

Complaints Resolution Panel

Complaint Form

Use this form to submit complaints about advertisements for therapeutic goods.

The advertisement

You **MUST** provide a copy of the advertisement you are complaining about, and indicate clearly where it was published. If it was published in a magazine or newspaper, state in which edition it appeared, the date, and the page number. If it was published in outdoor media, state the location and the date on which the advertisement was observed, and where possible provide a photograph of the advertisement. If it was published on the internet, state the website address and the date on which the advertisement was observed. If it was broadcast, identify the television or radio station, and the date and time of the advertisement.

Publication: <http://www.liverdoctor.com/>

Date/edition: October 23, 2008

The product advertised

Identify the therapeutic goods that are promoted in the advertisement. If possible, identify the party responsible for publishing the advertisement.

Numerous, an illustrative sample follows (Figures 5-13 below):

- **ADRENAL PLUS SUPPORT TABLETS,**
- **ALLERGY RELIEF, DHEA CAPSULUS,**
- **BIOCELL COLLAGEN II (eternal youth capsules),**
- **FEM PRO (PROGESTERONE CREAM / MSM),**
- **Livatone®, Plus,**
- **Selenium Complete,**
- **MSM with Vitamin C Powder.**

The sponsor of these products and the web site registrant is Health Direction Pty Ltd, 19 Little St., Camden, NSW 2570.

The administrative contact is: Dr. Sandra McCrae, 33 Elizabeth St., Camden, NSW, 2570; Phone: (02) 4655 4666; Fax: (02) 4655 9047

Confidentiality

You may request that your details be kept confidential, however it is recommended that you still provide contact details (below).

Please keep my personal details confidential: **No**

Details of the complaint

State clearly the nature of your complaint. It is not sufficient to highlight or quote words from the advertisement – explain what aspects of the advertisement are of concern to you, and why. If possible, identify sections of the Therapeutic Goods Advertising Code, Act, or Regulations you believe may have been breached in the advertisement. Attach a separate page if necessary.

This web site features a range of complementary medicine products, **a number of which DO NOT appear to be listed on the ARTG**, "specially formulated by Sandra Cabot" (Figures 1 & 2).

The web site states that Dr Sandra Cabot's professional name is Dr Sandra McRae and that she is a registered medical practitioner in NSW & QLD (Figure 3).

I have confirmed that Dr McCrae is registered in NSW (MPO: 064559) but cannot find an entry for her on the QLD medical register.

Her web site is registered in Australia (see: <http://whois.domaintools.com/liverdoctor.com>).

Registrant Details: Health Direction Pty Ltd; 19 Little St., Camden, NSW 2570

Domain Name: LIVERDOCTOR.COM

Administrative Contact: McRae, Sandra; 19 Little St., Camden, NSW 2570; +61.246558855

Registrar of Record: Enetica Pty Ltd; Record last updated on 2008-08-17

I submit that the content of this web site (appended) breaches:

- **Section 42DL(1)(c) of the Therapeutic Goods Act, 1989 (the Act) and Section 4(1)(a) and 5(2) of the Therapeutic Goods Advertising Code, 2007 (the Code), by promoting complementary medicines for diseases that have restricted representations (Figure 4);**

- **Section 42DL(1)(g) of the Act by promoting therapeutic goods not included on the ARTG (Figure 5-9 is just a sample).**
- **Section 4(1)(b); 4(2)(a); 4(2)(b), 4(2)(c) of the Code; see details below;**
- **Section 4(6)(b)(iv) of the Code, by using professional recommendation (Figures 1-3); and**
- **Section 42DM of the Act, by the above multiple breaches of the Code.**

Some illustrative concerns about misleading, unbalanced and unsupported promotional claims follow:

LIVATONE® PLUS 120 CAPSULES (in a page about “fatty liver”)

“The “Livatone® Plus” contains the clinically proven dose of the herb Milk Thistle, which is the dose that has been proven to help repair liver damage in hundreds of European clinical trials.” (Figure 10)

“The regular use of a liver tonic supports the repair of liver cells. It also supports the fat burning function of the liver which helps to keep weight under control.” (Figure 11)

However, a recent Cochrane systematic review said: “No evidence supporting or refuting milk thistle for alcoholic and/or hepatitis B or C virus liver diseases. Milk thistle (*Silybum marianum* (L) Gaertneri) extracts have been used as medical remedies since the time of ancient Greece. Alcohol and hepatotoxic viruses are the major causes of liver diseases. Several trials have studied the effects of milk thistle for patients with liver diseases. This systematic review could not demonstrate significant effects of milk thistle on mortality or complications of liver diseases in patients with alcoholic and/or hepatitis B or C liver diseases combining all trials or high-quality trials. Low-quality trials suggested beneficial effects. High-quality randomised clinical trials on milk thistle versus placebo may be needed”.

Rambaldi A, Jacobs BP, Gluud C. Milk thistle for alcoholic and/or hepatitis B or C virus liver diseases. Cochrane Database Syst Rev. 2007 Oct 17;(4)

<http://www.mrw.interscience.wiley.com/cochrane/clsysrev/articles/CD003620/frame.html>

In addition, I could find no references in PubMed (<http://www.ncbi.nlm.nih.gov>) to milk thistle and weight control.

Selenium Complete (in a page about “Hepatitis C”)

“Selenium is traditionally known as “the viral birth control pill” and assists in inhibiting viral replication and reducing viral load. It is also a powerful antioxidant mineral that works synergistically with glutathione to assist in protection against further damage to liver cells”(Figure 12).

I could find no references in PubMed (<http://www.ncbi.nlm.nih.gov>) to selenium reducing the viral load in Hepatitis C infection.

MSM with Vitamin C Powder (in a page on gall bladder disease)

“MSM (Methyl-Sulphonyl-Methane) is an organic form of sulphur, which may assist in softening and preventing further scar tissue. Sulphur is also a vital component of healthy bile. Sulphur is needed to produce the powerful antioxidant called glutathione. Vitamin C will neutralize free radicals generated during the phase 1 detoxification pathway in the liver and reduce toxic damage and chemical overload. Toxic chemicals are far less dangerous if there is plenty of vitamin C in the liver. It also helps the liver to regulate cholesterol levels and improves immunity” (Figure 13).

I could find no references in PubMed (<http://www.ncbi.nlm.nih.gov>) to MSM and gall bladder disease, nor any clinically relevant articles about the above claims made for Vitamin C.

In summary, given these illustrative complaints, I believe the Therapeutic Goods Administration should be asked to review ALL products listed on this web site the for their compliance with the Act and the Code, including their listing status on the ARTG, see:

<https://www.liverdoctor.com/index.php?page=shop&subpage=cat2>

I submit that the multiple breaches of both the Therapeutic Goods Act and Therapeutic Goods Advertising Code documented above require the highest penalties to be applied, including the maximum fine allowable under the Act and a corrective advertising order.

I have also contacted the advertiser directly: No;

This matter is also the subject of legal action: No

The complainant

Complaints may be made anonymously, but you are encouraged to provide your contact details so that you can be advised of the outcome of your complaint. You may request (above) that your personal details not be provided to the advertiser or included in the published determination.

Name: Dr. Ken Harvey
Adjunct Senior Research Fellow
School of Public Health, La Trobe University

Telephone: (03) 9029 0634

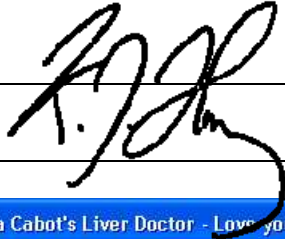
Email: k.harvey@medreach.com.au

Postal address: 35 Mary St.
Hawthorn, Vic, 3122

Fax: (03) 9818 1875

I am associated with the therapeutic goods industry: **No**
(if yes, see additional requirements below.)

Signature:



Date: October 23 2007



Dr Sandra Cabot's Liver Doctor - Love your Liver and Live Longer - Mozilla Firefox

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http://www.liverdoctor.com/index.php

Liverdoctor.com

Thomas R. Eanelli, M.D.
life changing story

Wedding 150 kg

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WELCOME TO Liverdoctor.com

Hello, my name is Dr Sandra Cabot. Many of you will know me from my famous book, titled "[The Liver Cleansing Diet](#)" which literally shot to fame like a shining meteorite during 1997. It made me a household name in Australian kitchens, and brought liver consciousness to hundreds of thousands of people in a short space of time. People from all walks of life and in many different states of health embraced this new and simple way of eating with a passion, that surprised me as well as many others.

There are thousands of diet books on the market and yet this one was different because it concentrated on just one bodily organ, namely the liver, which everyone seemed to relate to, because everyone has a liver. Perhaps its success related to the fact that when one improves the liver function through simple dietary habits it is possible to achieve many health benefits, especially weight control and internal cleansing of the body. It was incredible because everyone seemed to be having a

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Figure 1 <http://www.liverdoctor.com/index.php>

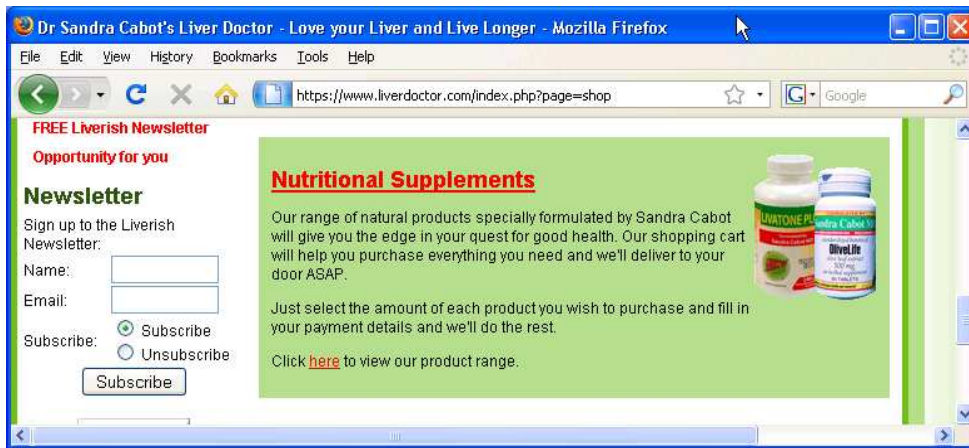


Figure 2 <https://www.liverdoctor.com/index.php?page=shop>

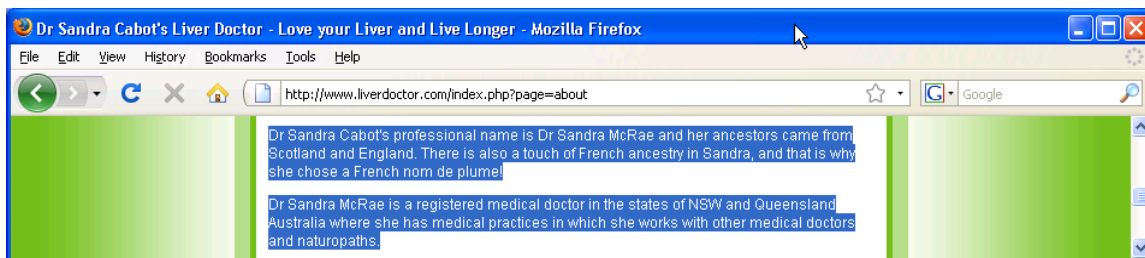


Figure 3 <http://www.liverdoctor.com/index.php?page=about>

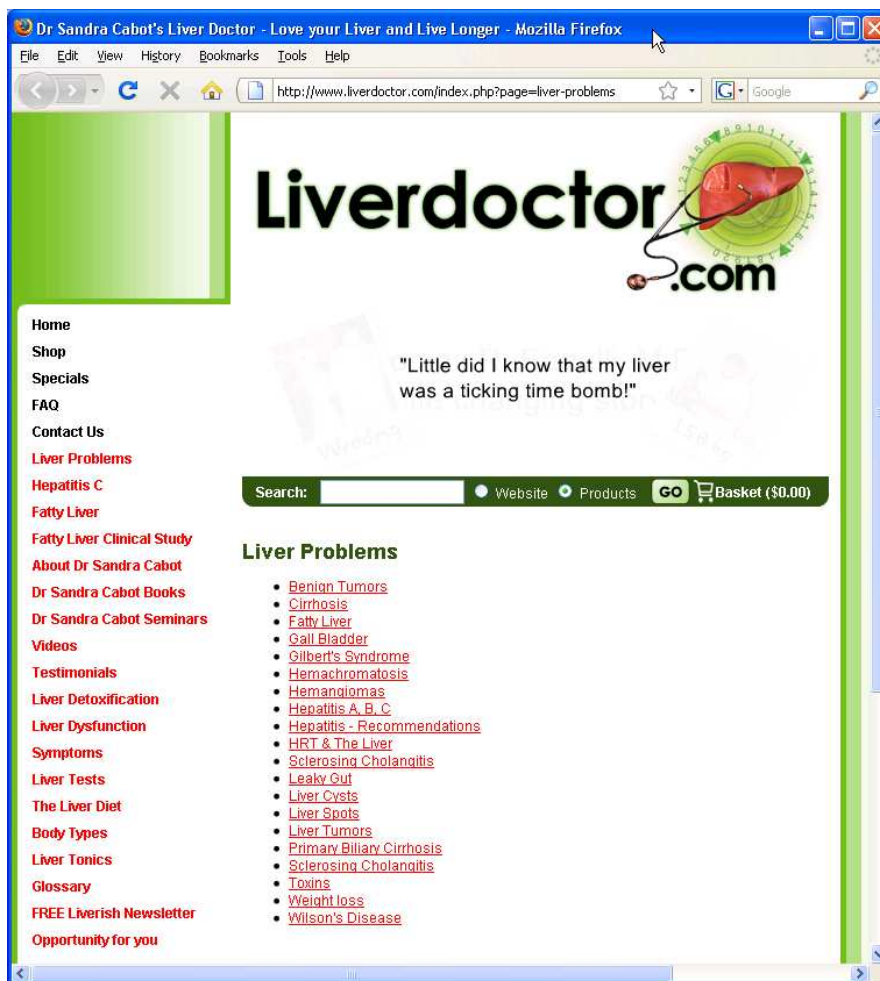


Figure 4 <http://www.liverdoctor.com/index.php?page=liver-problems>


Dr Sandra Cabot's Liver Doctor - Love your Liver and Live Longer - Mozilla Firefox

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ADRENAL PLUS SUPPORT TABLETS

Overcome Chronic Fatigue

Many people suffer with morning fatigue and depression due to sluggish function of the adrenal glands. The adrenal glands are 2 small glands that are situated just above the kidneys, and when they are working efficiently, they produce extra surges of energizing hormones such as cortisol, adrenalin and DHEA to help you face the challenges of the new day. In other words the adrenal gland hormones increase your resistance to stress and provide the drive and energy to succeed.



I call the adrenal glands your "survival glands"

Live life in the "high energy lane" naturally, and you will not have to rely on strong stimulants that let you down.

Contains per 4 tablets:

- Vitamin C 100mg
- Vitamin B6 (from pyridoxine HCL)40mg
- Vitamin B5 (also known as pantothenic acid from d-calcium pantothenate)1000mg
- Deglycyrrhized Licorice root (Glycyrrhiza glabra)200mg
- Mexican Wild Yam root 10:1 extract (Dioscorea villosa)100mg
- Schizandra Berry (Schizandra chinensis)100mg
- Siberian Ginseng Root 50:1 extract(Eleutherococcus senticosus)100mg
- Wild Spring-gathered Nettle Leaf(Urstica dioica)100mg
- Trimethylglycine (TMG)100mg

Other ingredients: Special plant cellulose, natural silica, vegetable stearates, and magnesium stearates.

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Name:
Email:

Figure 5 <https://www.liverdoctor.com/index.php?page=shop&subpage=cat2&id=127>


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ALLERGY RELIEF

The misery of allergy includes symptoms such as a running nose, red itchy eyes, sinus pain and sneezing. Well don't suffer any more, as we have a **natural strategy** that can reduce your allergy problems without side effects.


Have you heard of the powerful anti-allergy effects of quercetin and stinging nettle leaf? Together they make a powerful anti-allergy combination to reduce the hypersensitivity of your immune system to pollens, molds, dust, animal dander and environmental pollutants. They also exert a natural anti-inflammatory effect.

Prepare your immune system ahead of time to ward off allergies by taking "Allergy Relief Tablets". You will notice more energy too, as this formula helps to support the adrenal glands and the circulation. Furthermore you won't need to swallow anti-histamine drugs, which can overwork the liver and leave you with a hangover feeling.

Contains per 3 tablets:

- Vitamin C 2500mg
- Vitamin B5 (also known as pantothenic acid from d-calcium pantothenate)250mg
- Magnesium (from magnesium ascorbate)66mg
- Quercetin (from Dimorphandra mollis seed pods)1000mg
- Bromelain 1200GDU/g)150mg
- Stinging nettle leaf (freeze dried *Urtica dioica*)100mg

Other ingredients: Special plant cellulose, Vegetable stearates, Natural silica and magnesium stearates.



Sign up to the Liverish Newsletter:

Figure 6 <https://www.liverdoctor.com/index.php?page=shop&subpage=cat2&id=128>


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DHEA CAPSULUS

The Anti-aging Hormone



DHEA stands for the hormone "Dehydroepian-drosterone", which is made naturally in the adrenal glands. With age the production of DHEA diminishes greatly, and by the time you are in your seventies, your adrenal glands only manufacture around 20% of the amount of DHEA that they did in your twenties.

Some anti-aging researchers believe that the relative deficiency of DHEA accelerates the aging process.

LACK OF DHEA CAN RESULT IN:

- More rapid aging
- Chronic fatigue
- Lack of muscle strength and tone
- Loss of libido

Thankfully in this day and age we are able to replace the lost DHEA, with the natural hormone that is identical to the DHEA that your adrenal glands use to pump out during your youth.

Dr Sandra Cabot's DHEA is of the highest pharmaceutical grade and HPLC tested: thus you can be assured that you are getting the real hormone in the real doses

Each capsule of DHEA contains:

- DHEA 25mg

Newsletter
Sign up to the Liverish Newsletter:
Name:

Figure 7 <https://www.liverdoctor.com/index.php?page=shop&subpage=hrt-and-the-liver&id=134>


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BIOCELL COLLAGEN II

- Maintains support and fullness of younger skin.
- Helps to strengthen and maintain joint cartilage

Biocell Collagen II is a unique collagen type II compound derived exclusively from chicken sternal cartilage, the richest and purest source of collagen type II, as well as other healing and anti-ageing compounds. Biocell Collagen Type II has guaranteed levels of hyaluronic acid and chondroitin sulfate, glucosamine and cartilage matrix glycoprotein. Biocell Collagen type II is specially processed to make it highly absorbable, so that unlike native raw collagen, it can pass into your body from the intestines.

Per two capsules:

- Biocell Collagen II (sternum collagen type 2) 1000mg
- Chondroitin sulphate 200mg
- Hyaluronic acid 100mg



Figure 8 <https://www.liverdoctor.com/index.php?page=shop&subpage=cat2&id=129>


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FEM PRO (PROGESTERONE CREAM / MSM)



Progesterone is a natural female hormone that is produced from the ovary after ovulation occurs in the last 14 days of the menstrual cycle. It prepares the uterus for implantation of the fertilized egg, and is thus called the hormone of fertility. It balances the effect of estrogen upon the breast and uterus, thus reducing breast pain and lumpiness and the amount of menstrual bleeding.

Many women suffer with progesterone deficiency and it is common in the following.

- Premenstrual syndrome
- Peri-menopausal years till 10 years after menopause
- Endometriosis
- Unexplained infertility
- Osteoporosis
- Polycystic ovarian syndrome

Dr Sandra Cabot's progesterone cream contains real progesterone hormone in the natural form, which is identical to the progesterone produced by your ovaries. Real progesterone is different to plant hormones, such as diosgenin, that is found in wild yam.

Directions: Massage a rounded 1/8 tsp (a full pump equals 1/4 tsp) of cream into hands and body twice daily. Individual needs may vary. transdermal delivery system with 7% MSM.

Purified water, Aloe Vera gel, methyl sulfanyl methane (msm), cetil palmitate

Figure 9 <https://www.liverdoctor.com/index.php?page=shop&subpage=hrt-and-the-liver&id=136>

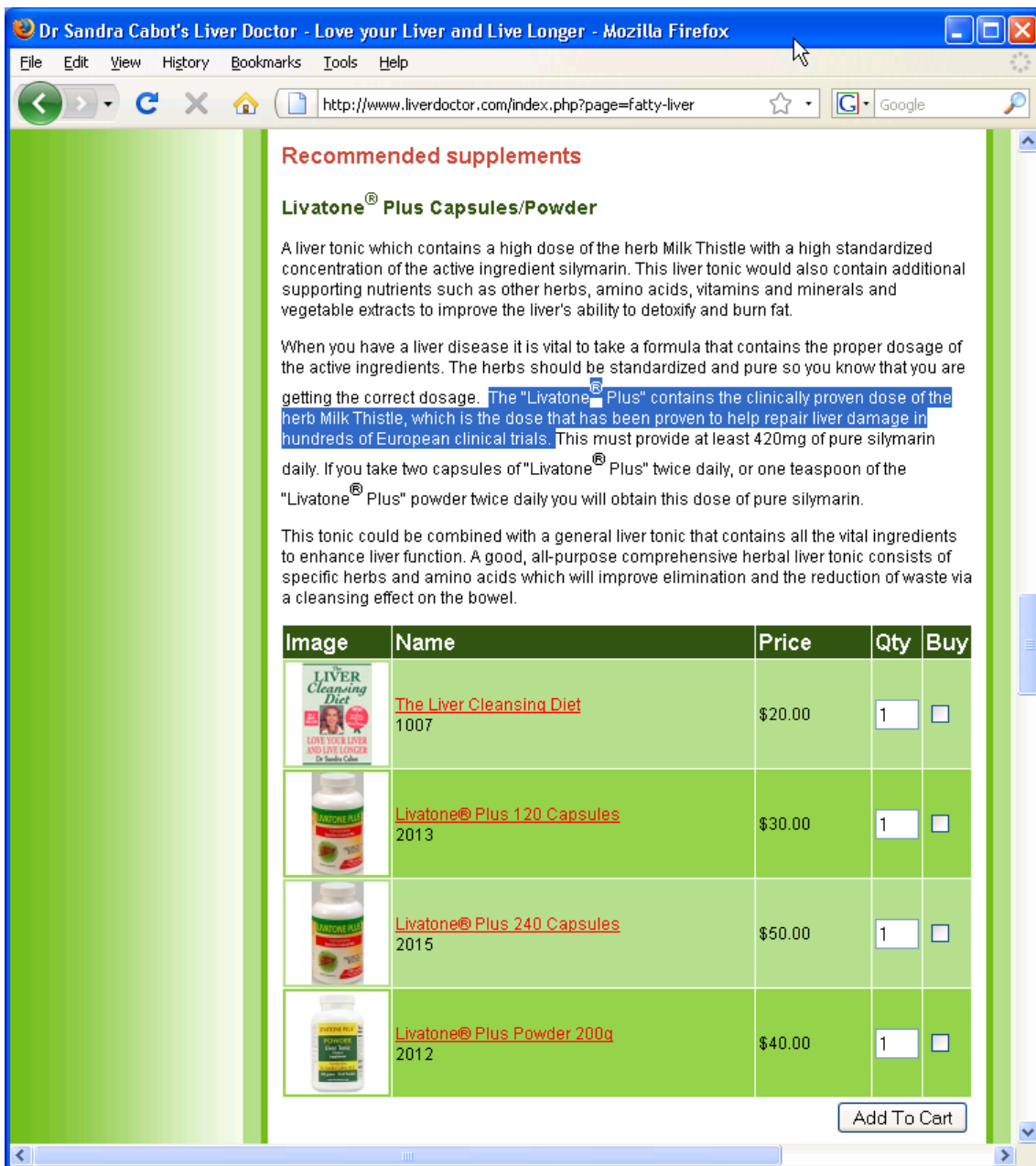


Figure 10 <http://www.liverdoctor.com/index.php?page=fatty-liver>

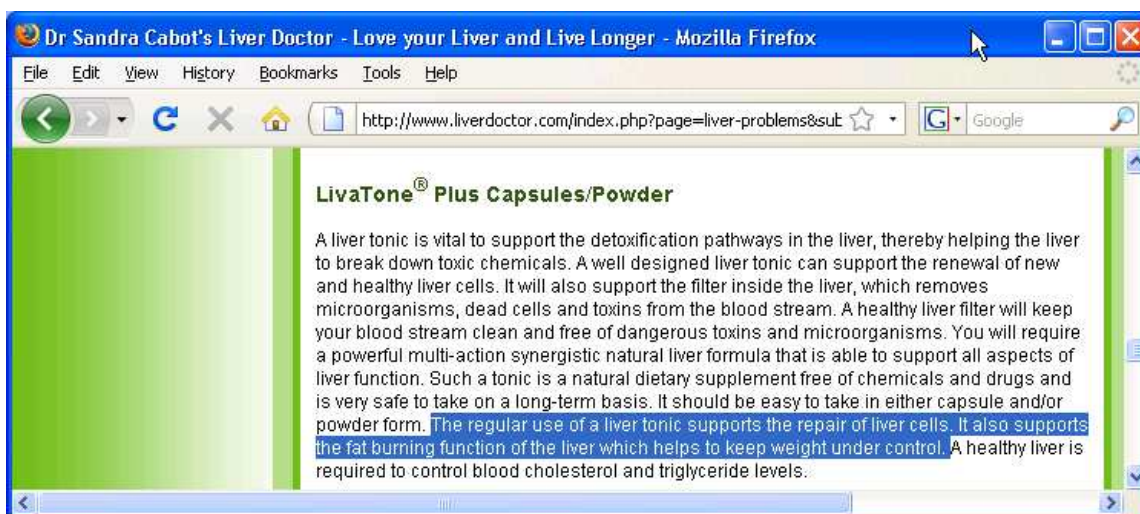


Figure 11 <http://www.liverdoctor.com/index.php?page=liver-problems&subpage=hepatitis-recommendations>



Figure 12 <http://www.liverdoctor.com/index.php?page=hepatitis-c>



Figure 13 <http://www.liverdoctor.com/index.php?page=liver-problems&subpage=gall-bladder>