

NAATP
NATIONAL 2019





NATIONAL ASSOCIATION
OF
ADDICTION TREATMENT PROVIDERS

Quality Assurance Breakout Session 6: Marketing and Ethics

Marketing, Transparency, Financial Remuneration, Brand Integrity, Third Party Marketers, NAATP Ethics Code Compliance

VOICE.
VISION.
LEADERSHIP.

QA 6: Marketing and Ethics

Panelists



Jay Crosson
Cumberland Heights
Treatment Center



Lissa Franklin
Southeast Florida
Recovery Awareness



Michelle Rusk, JD
Federal Trade Commission



Peter Thomas
NAATP



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ADDICTION TREATMENT PROVIDERS

Peter Thomas
NAATP

The Addiction Treatment Provider Quality Assurance Guidebook

Section H: Marketing, Visibility, and Advertising (P. 40-43)

H-1: Marketing

- *Addiction treatment providers should engage in marketing practices that promote transparency, foster trust, support consumer confidence, and focus on the best interest of the patient. Marketing activities and strategy should be developed and implemented in a way that aligns with a holistic bio-psycho-social-spiritual treatment philosophy, encourages collaboration among providers, and is integrous with the organization's Mission, Vision, and Values.*

H-2: Transparency

- *Addiction treatment providers should be fully transparent in all print, digital, and direct marketing performed by or on behalf of the provider. Marketing should make easily available the actual corporate identity of the treatment program being marketed or promoted, and accurately reflect the provider's clinical competence, location, amenities, staff and staff credentials.*

The Addiction Treatment Provider Quality Assurance Guidebook

Section H: Marketing, Visibility, and Advertising (P. 40-43)

H-3: Financial Remuneration

- *Addiction treatment providers should not provide or receive any form of remuneration—financial or otherwise—for patient referrals made to or by the treatment provider.*

H-4: Brand Integrity

- *Addiction treatment providers should conduct all marketing and business development activities in a way that clearly identifies and enhances their company brand and does not infringe upon the recognition or integrity of a third-party brand*

The Problem

July 24, 2018 01:00 AM

As opioid crisis fuels patient-brokering fraud, Congress urged to act

SUSANNAH LUTHI  

GOOGLE

SEARCHING FOR HELP

She turned to Google for help getting sober. Then she had to escape a nightmare.

By [Cat Ferguson](#) | Sep 7, 2017, 8:00am EDT

Illustrations by [Eric Petersen](#)

“Mom, When They Look at Me, They See Dollar Signs”

How rehab recruiters are luring recovering opioid addicts into a deadly cycle.

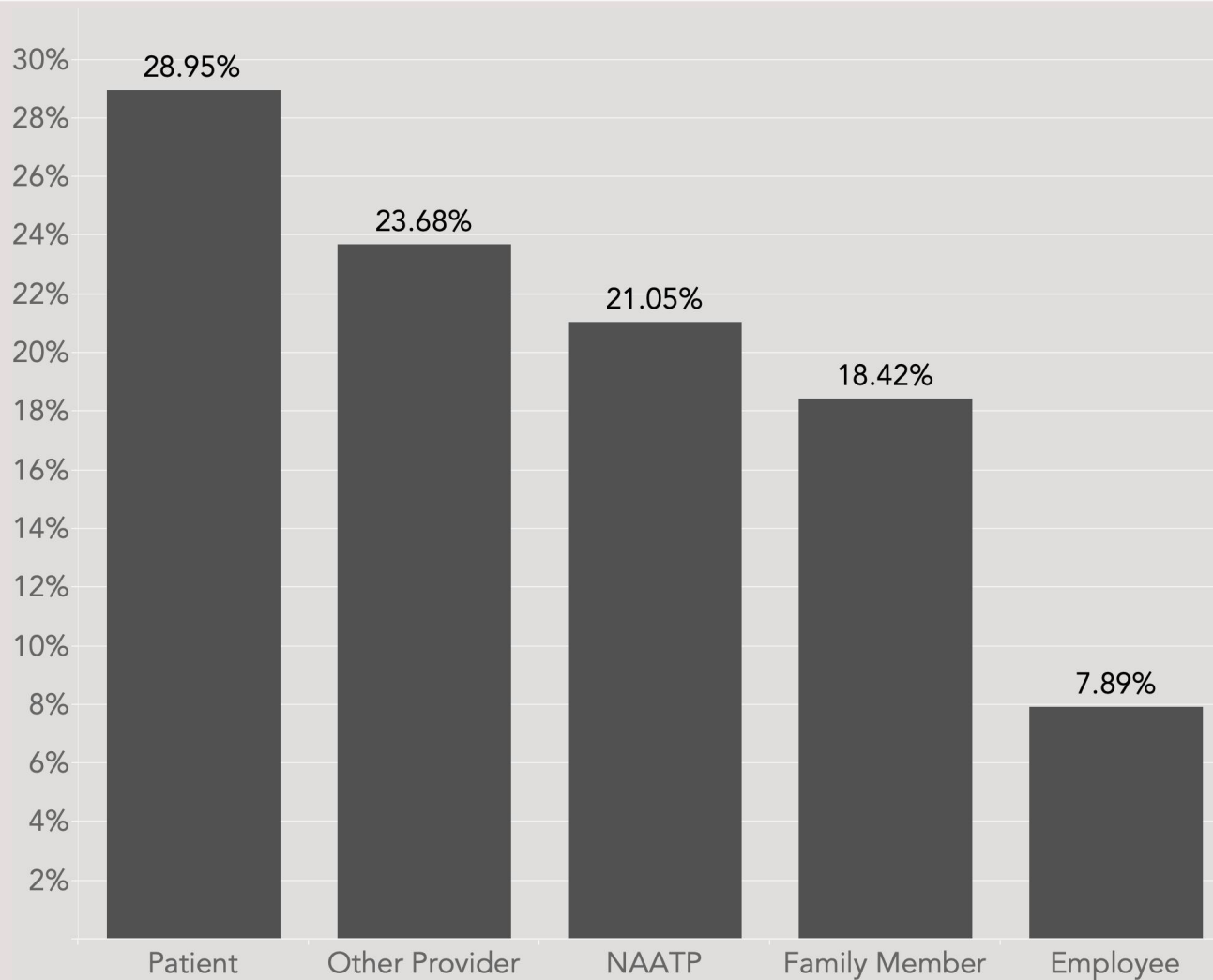
JULIA LURIE MARCH/APRIL 2019 ISSUE

Corrective Action

NAATP Quality Assurance 2016-2019

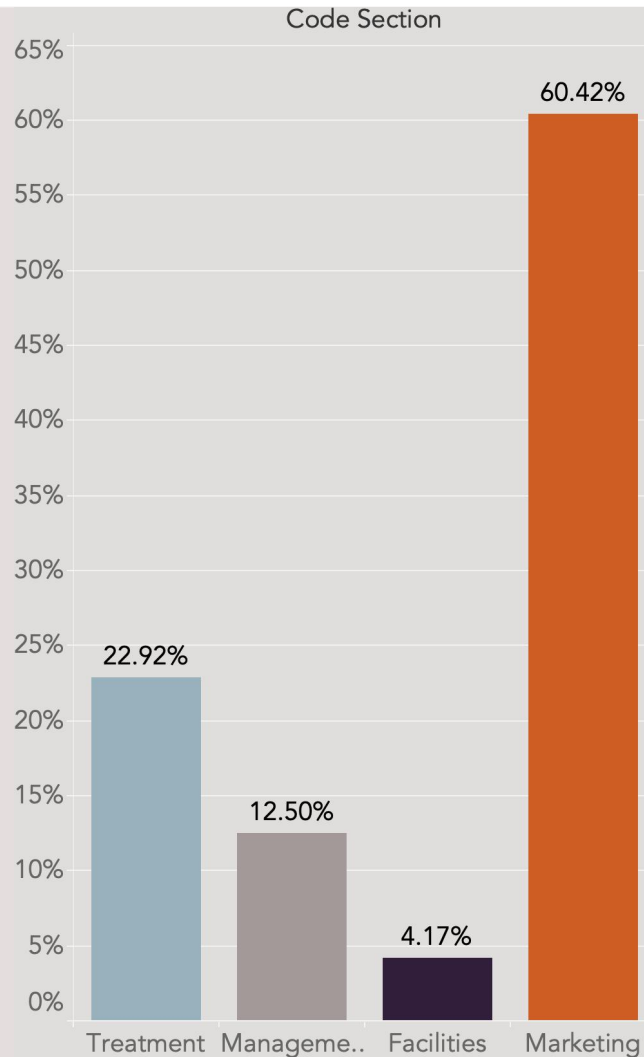
- 1-2016: Ethics Complaint Process
- 7-2017: NAATP QA Initiative Launched
- 9-2017: Google Restricts AdWords
- 1-2018: NAATP Released Ethics “2.0”
 - Removed 78 facilities from membership
 - Revised Complaint Process
 - Updated Membership conditions
- 3-2018: Treatment Discernment Guide
- 7-2018: NAATP Congressional Testimony
- 1-2019: Accreditation Requirement
- 3-2019: Released Ethics “2.5”
- 3-2019: Released of Outcomes Toolkit
- 4-2019: Beta Release of NAATP Quality Assurance Guidebook

NAATP Ethics Complaint Submissions



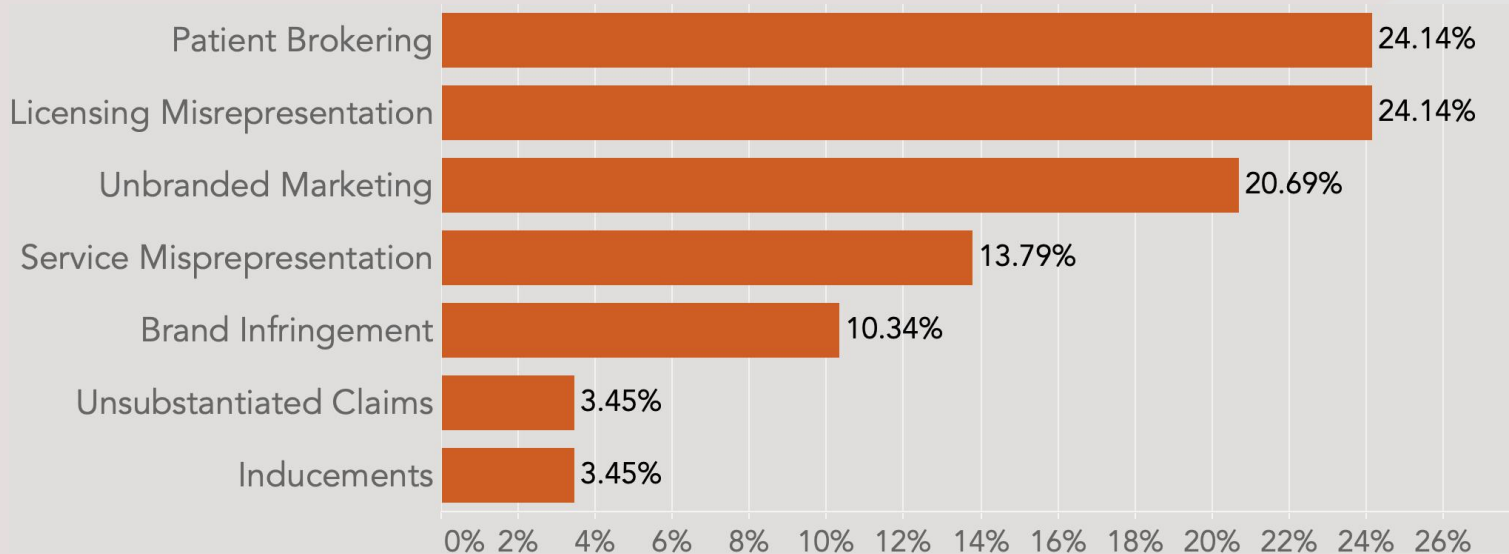
- Most submissions made by patients.
- Almost half from patients or family members
- Since January 2018 all violations discovered by NAATP Staff follow same complaint policy
 - Internal Complaints now comprise 1 in 5 ethics complaints
- 300% Increase in complaints in 2017
- 90% increase in 2018

NAATP Ethics Complaint Submissions



- All complaints must relate to one of four Code of Ethics Sections: Treatment, Management Facilities and Marketing.
- 60% of complaints relate to marketing
 - More than all other code sections combined

NAATP Ethics Complaint Submissions



- Within Marketing, most complaints relate to Patient Brokering, and License Misrepresentation (about 25% each)
 - Patient Brokering includes call aggregation, lead sales, and purchase or sale of calls
- About half of Marketing Complaints relate to some form of unbranded or misleading marketing

Marketing Simplified:

Is the information true, current, and transparent?

Read our Patient Reviews

See why people just like you chose us to start their recovery.

All of our reviews are submitted voluntarily without compensation by our patients and patient's family members. Some reviews may be from our staff.

- Recreated from a recent complaint
 - The facility has a number of 5-star reviews, presumably from patients
 - The facility was not open, and had not served any patients
- Why risk Credibility?
 - There were a number of great reviews from staff
 - Staff are the product we sell. Why not highlight their credentials and reviews?

Hear from our Professional Staff!

We are excited by the upcoming opening of our new location. Check out our reviews to hear what our Professional Staff think about working with us.

Marketing Simplified:

Does the consumer know who they're contacting before they call?

Find an AA Meeting Today

"A journey of a thousand miles begins with a single step." -Laozi, Lao-Tzu

24/7 Hotline to find a meeting near you

CALL US TODAY

(855) 325- [REDACTED]

Providing a Solution since 1935

The history of the 12 Step Program began in 1935 with the work of Bill Wilson and Dr. Robert Holbrook Smith or perhaps better known as "Bill W" and "Dr. Bob." It was through their leadership that AA took its roots in Akron, Ohio and became the prototype for the future for all recovery programs that exist [today](#)



Go To Meetings



Work The Steps



Get a Sponsor

- Website recently sent to NAATP Staff
 - 1 page site
 - 10 "calls to action" all links initiate call to a call center
- No relation to AA
- No ability to find a meeting

NAATP Ethic Complaint Process

If you have a complaint about a NAATP treatment center member, please follow these steps:

- Contact the treatment center
- Contact the accrediting body (usually [CARF](#) or the [Joint Commission](#))
- Contact the [State Licensing Agency](#)
- File a complaint with the [Better Business Bureau](#)
- File a complaint with the [Federal Trade Commission](#)
- File a complaint with NAATP

NAATP Ethics Complaint Process

NAATP is not a policing body

- NAATP authority is limited to current NAATP Members
 - We do not review complaints against non-members
 - Confirm that the facility is a member by checking our membership directory, [The AID](#)
 - If a center is not listed, it is not a member
- NAATP's ultimate recourse is removal from membership
 - Our primary goal is adherence to the Code and QA Guidebook
 - NAATP Seeks corrective action prior to removal from membership



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Lissa Franklin

Southeast Florida Recovery Awareness

Disclaimer

- I am not: law enforcement, a lawyer, or a federal agent
- Being involved with the local task forces as a civilian does not give me any special privileges and/or investigative authority.
- This presentation is not legal advice (see bullet one).
- This presentation is my own words, not that of any organization I am affiliated and/or involved with.
- This presentation is not sponsored by State, County, or City.
- Should anyone have concerns or comments with general statements made about types of fraud and/or patient trafficking, please direct all legal matters to my attorney: susan@romanolawgroup.com



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Where we were

Where we were:

What people think was the problem:

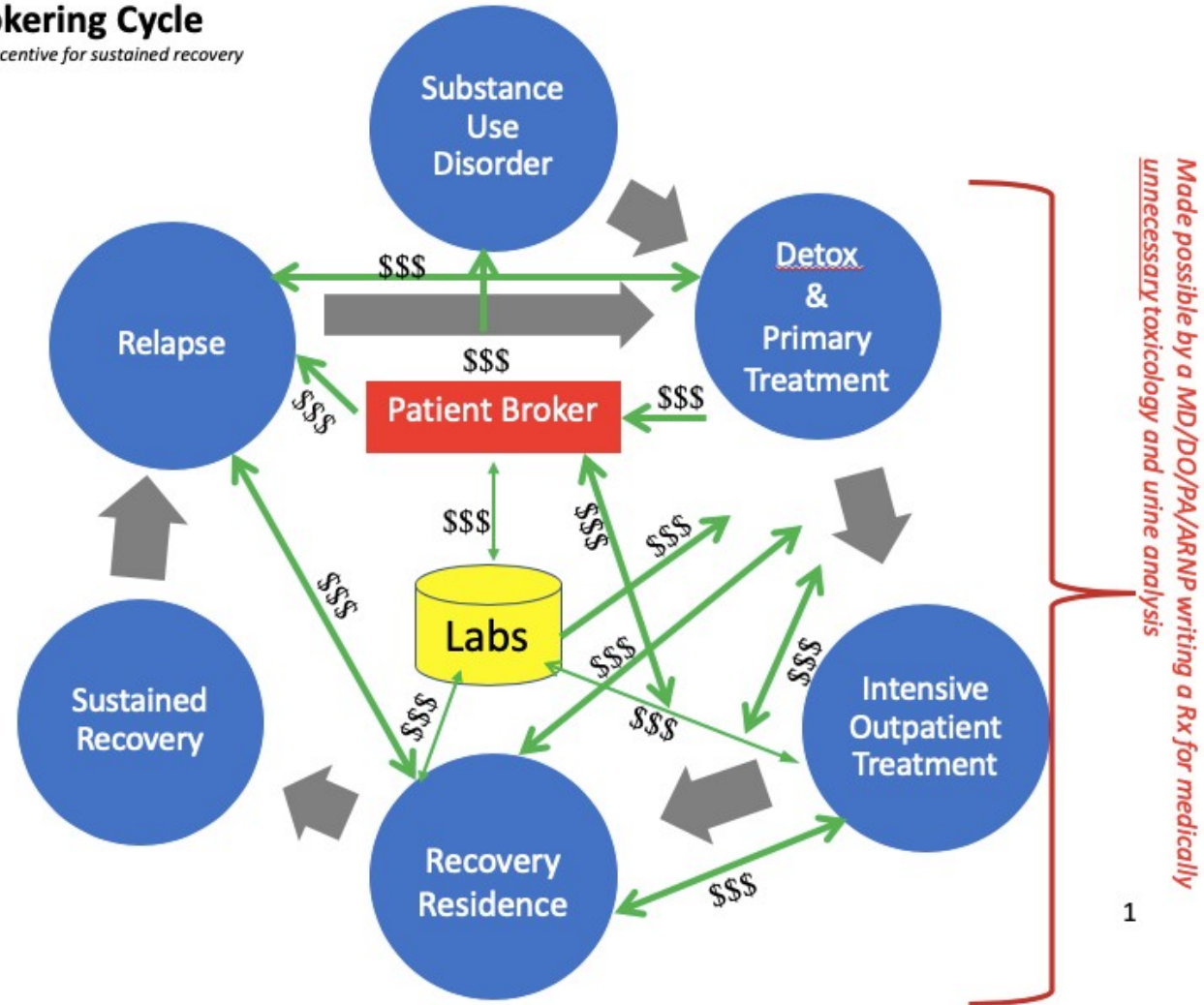


What was actually the problem:

- Unscrupulous Physicians
- Lack of regulations and standards within SUD treatment
- Lack of enforcement of bullet 2
- Language and portrayal by media
 - It has always been a national insurance shuffle, not just the “Florida Shuffle”

Patient Brokering Cycle

**Note: no monetary incentive for sustained recovery*





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What we did

What we did:

Sober Homes Task Force

- State Attorney Dave Aronberg, District 15
 - Past: Pill Mills
 - Current: Fix federal law to promote recovery instead of relapse
- Convened July 2016
- **Accomplishments:**
 - HB 807: Patient Brokering, Marketing, Recovery Residences, Standards of Clinical Care
 - Pilot Project and RCO
 - 73 arrests and counting
 - **Hotline: 1-844-324-5463**
 - <http://www.sa15.state.fl.us/stateattorney/SoberHomes/indexSH.htm>

Delray Beach:

Entire municipality collaboration

- Delray Beach Drug Task Force
- Delray Beach Police Department and Delray CARES Program
- Delray Beach Fire Rescue
- Recovery Residence Ordinance
- Code Enforcement

This time compared to last year, Delray Beach has seen a 79% reduction in overdoses



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Where we are now

Where we are now: Florida

Legislation

- **HB 807**
 - Recovery Residence Referrals (Section H)
 - Patient Records
 - Marketing Prohibitions (Section H)
 - SUD Treatment Licensure
- **2019 Hopefuls**
 - SB 102: Mandatory Certification Recovery Residences
 - SB 366: Needle Exchange
 - SB 528: MH/SUD Peer Screening
 - SB 530: Good Samaritan
 - SB 900: (SHTF Glitch Bill)

Community

- FARR
- PBCSAC
- Rebel Recovery
- PBC “Drug Czar”
- Delray C.A.R.E.S.
- SEFRA

Where we are now: Nationally

Industry organizations

- NAATP
- Joint Commission
- CARF
- SAMHSA
- NAMSDL
- LegitScript

State and Federal Oversight

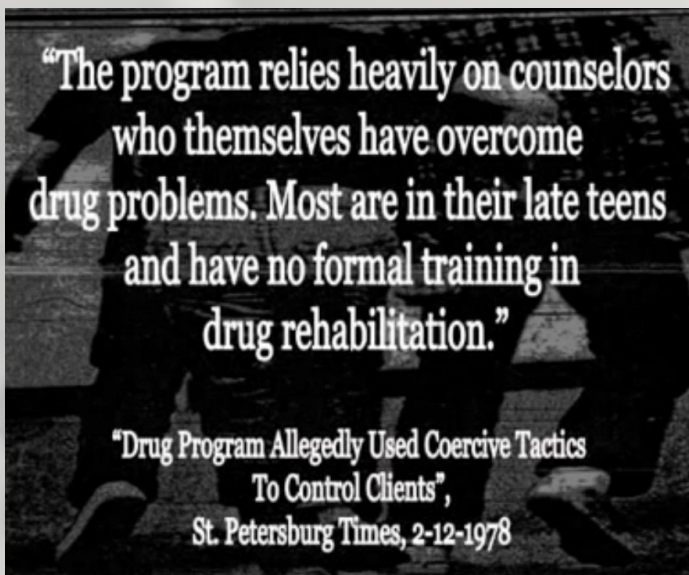
- House E&C
- H.R. 6 (Antikickback in Recovery Act)
- 18 USC 220: Illegal remunerations for referrals to recovery homes, clinical treatment facilities, and laboratories
(H-3: Financial Remuneration)
- States individually implementing own laws
 - NAMSDL



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Wrong is wrong,
even if everyone
is doing it.

Right is right,
even if no one
is doing it.



Where we still have to go...

"Misleading marketing practices, regardless of intention, damage patients and undermine the credibility of the field at large...these types of practices devalue the field, undermine collaboration, harm patients, and create liability for the providers engaging in deceptive and misleading marketing practices"

– NAATP Quality Assurance Guidebook, Section H, Preface

Optimizing patient care needs to supersede optimizing search engines

Fan pages, recovery rappers, momketers, oh my.

- “the recovery rapper told me to”
- Fake non-profits
- Recovery “celebrities”
- Closed Facebook groups guised as parent support groups but the admins are employees for addiction treatment centers
- Momketers
- Illegitimate credentials

Optimizing patient care needs to supersede optimizing search engines

- **Geo-targeting** (*H: 1,2,4,5*)
- **Misleading marketing** (*H:1, 2, 4, 5*)
- **Clinical & medical misrepresentation** (*H:1,2,4*)
- **Third Party Marketing Companies** (*H5*)
- **Company reviews** (*I:IV;C*)

Closing: Teamwork makes the dream work!

If you are in this room, you are committed to doing better

- ***Educate***

- See something, say something. Take every opportunity to educate others.

- ***Advocate***

- Start a task force in your local area!

- ***Empower***

- Equip patients and their families, staff, and any affiliates, with the knowledge of best practices so they may pass it on to others, causing a ripple effect of education by advocating and empowering others the same as you did to them.

- ***Lissa Franklin, BA***

- 305.978.2207
- franklin.lissa@gmail.com



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Jay Crosson Cumberland Heights Treatment Center

The Addiction Treatment Provider Quality Assurance Guidebook

Section I: Code of Ethics (P. 44-45)

I-1: Code Compliance

- *Addiction treatment providers should, and NAATP members must, adopt and adhere to the NAATP Code of Ethics (Code). Adherence to the Code promotes competence and professional conduct. Adherence to the Code also demonstrates competence and professional conduct to consumers, colleagues, health care, payers, policy-makers, the press, and the public. The Code provides a framework for values-based service that furthers the provider's mission and guides operational decision-making.*

QA 6 MARKETING & ETHICS: Section I Code of Ethics

- ✓ All NAATP members must adhere to the code of ethics
- ✓ Ethical conduct springs from five principles:
 1. Integrity
 2. Objectivity
 3. Competence
 4. Confidentiality
 5. Professional Behavior
- ✓ Guidelines are offered for all.

QA 6 MARKETING & ETHICS: Section I Code of Ethics

Original Ethics Code Adopted January, 2012

Ethics Code 2.0 Adopted January, 2018

- ✓ Establishes a Uniform Industry Standard and a Common Foundation for Ethical Practice
- ✓ Significant Focus on:
 - Marketing Accuracy
 - Marketing Transparency
- ✓ Addresses the Most Pressing Concerns - the Big 5
(Patient Brokering, Predatory Web Practices, Insurance and Billing Abuses, Payment Kickbacks, Licensing and Accreditation Misrepresentation)

QA 6 MARKETING & ETHICS: Section I Code of Ethics

Ethics code 2.5 was adopted February 2019 and further refined and delineated violations of the NAATP code of ethics. Changes included in the most recent update:

1. NAATP Members may not own, operate or otherwise control directory type websites.
2. An NAATP member may not engage in the buying and selling of patient leads including phone calls. Any collection or aggregation of leads for compensation is prohibited regardless of origination source, i.e. television ad, online directory, or other source. .

QA 6 MARKETING & ETHICS: Section I Code of Ethics

.... Additional Ethics code 2.5 changes:

3. NAATP Members may not use misleading language in advertising. Search engine ads may not include language in the heading or ad text that includes the name of another treatment center. Ads may not reference locations where services are not provided, or services for which the provider is not licensed.
4. NAATP Members must accurately reflect the level(s) of care offered, and for which the facility is licensed. Facilities providing outpatient clinical services along with a housing component must label clearly their program as such, and distinguish themselves from licensed residential facilities. Providing information about services that the facility does not offer in a way that could suggest those services are available is prohibited.



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Michelle Rusk
Federal Trade Commission



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FEDERAL TRADE COMMISSION STOPPING FRAUD AND DECEPTION IN THE ADDICTION TREATMENT INDUSTRY



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The views I express today are my own and do not necessarily reflect the views of the Federal Trade Commission or any individual Commissioner.

Michelle Rusk
Attorney
Advertising Practices
Consumer Protection Bureau
Federal Trade Commission

FTC Mission



- Small, independent law enforcement agency
- Broad mandate: stop deceptive and unfair acts or practices in commerce
- Includes all forms of marketing; all products and services
- Policing health fraud remains a big part of consumer protection mission
- Urgent need to stop deception in addiction treatment industry

FTC Law Basics



- **FTC Act Section 5 and 12** prohibits unfair or deceptive acts in commerce, and false ads for foods, supplements, drugs, devices, cosmetics

In other words: Common Sense Principles

- Ads and other marketing must be truthful and not misleading
- Claims need to be adequately supported *before* they appear in marketing.
- Marketers are responsible for all messages conveyed to consumers (express *and* implied)
- Ads can be deceptive by what they fail to say (material omissions)

FTC Law Basics



- **SUPPORT ACT of 2018** enhances FTC enforcement tools:
Sections 8021-8023: “Opioid Addiction Recovery Fraud Prevention” authorizes FTC to seek civil penalties for deceptive or false claims about performance, safety, efficacy, cost of addiction treatment products and programs.
- Also expands DOJ ability to stop patient brokering:
Section 8122: Criminal penalties of up to \$200,000/10 years in prison; not limited to services reimbursed by federal health care.

Coordinated Law Enforcement



- Long history of working with other federal and state enforcement agencies, and foreign counterparts
- Refer matters to Department of Justice for criminal prosecution
- Coordinate closely with FDA on health-related products and services (liaison agreement)
- Joint investigations and enforcement with State Attorneys General
- Collect and share Consumer Sentinel data with federal, state, and local law enforcement across the country

FTC Enforcement



- Enforcement Sweep with other agencies: DOJ, DoD, FDA, USPIS, USADA
- Blend of herbs/other compounds
- \$75 for 8-oz bottle
- Targeted opiate-addicted consumers
- Testimonials: "Elimidrol SAVED my life."
- \$ 235,000 for consumer redress as part of \$1.4 million settlement

FTC Enforcement



➤ **Who is Potentially Liable? Anyone who actively participates in the deceptive or unfair marketing.**

- The advertiser (treatment provider)
- Individual owners/corporate officers
- Experts and endorsers
- Ad agencies, PR firms, infomercial producers

If you played a role, you could be subject to FTC action.

FTC Enforcement



➤ What are the consequences?

- Injunctions (can't make challenged claims)
- Corrective advertising or disclosures
- Bans or bonds
- Refunds for consumers ("redress")
- Disgorgement of "ill-gotten gains"
- Civil Penalties (\$42,530 per violation – each and every occurrence)

FTC Enforcement



Alcohol Abuse

- 3rd Leading Cause of Death
- 50% More Hospitalizations

Alcoholism Cure Foundation™

Secure Sign Up

Privacy and Security

Doctor-Patient Privilege plus high level security assurances are important benefits. Does anyone seriously think weekly meetings in rooms full of alcoholics are Anonymous? **Alcoholism Cure Foundation** leads all other alcohol abuse treatments, in all ways, not just that our Permanent Cure rate is 300% better, and costs far less.

Permanent Cure costs about \$350 until you see results in 1-10 weeks. Difficult cases only a few hundred more.

All Programs are Tax Deductible see your tax advisor

We cheerfully refund step up fees if you are not **Drinking Down Half** in the typical 1-10 weeks. This keeps your cost (including ingredients) until you are cured to less than a single bar drink/day.

You may cancel anytime you are not at least **Drinking Down Half** after following your program for five months, or if we can not bring you down to **Social Drinking** within a reasonable time afterwards. From when you first see results, **Cure Dividend Savings** typically exceed all costs, and your program is virtually cost free.

Which Permanent Cure Program Is Right For Me?

Very Heavy Drinker Program works best:

- More than 7 ounces/day more than 3 days/month
- Drinking 10+ years of 2+ drinks/day
- Female under 120 pounds drinking 3+ ounces/day
- Spend about \$6-15/Day on alcohol

Faster results, more side effects, more monitoring. Fee begins at **\$3.33/day** (\$99.96). **Drinking Down Half** usually in **1-10 weeks**. Anticipating your cure, fee steps up in the 2nd month to \$5/Day (PayPal charges 2nd+3rd months together) and final step up to \$9/day (\$269.96/month) 4 months from now.

Heavy Drinker Program works best:

- Less than 7 ounces/day except rarely
- No binge drinking over 10 oz/day/month
- Heavy Drinking under 10 years
- Spend less than \$7/day on alcohol

Fee begins at **\$2/day** (\$59.96). **Drinking Down Half** usually in **1-10 weeks**. Anticipating your cure, fee steps up in the second month to \$3/Day (PayPal charges 2nd+3rd months together) and final step up to \$6/day (\$179.96/month) 4 months from now.

You may quit anytime if not being cured as we describe

You will see impressive results ... guaranteed. Often within 1-10 weeks, nearly always by 5 months.

You must follow the program for five months since you may be a difficult case.

Virtually Cost Free. Cure Dividend Savings typically exceed regular monthly fees.

Membership Virtually COST FREE to You Yes, Most members SAVE MONEY each month more than fees!

Press "Yes, I Want My Life Back"

Your family will be everlastingly thankful you made the smartest move of your life. Decide now.

Very Heavy Drinker

Yes! I Want My Life Back

PayPal division of eBay has over 100,000,000 members and accepts all major payment methods (Click, Wait 20 sec., Arrow Back Only)

Heavy Drinker

Yes! I Want My Life Back

FREE Assessment
Next 200 Members
\$135
To Go
updated frequently

• Prefer to ask a few questions of our Advisors? Keep this page open.
Call Us Now: 904-234-0103

• Or pay with your credit card at PayPal and save \$45.

“Permanent Cure rate is 300% better”
than all other alcohol abuse treatments.”
“You may cancel anytime”
“We cheerfully refund”
“privacy/ Doctor –Patient Privilege”

Dr. Doug’s “Team of Doctors”

The team of doctors employed by Alcoholism Cure did the research in the sciences of Alcoholism and Nutraceuticals. We spent a fortune bringing together the surprisingly large amount of information that was already known about addictions to produce an answer to alcoholism that works. Our clinical successes have been beyond their wildest dreams.

Here is a sampling of 100 major scientific articles from well respected medical publications in our Research Library. There are 1,000s of such addiction articles.

FTC Enforcement



- “Dr. Doug” not a doctor. Named as individual defendant.
- Prescribed ineffective concoctions of supplements
- Threatened to publicly reveal consumers’ alcoholism when they tried to cancel
- Charged consumers’ financial accounts \$9,000 to \$20,000 without authorization
- Joint FTC/Florida AG Action
- Defendants permanently banned from marketing any treatment for alcoholism, drug addiction, or any other health problem; ordered to pay \$732,480 in refunds

FTC Enforcement



The Leader in Home Opiate Detox Since 2009

Withdrawal Ease has helped tens of thousands of people take their first step towards getting their lives back. If you or someone you love is suffering from the debilitating physical symptoms of opiate withdrawal, it can help you too.

"Don't wait until tomorrow. Take your first step today."

Order Now



Testimonials

"...your product and help truly transformed me back to the person I used to be — and I was a good person — and am finally back to that person..."

- “Withdrawal Ease” and “Recovery Ease” from the “leader in home opiate detox since 2009”
- Company and its owner settled charges that made false and unsubstantiated claims, including through product names
- False claims that clinical studies proved efficacy
- \$6.6 million suspended judgment

FTC v. Catlin Enterprises et al. (W.D. Tex. 2017)

FTC Enforcement



WARNING LETTER

VIA OVERNIGHT DELIVERY
RETURN RECEIPT REQUESTED

January 11, 2018

Kenneth Nersten
Choice Detox Center, Inc. dba Nofeel
552 Hamilton Street
Suite E-1
Costa Mesa, CA 92627

900 E Katella Avenue Suite D
Orange, CA 92867-5035

RE: 543456

Dear Mr. Nersten:

This is to advise you that the U.S. Food and Drug Administration (FDA) reviewed your website at the Internet address www.nofeel.com, in December 2017 and has determined that you take orders there for the product "Nofeel." The claims on your website establish that the product is a drug under section 201(g)(1)(B) of the Federal Food, Drug, and Cosmetic Act (the Act) [21 U.S.C. § 321(g)(1)(B)] because it is intended for use in the cure, mitigation, treatment, or prevention of disease. As explained further below, introducing or delivering this product for introduction into interstate commerce for such uses violates the Act. You may find the Act and FDA regulations through links on FDA's home page at www.fda.gov. In addition, the Federal Trade Commission has reviewed your marketing claims for "Nofeel" for potential violations of Sections 5 and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

Examples of some of the claims observed on your website that provide evidence your product is intended for use as a drug include the following:

- "Opiate Withdrawal Supplements"
- "Get the Best...Opiate Withdrawal Supplements...Clinically proven"
- "NOFEEL – "Opiate Withdrawal Supplements...you need to recover"
- "Nofeel system is a combination of formulas and functions...that work to achieve results."

Your product "Nofeel" is not generally recognized as safe and effective for the above referenced uses and, therefore, this product is a "new drug" under section 201(p) of the Act [21 U.S.C. § 321(p)]. New drugs may not be legally introduced or delivered for introduction into interstate

- FTC/FDA Joint Warning Letters sent to 11 marketers and distributors of opioid cessation products making unproven claims
- 4 additional letters sent by FTC
- Targets given 15 days to remove claims or risk product seizure, injunction, other law enforcement.



Common Indicia of Deception/Fraud

- Hidden identities and affiliations
- Call centers making “perfect-fit” referrals
- Extreme success rates
- Clinical studies prove/Medical breakthrough
- Suspect expert or celebrity endorsements
- Seals or certifications from questionable organizations
- Ads presented as news reports
- Commercial sites presented as third-party resources
- Too-good-to-be-true testimonials
- Marketing by spam/robocalls

"Independent" Resource Sites



- Product claimed to help children with autism and apraxia develop normal speech
- Purported independent “Apraxia Research” site was just company marketing ploy.

Deceptive Certifications



FUCOIDAN FORCE™
Incredible Cancer Fighting Agent
Promotes the Self-Destruction & Elimination of Cancerous Cells

Ultimate Immune System Booster

Immune Strong™ with Agaricus:

- ✓ Works Wonders against Colds, Flu (Influenza) and Viruses.
- ✓ Offers an Easier Way to Stop the Wheezing, Sneezing and Hacking Fast!
- ✓ Helps prevent postnasal-drip triggered Sore Throats, Hoarseness & Infections.
- ✓ Keeps the Sniffles at bay. Helps prevent Cold & Flu related Congestion.
- ✓ Reduces health-related time-off from Work by a Whopping 97%.
- ✓ Combats deadly Ailments and Diseases including MS, HIV, AIDS and Cancer.

Buy 6 Get 2 FREE - \$299.70

Add to Cart

Immune Strong™ delivers...
Serious Immune Protection from Seasonal & Daily Immune distress

Lifetime Money Back Guarantee
FREE Delivery US Orders over \$75

CERTIFIED ethicalSite™
06-23-16
Active Member
CLICK TO VERIFY



- “Combats deadly ailments and disease including MS, HIV, AIDS, and cancer”
- Reduces health-related work absences “by a whopping 97%”
- “Selfie Seal” issued by same individuals who owned the supplement marketer

Deceptive Testimonials



*"Losing 80 pounds
changed my life forever!"
- Tiffany Black*

Tiffany Black Lost 80 Pounds With Xenadrine-EFX!

Anything's Possible With New Xenadrine-EFX!

"I never thought losing 80 pounds could be so fast and so easy. I used to be insecure and overweight, but thanks to Xenadrine-EFX now I'm a confident woman with a life full of exciting possibilities. That's why I recommend Xenadrine-EFX to everyone I meet. With Xenadrine-EFX you start seeing and feeling the difference almost immediately. And you won't believe the energy you get! Take my word for it...Xenadrine is fantastic!"

Clinically Proven to Deliver Dramatic Results...without Ephedrine!

Xenadrine-EFX was recently put to a comparison test in a head-to-head clinical trial against two leading ephedrine-based thermogenic diet products and significantly outperformed them both! This landmark study represents the first time that any diet supplement has been shown to boost metabolic rate greater than ephedrine. That's exactly what your body needs to achieve rapid weight loss. Equally impressive was the fact that these powerful effects were observed within just 60 minutes of taking Xenadrine-EFX.

Simply put, no other diet supplement is safer, faster or more effective at reducing body-fat than new Xenadrine-EFX. To believe it, you just have to experience it for yourself. Just like Tiffany did!

Reshape Your Body and Energize Your Life With New Xenadrine-EFX!



The Guaranteed Easiest and Fastest Way to Take the Weight Off!

For more information, visit www.Xenadrine.com or call toll free 1-888-CYTODYN Dept. 2959

Available at www.Xenadrine.com, Wal-Mart, Walgreens, Target & other fine health food and drug stores nationwide.

©2002 Cyndee, LLC. All rights reserved. All trademarks and registered trademarks are the property of their respective owners. Results shown may vary by individual. 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.

"I never thought losing 80 pounds would be so fast and easy.."

"Clinically proven to deliver dramatic results without ephedrine"

- Undisclosed payment for testimonials of up to \$20,000
- Placebo in one study lost more than the group on Xenadrine
- FTC case included \$12.8 million in consumer redress

Fraud Trifecta



Special Report 2015: How To Lose at Least 21 lbs of Belly Fat in Just 1 Month With These 2 Diet Cleanses That Celebrities Use.

This report was created by Health & Lifestyle to expose the truth behind a new diet sweeping the world



Staff reporter Helen Crisell investigates a weird weight loss solution that is quickly gaining popularity in the US.

By Helen Crisell | 🔥 2,391,558 | 💬 656

(Diet Report - Health & Lifestyle) - For the past couple of months our readers have been going crazy over two free internet products that are helping women across the world lose the fat around their bodies - [Pure Garcinia Cambogia Extract](#) and [Premium Cleanse](#). This revolutionary system, called by some "The Holy Grail of Weight Loss" has been featured on countless popular TV shows, proven to be safe for ongoing use and best of all - it's totally affordable for anyone.

Waves of celebrities including Kim Kardashian, Nicole Kidman and Jennifer Lopez, have lost a significant amount of body fat



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