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**DECLARATION OF KAITLIN A. DOHSE  
PURSUANT TO 28 U.S.C. § 1746**

I, Kaitlin A. Dohse, hereby state that I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify as follows:

1. My name is Kaitlin A. Dohse and I am over the age of eighteen. I am a Law Clerk with the Midwest Region of the Federal Trade Commission ("Commission" or "FTC"), located at 55 West Monroe Street, Suite 1825, Chicago, Illinois 60603.

2. My duties as a law clerk include assisting in the investigation of parties suspected of violating the Federal Trade Commission Act ("FTC Act"). In the course of my employment, I was asked to assist in the investigation of Fortune-Hi Tech Marketing, Inc.; FHTM, Inc.; Alan Clark Holdings, LLC.; FHTM Canada, Inc.; Fortune Network Marketing (UK) Limited; Paul C. Orberon; and Thomas A. Mills (collectively referred to as "FHTM").

3. My project was to conduct a price comparison of two product lines offered by FHTM: True Essentials and Envy Organics. True Essentials is available at <http://www.trueessentials.net> and Envy Organics is available at <http://www.envyorganics.com>. True Essentials is a line of nutritional products, while Envy Organics is a line of beauty products and bath and body products. Consumers may purchase these products through an FHTM Independent Representative or directly through the line's website.

4. I reviewed the websites for True Essentials and Envy Organics in or about May 2012. According to their websites, both lines feature an "Easy Ship" order option. By selecting

this option, consumers automatically are shipped and charged for the product each month. The Easy Ship price is always lower than the regular price offered by FHTM. According to the websites, consumers can cancel their monthly obligation if they contact the company at least seven days before shipment.

5. As part of the FTC's investigation of FHTM, I was asked to compare the prices of FHTM products with similar products offered by other companies. I created two spreadsheets – one for each product line – that track the price comparisons between FHTM product lines and others. This process required me to examine product details for hundreds of products to find comparable products to those offered by FHTM.

6. The first spreadsheet contains data comparing True Essentials nutritional products with similar products available at <http://www.drugstore.com> ("Drugstore.com"). I determined which Drugstore.com products to compare by doing a keyword search, using the name of the True Essentials product or the product type. I then chose the same quantity, or the quantity closest to the True Essentials product. I also compared the ingredients of the products. Where the same size or quantity was unavailable, I compared a similar product of a different size. I also included the date of the product comparison.

7. Finally, I compared the products' prices by calculating the cost per serving. I found the number of servings for each True Essentials product on the True Essentials website. For the Drugstore.com products, I used the number of servings listed on each product's nutritional label on the website. For seven categories, I calculated the price as cost per capsule

because servings varied. This is noted on the spreadsheet. A true and correct copy of the spreadsheet is attached hereto as **Dohse Att. A**.

8. In total, I conducted sixty-eight product comparisons, evaluating thirty-one True Essentials products against sixty-eight Drugstore.com products. In order to obtain an accurate comparison, I recorded the size/quantity and price (including Easy Ship price) of the True Essentials product. On the right side of the spreadsheet, I then recorded the same data for a similar Drugstore.com product.

9. The price comparison shows that in nearly every product category, there is at least one alternative brand that was less expensive than the True Essentials brand. In only two product categories (out of thirty-one), were True Essentials products less expensive than every other Drugstore.com alternative. There were a few other instances in which a True Essentials Easy Ship option was less expensive than a Drugstore.com alternative. In these instances, however, the Easy Ship option requires a continuing monthly purchase.

10. The second spreadsheet contains data comparing Envy Organics beauty and bath products with similar products found on several websites. When possible, I compared each Envy Organics product with more than one similar product. I did this because beauty products vary in price drastically depending on the company or website.

11. In all, I compared thirty-two Envy Organics products with eighty-two products from the following websites: <http://www.beauty.com>, <http://www.sephora.com>,

<http://www.drugstore.com>, <http://www.ulta.com>, <http://www.amazon.com>, and  
<http://www.aveda.com>.

12. I found comparable products by first completing a keyword search on the various web sites using the name of the Envy Organics product or the product type. I then examined the search results, narrowing down the results based on the size of the product and its ingredients. I also compared the product description of the Envy Organics product with the product description of the alternative product.

13. I recorded the Envy Organics product data on a spreadsheet. The data included the Size/Quantity and Price (including Easy Ship price) of each product. When the same size or quantity was unavailable for a comparable product, I compared a similar product of a different size. I also included the date of the product comparison. Finally, I calculated the FHTM Product Price/Ounce (including Easy Ship price) and compared it to the Other Brand Price/Ounce. A true and correct copy of the spreadsheet is attached hereto as **Dohse Att. B**.

14. As with the True Essentials line of products, for nearly every category of Envy Organics product, there was at least one less expensive alternative available elsewhere. In only three product categories did Envy Organics have the lower price.

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

Executed on July 24, 2012.



Kaitlin A. Dohse