

DECLARATION OF RHONDA WOOTEN
PURSUANT TO 28 U.S.C. § 1746

I, Rhonda Wooten, hereby declare as follows:

1. My name is Rhonda Wooten. I am a United States citizen over eighteen (18) years of age and residing in Paxton, Illinois.
2. I have personal knowledge of the facts stated in this declaration, and if called as a witness, I could and would competently testify to the facts stated herein.
3. Throughout this declaration, in many instances, information from copies of documents that are attached hereto that would reveal personally identifiable or sensitive information about me has been blacked out, such as my account number, address, and irrelevant transactions.
4. In August 2009, I was searching the Internet for weight loss products and I found a website selling a weight loss product called "Acai Advanced." I do not remember the website address. The website stated that I would receive another health product that would complement Acai Advanced called "Colopure." Based on the information on the website, Acai Advanced was a weight loss pill and Colopure is a body or colon cleansing pill. The website stated that using Colopure with Acai Advanced would significantly help me lose weight.
5. The website had one or more testimonials from customers promoting Acai Advanced or Colopure. In general, these customers stated that they had used the product and it had worked. These customers stated that they had lost over 25 pounds in a short period of time. The website had a testimonial from a female customer from my hometown in Paxton, Illinois. I was surprised and encouraged that someone from my hometown had used the product and had lost weight. I decided to find out how much each product would cost me.

6. The website stated the following:
 - a. For a \$5.95 shipping fee, I would receive a free trial of a Acai Advanced.
 - b. For a \$4.95 shipping fee, I would receive a free trial of Colopure.

Based on the information on the website, it was my understanding that I was getting a free trial of Acai Advanced and Colopure to try and decide whether I liked the products. It was also my understand that if I liked the Acai Advanced or Colopure, I could reorder by visiting the company's website or calling the company's customer service department to purchase more Acai Advance or Colopure. I was very interested in trying out the products. Additionally, I believed I only had to pay the \$5.95 shipping fee for Acai Advanced and \$4.95 shipping fee for Colopure, for a total of just \$10.90. I decided it was worthwhile to try the products, so I requested the Acai Advanced and Colopure free trials from the website.

7. I do not remember seeing any "terms and conditions" page on the website or any links to a "terms and conditions" web page. I submitted my personal information and my debit card information, which is linked to my checking account from Farmers-Merchants National Bank, onto the website. I included my debit card information only to pay the \$5.95 shipping fee for Acai Advanced and \$4.95 for Colopure.

8. About a week after I requested Acai Advanced and Colopure, I received Acai Advanced in the mail. I did not try the pills because my husband was concerned that we did not have enough information about Acai Advanced or the company.

9. In or around September 2009, I received a package containing Colopure and a document titled "Packing List." The return address on the package was Innovative Fulfillment Center, 12399 Belcher Road, Suite 140, Largo, Florida 33773. The return address on the packing list was Fulfillment Center, Attn: CCN Returns, 12399 Belcher Road South, Suite 140,

Largo, FL 33773. The packing list also showed that CCN's or Colopure's customer care department toll-free telephone number as 1-888-692-8352, and that the Colopure bottle was shipped on August 17, 2009. Attached hereto as **Wooten Att. A** is a true and correct copy of the front of the package. Attached hereto as **Wooten Att. B** is a true and correct copy of the packing list. Attached hereto as **Wooten Att. C** are true and correct photographs of the Colopure bottle. The photographs fairly and accurately show the product label as they appeared on the Colopure bottle. I believe the Acai Advanced product I received was a from a different company, not CCN.

10. I did not try Colopure because my husband was concerned that we did not have enough information about Colopure or CCN.

11. I reviewed my August 2009 bank account transaction report and I noticed that I was charged \$4.95, which I believe was for the Colopure shipping fee.

12. In or around late September 2009, I received another package containing Colopure and another packing list document. As with the first shipment of Colopure, the return address on the package list was Innovative Health Fulfillment, but the address listed for Innovative Health Fulfillment was different from what was listed on the prior packing list: 6901 Bryan Dairy Road, Suite 110, Largo, Florida 33777. The return address on the packing list was Fulfillment Center, Attn: CCN Returns, 12399 Belcher Road South, Suite 140, Largo, FL 33773. The packing list also showed that CCN's or Colopure's customer care department toll-free telephone number as 1-888-692-8352, and that the Colopure bottle was shipped on September 17, 2009. The Colopure bottle was identical to the first shipment of Colopure from CCN. Attached hereto as **Wooten Att. D** is a true and correct copy of the front of the package. Attached hereto as **Wooten Att. E** is a true and correct copy of the packing list.

13. The packing list as mentioned above contained an itemized invoice or receipt showing the purchase order for Colopure for \$59.95 plus \$4.95 for shipping and handling. I had not contacted CCN's customer care department or visit CCN's website to order this second shipment of Colopure nor did I authorize CCN to charge this second shipment of Colopure to my bank account.

14. I obtained transaction report from Farmers-Merchants National Bank dated September 25, 2009. The report contained an itemized transaction line showing the following charges:

- a. On September 1, 2009, I was charged \$59.95. The merchant descriptor is listed as "VP/ilifecolo8885726947."
- b. On September 17, 2009, I was charged \$64.90. The merchant descriptor is listed as "VP/ilifecolo8885726947."
- c. On October 20, 2009, I was charged \$64.90. The merchant descriptor is listed as "VP/ilifecolo8885726947."

I believe the merchant descriptor listed in this paragraph was associated with Colopure and CCN. Attached hereto as **Wooten Att. F** is a true and correct copy of this report from Farmers-Merchants National Bank dated September 25, 2009.

15. In or around October 2009, I received a third shipment of Colopure from CCN.

16. During this entire time period, I repeatedly called CCN customer care department to ask why was I continuing to receive Colopure and to complain about the numerous unauthorized charges. I believe I called CCN's customer care department toll-free telephone number, 1-888-572-6944, listed on the packing list. However, each time I called, I was placed on hold by CCN's automated telephone system. It was very difficult to speak to a live CCN

representative. When I finally got through to a live CCN representative, I asked the CCN representative why I had been receiving monthly shipments of Colopure and why I had been charged three times in the amount of \$59.95, \$64.90, and \$64.90 for Colopure. I told the CCN representative that I had only signed up to receive one free trial of Colopure and had only agreed to pay the \$4.95 shipping fee. I also told the representative that I had requested the free trial of Colopure simply to try the product with the understanding that I could order more later if I wanted. I told the CCN representative that I wanted a refund for all the unauthorized Colopure charges debited from my checking account.

17. The CCN representative told me that I had signed up and agreed to receive monthly shipments of Colopure and to be charged \$59.95 for the free trial of Colopure and \$64.90 for the monthly Colopure shipments. The CCN representative also told me that I was required to call CCN to cancel my membership in order to stop the monthly charges for Colopure and shipments of Colopure. I told the representative that I had not seen anything on the website saying I was going to be charged \$59.95 for the free trial of Colopure nor that I was signing up to receive monthly shipments of Colopure for \$64.90. I would have noticed such significant statements or terms. I also did not know that I had to call CCN's customer care department to cancel. I explained to the representative that if I had known I was signing up for a monthly program costing \$64.90 a month by requesting one "free trial," I definitely would not have done so. The CCN representative continued to insist that the information about CCN's monthly program was on the website.

18. I asked the representative if I could return all the Colopure bottles I had received and get a refund. The representative told me that I could not because I had not returned the products in time, in accordance to CCN's return policy. I again emphasized to the representative

that I did not know I had to return the products back to CCN to avoid being charged because it was not clearly disclosed to me. I also told the representative that I had not opened the bottles and therefore should be able to return them. The CCN representative refused, again citing CCN's return policy, which I had never seen on the website, and stating that it did not matter if the Colopure bottles were unopened.

19. The CCN representative then told me I could return the third shipment of Colopure for a full refund in the amount of \$64.90 because I was within company's return policy time period. The representative gave me a cancellation number and told me to put it on the outside of the package. The representative also told me to get delivery confirmation. The representative told me that he would cancel my account and I would not receive any future shipments of Colopure.

20. On that same day, after speaking with the CCN representative, I mailed the third shipment of Colopure back to CCN as instructed. I paid about \$5 to return the package using the United States Postal Service ("USPS") and obtained delivery confirmation. I tracked the package to confirm that it had been delivered. According to USPS website, the package had been delivered about a week from the date I had mailed it to CCN. However, I did not receive a refund at that time.

21. From November 2009 through January 2010, I repeatedly called CCN to check the status of my refund. Each time I called, a CCN representative told me that my refund was processing. On one or more occasion, a CCN representative told me that my refund was coming from the United Kingdom and that was why it was taking so long to process.

22. In or around late December 2009, I filed a complaint against CCN with the Better Business. In December 2009 or January 2010, I received a letter from the Better Business

Bureau stating that they had contacted CCN regarding my complaint and that CCN was going to send me a check in the amount of \$50.95.

23. In January or February 2010, I received a check in the amount of \$50.95 from CCN despite the fact that I had previously been promised a full refund in the amount of \$64.90 by one ore more CCN representatives. I had already spent over two months trying to contact CCN to complain and get a refund. I felt that it would have been fruitless to try to contact CCN again to get the remainder of my promised refund. Additionally, I felt that getting a little bit of my money was better than nothing.

24. I was led to believe that all I had to pay was the \$4.95 shipping fee to get my “free trial” of Colopure. Instead, this request led to several extremely stressful and burdensome months dealing with CCN. In total, I lost at least \$150, which caused me financial hardship and difficulty paying my bills.

I declare under penalty of perjury that the foregoing statement is true and correct.

Executed on Mar 26, 2010 at Paxton, Illinois
City

Rhonda Wooten
Rhonda Wooten

Return Service Requested

US Postage Paid
UPS Mail Innovations
PRSRT STD

*I-X  18-66
3 -927 


PKG# 4727158
MMS# 070050818091809414


ZIP 60957

Return Address: INNOVATIVE FULFILLMENT CENTER
888-692-8352
12399 BELCHER ROAD
SUITE 140
LARGO FLORIDA 33773
UNITED STATES

PKG ID: 00031211
0 LBS 4 OZ

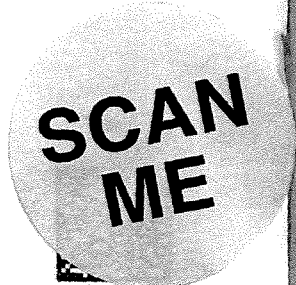
Shipper: UPS Mail Innovations

Ship To: RHONDA WOOTEN

PAXTON IL
UNITED STATES

Postal Code: 
Order Number: 4727158
Cost Center: 11



4727158



USPS DELIVERY CONFIRM



ELECTRONIC RATE APPROVED # 

Wooten Att. A



4727158

PACKING LIST

ORDER # 4727158



S INNOVATIVE FULFILLMENT CENTER
H 888-692-8352
I 12399 BELCHER ROAD
P SUITE 140
F LARGO, FLORIDA 33773
R UNITED STATES
O
M

S RHONDA WOOTEN
H [REDACTED]
I [REDACTED]
P PAXTON, IL [REDACTED]
T UNITED STATES
O

Wooten Att. B

SHIP DATE	SHIP VIA	CUSTOMER #	PAYMENT	TOTAL BOXES	TOTAL WEIGHT	
08/17/2009	Mail Innovations	1390920	VISA	1	0.3 lbs	
QTY	PART #	WAREHOUSE	BOX	DESCRIPTION	PRICE	AMOUNT
1	COLONP-01FT	ANA-1	1	Colopure Risk Free Trial	\$0.00	\$0.00

(Sales Tax has been charged as required by State Law)
All amounts are shown as U.S. Dollars

Subtotal 0.00 USD
S&H 4.95 USD
Tax 0.00 USD
Total 4.95 USD

Your credit card will show a charge from: **OnV/colopure8882239486**

Return Policy

If you are not satisfied with the product for any reason, simply return all unopened units for a full refund (less shipping & Handling) within 30 days of the original purchase date. Refunds will be given on unopened units only; Exceptions will be made for trial offers. All returns are subject to a 15% restocking fee. Returned merchandise requires a delivery confirmation from the shipping provider and an RMA (Return Merchandise Authorization) number from Customer Care. Refunds will not be made on packages marked "Return to sender".

Return Address

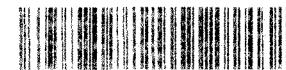
Fulfillment Center
ATTN: CCN RETURNS
12399 Belcher Road South, Suite 140
Largo, FL 33773

Customer Service

You are ordering the Colopure 14-day risk-free trial offer for only \$1 plus \$4.95 shipping and handling. Your 14-day trial begins when you receive the product. If you are not satisfied with Colopure for any reason just return the unused portion anytime before the end of the 14-day trial period and you will have no further obligation. For your courtesy we will provide you with an additional 7 days after the 14-day trial period to allow for return shipping to avoid further obligation. If you are happy with the product do nothing and your credit card will be charged an additional \$38.95 approximately 21 days after your receipt of the initial trial shipment. In addition approximately 30 days after you order your risk-free trial and about every 30 days thereafter we will automatically send you an additional 1 month supply. The credit card you provide today will be billed the low price of \$39.95 plus \$4.95 shipping & handling for a total of \$44.90 when each new product ships. That's 20% off the regular price for a 1-month supply. You may cancel your membership during the trial period or any time thereafter by simply calling our Customer Care department at 1-888-692-8352 or by using our contact form at www.getorderhelp.com.

MESSAGE:

Thank you for your order.



RHONDA WOOTEN

NATURAL HERBAL CLEANSING FORMULA

COLOPURE™

- May safely absorb and eliminate toxins†
- May promote healthy colon function†
- No harsh stimulants†

DIETARY SUPPLEMENT 60 Capsules



Supplement Facts

Serving Size: 1 Capsule

Amount Per Serving	% Daily Value
Proprietary blend: 800mg	*
Psyllium (seed)	
Rhubarb powder (root)	
Ginger powder (root)	
Fennel powder (seed)	
Buckthorn powder (bark)	
Licorice powder (root)	
Goldenseal powder (whole herb)	
Cascara sagrada powder (bark)	

* Daily Value not established

Other Ingredients: Gelatin, rice flour, magnesium stearate, silicon dioxide.

Manufactured for:

Central Coast Nutraceuticals, Inc.
2375 E. Camelback Rd., 5th Floor
Phoenix, AZ 85016 USA Phone: 888-692-8352

Suggested Use: As a dietary supplement, take 1 to 3 capsules daily. Start with 1 capsule in the evening. Add an additional capsule each evening until you reach 3 capsules total. Do not exceed 3 capsules daily.

**Cleansing the Natural Way with COLOPURE
Natural Herbal Cleansing Formula!**

COLOPURE may promote healthy colon function by safely and naturally helping to absorb and eliminate toxins from the body, making you feel fresh, clean, and revitalized.†

† 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.

central coast nutraceuticals inc.



Return Service Requested

US Postage Paid
UPS Mail Innovations
PRSRT STD

*I-X  18-66
3 -980


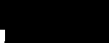
PKG# 4841538
AMS# 070940918090031300


ZIP: 

Return Address: INNOVATIVE HEALTH FULFILLMENT
888-572-6944
6901 BRYAN DAIRY ROAD
SUITE 110
LARGO FLORIDA 33777
UNITED STATES

PKG ID: 00089995
0 LBS 4 OZ

Shipper: UPS Mail Innovations

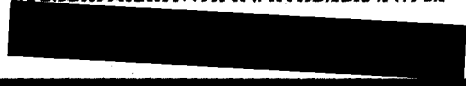
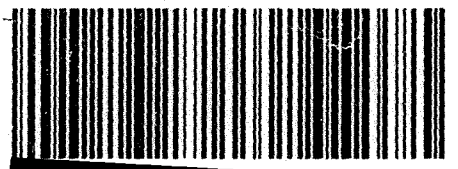
Ship To: RHONDA WOOTEN

PAXTON IL 
UNITED STATES

Postal Code: 
Order Number: 4841538
Cost Center: 11


4841538

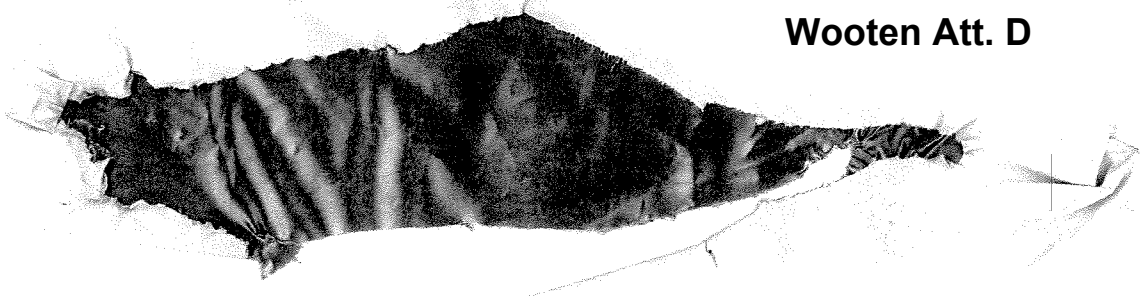


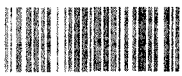
USPS DELIVERY CONFIRM



ELECTRONIC RATE APPROVED # 

Wooten Att. D





4841538

PACKING LIST

ORDER # 4841538



S INNOVATIVE HEALTH FULFILLMENT
H 888-572-6944
I 6901 BRYAN DAIRY ROAD
P SUITE 110
F LARGO, FLORIDA 33777
R UNITED STATES
O
M

S RHONDA WOOTEN
H [REDACTED]
I [REDACTED]
P PAXTON, IL [REDACTED]
T UNITED STATES
O

Wooten Att. E

SHIP DATE	SHIP VIA	CUSTOMER #	PAYMENT	TOTAL BOXES	TOTAL WEIGHT	
09/17/2009	Mail Innovations	1390920	VISA	1	0.3 lbs	
QTY	PART #	WAREHOUSE	BOX	DESCRIPTION	PRICE	AMOUNT
1	COLONP-01A	ANA-1	1	Colopure 1 Month Supply	\$59.95	\$59.95

(Sales Tax has been charged as required by State Law)
All amounts are shown as U.S. Dollars

Subtotal 59.95 USD
S&H 4.95 USD
Tax 0.00 USD
Total 64.90 USD

Your credit card will show a charge from: OnV/colopure8882239486

Return Policy

If you are not satisfied with the product for any reason, simply return all unopened units for a full refund (less shipping & Handling) within 30 days of the original purchase date. Refunds will be given on unopened units only; Exceptions will be made for trial offers. All returns are subject to a 15% restocking fee. Returned merchandise requires a delivery confirmation from the shipping provider and an RMA (Return Merchandise Authorization) number from Customer Care. Refunds will not be made on packages marked "Return to sender".

Return Address

Fulfillment Center
ATTN: GCN RETURNS
12399 Belcher Road South, Suite 140
Largo, FL 33773

Customer Service

You are receiving this shipment because you are currently enrolled into the Lifestyle Program. You will continue to receive a fresh shipment of the product each month until you cancel your Lifestyle Program membership. You may cancel your Lifestyle Program membership at any time by simply calling our Customer Care department at 1-888-692-8352 or by visiting www.getorderhelp.com. People see most noticeable results by using our products consistently for 3 or more months with diet and exercise. Thank you for continuing to be a valued customer.

MESSAGE:

Thank you for your order.



RHONDA WOOTEN

FARMERS-MERCHANTS

NATIONAL BANK

MELVIN • PAXTON • PIPER CITY

101 North Taft Street
Paxton, Illinois 60957

(217) 379-4343
FAX (217) 379-3311

Date 9/25/09

Page 1

RICK WOOTEN
RHONDA WOOTEN

PAXTON IL

9/01 DBT CRD 0547 09/01/09 70120100 VP/ilifecolo8885726947
UK Card#

59.95-

9/17 DBT CRD 0539 09/17/09 71120100 VP/ilifecolo8885726947
UK Card#

64.90-

10/20 DBT CRD 0549 10/20/09 70120100 VP/ilifecolo8885726947
UK Card#

64.90-

Wooten Att. F

\$354.55