

Case #175 (3/10/08)

**GARDEN OF LIFE**

**FucoTHIN Dietary Supplement**

## **BASIS OF INQUIRY**

Direct response advertising for Garden of Life's fucoTHIN dietary supplement came to the attention of the Electronic Retailing Self-Regulation Program ("ERSP") pursuant to an anonymous competitive inquiry.

Based on ERSP's review of print and online advertising for the fucoTHIN dietary supplement, the following representative core claims were identified as being communicated in the advertising regarding the general efficacy of the product:

### 1. Performance Claims

- *"Non-Stimulant – Unlike ephedra or caffeine, fucoTHIN burns fat without stimulating the central nervous system- no nervousness, jitters , or lost sleep"*
- *"Dual Action Formula- FucoTHIN burns fat while providing antioxidant cellular protection"*

### 2. Establishment Claims

- *"Clinically Proven Results – Double blind, placebo controlled human studies demonstrate- · An average of 18.2% Increase in metabolism · 450% More Weight Loss on Average Than Dieting Alone"*
- *"Burns Belly Fat – FucoTHIN has been clinically proven to specifically metabolize visceral fat, more commonly referred to as belly fat."*
- *"Patent Pending- FucoTHIN contains the original patent pending fucoxanthin formula used in clinical research."*

### 3. Superiority Claims

- *"Now the #1 Weight Management Product in the Natural Product Industry."*
- *"Fastest Selling Weight management Product In America."*

### 4. Consumer Testimonials

- *"I've lost 58 lbs in 13 weeks."*
- *"I lost 7 inches in my waist."*

## **MARKETER'S POSITION**

The marketer explained that fucoTHIN is a proprietary blend of fucoxanthin derived from seaweed and pomegranate oil and the subject of a pending patent, the application of which is for Xanthigen. FucoTHIN is Garden of Life's

Xanthigen dietary supplement. Xanthigen is an extract from deep seawater-cultivated marine vegetables standardized to fucoxanthin, neoxanthin and violaxanthin with strong thermogenic and weight control properties.

### *I. The Marketer's Studies*

Garden of Life submitted several studies as support for the efficacy of fucoTHIN. In 2005 a Japanese animal study demonstrating fucoxanthin's thermogenic effects was published. According to the study, fucoxanthin increased the metabolic processes in cells making the cells burn more fuel to produce energy, a process commonly known as thermogenesis. The study found that fucoxanthin raised metabolic rates, reduced white adipose tissue (fat), and decreased the overall body weight of rodents – particularly in their abdominal region.

In 2006, two separate studies were conducted, both performed by a highly reputable and independent third party research institute. According to Garden of Life, both studies met the “gold standard” of testing (randomized, double-blind, placebo controlled) and both utilized the Xanthigen blend, testing the exact same dosage of Xanthigen present in fucoTHIN. One of the studies was designed to evaluate the energy expenditure (metabolic rate) of humans affected by Xanthigen. The other study evaluated the actual weight and inches lost by humans taking Xanthigen.

A total of 150 subjects participated in these studies: 40 in the Metabolic Rate Study and 110 in the Weight Loss Study. Both studies lasted 16 weeks, and in both studies, all the participants were counseled to follow an 1800 calorie diet. Because there was particular interest on fucoxanthin's effects on white adipose tissue that comprises human visceral fat, the groups within the weight loss study were further broken down into two subgroups: 1) those with Non-Alcoholic Fatty Liver Disease and 2) those who did not suffer from Non-Alcoholic Fatty Liver Disease.

#### *a) The Metabolic Rate Study*

The Metabolic Rate Study concluded that there was a statistically significant difference between the group taking Xanthigen and the placebo control group. The study administrators found:

- The group taking Xanthigen (fucoTHIN) experienced an increase in energy expenditure rate (i.e., metabolic rate) of 7.03 units as measured at the conclusion of the 16-week study. The placebo group experienced an increase of 5.95 units. Therefore, the group taking Xanthigen (fucoTHIN) had a metabolic rate increase that averaged 18.2% higher than the placebo group.

- The placebo group's baseline metabolic rate at the beginning of the study was 5.91 units and, as noted above, 5.95 units at the conclusion, an average increase over baseline of under 1%.

*b) The Weight Loss Study*

- There were two groups who took Xanthigen (fucoTHIN) in this study: those with Non-Alcoholic Fatty Liver Disease and those with normal liver fat. The group with Non-Alcoholic Fatty Liver Disease lost an average of 15.2 pounds while the group with normal liver fat lost an average of 13.9 pounds. The average of both groups which is the entire study group taking Xanthigen lost an average of 14.5 pounds.
- The placebo group lost only 3 pounds
- In addition, waist circumference was significantly reduced in those taking Xanthigen versus the placebo
- The reduction in waist circumference indicated that Xanthigen effectively reduced visceral fat and white adipose tissue.

The marketer also noted that Life Science Alliance, a respected and independent consortium of scientific consultants, reviewed the two studies along with the Japanese animal study and found that the three studies were well designed in a reasoned scientific manner and concluded that Xanthigen is safe and a non-stimulant.

II. The Marketer's Claims

a. Performance Claims

- *"Non-Stimulant – Unlike ephedra or caffeine, fucoTHIN burns fat without stimulating the central nervous system- no nervousness, jitters , or lost sleep"*

The marketer stated that fucoTHIN does not contain ephedra or caffeine or a host of other ingredients typically present in stimulant-based thermogenic nutrition products including bitter orange, ma huang, guarana, or any other type of caffeine. It maintained that none of the components of fucoTHIN work by affecting the central nervous system.

- *"Dual Action Formula- FucoTHIN burns fat while providing antioxidant cellular protection"*

The marketer explained that fucoxanthin is a thermogenic, which increases the metabolic rate of cells requiring them to "burn" fat that the body stores in adipose tissue. Garden of Life noted that thermogenesis is completed when the conversion of nutrients (such as fat) to energy occurs within the cells, more specifically, inside cell structure called mitochondria.

The marketer referred to the three studies discussed above which it maintained demonstrated fucoTHIN's thermogenic properties, increasing the metabolic rate and decreasing the body weight of humans and rodents. The marketer stated that in addition to being thermogenic, fucoxanthin is a carotenoid. Carotenoids are antioxidants that provide cells protection from free radical damage. It noted that several studies have cited the antioxidant properties of fucoxanthin. It called ERSP's attention to one particular study in which the authors concluded that fucoxanthin exhibits *"antioxidant activities comparable to that of alpha-tocopherol"* (i.e., Vitamin E).

*b. Establishment Claims*

- *"Clinically Proven Results – Double blind, placebo controlled human studies demonstrate- · An average of 18.2% Increase in metabolism · 450% More Weight Loss on Average Than Dieting Alone"*

Garden of Life contended that that the efficacy of Xanthigen (fucoTHIN) has been proven in the three clinical studies referred to previously in the Marketer's Position and contended that the results have been corroborated in in-vitro testing as well.

More specifically, in the Metabolic Rate Study, the group taking Xanthigen (fucoTHIN) had an increase in energy expenditure rate that averaged 18.2% higher than their baseline. The placebo group only averaged a 1.8% increase based on change of diet alone. Thus, the claim of 18.2% in metabolism is supported.

In the Weight Loss study, participants that took Xanthigen (fucoTHIN) lost an average of 14.5 pounds while those given placebo lost only 3 pounds. Mathematically, those who took the product lost over 450% more or 4.5 times more weight than those who just dieted. In order to avoid any possible confusion among its consumers and to ensure that its product claims are meaningful, Garden of Life stated that it has consistently disclosed the actual weight loss of the Xanthigen study group together with the fact that the studies' duration was 16 weeks and an 1800 calorie diet was followed. The marketer noted that it is now only using the statement that fucoTHIN results in *"4 ½ times More Weight Loss on Average Than Dieting Alone."*

Garden of Life also noted that, when space permits, it attempts to provide consumers with a full and clear explanation of the study findings as in the case of website and full page advertisements. More specifically, the actual clinical findings are integrated into several of the articles, both in the text and in side-bars, and on the website the information appears on the bottom of every page.

- *"Burns Belly Fat – FucoTHIN has been clinically proven to specifically metabolize visceral fat, more commonly referred to as belly fat."*

As also previously noted, fucoTHIN has strong thermogenic properties with significant implications for body weight reduction. The marketer maintained that its product is particularly strong at burning visceral fat, composed of white adipose tissue. It explained that visceral fat is the fat surrounding the internal organs and specifically the double layer of fat flanking the stomach. Thus, Garden of Life asserted, since fucoTHIN is proven effective at burning visceral fat, and visceral fat is the type of fat that builds in the abdominal region (belly), fucoTHIN is particularly effective at burning belly fat.

The marketer contended that the animal study and the Metabolic Rate study it submitted to ERSP demonstrates that fucoTHIN is proven to burn belly fat. It accomplishes this by igniting the production of a specialized protein (UCP1 gene) in white adipose tissue. It is believed that this gene stimulates the metabolism of fatty acids inside of the white adipose tissue and thereby speeds their oxidation.

- *“Patent Pending- FucoTHIN contains the original patent pending fucoxanthin formula used in clinical research.”*

The marketer stated that fucoTHIN is the same product as the Xanthigen treatment that was studied in the two clinical trials discussed previously. A provisional United States Patent (#60/873,727) for Xanthigen was filed by the inventor of the complex.

#### c. Superiority Claims

- *“Now The Number 1 Weight management Product in the Natural Product Industry” and “Fastest Selling Product In America”*

According to Garden of Life, these statements are based on sales reports published by SPINScan Natural report for 12 weeks ending on July 14, 2007. More specifically, the report notes that fucoTHIN has generated more revenue in its category than any other weight management product sold in nutrition stores during the trailing twelve week period. The marketer explained that SPINScans is an independent market research and consulting firm for the natural products industry and it submitted a chart to ERSP which purportedly demonstrates that fucoTHIN was ranked number one in SPINScans Diet Products sales category based on sales data compiled for 12 weeks ending 7/12/07.

The marketer noted that each time the claim is made in an advertisement, it is qualified by noting that SPINScan is the source.

#### d. Consumer Testimonials

*“I’ve lost 58 lbs in 13 weeks” and “I lost 7 inches in my waist.”*

Garden of Life indicated to ERSP that although the two testimonials were true, during the pendency of inquiry, it voluntarily modified reference to the testimonials in its advertising.

## ANALYSIS

During the ERSP inquiry, the marketer indicated to ERSP that it was in the process of voluntarily revising its advertising. However, because Garden of Life indicated that it was still its intention to use several of the claims in future advertising campaigns, ERSP proceeded with its review of the advertising at issue.

### *a. Performance Claims*

The performance claim identified by ERSP in its basis of inquiry that fucoTHIN is a *“Non-Stimulant – Unlike ephedra or caffeine, fucoTHIN burns fat without stimulating the central nervous system- no nervousness, jitters , or lost sleep,”* was essentially a statement distinguishing the product from other thermogenic products (i.e., ephedra and caffeine) that trigger activity in the central nervous system. For example, unlike the principal mechanism of action of ephedra which relies on its direct and indirect actions on parts of the sympathetic nervous system, and caffeine which is a well known central nervous system and metabolic stimulant, Xanthigen (i.e., fucoTHIN) helps to reduce white fat accumulation through a *natural* activation of thermogenic processes. This beneficial thermogenic effect is related to the ability of fucoxanthin to ignite production of a specialized protein called uncoupling protein-1 (UCP-1) in white fat cells. As Garden of Life explained, fucoxanthin-induced thermogenesis support is non-stimulant in nature because it bypasses adrenergic (stimulatory or sympathetic) receptors at the surface of the cells that are also known to be UPC-1 inducing. Instead, it addresses the process of energy distribution at the level of mitochondria, precisely where conversion of fat into energy is taking place.

Based upon the scientific references provided by the marketer, ERSP determined the marketer’s distinction of the effects of fucoTHIN from central nervous stimulators like ephedra and caffeine was an accurate representation of the mechanism of action of the product.

As noted earlier herein, Garden of Life has provided evidence of FucoTHIN’s thermogenic properties through increased metabolism. Thermogenesis is the process by which the body increases its metabolic rate, requiring utilization of internal stores of energy, such as fat. Based upon the studies submitted by the marketer, it was concluded that fucoTHIN exhibited a fat burning propensity in the observed test subjects.

Several sources of literature provided by Garden of Life indicated that the mechanism of action of fucoxanthin with mitochondria is crucial in understanding the effectiveness of the ingredient at the cellular level.

Mitochondria are known as the powerhouses of the cell and act like a digestive system that takes in nutrients, breaks them down, and creates energy for the cell. UCP-1 targets mitochondria to boost the rate at which fatty acids are burned and oxidized, thus generating more heat production and resulting in significant white adipose tissue reduction.

Acting as biological antioxidants, carotenoids protect cells and tissues from the damaging effects of free radicals. According to literature provided by Garden of Life, fucoxanthin, is a carotenoid (a class of natural pigments found principally in plants and algae) and a powerful antioxidant that protects cells from free-radical damage. It is the pigment that gives brown seaweed its characteristic color and also participates in photosynthesis. As Garden of Life noted, the antioxidant properties of brown seaweed, and fucoxanthin in particular, have been observed in a number of scientific studies.

ERSP determined that the marketer's scientific literature provided a reasonable basis for the claim that "*FucoTHIN burns fat while providing antioxidant cellular protection.*"

*b. Establishment Claims*

ERSP remained concerned with the targeted weight loss claims being made in the advertising. Numerous journals and conferences have included discussions about targeted weight loss claims and the omission of sufficient scientific evidence to support such advertising claims. For instance, the Federal Trade Commission ("FTC") has noted on several occasions that, with respect to dietary supplements, there is no such thing as spot reduction. Fat is lost throughout the body in a pattern dependent upon genetics, sex (hormones), and age. Overall body fat must be reduced to lose fat in any particular area. More specifically, the FTC recently stated that "*there is no convincing evidence that ... weight loss can be selectively targeted to specific parts of the body.*"

With respect to the marketer's claim "*Burns Belly Fat – FucoTHIN has been clinically proven to specifically metabolize visceral fat, more commonly referred to as belly fat*" ERSP determined that it would be it reasonable for consumers to interpret the claim as meaning that fucoTHIN has been "*clinically proven*" to reduce belly fat. As ERSP has noted in previous reviews, "*clinically proven*" claims communicate very strong and aggressive messages to consumers. As a result, support for these claims (particularly as they relate to health and safety) is carefully scrutinized. Some regulatory agencies, such as the FTC will often request two studies as support for establishment and clinically proven claims.

Notwithstanding the encouraging results of the marketer's study with respect to the weight loss achieved by subjects using the product in conjunction with a low calorie diet, ERSP determined that it would not be appropriate for Garden of Life to extrapolate from these results that fucoTHIN has been "*clinically proven*" to reduce belly fat. It is a fundamental principle of advertising law that the more

specific a claim, the more specific the evidence that is necessary to support such a claim. Thus, based on ERSP's determination that it would be reasonable for consumers to take a claim for the advertising that fucoTHIN is "*clinically proven to reduce belly fat*," it is the marketer's burden to produce reliable and competent clinical data demonstrating this particular spot weight loss reduction. Based upon the evidence in the case record, it was concluded that this claim has not been supported.

Although Garden of Life accurately reported the amount of weight loss of the subjects using the test product as compared to placebo (i.e., 14.5 lbs. vs. 3.5), there was no indication that this weight loss occurred in any particular area of the body. In fact, in the "conclusion" section of the study, the authors make no mention of visceral fat or belly fat. More specifically, it is simply indicated that "*The results of this double-blind randomized placebo-controlled clinical trial demonstrates that Xanthigen promotes weight loss, body and liver fat reduction in non diabetic females independent of their liver fat content.*" Accordingly, ERSP believes that it would be inaccurate to maintain that this resulting data would adequately serve as "*clinical proof*" that the product burns belly fat and, as such, ERSP recommended that the marketer discontinue this claim.

In addition, ERSP determined that claim that "*Clinically Proven Results – Double blind, placebo controlled human studies demonstrate- · An average of 18.2% Increase in metabolism; 450% More Weight Loss on Average Than Dieting Alone*" was not sufficiently supported in its quantified context. Although the percentage figures used in the claim accurately reflected the difference in increased metabolism as compared to base line and weight loss as compared to subjects who simply dieted, the pivotal issue for ERSP in evaluating the claim was assessing the message that consumers may reasonably be taking away. Here, it was determined that consumers could reasonably interpret the claim as meaning that fucoTHIN has been clinically proven to produce these express results in the average (i.e., typical) consumer. However, ERSP did not agree that this claim was adequately supported in its "*clinically proven*" context. Although the marketer's study did meet several of the criteria that constitute reliable and competent testing (i.e., double-blind, placebo controlled), the test sample was limited to obese women, many of which had significantly high liver fat content. Conversely, the advertising for fucoTHIN is not limited to this specific population but is intended for a much broader audience. In fact, in the marketing materials, Jordan Rubin specifically states that the product is targeted to "*two thirds of America...*" who "*want to lose a few pounds of fat*" which would seem to indicate that fucoTHIN is not advertised solely to obese women (i.e., the testing sample) but in fact to slightly overweight and obese individuals of both genders. Thus, while it may not be unreasonable for consumers to expect a certain degree of weight loss and increased metabolism, it would seem that the achieving the quantified percentage results expressed in the advertising is not representative of what the typical consumer can expect. In sum, ERSP had serious reservations that the performance results obtained from this very distinct test sample group would

not be the same for many consumers in the target audience – particularly when expressed in a specific, quantified percentage context.

ERSP did determine that the information provided by Garden of Life provided a reasonable basis for the claim that *“Patent Pending- FucoTHIN contains the original patent pending fucoxanthin formula used in clinical research.”*

Lastly, ERSP notes that during the pendency of the review, Garden of Life has voluntarily taken significant action to bring its advertising into compliance with the aforementioned recommendations. ERSP expressed its appreciation to the marketer and will continue to closely monitor the future advertising for this product.

### *c. Superiority Claims*

The sales superiority claims regarding fucoTHIN were communicated in several different contexts (i.e., *“Fastest Selling Weight Loss Product in America”*; *“the #1 Weight Management Product in the Natural Product Industry.”*; *“Fastest Selling Weight Management Product In America.”*). ERSP determined that a claim stating that fucoTHIN is the *“Fastest Selling”* or *“#1”* weight management product *“In America”* as compared to a claim that fucoTHIN is the top selling product *in the Natural Product Industry”* communicate different messages to consumers. The natural products industry has been defined as *“the intersection of natural, organic, and specialty food and beverage, sustainable products, and vitamins and supplements.”* In addition, Garden of Life indicated that its sales in the natural product industry are limited to transactions in *“independent”* health food stores, not GNC or grocery stores.

Nevertheless, a claim that a product is the national best (or fastest) seller of *“weight management”* or *“weight loss”* products *“... in America”* would not be a comparison confined to the natural products industry but would presumably include any and all weight loss products currently being marketed in the United States and would need to be supported by sales data comparing the sales of fucoTHIN with all other weight loss products in the country. Accordingly, there was no data provided to support such a claim.

Although the claim that fucoTHIN is the *“Fastest Selling Weight Loss Product in America”* was qualified as being limited to *“the natural products industry”* in a small typed disclosure at the bottom of the page, ERSP determined that such disclosure of this type is generally reserved for the *“source”* of such information (i.e., SPINscans) as opposed to defining the basis of the comparison (i.e., the natural products industry), which could reasonably be considered material information that should not be relegated to a small print disclosure at the bottom of the advertisement.

As was the case with Garden of Life's performance and establishment claims, the marketer has voluntarily revised its advertising to more accurately describe the basis of its superiority claims.

*d. Consumer Testimonials*

Garden of Life indicated to ERSP that despite the accuracy of the two testimonials used in advertising, it has voluntarily discontinued these testimonial references in its advertising.

Going forward, ERSP reminded Garden of Life that should it make a decision to use consumer testimonials in its future advertising, it should carefully abide by the provisions of section 255.2 of the FTC Guide Concerning the Use of Endorsements and Testimonials in Advertising which states that *"An advertisement employing an endorsement reflecting the experience of an individual or a group of consumers on a central or key attribute of the product or service will be interpreted as representing that the endorser's experience is representative of what consumers will generally achieve with the advertised product in actual, albeit variable, conditions of use. Therefore, unless the advertiser possesses and relies upon adequate substantiation for this representation, the advertisement should either clearly and conspicuously disclose what the generally expected performance would be in the depicted circumstances or clearly and conspicuously disclose the limited applicability of the endorser's experience to what consumers may generally expect to achieve."*

## CONCLUSION

During the pendency of the review, the marketer indicated to ERSP that it was in the process of voluntarily revising its advertising and had voluntarily begun steps to bring its advertising into compliance with ERSP's recommendations.

ERSP determined that the marketer provided a reasonable basis for its general performance claims as well as the claim that *"FucoTHIN contains the original patent pending fucoxanthin formula used in clinical research."* However, ERSP also concluded that the marketer's evidence did not adequately support its "clinically proven" and superiority claims for the product in the context in which the claims were presented.

Lastly, Garden of Life indicated that it voluntarily discontinued the two testimonials referred to in the Basis of Inquiry.

## MARKETER'S STATEMENT

This statement is submitted by Garden of Life, Inc., the marketer of the natural thermogenic fat burner, fücoTHIN® ("GOL").

GOL thanks the ERSP and, specifically Peter Marinello, its Director and Robert Hilleman, its Program Analyst. Throughout this process they were thorough, thoughtful, fair, reasonable and approachable. The ERSP's careful review of the abundant science behind our product was appreciated. Communicating difficult scientific concepts (such as thermogenesis, increases to human metabolic rate and the targeted effects of a product that acts specifically in White Adipose Tissue) in ways that are meaningful to the public is not easy. We feel that Mr. Marinello was at all times willing to thoughtfully consider all issues, in their appropriate context and with the full support of statistically significant clinical results.

We were particularly appreciative that the ERSP:

- a) Noted that GOL "submitted several studies as support for the efficacy of fūcoTHIN"
- b) Noted that GOL submitted two animal studies demonstrating that "fucoxanthin increased the metabolic process in cells"
- c) Noted that GOL submitted two human clinical studies on the proprietary fūcoTHIN formula with a total of 150 participants, "both performed by a highly reputable and independent third party research institute.
- d) Agreed that the studies followed the "Gold Standard" of double-blind placebo controlled studies specifically performed on the effects of fūcoTHIN on the human body (in this case, with 150 overweight women);
- e) Noted that the Human Metabolic Rate Study concluded that there was a statistically significant" increase in human metabolic rate for the group taking fūcoTHIN and that difference was, in fact, 18.2%.
- f) Noted that the Human Weight Loss Study group taking fūcoTHIN lost an average of 14.5 pounds while the placebo group only lost 3 pounds.
- g) Commented that the weight loss study demonstrates "encouraging results . . . with respect to the weight loss achieved by subjects using the product"
- h) Agreed that GOL provided "evidence of fūcoTHIN's thermogenic properties";
- i) Agreed that the evidence demonstrated that the thermogenesis induced by taking fūcoTHIN "is non-stimulant in nature" and "determined the marketer's distinction of the effects of fūcoTHIN from central nervous stimulators like ephedra and caffeine was an accurate representation"
- j) Determined that GOL "provided a reasonable basis for the claim that "fūcoTHIN burns fat while providing antioxidant cellular protection"; and
- k) Agreed that the fūcoTHIN formula is the subject of a pending patent.

When the ERSP first initiated its inquiry it raised multiple areas of interest which were quickly satisfied after review of the multiple studies and scientific articles GOL submitted. However, at the conclusion of the process three issues remained in question. GOL, on its own initiative and while the review was still open

addressed these issues (as acknowledged by the ERSP) and voluntarily modified its claims. Specifically, our future advertising will:

1. Reflect that fücoTHIN is the number one, top selling product among all categories as well as within the Diet Category within the *Natural Products Industry* as defined and reported by SPINSSCAN as of January 26, 2008.
2. Advise our customers that fücoTHIN contains the *only* weight loss formula containing fucoxanthin that's been clinically tested in humans;
3. Explain that a total of 150 overweight women participated in two Gold-Standard, double blind placebo controlled human clinical studies. The studies lasted for 16 weeks and during that time the women followed an 1800 calorie diet;
4. Refer to the results of our human clinical studies as "clinically studied" or "clinical results."
5. Explain that the participants in the Human Weight Loss Study lost an average of 14.5 lbs. when taking fücoTHIN as opposed to only 3 lbs. when taking only the placebo.
6. Continue to explain to our consumers that "fücoTHIN burns fat while providing antioxidant cellular protection."
7. Advise our customers that fücoTHIN has been shown to significantly boost the human metabolism.
8. Remind our customers that only fücoTHIN contains the proprietary, patent pending fucoxanthin formula that's been clinically tested in humans and proven to burn fat naturally without side effects.

Copyright 2008. Council of Better Business Bureaus, Inc.