability to communicate, but also to captivate, motivate and even persuade. The paper in hand examines the nature of language and advertising, as it primarily aims to detect persuasive elements and deceptive techniques within the most influential and inexorable discourse: the advertising discourse. It catalogs the most common linguistic strategies used in advertising campaigns, with a special focus on written texts. According to research carried out by the U.S. Federal Trade Commission in 2003, weight-loss products are one the fastest-growing segments within the dietary supplement industry. The Media certainly play an important role in educating the public, but can also exploit great persuasive ability by manipulating messages that emphasize the effective results of weigh-lost products without diet and physical activity. The results of the research revealed common telltale signs of advertising scams.

1. Introduction

To a greater or lesser extent physical appearance has always played an important role in our society; attractive teens are more popular in high school, attractive applicants have better chance of getting good jobs, and even attractive people are more likely to have successful lives. Hence in such a shallow society it is not surprising that we all become somewhat obsessed with our appearance. Also, the issue of obesity in developed countries, which is worsen by the high percentage of sedentary lifestyle and the consumption of junk food—specially in the United States—results in a growing demand for “miracle” slimming products; people seek to achieve the perfect body fast and effortlessly, and then it is when dietary supplement companies rub their hands with glee.

In addition, the regulation of dietary supplements advertising and trade is not strict enough. This industry is very dynamic, and the number of dietary products has increased significantly in recent years, in large part thanks to the guile of both manufacturers and advertisers. In fact, we are constantly bombarded by weight-loss ads in magazines, TV commercials, infomercials, newspapers or the Internet, where digitally manipulated before-and-after pictures or a supermodel without an inch of fat support a product that, although being portrayed as a great accomplishment is, in reality, just a scam. Actually, “[...] there are so many similar products and so many competing brands that advertisers cannot rely merely on rational arguments to sell their goods”. (Helmer, 2002: 4). It is not a secret that advertisers use manipulation to create false claims about products in order to make a profit. Companies rely on their slogans to attract customers and the language used in the marketing media has a huge impact on society. “To be successful in the communication process, advertising needs to be more than just informative”. (Janoschka, 2004: 16), it needs to be influential. In fact, the

balance has been tipped from information to persuasion; “[...] in recent decades, advertisements often have been composed with minute attention to detail and extensive pre-testing, so even the smallest facet of an ad may reflect a marketing strategy”. (Pope, 1983: 5). Advertising’s ultimate objective is to convince people to buy a product, “[...] But the principles underlying what works in advertising also apply to persuasion in other areas of life”. (Armstrong, 2010: 293).

Advertising claims for alternative dietary products such as supplements tend to over-promise results and they also have no scientific proof—the called “get-rich-quick” scams might not help you lose a pound, but will for sure make your wallet thinner. Advertising credibility has been defined as the “extent to which the consumer perceives claims made about the brand in the ad to be truthful and believable.” (MacKenzie et al., 1983: 51). Yet, it is surprising how many people are swindled, often unaware of the sneaky tricks used by companies in order to sell their products above all else, even if their “super pill” or their “magic powder” constitute a potential danger.

2. Research Line

2.1. The Discourse of Advertising

Advertisements constitute such an important part of our society that people have at long last considered a new discourse type: the discourse of advertising. Guy Cook¹ (2001: 203) remarks that “advertising is not a remote and specialized discourse, but a prominent discourse type in contemporary society”. Besides, the words in ads should not be viewed in isolation, but in interaction; namely, the discourse comprises both text and context. In support to this statement, Cook (2001: 3) adds that “Although the main focus of discourse analysis is on language, it is not concerned with language alone. It also examines the context of communication”. Advertising discourse is therefore

¹ Cook, G. (2001). *The Discourse of Advertising*. London, UK: Routledge.

complex and “always holds out more to be analysed, leaves more to be said”. (Cook, 2001: 5). Further, “In the advertising discourse [...] Every visual sign ‘connotes’ a quality, situation, value or inference which is present as an implication or implied meaning”. (Hall, 1973:12).

2.2. A Legislative Background on the Dietary Supplements Industry

To what extent is dietary supplement advertising legal? Many organisms take part in its regulation process in the United States—leader country in dietary supplements consumption. On the one hand, the FDA² (Food and Drug Administration) makes a clear distinction between drugs and supplements, which include vitamins, minerals, herbs, amino acids and concentrates; in contrast to drugs, supplements do not undergo rigorous scientific testing to determine their effectiveness before being marketed. On the other hand, in 1994 the DSHEA (Dietary Supplements Health and Education Act) changed the FDA’s role in supplement labeling; now supplements were fairly easy to spot since the words “dietary supplement” were required to be included on product labels. As the FDA (2007: 2) asserts in their journal, both “consumers and manufacturers have responsibility for checking the safety of dietary supplements and determining the truthfulness label claims”, Also, the FTC³ (Federal Trade Commission) has primary responsibility for claims in the advertising, including print, infomercials, catalogs, TV, and the Internet. The agency regulates media advertising of dietary supplements and openly states that “advertising of any product must be truthful, not misleading, and substantiated”. (FTC, 2001: 1). Although the commerce of supplements is not fully approved, any nutritional product should be reviewed by FDA to check its safety before it is marketed. Manufacturers who wish to sell a new product have, thus,

² FDA. (2007). *An FDA Guide to Dietary Supplements*. Retrieved from <http://www.fda.gov/>

³ United States Bureau of Consumer Protection & Federal Trade Commission. (2001). *Dietary Supplements: An Advertising Guide for Industry*.

two options: either they can submit to FDA information that supports the safety of the product, or they can petition FDA to establish the conditions under which the product would be expected to be safe. Nevertheless, according to FDA's Center for Food Safety and Applied Nutrition, no such petitions have been received to date.

In the case of Spain, the AEMPS (Agencia Española de Seguridad Alimentaria y Nutrición) together with the AECOSAN (Agencia Española de Consumo, Seguridad Alimentaria y Nutrición) regulate the commerce of dietary supplements and inform consumers of the potential dangers of, what they wryly call, "dietas milagrosas." According to *Art. III in Ley 34/1988 General de Publicidad*, "la publicidad engañosa, desleal, subliminal y la que infrinje lo dispuesto en la normativa que regula la publicidad de determinados productos, bienes y actividades o servicios". (BOE 274, 1988: 3) is considered illicit advertising, which is regulated by the Penal Code since 1996.

2.3. Deceptive Claims

As reported by FTC (2001: 3), a deceptive ad is "one that contains a misrepresentation or omission that is likely to mislead consumers acting reasonably under the circumstances to their detriment". In recent times, action has been taken against anyone involved in promotions which encompassed false information. "All parties who participate directly or indirectly in the marketing of dietary supplements have an obligation to make sure that claims are presented truthfully and to check the adequacy of the support behind those claims". (FTC, 2001:2). More to the point, FTC states that it is essential to identify claims. Under DSHA supplement manufacturers are allowed to use three types of claims: (1) nutrient-content claims, which describe the level of a particular nutrient; (2) disease claims, which show the diet-to-health link; (3) structure-function claims, which refer to the effect on the body's structure or function.

Although manufacturers might use structure-function claims without FDA's authorization, the product's label must specify the disclaimer: "This statement has not been evaluated by the Food and Drug Administration". According to FDA (2007: 8), "the majority of supplement manufacturers are responsible and careful. But, as with all products on the market, consumers need to be discriminating. FDA and industry have important roles to play, but consumers must take responsibility, too". Fraudulent products might often be given away by their advertising claims. Board member of the NCAHF (National Council Against Health Fraud) Stephen Barrett⁴ reveals some possible indicators of fraud: (1) the use of terms such as "magical" or "miracle" to refer to the product; (2) the use of phony medical jargon such as "purify" and "energize" to describe the product's effects, "even though nothing has actually been accomplished", Barret says (FDA, 2007: 6); (3) claims that a product is supported by clinical studies, but with inadequate or irrelevant references; and (4) claims that a product has only benefits. According to Barret (2007: 6), "[a product] potent enough to help people will be potent enough to cause side effects". Although not being backed by the government and often overtly recognized as illicit and a potential risk, the key ingredients for dietary supplements' success are the social demand, the marketing savvy and a nonrestrictive regulatory environment. Altogether explains why weight-loss advertising scams are extremely evasive.

In addition to the basic principles of advertising substantiation, when analyzing dietary supplement ads both the amount and type of evidence are of particular relevance. One of the most popular advertising strategies is to find a satisfied customer or an expert endorser who can guarantee the product's effectiveness. However, subjective and not genuine evidence does not uphold claims about the effects of a

⁴ Barret, S. M.D., Ph.D. Co-founder of the National Council Against Health Fraud (NCAHF), and webmaster of Quackwatch.

product. Thus, advertising should not exaggerate the results, and should not suggest larger scientific certainty than actually exists.

2.3.1. The case of *Acai Berry* and *Herbalife*. These are two real examples of weight-loss scams; both companies were charged because of deceptive practices to sell their weight-loss products on the Internet. According to FTC's director Steve Baker⁵, the companies deceived consumers out of millions of dollars, and there might be even more people affected. Three different allegations were avowed: (1) false claims, (2) false endorsements, and (3) false free-trial offer. The ABC News carried out a research and published two revealing videos: *Inside the Acai Berry Online Diet Scam*⁶, and *Herbalife Investigation: American Dream for Sale?*⁷, which uncovered both companies and their illicit practices. On the one hand, the first documentary presents the figure of the “online marketer”, who trolls for desperate dieters for a living, and puts into question the authenticity of testimonials and endorsements as the image of a random person can be used without consent in order to promote a product. On the other hand, the second documentary reveals the darkest secrets of a company which recruits independent distributors by promising great—but false—successes.

3. Analysis

A total of 36 weight-loss supplements ads of different layouts—magazines (15), infomercials (11), and the Internet (10)—were randomly collected for this research (see Appendix C, and CD-ROM that accompanies this paper). The samples were, in their totality, English advertisements for nonprescription weight-loss products from the main brands in the international marketplace. Once the selection was done the advertising

⁵ Baker, S. Director of the Federal Trade Commission's Midwest Region in Chicago since 1988.

⁶ *Inside the Acai Berry Online Diet Scam*. Retrieved from <http://abcnews.go.com/2020/video/inside-acai-berry-online-diet-scam-18136870>

⁷ *Herbalife Investigation: American Dream for Sale?* Retrieved from <https://www.youtube.com/watch?v=EqOMHOGt3JQ>

discourse was examined and claims were analyzed in minute detail in order to identify common patterns among the samples. On the one hand, Jeffrey Schrank's⁸ classification was considered in order to study the samples and determine the reliability of their claims. This first analysis revealed general telltale signs of advertising scams, which suggests that advertisers' use of certain linguistic techniques has a compelling effect on the consumer. On the other hand, claims were also classified by typology in order to illustrate the rate of frequency in which they were used by different advertisers.

3.1. Jeffrey Schrank's Classification

“Ads can be studied to detect their psychological hooks, they can be studied to gauge values and hidden desires of the common person, they can be studied for their use of symbols, color and imagery. But perhaps the simplest and most direct way to study ads is through an analysis of the language of the advertising claim”. (Schrank, 1976: 184). In his essay, Jeffrey Schrank discusses several strategies advertisers usually resort to when designing effective campaigns. Schrank (1976: 184) asserts that “advertising works below the level of conscious awareness and it works even on those who claim immunity to its message”. Companies rely on claims that hype the benefits of dietary supplements, but this issue has always been a controversial one, as many consumers often wonder whether these assertions are trustworthy. According to Shrank (1976: 184) the “verbal or print part of an ad that makes some claim of superiority for the product being advertised” is vital; whereas some claims are honest, others are illicit. Hence the first step to evaluate the accuracy and reliability of an ad is to identify both explicit and implicit claims. It is interesting that, depending on how it is drawn up, a statement might convey an implied claim of the product's goodness; if the ad is attractive and the statements are influential enough, it might even create a need on the consumer.

⁸ Schrank, J. (1976). “The Language of Advertising Claims.” *Teaching about Doublespeak*. Urbana, IL: National Council of Teachers of English.

Nevertheless, most claims are “neither bold lies nor helpful consumer information”, (Schrank, 1976: 184) and as such, they rely hugely on the manipulation of language to attract customers.

3.1.1. The weasel claim. “A weasel word is a modifier that practically negates the claim that follows”. (Schrank, 1976: 185). Thus, claims that might appear genuine at first glance but that are actually insubstantial are considered weasels. Many examples of these were found in the samples, including words such as “help”, “incredible”, “advanced”, “effective” or “amazing” (see Appendix B1 for more examples).

3.1.2. The “we’re different and unique” claim. As there are many parity products, “products in which all or most of the brands available are nearly identical” (Schrank, 1976: 184) in order to create the illusion of superiority, two rules are applied. On the one hand, “the word ‘better’ has been legally interpreted to be a comparative and therefore becomes a clear claim of superiority”, (Schrank, 1976: 185). Hence under this rule it would not be proper to employ this adjective to contrast parity products of competing brands. In fact, evidence showed that only 5 out of 36 ads explicitly claimed their products to be better than others, and often akin expressions were typically found, including “new”, “first”, “ultimate” or “America’s #1 weight-loss supplement” (see Appendix B2 for more examples).

3.1.3. The “water is wet” claim. By this technique, claims such as “reduces fat”, “boosts energy” or “burns calories” simply state something about the product that is commonly true for other products belonging to the same category. Hence the claim might not actually attest any fundamental advantage (see Appendix B3 for more examples).

3.1.4. The testimonial or “success story”. Many companies resort to this old classic in order to draw the audience’s interest; an individual or celebrity appears in an ad and

promotes the product by worshipping it, often verging on the absurd. This strategy leads consumers feel identified with the addresser—who, of course, is being paid by the company—and it also serves to reduce skepticism. However, the truth is that testimonials hardly ever describe real successes, and statements like “It really works!” or “I feel great now” are just hot air (see Appendix B4 for more examples). Indeed, “Individual experiences are not a substitute for scientific research”. (FTC, 2001:10)

3.1.5. The scientific claim. Within the dietary supplements industry it is very common to find ads which claim some sort of clinical proof, often sustained by a hypothetical doctor’s endorsement. Many of the samples included statements such as “scientifically proven” or “recommended by 15,000 doctors” (see Appendix B5 for more examples). However, both the data and the information provided are always incomplete and insubstantial since, as seen previously, the FDA does not test this kind of products.

3.1.6. The “compliment the consumer” claim. Charming people with adulation is one of the most effective techniques used by companies to get the audience on their side. In order to get the affection and interest of possible customers, advertisers include encouraging expressions such as “get the body you deserve”, “stop blaming yourself” or “make your ex wish he wasn’t” (see Appendix B6 for more examples).

3.1.7. The rhetorical question. By posing a direct question advertisers demand a certain response from the audience, which is supposed to substantiate the product’s goodness. In addition, it is noteworthy the fact that certain questions such as “have you ever looked at your body and wanted to cry?” or “sick of feeling guilty and overweight?” intended to encourage people to consume by stressing how miserable their lives are (see Appendix B4 for more examples).

3.2. Claims by Typology

The following charts aim to record the most common advertising claims used in the 36 weight-loss sample ads. As results show, many of them used at least one, and often several of them, which suggests a discernible pattern.

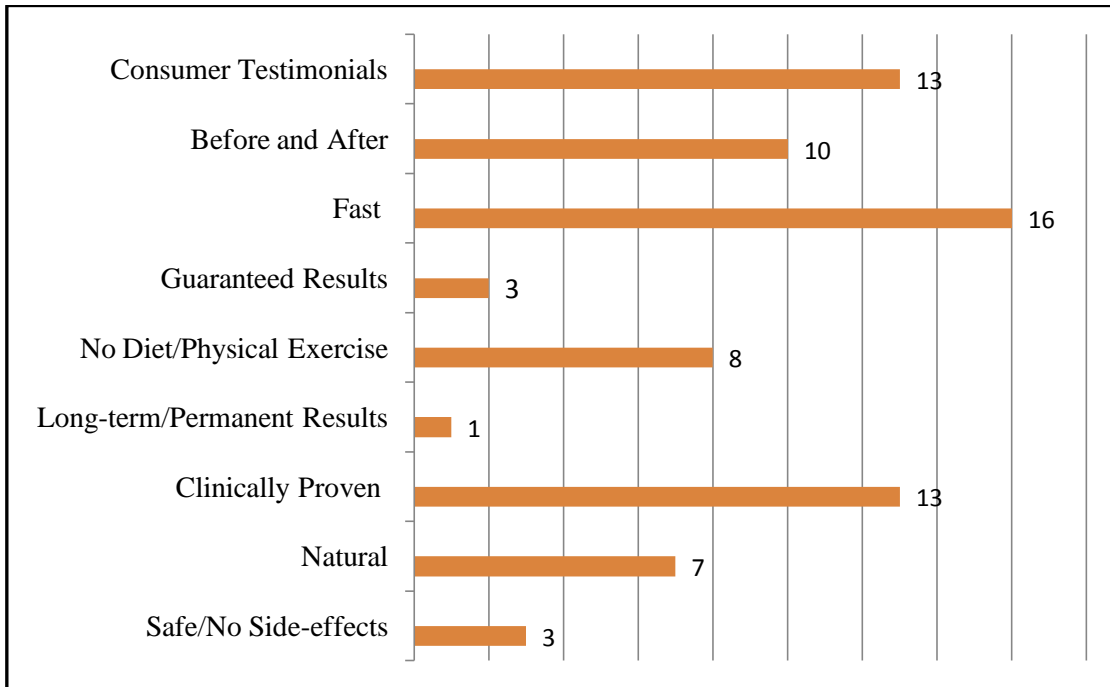


Figure 1: Claims rate (number)

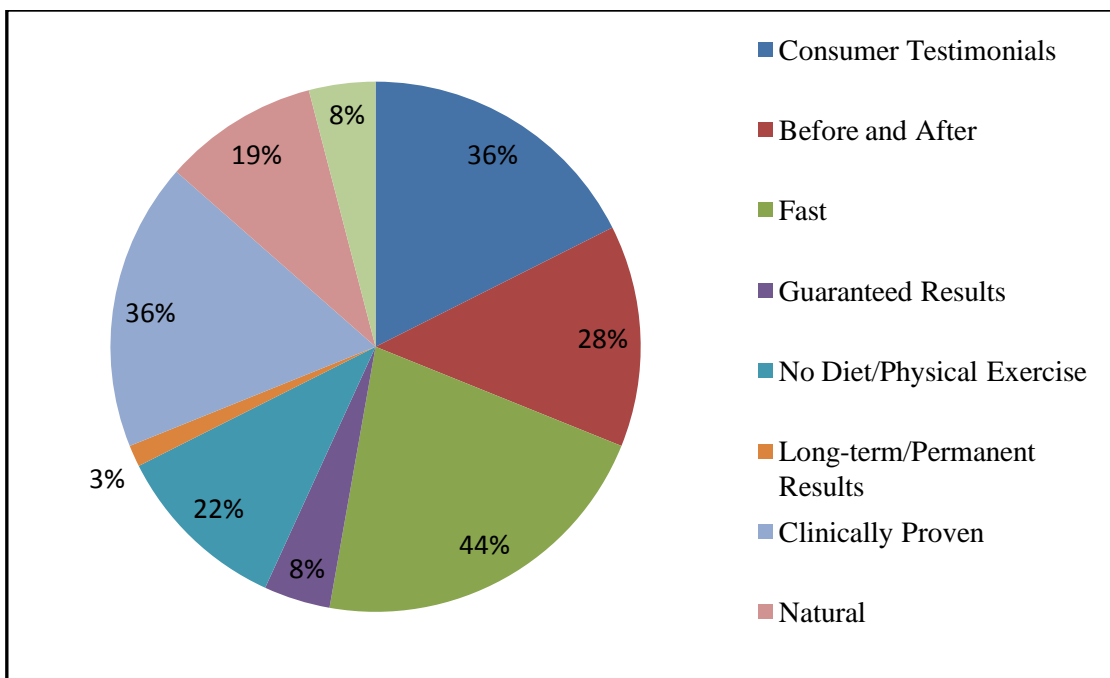


Figure 2: Claims rate (percentage)

According to *Figures 1-2*, the most prevalent claims found in the weight-loss adverts were, firstly, fast claims, 16 (44%) and secondly, both consumer testimonials and clinically proven claims, 13 (36%).

3.2.1. Fast results. Companies emphasize the fact that consumers can obtain the desired results on a relatively short period of time. Actually, 44% of the ads promised quick weight-loss by claiming “users lost an average of 30.5 lbs in 6 months” or “lose 26 pds in 26 days”. Moreover, it is interesting to note the explicitness of certain product names—“QuickTrim”, “Fastin” or “Medifast” (see Appendix B8 for more examples).

3.2.2. Guaranteed results. It is noteworthy that only 2 out of 36 samples overtly assured the product’s absolute success by claiming “100% satisfaction guaranteed”; one of them even went beyond and promised to refund the money invested to consumers if unsatisfied (see Appendix C12 and C16).

3.2.3. Long-term or permanent results. According to experts, permanent lifestyle changes are required in order to experience weight loss, so assuming a product causes some sort of weight loss, it would be certainly gained as soon as the treatment is interrupted and caloric consumption restored. In fact, only 1 of the samples claimed permanent results: “No rebound” (see Appendix C8).

3.2.4. Consumer testimonials. According to the research, consumer testimonials were found to be certainly rampant in weight-loss advertising as a means of promoting the “success” of a product (see Appendix B4 and CD-ROM for examples).

3.2.5. Before-and-after photographs. Often supporting testimonials, before-and-after shots are perhaps weight-loss supplements advertiser’s all-time favorite. In fact, 40% of the samples included images of this kind which supported their statements. However, many photographs were visibly fake—either they showed two completely different persons or revealed digital manipulation (see Appendix C for more examples).



Figure 3: Sample before-and-after photographs

3.2.6. No diet or physical exercise. According to scientists, “the amount of weight loss that can be achieved through the use of nonprescription products without reducing caloric intake or increasing exercise is likely to be no more than one-fourth to one-third of a pound per week”. (FTC, 2003: 6). Further, “It is a law of physics and you cannot lose weight unless you change your energy balance”, expert Dr. Hubbard⁹ says. Nevertheless, claims such as “Eat what you like when you like” and “Get a gym body without going to the gym” abounded in the samples (see Appendix B9 for more examples).

3.2.7. Clinically proven. Many ads cynically claimed products to be scientifically tested, often including statements like “Doctor recommended”, and even supported by the photograph of a hypothetical health professional. This is not legitimate and therefore leads to the issue of disclaimers. It is a significant fact that only 9 out of 36 samples included the required FDA disclaimer. Often, disclaimers like “Results not typical” or “Individual results will vary” were found to be quite deficient in informing consumers that they might not achieve similar results as the ones being claimed (see Appendix B5 for more examples).

⁹ Van Hubbard, M.D., Ph.D. Director of the Division of Nutrition Research Coordination and Chief of the Nutritional Sciences Branch of the Division of Digestive Diseases and Nutrition, National Institute of A-3 Diabetes and Digestive and Kidney Diseases, at the National Institutes of Health (NIH).

3.2.8. Natural and safe. Safety claims for weight-loss supplements is actually a serious matter of concern, especially if the product might present a health risk for certain people. 19% of the ads in the sample claimed that the products were completely natural and organic, “100% natural and organic”, whereas only 8% claimed no to have side-effects, “Safe and free of side effects” (see Appendix B11 for more examples).

3.3. Big Things Come in Small Packages

As Churchill¹⁰ once said, “Broadly speaking, the short words are the best, and the old words best of all”. Advertisers know this very well. According to the research, the most high-impact elements used in the ads to persuade consumers happened to be rather simple. Weasels such as “new” or “guaranteed” appear to be especially powerful in advertising. On the one hand, we all want “new”—new cars, new cell phones or new clothes. On the other hand, “guarantee” is considered a safety net. Indeed, it is extraordinary how it is possible to craft these common and, apparently, plain words and transform them into something big. Advertiser’s key to success lies, thus, in the combination of these “magical” words into phrases in order to “trigger buying behavior”. (Price, 2012: 144).

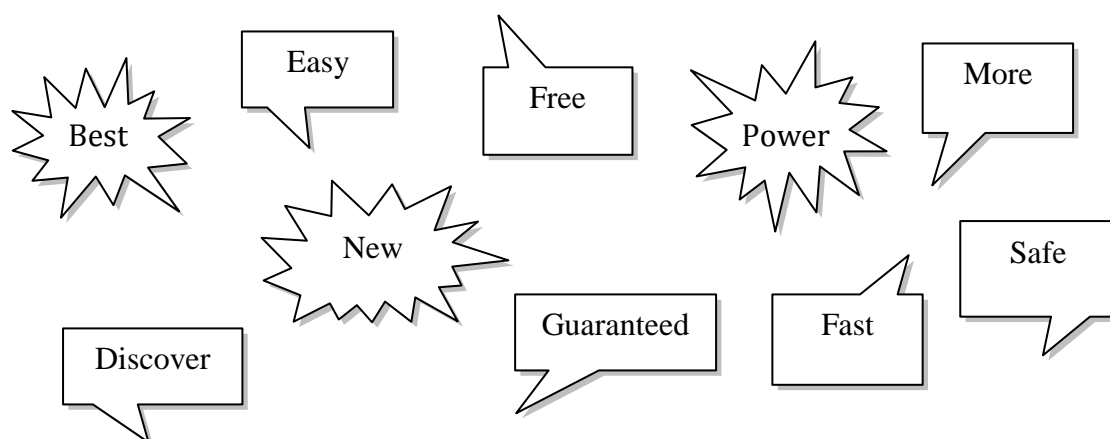


Figure 4. Most persuasive words in weight-loss advertising

¹⁰ Sir Winston Leonard Spencer-Churchill (1874 –1965), PM of the United Kingdom, also an officer in the British Army, a historian, a writer, and an artist. He won the Nobel Prize in Literature, and was the first person to be made an honorary citizen of the United States.

4. Conclusions

Throughout this paper the dynamism of the advertising discourse has been examined. The research revealed subliminal messages that lie beyond slogans, which suggests: (1) how exceptionally powerful a single word can be, and (2) how shrewdly advertisers manipulate consumers' perceptions and feelings. Certainly, ads are crafted to raise an effect while being laughed at, thrilled, and even hated—all but ignored. Hence a well-designed campaign is a two-edged sword able to cause dramatic effects. The case of deceptive advertising practices directly affecting the health sector is especially unsettling, but what is more alarming is the fact that regardless of law reinforcement and consumer education endeavor, illicit weight-loss advertising is inexorably widespread. The use of misleading claims is unbridled, making the line between truth and dishonesty extremely thin. In fact, nearly the totality of the 36 samples made at least one claim that was almost certainly defective. Further action must be carried out to eradicate this matter. The Media, on the one hand, must adopt responsible standards and avoid the spread of misleading information. On the other hand, we need to acknowledge our rights as consumers, become more skeptical towards advertising claims and, ultimately, be able to discriminate scams.

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Appendix A

Brand list

Acai Berry

Dietrine

Fastin

Herbalife

HCG

Hydroxycut

Lichi

Li Da

Medifast

Proactol

Quicktrim

Sensa

Strive

Voyager-V3

Xenadrine

Zantrex-3

Appendix B

Claims

Appendix B1 – Common weasel words and expressions

- *helps*
- *new*
- *promotes*
- *great*
- *incredible*
- *works*
- *speeds*
- *get*
- *energetic*
- *reach*
- *success*
- *amazing*
- *super*
- *powerful*
- *guaranteed*
- *easy*
- *free*
- *more*
- *effective*
- *weapon*
- *advanced*
- *right*
- *satisfying*
- *promise*
- *wonder*
- *extremely potent*
- *victory*
- *vibrant*
- *life-changing*
- *electrifying*
- *feel*

Appendix B2 – Common claims that stress uniqueness and goodness

- *new*
- *brand New*
- *first*
- *most advanced*
- *finally*
- *the weight-loss breakthrough*
- *ultimate*

- *America's #1 weight-loss supplement*
- *still America's #1*
- *a whole new approach to dieting*
- *way beyond anything on the market today*
- *the world's most advanced*
- *more weight loss*
- *say hello to an amazing innovation*
- *the future of weight loss is here!*
- *join the weight-loss revolution*

Appendix B3 – Common “water is wet” claims

- *blocks carbohydrates*
- *weight management*
- *suppresses your appetite*
- *helps stop fat production*
- *increases metabolism*
- *reduces fat*
- *boosts energy*
- *controls cravings*
- *digestive cleansing*
- *burns calories*
- *slims your stomach*

Appendix B4 – Common testimonial claims

- *I feel like a different person!*
- *I feel beautiful*
- *I lost 40 lbs*
- *it REALLY works!*
- *changes are 100% real*
- *it was extremely easy*
- *I feel great now*
- *I'm more confident*
- *I feel more energetic, confident and really see the results!*
- *every part of my life has been changed more positively*
- *I lost so much weight*
- *before, shopping was a nightmare*
- *now I can wear skirts*
- *people don't even recognize me anymore*

Appendix B5 – Common scientific claims

- *clinically proven*
- *scientifically proven*
- *scientific discovery*
- *recommended by Dr. Oz.*
- *doctor recommended*
- *Dr. approved and supervised weight loss*
- *medically monitored*
- *recommended by 15,000 doctors*
- *people studied it*

Appendix B6 – Common compliment and encouraging claims

- *you have the power to reinvent yourself*
- *get the body you deserve*
- *get back on the beach*
- *reach your weight loss goals*
- *get the body you've always wanted*
- *feel and look better every day*
- *make your New Year's resolutions come true*
- *make your ex wish he wasn't*
- *stop blaming yourself*
- *be free*
- *your happy victory*
- *it's time to look great*
- *look and feel like a celebrity*

Appendix B7 – Common rhetorical questions

- *do you have the body you've always dreamt of?*
- *have you ever looked at your body and wanted to cry?*
- *sick of feeling guilty and over weight?*
- *sick of fad diets and starving yourself to lose weight?*
- *getting married?/ class reunion?*
- *do you feel sexy?*
- *how hot can you be?*
- *need to lose 30 pounds?*

Appendix B8 – Claims that promise rapid results

- *fast*
- *lose 26 pds in 26 days*
- *rapid fat loss catalyst*
- *in 6 months*
- *I lost 30 lbs fast*
- *can revitalize your body and help you achieve results FAST*

Appendix B9 – Claims that promise success without dieting or exercising

- *without dieting or spending all the time working out*
- *continue to eat your favorite foods*
- *makes diet obsolete*
- *to help you lose weight without changing your diet or exercise routine*
- *eat what you like when you like*
- *no more dieter grumpiness*
- *no counting calories*
- *flush POUNDS and POUNDS without heavy dieting*
- *get a gym body without going to the gym*

Appendix B10 – Disclaimers

- *these statements have not been evaluated by the FDA*
- *results not typical*
- *results atypical*
- *individual results will vary*
- *results are dependent on the individual*
- *with sensible diet and exercise*
- *consult your physician before starting a weight-loss program*

Appendix B11 – Natural and safe claims

- *the all natural cleanse*
- *slimming by natural plants*
- *all natural*
- *no pills*
- *100% natural and organic*
- *risk free*

Appendix C

Samples

Appendix C1 – Acai Berry

Acai Berry Optimum
100% pure Acai berry plus colon cleanse

GET THE BODY YOU'VE ALWAYS WANTED! **ORDER**
Safe & Secure Transactions

100% SATISFACTION GUARANTEED

No Monthly Billing
No Subscription
No Free Trial

Acai Berry Optimum
100% pure acai berry plus colon cleanse

Look & Feel Like a Celebrity!

The Proprietary blends in Acai Berry Optimum will help you achieve rapid weight loss...

- ✓ Eliminate free radicals (harmful byproducts) and fight stress head on
- ✓ Targets belly fat, lower abdominal fat, flabby arms, butt fat, and overall body fat
- ✓ Experience increase in energy, increase in metabolism, and appetite suppression
- ✓ Lower overall body cholesterol, burn those calories, and say bye bye to constipation
- ✓ Works great for men and women. It's time to look great for SUMMER!
- ✓ Acai Berry Optimum is an effective colon cleanser that helps you eliminate toxins and washes clogging your system.

Acai berry is that super fruit with the highest antioxidant levels to mankind. Acai berry helps you to fight excess weight and prevents oxidative diseases like cancer and heart disease. Acai Berry is just too GREAT!

The combination of the Suidshum Bark (left) and Cascar Sagrada (right) makes Acai Berry Optimum the ultimate colon cleanser. Suidshum bark is so potent that it takes at least a year after harvest to become consumable.

Fennel seeds are powerful medicinal herbs that help cure digestive disorder by relaxing your intestines and eliminating bloating. Bloating be gone!

Rhubarb is a laxative and astringent, it is an effective tonic for the digestive system and it acts upon the bowels, removing debris and tightening the tissues.

LOOK Slim and Toned

GET THE BODY YOU'VE ALWAYS WANTED! **ORDER**
Safe & Secure Transactions

100% SATISFACTION GUARANTEED

Cleanse Your Body • Improve Health
Lose Weight • Gain Energy

Acai Berry Optimum
100% pure Acai berry plus colon cleanse

Acai Berry Optimum
100% pure acai berry plus colon cleanse

The ad shows a fit girl and some before-and-after shots (3.2.5.). The text contains weasels, such as “help” or “effective”, as well as many encouraging phrases to reinforce its message (3.1.6.). It also includes “water is wet” statements (3.1.3.), and fast (3.2.1.) and natural (3.2.8.) claims. It does not include FDA disclaimer.

AcaiBerry Detox
The All Natural Cleanse
A patented blend of Omega 3, 6 and 9 essential fatty acids
60 Capsules

- ✓ Higher Anti-oxidants than Pomegranate and Green Tea
- ✓ Flush POUNDS and POUNDS without heavy dieting
- ✓ Slims your stomach
- ✓ Increases energy and concentration
- ✓ Feel and look better every day

Get your **RISK FREE TRIAL NOW**
*just pay \$3.95 S&H

The ad contains weasels, such as “increases” or “better”, an encouraging claim (3.1.6.), a “water is wet” statement (3.1.3.), and it also promises results without dieting (3.2.6.). It does not include FDA disclaimer.

Appendix C2 – Dietrine

Carb Blocker & Fat Blocker

Lose Weight the Easy Way

Eat What You Like When You Like

Dietrine Carb Blocker is the first nutritional ingredient that has been clinically & scientifically proven to neutralize starch, found in your favorite foods such as potatoes, breads, & pasta.

Dietrine Carb Blocker allows you to enjoy the foods that you love without all the calories.

Dietrine™ Carb Blocker will help you:

- ❖ Blocks Carbohydrates
- ❖ Increases Metabolism
- ❖ Reduces fat storage
- ❖ Boosts energy levels
- ❖ Controls carb cravings

2 Free Bottles

Click Here to Learn More

\$100 Saving for a limited time when ordering our Maximum Results package

The ad shows an image of a girl eager to eat a doughnut. The text contains some “water is wet” statements (3.1.3.) and promises easy results (3.2.6.). It also claims uniqueness (3.1.2.) and clinically proven efficacy (3.2.7.). It does not include FDA disclaimer.

Appendix C3 – Fastin

HI-TECH PHARMACEUTICALS, INC.
U.S. PATENT 20060204599

FASTIN™

(Phenylethylamine HCL)

NCCc1ccccc1

The World's Most Advanced Weight Loss Aid Ever Developed!†

RAPID FAT LOSS CATALYST†

RAPID FAT LOSS CATALYST†

RAPID FAT LOSS THERMOGENIC INTENSIFIER!

- **Increases** the Metabolic Rate, Promoting Thermogenesis (The Burning of Stored Body Fat)†
- **Increases** the Release of Norepinephrine and Dopamine for Dramatic Weight Loss†
- Promotes Extreme Energy and Does Not Cause the "Jitters"†

RAPID FAT LOSS CATALYST

RAPID FAT LOSS CATALYST

WARNING: EXTREMELY POTENT DIET AID! DO NOT CONSUME UNLESS RAPID FAT AND WEIGHT LOSS ARE YOUR DESIRED RESULT.

RAPID FAT BURNER **RAPID FAT BURNER**

Hi-Tech Pharmaceuticals recently launched Fastin™ into the weight loss arena. In recent months, Hi-Tech acquired the rights to Fastin from King Pharmaceuticals. King Pharmaceuticals manufactured the brand name product Fastin (phenfermine HCL) for Smith Kline Beecham. In December 1998, Smith Kline Beecham withdrew Fastin from the market. Hi-Tech Pharmaceuticals has reformulated Fastin™ as an O.T.C. diet aid and expects it to be Hi-Tech's top weight loss aid. Fastin™ is a pharmaceutical-grade dietary supplement indicated for weight loss in extremely overweight individuals. Fastin™ has both immediate and delayed release profiles for appetite suppression, energy and weight loss. Fastin™'s pharmaceutical-grade fat loss catalysts achieve extraordinary results. **Fastin™ is now available without a prescription!**

The ad visibly claims for fast results (3.2.1.) and contains weasels, such as “increases”, “promotes” or “extremely potent”. It also claims superiority over other products (3.1.2.). It does not include FDA disclaimer.

Appendix C4 – Herbalife

HERBALIFE
Independent Distributor

HEALTHY NUTRITION

- Weight Management
- Immune Solutions
- Promote Cellular Nutrition
- Boost Your Energy
- Help Build & Maintain Lean Muscle Mass
- Digestive Cleansing
and much more...

**ALL NATURAL
DOCTOR RECOMMENDED**

**Call: 995-1746 - Brendan
819-2088 - Hope**
Email: brendans_dunn@hotmail.com
Website: www.drsofnutrition.com

HERBALIFE. *Making the world healthier.*

The ad contains weasels, such as “help” or “promote”, and a series of “water is wet” statements (3.1.3.). It also includes natural claims (3.2.8.) and doctor endorsement (3.2.7.). It does not include FDA disclaimer.

Appendix C5 – HCG



HCG DIET

Make Your New Years Resolution Come True

**LOSE 26 PDS
IN 26 DAYS**

LOSE POUNDS & INCHES

Dr. Approved & Supervised, Medically Monitored Weight Loss



BEAUTY MARK
ANTI-AGING & WELLNESS CENTER

Dr. Ester S. Mark, Orange County's TOP Internal Medicine, Anti-Aging & Wellness Physician

(949) 600-7714

www.BeautyMarkWellnessCenter.com

The Taj Mahal Building, 23521 Paseo de Valencia, Ste 310, Laguna Hills, CA 92653



The ad shows an image of a girl carrying a scale, while eating healthy and happily. The text includes a medical endorsement (3.2.7.), which is reinforced with the photograph of a hypothetical doctor, an encouraging phrase (3.1.6.), “water is wet” statements (3.1.3.) and it fast claims (3.2.1.). It does not include FDA disclaimer.

Appendix C6 – Hydroxycut

“Have you ever looked at your body and wanted to cry?”™

*“If you’re like me, then the answer is definitely ‘yes’. Before I discovered Hydroxycut, I weighed a hefty 187 pounds and hated the way I looked and felt. My bodyweight was out of control. After adding Hydroxycut to my weight-loss plan, I lost an incredible 63 pounds, 12 dress sizes, and inches off my waist! My husband is so proud of me. He thinks I’m more beautiful and sexier than ever. If you really need to lose weight fast like I did, you should use Hydroxycut.”**

— Julia Teachout, Mesa, AZ

BEFORE MIDPOINT AFTER

BEFORE AFTER

*“I couldn’t believe how powerful Hydroxycut was until I tried it for myself. I lost 63 pounds and 12 dress sizes in just 19 weeks!”**

*“Hydroxycut really helped me lose weight from my problem areas – hips, butt, and thighs.”**

Julia’s results not typical*

Television actors, fashion models, and millions of men and women across America trust the most recognized name in weight loss – Hydroxycut – to help them quickly lose weight. Julia achieved the body of her dreams and increased her energy level using the clinically proven Hydroxycut formula. *You can, too.* Try Hydroxycut for yourself today. You’ve got nothing but pounds and inches to lose!*

BEFORE AFTER

*“My husband John lost an extraordinary 92 pounds and 18 inches off his waist with the help of Hydroxycut! Hydroxycut is one fat burner that really does work!”**

Hydroxycut is the single most effective, natural weight-loss product I’ve ever used. I highly recommend it to both men and women!”*

— Dr. Christine Lydon, MD

Advanced Weight Loss Formula

HYDROXYCUT

Lose Fat Fast!
Clinically Proven
Increase Energy!
100% Natural

MUSCLE TECH

140 Capsules

GNC Live Well. BITE 20. Advertisers

www.hydroxycut.com

*Results Not Typical and depend on your diet and exercise program. This product is not intended to diagnose, treat, cure, or prevent any disease. These statements have not been evaluated by the FDA. This product is not for use by individuals under the age of 18. Julia and John Teachout have been remunerated for their appearance. Julia lost 63 lbs. and John lost 92 lbs. in 19 weeks by combining one teaspoon Hydroxycut. Average weight loss reported is 9.4 lbs. in 8 weeks. *This product contains ephedra and may cause serious adverse health effects if used improperly. *IMPORTANT: Read the ENTIRE label before use and carefully follow the labeled directions for use.

The ad shows an image of a sexy girl and some before-and-after shots (3.2.5.). The text contains many weasels, such as “incredible”, “powerful”, “really” or “extraordinary”. It claims superiority and includes a doctor endorsement (3.2.7.), reinforced by a photograph, a rhetorical question (3.1.7.), a testimonial or success story (3.1.4.), “water is wet” statements (3.1.3.), as well as fast (3.2.1.) and natural (3.2.8.) claims. It also contains disclaimers, including FDA’s.

America's #1 SELLING
Weight-Loss Supplement!

“I Lost 39 lbs. Fast with Hydroxycut!”

Looking back at photos, I always had a smile on my face, but inside I was unhappy. Even at my thinnest, I never felt confident enough to wear a bikini. I had seen other Hydroxycut transformations and was inspired to give it a try. I was so excited when I started losing weight. I lost an amazing 39 pounds and over 7 inches off my waist in only 13 weeks! I am proof that Hydroxycut really works fast. Bring on the beach, the boat trips and the pool parties!

Gillian Risebury - Collinsville, Illinois

Another True Success Story

Before **LOST 39 pounds** After

Results will vary. Individual combined Hydroxycut caplets with sensible diet and exercise.

The ad shows an image of a smiling girl on the beach and before-and-after shots (3.2.5.). The text includes a testimonial or success story (3.1.4.) and it claims uniqueness (3.1.2.) and fast results (3.2.1.). It does not include FDA disclaimer, but it suggests sensible diet and exercise.

Appendix C7 – Lichi

Lose up to
25
pounds *fast!**

The Lichi Super Fruit Promise
 Lichi Super Fruit promises weight-loss results, fast. Lichi Super Fruit Dietary Supplement is made from quality ingredients that combine the best in diet and nutritional research. With the miraculous power of the lychee berry, along with Acai, Green Tea and Resveratrol, Lichi Super Fruit Dietary Supplement is proven to accelerate weight loss and improve health. With normal exercise and a reduced calorie diet, Lichi Super Fruit can help you quickly reach your weight-loss goals. We take Lichi everyday and we know you'll love it!

- The Lichi Team

Before **After**

Lichi™
Super Fruit
 LYCHEE EXTRACT
 Açai • Resveratrol
 Green Tea
90 SOFTGELS
 HERBAL DIETARY SUPPLEMENT

Dr. OZ
 Featuring the Lichi Super Fruit Recommended by

Available at these retailers:
 GNC LiveWell | CVS pharmacy | Walgreens | FRIE LAID | DUANEreade | Meijer | FACE VALUES | USA Drug
 Ritey's | MED-1 | Kinney Drugs | LEWIS | A.P. | Kings | weis | WALDBAUM'S

*These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease. *Based on a review of all available published research on the absolute amount of weight loss from other fat burners. Results are dependent on the individual. For optimal results, accompany with diet and exercise. Read the entire label before use and follow directions.

The ad shows an image of a fit girl and before-and-after shots (3.2.5.). The text contains weasels, such as “super”, “promise”, “miraculous power”, helps” or “love”. It includes a doctor endorsement (3.2.7.), and it claims fast results (3.2.1.). It includes FDA disclaimer and suggests sensible diet and exercise.



Get rid of fat
slim easy and fast

The fastest weight loss diet
Slimming by natural plants,
safe and free of side effects.
No rebound, no diarrhea.

The advertisement features a woman in a white bikini, a box of the product, and two green capsules. The text is prominently displayed in a teal banner at the top and in the center. The product box is blue and white, with the brand name 'Li Da' visible. The capsules are green and white.

The ad shows a picture of a model. The text contains weasels, such as “easy” and an encouraging statement (3.1.6.). It claims superiority (3.1.2.), fast results (3.2.1.) and natural and safe properties (3.2.8.). It does not include FDA disclaimer.

Medifast: The weight-loss plan with all the *right ingredients*



FAST
Experience average weight loss of up to 2 - 5 pounds a week with the Medifast 5 & 1 Plan

SAFE
Recommended by 15,000 doctors; low-glycemic foods that can work for everyone, including people with type 2 diabetes

SIMPLE
Nutritious, easy-to-prepare, pre-portioned meals; no counting calories, carbs, or points

SATISFYING
Provides solid, clinically proven nutrition with the highest Fullness Index™ so you don't feel hungry

SUPPORTED
Answers and inspiration whenever you need them, through our online community, Health Coaches, Weight Control Centers, or physicians.

Genie Francis lost over 30 pounds on the 5 & 1 Plan!

Results not typical.

It's easy to order:
www.GetMedifast.com
or call 800.971.7301

SAVE \$50.00* on your order of \$275 or more: mention or enter code BHFALL50

consult your physician before starting a weight-loss program. *Limit one per customer and not valid with prior purchases, V.I.P. Membership, or any other promotions or discounts. See Web site for complete plan details. Offer expires 11/30/08.



Medifast
The power to choose health.

The ad shows before-and-after shots (3.2.5.) of a smiling woman. The text contains weasels, such as “right”, “simple” or “satisfying”. It also includes a testimonial (3.1.4.) and claims fast results (3.2.1.) , safety (3.2.8.) and medical endorsement (3.2.7.). It does not include FDA disclaimer, but it suggests consulting a physician and claims that results may vary.

Appendix C10 – Proactol

A

Proactol™
clinically proven fat binder

Sick of feeling guilty and over weight?
Proactol a clinically proven fat binder can **help!**

- ✓ Binds up to 28% of your dietary fat intake.
- ✓ **Helps** decrease your food cravings.
- ✓ **Helps** decrease your appetite.
- ✓ **Helps** to promote long term weight loss.
- ✓ Proactol™ a clinically proven fat binder.

Proactol™ is a clinically proven fat binder that can **help.** [Click Here!](#)

B

Proactol™
clinically proven fat binder

Brand new to the open market!
Proactol™ a clinically proven fat binder.

- 👉 Clinically Proven
- 👉 Binds up to 28% of your dietary fats
- 👉 **Helps** decrease excess body weight
- 👉 **Helps** lower your cholesterol
- 👉 100% natural and organic

Sick of fad diets and starving yourself to lose weight
Proactol™ a clinically proven fat binder can **help!**

[Click Here!](#)

The ads show (A) a woman who is holding a doughnut impishly, and (B) a smiling hypothetical doctor. The texts contain weasels, such as “helps”, “pro-”, as well as “water is wet” statements (3.1.3.) and rhetorical questions (3.1.7.). They also include safe (3.2.8.) and clinically proven claims (3.2.7.). Neither of them include FDA disclaimer.

Baywatch Babe's Body is Back!

When you're known for how you look in a swimsuit, it really puts on the pressure when you gain weight. As a busy mom, I tried everything... even boot camp, but I couldn't shed those pounds!

I was thrilled to try QuickTrim's sensible and effective formulas. Extreme Burn helped revitalize my body, curb my appetite and burn more calories. With QuickTrim's Extreme Burn™ I feel more energetic, confident and really see the results![†]

Get Back on the Beach with QuickTrim®!

"Get the Body You Deserve!"
Nicole Eggert

Burn More Calories![†]
Provide Natural Energy![†]

QUICKTRIM
Extreme Burn
SUSTAINED RELEASE WEIGHT LOSS FORMULA

MAXIMUM RESULTS WITH ENERGY TO BURN![†]

- HELPS BURN MORE CALORIES[†]
- HELPS SUPPORT HEALTHY METABOLISM[†]

with Daily Diet & Exercise Program
Dietary Supplement • 60 Capsules

NOW!

SEPT. 2009

GNC LiveWell SHOP NATIONWIDE OR AT GNC.COM
Walgreens SUPER CENTERS
RITE AID PHARMACY
CVS/pharmacy and other fine retailers nationwide

†These claims are based on data published in the Journal of the International Society of Sports Nutrition. These statements are not intended to diagnose, cure, treat, or prevent any disease. ©2009 International Society of Sports Nutrition. All rights reserved.

QuickTrimUS.com

The ad shows a celebrity in bikini. The text contains weasels, such as “helped”, “sensible”, “effective”, “more”, “revitalize” or ”now”. It also includes “water is wet” claims (3.1.3.), encouraging statements (3.1.6.), a success story (3.1.4.), fast (3.2.1.) and natural (3.2.8.) claims. It includes FDA disclaimer.

NEED TO LOSE 30 POUNDS?

TRY SENSA® FREE!*

SENSA® is clinically proven to help you lose 30 lbs without dieting or spending all your time working out.** Just sprinkle on your food, eat and lose weight!

GET A GYM BODY WITHOUT GOING TO THE GYM

- ✓ NO COUNTING CALORIES
- ✓ NO STIMULANTS
- ✓ NO PILLS

Doesn't change the taste of your food!

TRY SENSA® FREE!

Visit SensaOffer.com/OK or (800)750-6971

CLINICALLY PROVEN. 100% SATISFACTION GUARANTEED.

GNC LiveWell.
SHOP NATIONWIDE OR AT GNC.COM

*Product is Free to try for 30 days! Pay only a small shipping and handling fee. **In one of the largest studies ever conducted on a non-prescription weight-loss system, 1136 people lost an average 30.5 pounds in just 6 months without changing their diet or exercise regime.

SALTY SWEET
MONTH 1
SENSA

The ad shows a fit body. The text contains weasels, such as “help” and “free”. It also includes a rhetorical question (3.1.7.), natural (3.2.8.) and clinically proven claims (3.2.7.). It guarantees results (3.2.2.) without dieting or exercising (3.2.6.). It does not include FDA disclaimer.

Want to Lose Weight But Hate Traditional Dieting*?

Join the SENSEA® Weight-Loss Revolution!



SENSEA®
WEIGHT-LOSS SYSTEM

AS SEEN ON
TV



**Studies show SENSEA® users lost
an average of 30.5 lbs in 6 months**

*SENSEA® advocates a healthy lifestyle with
regular exercise and portion control.

How SENSEA® Works

- 1 **SHAKE** on your food. SENSEA® helps reduce cravings, curb your appetite and helps you feel full faster.
- 2 **EAT and enjoy**. Continue to eat your favorite foods. There are no special meals to buy.
- 3 **LOSE weight!** SENSEA® uses science and your sense of smell to help you lose weight without changing your diet or exercise routine.

In The News

The New York Times **SHAPE**

CBS **SELF** *Woman's World* 

Try SENSEA® **FREE** for 30 Days! Just pay S&H.

Call **1-800-586-7212**

or Visit FreeSensaTrial94.com

NO Pills NO Diets NO Stimulants NO Pre-packaged Meals NO Calorie Counting

The ad shows a smiling girl measuring her waist while pointing to the audience. The text contains weasels, such as “help”, “enjoy” or “free”. It also includes natural (3.2.8.), clinically proven claims (3.2.7.), and promises results without dieting or exercising (3.2.6.). It does not include FDA disclaimer.

SENSA®
WEIGHT-LOSS SYSTEM

IT CHANGED
MY LIFE, NOT
MY LIFESTYLE.

I don't have time for complicated diets. But I do have time for SENSA®. I just shake it on my food, and SENSA® does the rest. Now I'm eating less, living healthier and feeling great!

OCTAVIA SPENCER
Award-Winning Actress

I LOST
20
POUNDS

TRY SENSA®
FREE!
800.379.0855
sensalifestyle.com/us

No Pre-Packaged Meals • No Calorie Counting • No Stimulants

SENSA® advocates a healthy lifestyle with regular exercise and portion control.
\$30 Day Trial • \$84 with enrollment in auto-ship program. Cancel anytime. Call for details.

The ad shows a famous actress. The text contains weasels, such as “great” or “free”. It also includes a success story (3.1.4.), natural claims (3.2.8.) and promises results without dieting (3.2.6.). It does not include FDA disclaimer.



The ad shows a smiling girl measuring her waist. The text guarantees results (3.2.2.) without dieting (3.2.6.). It does not include FDA disclaimer.

Appendix C13 – Strive

Make your ex wish he wasn't.

SMOOTHIE KING DIETARY SUPPLEMENTS

strive

Introducing Strive™, our newest and most effective weight loss formulation. It speeds the metabolism, boosts energy and helps knock off the pounds. Oh yes, it also tastes great. The new Strive... only from Smoothie King.

The ad shows a slim body and a measuring tape. The text contains weasels, such as “helps”, “oh yes” or “great”, and encouraging (3.1.6.) and “water is wet” (3.1.3.) statements. It also claims superiority (3.1.2.). It does not include FDA disclaimer.

Appendix C14 – Voyager-V3

THE ULTIMATE SECRET WEAPON WITH WEIGHT CONTROL

Mood . Appetite . Energy

Product Description

Voyager Health Technologies' V3 Weight Management Complex represents a **revolutionary** approach to overall health and wellness. By allowing you to literally "dial in" the amount of energy and mood enhancement you desire throughout the day, along with the level of appetite you choose to experience between meals, V3 puts you firmly in control of your daily dietary intake.

Whether it's dialing down your cravings for sweets or carbohydrates, or dialing up your exercise routine and positive mental outlook. Taken as part of an overall commitment to better health, practical eating habits and daily exercise with proper hydration levels, V3 gives you victory of the three most common challenges in weight management and a healthy lifestyle.

Supplement Facts

Voyager Health Technologies' V3 Weight Management Complex	
Proprietary V3 Blend	100 mg
Dark Cocoa Powder	100 mg
Whey Protein Isolate	100 mg
Green Tea Extract	100 mg
Chromium Picolinate	100 mcg
Calcium	100 mg
Magnesium	100 mg
Zinc	100 mg
Vitamin B12	100 mcg
Vitamin D3	100 IU
Vitamin E	100 IU
Vitamin K	100 mcg
Vitamin C	100 mg
Vitamin B6	100 mcg
Vitamin B9	100 mcg
Vitamin B1	100 mg
Vitamin B2	100 mcg
Vitamin B3	100 mg
Vitamin B5	100 mg
Vitamin B7	100 mcg
Vitamin B8	100 mcg
Vitamin B10	100 mcg
Vitamin B11	100 mcg
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Vitamin B70	100 mcg
Vitamin B71	100 mcg
Vitamin B72	100 mcg
Vitamin B73	100 mcg
Vitamin B74	100 mcg
Vitamin B75	100 mcg
Vitamin B76	100 mcg
Vitamin B77	100 mcg
Vitamin B78	100 mcg
Vitamin B79	100 mcg
Vitamin B80	100 mcg
Vitamin B81	100 mcg
Vitamin B82	100 mcg
Vitamin B83	100 mcg
Vitamin B84	100 mcg
Vitamin B85	100 mcg
Vitamin B86	100 mcg
Vitamin B87	100 mcg
Vitamin B88	100 mcg
Vitamin B89	100 mcg
Vitamin B90	100 mcg
Vitamin B91	100 mcg
Vitamin B92	100 mcg
Vitamin B93	100 mcg
Vitamin B94	100 mcg
Vitamin B95	100 mcg
Vitamin B96	100 mcg
Vitamin B97	100 mcg
Vitamin B98	100 mcg
Vitamin B99	100 mcg
Vitamin B100	100 mcg

Many studies have shown that people who have regular doses of natural caffeine are 80% less likely to develop Parkinson's. Other research has shown that natural caffeine can reduce the risk of colon and liver cancer by some 25%, slash the risk of skin cancer by some 40%, drop the risk of liver cirrhosis by 22%, and lower the risk of gallstones by nearly half.

The ad shows a slim body and a measuring tape. The text contains weasels, such as “secret weapon”, “ultimate” or “revolutionary”, and many “water is wet” statements (3.1.1). It also claims uniqueness (3.1.2.). It includes FDA disclaimer.

Appendix C15 – Xenadrine

RONNIE'S falling in **LOVE**
with Xenadrine[®] ULTRA[™]

NEW FORMULA
ULTRA STRENGTH
Xenadrine
ULTRA
Weight Loss That Works!
Lose More Weight
Boost Energy!
Clinically Proven
Key Ingredients

"My GTL routine just got even better. XGTL baby – Xenadrine. Gym. Tan. Laundry. Xenadrine is like a workout partner – it boosts my energy to push through even the toughest workouts. I promised myself to never fall in love at the shore, but I love the boost I get from Xenadrine!"
Ronnie Ortiz-Magro

www.xenadrine.com

Super Centers **GNC** Love **WALGREENS** **CVS/pharmacy**

Average weight loss with key ingredients (saxagrin[®], fenproporex, methylphenylpropylamine, caffeine, carnitine, Acetyl-L-carnitine, and acetyl-L-glutamate) 21 lbs. vs. 2 lbs. for placebo in 12 weeks in one open-label study. 17 lbs. vs. 2 lbs. in a 6-week study. All groups followed calorie-reduced diet. Another ingredient (Caffeine anhydrous [1,3,7-trimethylxanthine]) supports increased energy. Sensible diet and exercise are essential to healthy weight loss. Read or view label before use. © 2010.

The ad shows a smiling fit boy. The text contains weasels, such as “help” or “love”, and a testimonial (3.1.4.). It does not include FDA disclaimer, but suggests sensible diet and exercise.

ADVERTISEMENT

Three Years and Still America's #1 Selling "Super Pill"

YES! Amazing Weight Loss. Incredible Energy.

FACT: 546% More Weight Loss* Than America's Most Notorious Stimulant-Based Diet Pill

Finally, amazing weight loss and incredible energy in one amazing "Super Pill." That's right! Amazing weight loss plus the kind of intense non-stop energy kick you want from a diet pill... and more. Much more!

Zantrex-3... 546% more weight loss* than America's most notorious stimulant-based diet pill. And that's a fact. Here's another fact: Zantrex-3 is way beyond ephedrine, way beyond fat-burners, way beyond anything on the market today. Zantrex-3 is a new category of bifurcated weight-loss compounds providing both amazing weight loss and incredible energy combined into a single power-packed Super Pill.

Zantrex-3 is so powerful you won't find it in any supermarket next to some "Flintrock" vitamin for kiddies.

Beyond sustained energy, Zantrex-3 is serious weight loss... we're talking about amazing, significant weight loss. 5 times more weight loss than America's most notorious stimulant-based diet pill and all the energy you'll ever want or need... day or night.

So if you're finally ready to look great, feel great, and have energy to burn, Zantrex-3 is the one formula you've got to experience to believe. Get your Zantrex-3 today! Zantrex-3 in the distinctive bright blue bottle.



100% MONEY-BACK GUARANTEE. If you are not totally satisfied with Zantrex-3, just return the empty container within 30 days for a full, prompt refund, no questions asked!

Now available at:  Call: 1-800-341-4377
www.Zantrex3.com

and smarter supplement retailers nationwide!

ZOLLER LABORATORIES These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease. Individual results will vary. Use in conjunction with a sensible diet and exercise program.

*The "546% more weight loss" claim is based solely on Zantrex-3's active weight loss component. However, Zantrex-3's non-ephedrine, stimulant-based Super Stimulant™ has been shown to produce additional weight loss in some studies. The full study details visit www.Zantrex3.com. All trademarks are the property of their respective companies.

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The ad contains many weasels, such as “super”, “amazing”, “great”, “more” “incredible” or “significant”. It blatantly claims superiority (3.1.2.) and guarantees results (3.2.2.). It includes FDA disclaimer and suggests sensible diet and exercise.

Appendix C17 - Others

A

As Seen On
NBC CNN abc

“25 Pounds in Only 2 Weeks!”

**Kathleen Hodges, Calif., Results Not Typical*

Scientists Discover Rare Weight-Loss “Wonder Herb”

- ✓ **Clinically Proven Fast Weight Loss!**
- ✓ **Rapidly Melts Away Belly Fat!**
- ✓ **Get the Body You Deserve in 2009!** For Men & Women!

B

WARNING: Due to recently being featured on T.V. we can no longer guarantee supply. As of Monday, Feb 03, 2014 we currently have product IN STOCK and will ship within 24 hours of purchase.

Burn Fat Without Diet or Exercise!

- ✓ **HELPS STOP FAT PRODUCTION**
- ✓ **SUPPRESSES YOUR APPETITE**
- ✓ **INCREASES SERATONIN LEVELS FOR EMOTIONAL EATERS**

100% Natural Pure Extract Capsules

WITH HCA®

Supports Appetite Control
100% Pure and Patent
Inhibits Fat Production
Dietary Supplement - 60 Capsules

100% Safe & Secure Transactions &

TELL US WHERE TO SEND YOUR BOTTLE TODAY!

JUST PAY SHIPPING & HANDLING

LIMITED TO 200 PER DAY

First Name:

Last Name:

Address:

City:

Zip Code:

Country:

State:

Phone:

Email:

RUSH MY TRIAL

ONLINE EXCLUSIVE LIMITED SUPPLY

100% Natural Ingredients
SATISFACTION 100% GUARANTEE
100% USA USE MADE IN THE USA

The ads show (A) a woman who wears extra-large pants and measures her waist, and a perfect male torso, and (B) a joyful slim girl in bikini. The texts contain weasels, such as “wonder”, “helps” or “increases”, as well as compliments (3.1.6.), “water is wet” statements (3.1.3.) and fast claims (3.2.1.). They also include natural (3.2.8.) and clinically proven claims (3.2.7.) and promise results without diet or exercise (3.2.6.). One ad (A) claims atypical results, but neither of them include FDA disclaimer.