TAULER | SMITH
LLP

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2/20/2018

VIA CERTIFIED MAIL

[redacted]

Re: [redacted] Sale of Unlawful Male Enhancement Products Tauler Smith LLP Case #12820173

To Whom It May Concern:

We represent Outlaw Laboratory, LP ("Plaintiff"), a manufacturer, distributor and retailer of male enhancement products "TriSteel" and "TriSteel 8 hour." We have recently discovered that your company, [redacted], is selling illegal sexual enhancement products, including but not limited to, Triple Green and Samurai-X (the "Illicit Products").

- Enclosed as **EXHIBIT A** are photographs taken at your place of business capturing your sale of the Illicit Products.
- Enclosed as **EXHIBIT B** are notices from the Food and Drug Administration regarding the illegality of the Illicit Products.

As you can see, the Illicit Products are illegal to sell and subject your company to legal action for racketeering and unfair business practices under RICO (Racketeer Influenced Corrupt Organizations) and the Federal Lanham Act. Accordingly, under these federal laws our client is entitled to:

- Your profits from the sale of the Illicit Products dating back four years. (15 U.S.C. § 1117)
- Attorney's fees. (18 U.S.C. § 1964)
- Punitive damages. (15 U.S.C. § 1117)
- Triple damages. (18 U.S.C. § 1964 & 15 U.S.C. § 1117)

We estimate that you are liable for over $100,000 if we prosecute this matter to a jury trial. Although Plaintiff is entitled to the monetary remedies detailed above, it is willing to settle all claims in exchange for a one-time settlement agreement of **$9,765**, and your agreement to stop selling the Illicit Products. This offer will double if we are forced to file a formal lawsuit, and the offer will be withdrawn if litigation exceeds one month in duration.

Please have your attorney contact our office no later than 3/6/2018. If this matter is not fully resolved before 3/22/2018 we file a lawsuit against your business, a draft of which we have attached as **EXHIBIT C**.

This letter is sent without prejudice to Plaintiff's rights and claims, all of which are expressly reserved. Please direct any communications regarding this matter to my attention and reference [redacted]

Best regards,

Leticia Kimble, Esq.

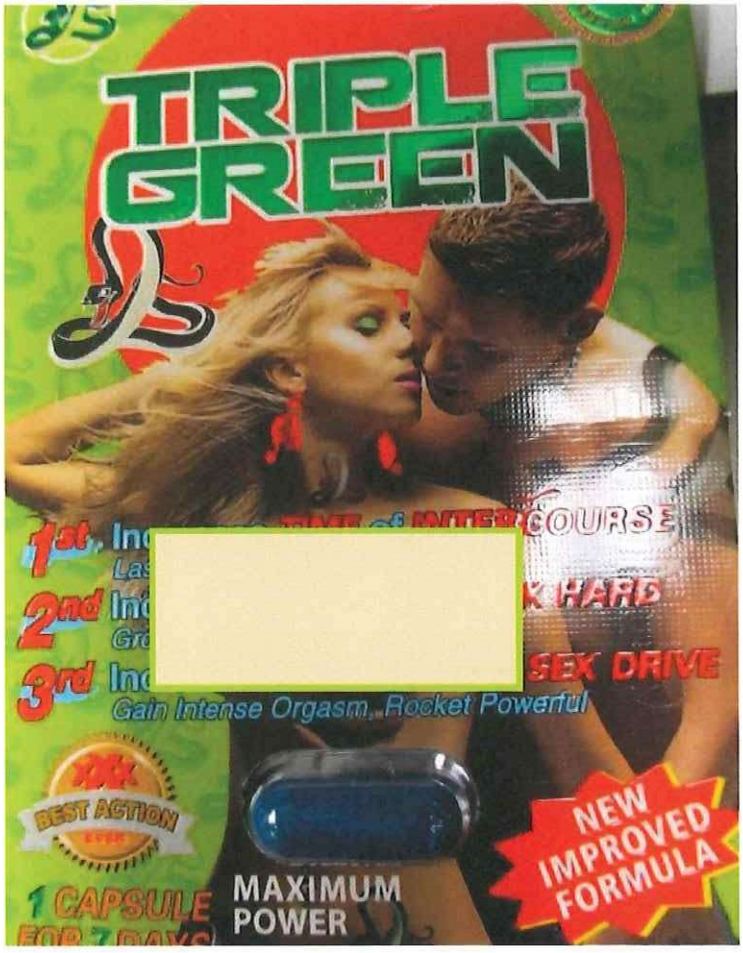
IMPERIAL
TRIPLE GREEN
TROJAN
ENZ
PREMIUM LUBRICANT
DURACELL
COPPERTOP
DURACELL
UP TO 6X POWER

[redacted]

FDA U.S. FOOD & DRUG ADMINISTRATION

Public Notification: Triple Green Capsules Contain Hidden Drug Ingredient

[12-22-2016] The Food and Drug Administration (FDA) is advising consumers not to purchase or use Triple Green Capsules, a product promoted for sexual enhancement. This product was identified by FDA during an examination of international mail shipments.



FDA laboratory analysis confirmed that Triple Green Capsules contain sildenafil, the active ingredient in the FDA-approved prescription drug Viagra, used to treat erectile dysfunction (ED). This undeclared ingredient may interact with nitrates found in some prescription drugs such as nitroglycerin and may lower blood pressure to dangerous levels. Men with diabetes, high blood pressure, high cholesterol, or heart disease often take nitrates.

Health care professionals and patients are encouraged to report adverse events or side effects related to the use of this product to the FDA's MedWatch Safety Information and Adverse Event Reporting Program:

- Complete and submit the report online at **MedWatch Online Voluntary Reporting Form (https://www.accessdata.fda.gov/scripts/medwatch/)**, or;
- Download and complete the **form (http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM349464.pdf)**, then submit it via fax at 1-800-FDA-0178.

Note: This notification is to inform the public of a growing trend of dietary supplements or conventional foods with hidden drugs and chemicals. These products are typically promoted for sexual enhancement, weight loss, and body building and are often represented as being "all natural." FDA is unable to test and identify all products marketed as dietary supplements that have potentially harmful hidden ingredients. Consumers should exercise caution before purchasing any product in the above categories.

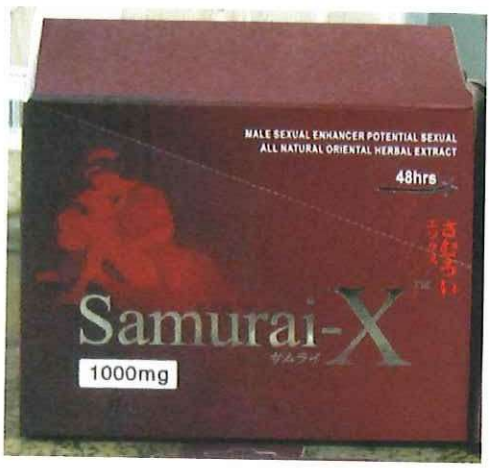
Please refer to the links below for more information:

U.S. FOOD & DRUG ADMINISTRATION

Public Notification: Samurai-X contains hidden drug ingredient

[12-23-2014] The Food and Drug Administration (FDA) is advising consumers not to purchase or use Samurai-X, a product promoted and sold for sexual enhancement on various websites and possibly in some retail stores.

FDA laboratory analysis confirmed that Samurai-Xcontains sildenafil, the active ingredient in the FDA-approved prescription drug Viagra, used to treat erectile dysfunction (ED). This undeclared ingredient may interact with nitrates found in some prescription drugs such as nitroglycerin and may lower blood pressure to dangerous levels. Men with diabetes, high blood pressure, high cholesterol, or heart disease often take nitrates.



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For more information:

Tainted Sexual Enhancement Products (http://www.fda.gov/Drugs/ResourcesForYou/Consumers/BuyingUsingMedicineSafely/MedicationHealthFraud/u

Subscribe to the RSS feed (http://www.fda.gov/AboutFDA/ContactFDA/StayInformed/RSSFeeds/TDS/rss.xml)

Beware of Fraudulent 'Dietary Supplements' (/ForConsumers/ConsumerUpdates/ucm246744.htm)

Contact FDA

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Attorneys for Plaintiff
OUTLAW LABORATORY, LP

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

OUTLAW LABORATORY, LP,a Texas limited partnership,

Plaintiff

VS.

[redacted]
[DISTRIBUTOR REDACTED]; [SUPPLIER REDACTED]; [ADDITIONAL DEFENDANTS REDACTED] and DOES 1 through 10, inclusive,

Defendants.

CASE NO.

COMPLAINT FOR:

(1) FALSE ADVERTISING IN VIOLATION OF THE LANHAM ACT § 43 (a)(1)(B)); AND

(2) VIOLATION OF THE CIVIL RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT (RICO)

[DEMAND FOR A JURY TRIAL]