

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

MILE HIGH MADISON GROUP, INC.,  
a Delaware corporation;

NORDIC CLINICAL, INC.,  
a Delaware corporation;

ENCORE PLUS SOLUTIONS, INC.,  
a Florida corporation;

LE GROUPE MILE HIGH MADISON, INC.,  
a Quebec corporation;

CLINIQUE NORDIQUE, INC.,  
a Quebec corporation;

VITTORIO DICRISCIO,  
individually and as an officer, director, or control  
person of Mile High Madison Group, Inc., Nordic  
Clinical, Inc., Encore Plus Solutions, Inc., Le  
Groupe Mile High Madison, Inc., and Clinique  
Nordique, Inc.;

and

VITO PROIETTI,  
individually and as an officer, director, or control  
person of Mile High Madison Group, Inc., Nordic  
Clinical, Inc., Encore Plus Solutions, Inc., Le  
Groupe Mile High Madison, Inc., and Clinique  
Nordique, Inc.,

Defendants.

Case No. \_\_\_\_\_

COMPLAINT FOR PERMANENT  
INJUNCTION AND OTHER  
EQUITABLE RELIEF

Plaintiff, Federal Trade Commission (“FTC” or “Commission”), for its complaint alleges:

1. The FTC brings this action under Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b), to obtain permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other equitable relief for Defendants’ acts or practices in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a), 52, in connection with the labeling, advertising, marketing, distribution, and sale of Neurocet, a pill that purportedly relieves bone and joint pain and reduces inflammation, and Regenify and Resetigen-D, identical pill products that purportedly repair and regenerate the body’s cells and thereby cure or treat several serious health conditions and diseases.

### **JURISDICTION AND VENUE**

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345.

3. Venue is proper in this District under 28 U.S.C. § 1391(b)(1), (b)(2), (b)(3), (c)(1), (c)(2), (c)(3), and (d), and 15 U.S.C. § 53(b).

### **PLAINTIFF**

4. The FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces Section 12 of the FTC Act, 15 U.S.C. § 52, which prohibits false advertisements for food, drugs, devices, services, or cosmetics in or affecting commerce.

5. The FTC is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and to secure such equitable relief as may be

appropriate in each case, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies. 15 U.S.C. § 53(b).

### **DEFENDANTS**

6. Defendant Mile High Madison Group, Inc. (“Mile High DE”) is a Delaware corporation formed on or about October 25, 2005, with a registered agent address at Registered Agent Legal Services, LLC, 1013 Centre Road, Suite 403S, Wilmington, DE 19805. From on or about October 21, 2008 through the present, Mile High DE also has been registered to do business in the state of New York. Mile High DE’s mailing address is 25 Power Dam Way Ste. 2-5, Plattsburgh, NY 12901. In its New York corporate filings, Mile High DE lists its principal executive address as 8294 Pascal Gagnon, Montreal, Canada, H1P1Y-4. Mile High DE also maintains business addresses at 15556 Marcello Circle, Naples, FL 34110 and 3109 Grand Avenue, Suite 102, Miami, FL 33133. Mile High DE transacts or has transacted business in this District and throughout the United States. At times material to this Complaint, acting alone or in concert with others, Mile High DE has advertised, marketed, distributed, or sold Neurocet, Regenify, and Resetigen-D to consumers throughout the United States.

7. Defendant Nordic Clinical, Inc. (“Nordic Clinical DE”) is a Delaware corporation formed on or about September 17, 2015 with a registered agent address at Harvard Business Services, Inc., 16192 Coastal Highway, Lewes, DE 19958. From on or about October 5, 2015 through March 7, 2019, Nordic Clinical DE also was registered to do business in the state of Florida, with its last mailing address at National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover, DE 19904. Nordic Clinical DE maintains or has maintained business addresses at 4737 N. Ocean Drive, Suite 111, Ft. Lauderdale, FL 33308 and 8290 rue Pascal-Gagnon, St-Leonard, Quebec, H1P 1Y4, CA, which address is listed as its principal address in

Florida corporate filings. Nordic Clinical DE transacts or has transacted business in this District and throughout the United States. At times material to this Complaint, acting alone or in concert with others, Nordic Clinical DE has advertised, marketed, distributed, or sold Neurocet, Regenify, and Resetigen-D to consumers throughout the United States.

8. Defendant Encore Plus Solutions, Inc. (“Encore Plus”) is a Florida corporation formed on or about August 1, 2014, with a registered agent address at Legalinc Corporate Services, Inc., 5237 Summerlin Commons, Suite 400, Fort Myers, FL 33907. Encore Plus’s principal and mailing address is 3109 Grand Avenue, Suite 102, Miami, FL 33133, which address also is used by Mile High DE and Mile High QC. Encore Plus transacts or has transacted business in this District and throughout the United States. At times material to this Complaint, acting alone or in concert with others, Encore Plus has advertised, marketed, distributed, or sold Neurocet, Regenify, and Resetigen-D to consumers throughout the United States.

9. Defendant Le Groupe Mile High Madison, Inc., also registered as Mile High Madison Group, Inc. (“Mile High QC”), is a Quebec corporation formed on or about October 10, 2008, with its principal and mailing addresses at 8294 rue Pascal-Gagnon, Montréal (Québec), H1P1Y4, Canada. Mile High QC maintains or has maintained a business address at 3109 Grand Avenue, Suite 102, Miami, FL 33133, which address also is used by Mile High DE and Encore Plus. Mile High QC has numerous contacts with the United States in furtherance of its direct mail marketing scheme. Alone or in concert with the other defendants named herein, Mile High QC has retained employees in the United States in connection with the advertising, marketing, sale, or distribution of Neurocet, Regenify, and Resetigen-D. Mile High QC also has maintained merchant accounts and internet domain registrations in the United States in connection with its

advertising, marketing, and sale of Neurocet, Regenify, and Resetigen-D. Mile High QC also has directly entered into business relationships with numerous individuals and companies located in the United States to facilitate its advertising, marketing, sale, or distribution of Neurocet, Regenify, and Resetigen-D, including, but not necessarily limited to: product manufacturers; copywriting, design, and marketing service providers; mailing-list providers; warehousing and fulfillment providers; and customer service providers. Mile High QC transacts or has transacted business in this District and throughout the United States. At times material to this Complaint, acting alone or in concert with others, Mile High QC has advertised, marketed, distributed, or sold Neurocet, Regenify, and Resetigen-D to consumers throughout the United States.

10. Defendant Clinique Nordique, Inc., also registered as Nordic Clinical, Inc. (“Nordic Clinical QC”), is a Quebec corporation formed on or about September 22, 2015, with its principal and mailing addresses at 8290 rue Pascal-Gagnon, Montréal (Québec), H1P1Y4, Canada. Nordic Clinical QC also maintains or has maintained a business address at 4737 N. Ocean Drive, Suite 111, Fort Lauderdale, FL 33308, which also is used by Nordic Clinical DE. Nordic Clinical QC also has directly entered into business relationships with companies and individuals located in the United States to facilitate the advertising, marketing, sale, or distribution of Neurocet and other health-related products including, but not necessarily limited to: product manufacturers; copywriting, design, and marketing service providers; mailing-list providers; warehousing and fulfillment providers; and customer service providers. Nordic Clinical QC transacts or has transacted business in this District and throughout the United States. At times material to this Complaint, acting alone or in concert with others, Nordic Clinical QC has advertised, marketed, distributed, or sold Neurocet, Regenify, and Resetigen-D to consumers throughout the United States.

11. Defendant Vittorio DiCriscio (“DiCriscio”) resides in Montreal, Quebec. At times material to this Complaint, DiCriscio has been Chief Executive Officer (“CEO”) of Mile High DE and Nordic Clinical DE and President of Mile High QC and Nordic Clinical QC. He holds a 50% ownership in Mile High DE, Nordic Clinical DE, Mile High QC, and Nordic Clinical QC. Defendant DiCriscio has direct authority and control over the operations of Defendants Mile High DE, Nordic Clinical DE, Encore Plus, Mile High QC, and Nordic Clinical QC (hereinafter, collectively “Corporate Defendants”).

12. At times material to this Complaint, Defendant DiCriscio, as CEO, President, or a control person of the Corporate Defendants, acting alone or in concert with others, has overseen the day-to-day management and operation of these corporations. Defendant DiCriscio has participated in creating, reviewing, or approving the advertising and marketing for Neurocet, Regenify, and Resetigen-D, and in evaluating substantiation for the claims made in the advertising and marketing of these products. He has also participated in creating, reviewing, or approving customer service scripts pertaining to Neurocet, Regenify, and Resetigen-D.

13. Defendant DiCriscio, alone or in concert with others, has had responsibility for approving and authorizing budgets, agreements, product formulations, business and marketing plans, creative executions, marketing strategy, and vendor selections and management. He also has been directly involved in contracting or communicating with, overseeing, or approving payment to United States-based product manufacturers, copywriting, design, and marketing service providers, mailing-list providers, warehousing and fulfillment providers, or customer service providers, which have provided services to the Corporate Defendants in connection with the advertising, marketing, or sale of Neurocet, Regenify, and or Resetigen-D. Defendant DiCriscio has traveled to Florida on multiple occasions to meet with employees, contractors, or

other persons or entities in connection with the advertising, marketing, or sale of Neurocet, Regenify, or Resetigen-D. In connection with the matters alleged herein, Defendant DiCriscio has transacted business in this District and throughout the United States. At times material to this Complaint, acting alone or in concert with others, Defendant DiCriscio has formulated, directed, controlled, had the authority to control, or participated in the acts and practices of the Corporate Defendants, including the acts and practices set forth in this Complaint.

14. Defendant Vito Proietti (“Proietti”) resides in Montreal, Quebec. At times material to this Complaint, Proietti has been Chief Financial Officer (“CFO”) of Defendant Mile High DE; Vice President and Director of Defendant Nordic Clinical DE; Secretary, Treasurer, and Director of Defendant Encore Plus; Vice President, Secretary, and Treasurer of Defendant Mile High QC; and Vice President and Secretary of Defendant Nordic Clinical QC. At times material to this Complaint, Defendant Proietti has been a 50% owner of each of Defendants Mile High DE, Nordic Clinical DE, Mile High QC, and Nordic Clinical QC, and the sole owner of Defendant Encore Plus. Defendant Proietti has direct authority and control over the operations of the Corporate Defendants.

15. At times material to this Complaint, Defendant Proietti, alone or in concert with others, has overseen the day-to-day management of the Corporate Defendants. As an officer or control person of the Corporate Defendants, he has reviewed and approved advertising and marketing for Neurocet, Regenify, or Resetigen-D, and has evaluated substantiation for claims made in the advertising and marketing of these products. Defendant Proietti also has directly communicated with, authorized, and or approved payments to United States-based product manufacturers, copywriting, design, and marketing service providers, mailing-list providers, warehousing and fulfillment providers, or customer service providers, which have provided

services to the Corporate Defendants in connection with the advertising, marketing, or sale of Neurocet, Regenify, and Resetigen-D. Defendant Proietti has traveled to Florida on multiple occasions to meet with employees, contractors, or other persons or entities in connection with the advertising, marketing, or sale of Neurocet, Regenify, or Resetigen-D. In connection with the matters alleged herein, Defendant Proietti has transacted business in this District and throughout the United States. At times material to this Complaint, acting alone or in concert with others, Defendant Proietti has formulated, directed, controlled, had the authority to control, or participated in the acts and practices of the Corporate Defendants, including the acts and practices set forth in this Complaint.

#### **COMMON ENTERPRISE**

16. The Corporate Defendants function as a common enterprise to deceptively advertise and market Neurocet, Regenify, and Resetigen-D to consumers in the United States. The Corporate Defendants are interrelated companies with: a common business purpose and business functions; shared officers and directors, including Defendants DiCriscio and Proietti; shared managers, including DiCriscio, Proietti, and Maciek Marchlewski, Director of Operations, and Samantha Junker, Director of Customer Services; shared employees totaling approximately twenty persons; and shared principal offices in Quebec. Some or all of the Corporate Defendants also share a Director of Marketing, Alan Lauffer, located in Naples, FL, and share business and mailing addresses in Fort Lauderdale, FL, Miami FL, and Plattsburgh, NY, among others. Operating accounts held in the names of Mile High QC and or Mile High DE are also used to conduct business under the Nordic Clinical DE, Nordic Clinical QC, and or Encore Plus names. Because all of the Corporate Defendants have operated as a common enterprise, each of them is jointly and severally liable for the acts and practices alleged below.



Individual Defendants DiCriscio and Proietti have formulated, directed, controlled, had authority to control, or participated in the acts and practices of the Corporate Defendants that constitute the common enterprise.

### **COMMERCE**

17. At all times material to this Complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

### **DEFENDANTS’ BUSINESS ACTIVITIES**

#### **Advertising and Marketing of Neurocet**

18. Since at least October 2014, Defendants have advertised, offered for sale, distributed, and sold Neurocet to consumers. Neurocet is an ingestible product containing a blend of DL Phenylalanine (a laboratory-made amino acid), Calcium Fructoborate (a boron, fructose, and calcium compound), and Boswellia Serrata gum extract (derived from frankincense trees). Net sales totaled approximately \$7.2 million between 2014 and mid-2018.

19. Defendants have advertised and marketed Neurocet through direct-to-consumer mailers, letters, and postcards, and on their websites, nordicclinical.com, neurocet.com, neurocetrelief.com, neurocetjointpain.com, neurocetpainreliever.com, neurocetfx.com, neurocetrelievers.com, and neurocetgo.com.

20. The Neurocet direct-to-consumer mailers are glossy, magazine-style pamphlets that feature bold headlines about Neurocet’s amazing pain-relieving and anti-inflammation effects, numerous references to supposed research on Neurocet or its ingredients conducted by prestigious medical schools and universities, and testimonials from purported medical professionals and customers attesting to the product’s benefits.

21. Consumers can purchase Neurocet from Defendants by calling the 800-number on Defendants' mailers and postcards, by mailing in the order form on the mailers, or by ordering online through Defendants' websites. The suggested retail price for a one-month supply of Neurocet is \$39.95 plus \$7.95 shipping and handling; however, unit sales prices range from \$19.95 to \$39.95 depending upon quantities ordered.

22. Defendants have represented that Neurocet provides extraordinary relief from multiple types of pain, including joint pain, back pain, arthritis, and chronic pain. Defendants also have represented that Neurocet significantly reduces inflammation and stiffness, while increasing flexibility and mobility. Defendants have represented that the benefits of Neurocet are clinically or scientifically proven.

23. To induce consumers to purchase Neurocet, Defendants have disseminated or caused to be disseminated advertisements for the product, containing the following statements and depictions, among others:

A. Cover page of Neurocet Summer 2015 mailer:



# NATIONWIDE FREE GIVEAWAY!



**Scientists Discover the Most Powerful Natural Pain Relief Known to Science—and It's Now Available to You In a New Breakthrough Called *Neurocet*.**

- Lasted 26 times *longer* than 10 popular pain drugs (page 3)
- Relief lasted 5 days after one dose (page 3)
- Pain relief 48 times *stronger* than morphine (page 2)
- Based on a Johns Hopkins Medical School Breakthrough (page 2)

**“We’re On a Mission to Help End Chronic Pain.”**



“4 out of 5 folks are taking the *wrong* pain relievers. *Neurocet* can be an answered prayer for them.”

Shipments Are Arriving *Daily* to Keep Up With Demand For This Exciting New Breakthrough!



**Call 1-800-826-2294 to Request Your 2 FREE BOTTLES**

Friendly operators are standing by 24 hours a day, 7 days a week

B. Excerpt from page 4 of Neurocet Summer 2015 mailer:

**Neurocet Helps You Get Rid Of PAIN ALL OVER YOUR BODY**



- ✓ Back pain
- ✓ Migraine headaches
- ✓ Joint pains
- ✓ Muscle aches
- ✓ Fibromyalgia
- ✓ Chronic pain
- ✓ Rheumatoid arthritis
- ✓ Osteoarthritis
- ✓ Whiplash
- ✓ Upper back pains
- ✓ Aching knuckles
- ✓ Premenstrual cramps
- ✓ Addictive withdrawal pain

## **“Neurocet can last up to 26 times longer than other pain relievers—AND IT WORKS IN YOUR ENTIRE BODY.”**

In a remarkable study by Arnold Fox, M.D. DLPA outlasted 5 well-known prescribed pain drugs and arthritis drugs by 26 times. *Neurocet’s* relieved pain for 5 days while the drugs lasted around 4.5 hours.

*(continued from page 3)*

- Drs. Lars Terenius and Agenta Wahlstrom in Sweden found that the activity of a natural “morphine-like” factor was about 50% lower in chronic pain patients...”
- A study of migraine sufferers revealed endorphin losses of 50% to 80%. The worse the migraine condition, the lower the endorphin level.
- Researchers looked for endorphin activity in the spinal fluid from 80 chronic pain patients, finding a deficiency in endorphin levels when compared to healthy volunteers.
- In a separate study both the beta-endorphin and beta-lipotropin levels from 24 chronic pain patients, revealed up to an 87% loss beta-endorphin and just over two thirds less beta-lipotropin than the pain-free participants.

**12 REASONS YOU RUN OUT OF ENDORPHINS**

What causes low endorphin activity? A surprising range of ordinary events that everyone experiences. This includes pain you ignore, hoping it will go away.

We all have “endorphin-chewing” enzymes called carboxypeptidase A and enkephalinase that seriously degrade the enormous pain-stopping power of your body’s own defense system. *Fortunately, this is precisely where Neurocet helps you.* Who doesn’t experience the following...

- Stress
- Chronic pain
- Emotional distress

**Neurocet’s #1 Ingredient, DLPA, is the MOST POWERFUL NATURAL PAIN RELIEVER known to science.**

C. Excerpt from page 5 of Neurocet Summer 2015 mailer:

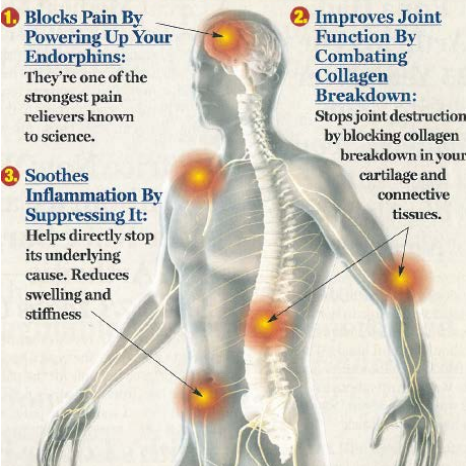
## **“You’ll *Never* Find Relief If You Don’t Combat Pain In The 3 Ways It Attacks Your Body.”**

*Neurocet* is the only true, fast-acting formula that gets to the *root of your pain* by addressing it in 3 different ways rather than one. The result is faster, deeper, more long-lasting relief over your entire body

**1 Blocks Pain By Powering Up Your Endorphins:**  
They’re one of the strongest pain relievers known to science.

**2 Improves Joint Function By Combating Collagen Breakdown:**  
Stops joint destruction by blocking collagen breakdown in your cartilage and connective tissues.

**3 Soothes Inflammation By Suppressing It:**  
Helps directly stop its underlying cause. Reduces swelling and stiffness



NEUROCET EXCLUSIVE

D. Excerpt from page 14 of Neurocet Summer 2015 mailer:

**Neurocet**  
**Breakthrough**  
**Ingredient #2:**  
**ApresFlex<sup>®</sup>, The Superior**  
**Form of Boswellia Serrata**

**New York University**  
**Medical School**  
**Finds a “Significant**  
**Improvement” In**  
**Arthritis Symptoms**

“In a double-blind study of 30 people, researchers compared Boswellia against a placebo. The results showed a *significant* improvement in knee pain, knee mobility and walking distance compared to the placebo.”

**ARTHRITIS PAIN**  
**DECREASED A**  
**STUNNING 62%**  
**In Double-Blind**  
**Clinical Test**

Even a mild level of pain can ruin every day. *You don't have to suffer any longer!* These are results are from a double-blind, placebo-controlled study on folks with arthritis.





E. Cover page of Neurocet Summer 2017 mailer:

**SPECIAL REPORT ON PAIN RELIEF** SUMMER 2017 • COMPLIMENTARY ISSUE

*Based on a discovery from the Kaplan Medical Center in Rehovot, Israel...*

# The Israeli secret for miraculous pain relief

Relief starting in as little as 5 days!

A mysterious desert mineral can help you feel decades younger, by restoring mobility and flexibility



**“Only 1% of Israelis get arthritis—while 20% of Americans suffer from it.”**

A mysterious mineral found 6,700 miles away in the middle east could spark a multi-million-dollar joint health revolution.

Only *Neurocet* contains this clinically tested, joint-nourishing miracle for improving discomfort, stiffness, flexibility and mobility. *This extraordinary story starts on page 2...*

**Fast acting joint and muscle comfort for:**

- Back pain • Sprains • Joint pains • Stiff neck
- Muscle aches • Foot pain • And more



▲ Israeli General Ariel Sharon led his forces to victory. Is this mineral the secret to their success?


**Your satisfaction is 100% GUARANTEED — or it's FREE!**

F. Excerpt from page 4 of Neurocet Summer 2017 mailer:

## Blue-chip study reports blessed relief

ApréFlex<sup>®</sup>'s stunning results from double-blind, placebo-controlled, randomized study of 60 people with osteoarthritis


### Arthritis' Painful Symptoms Plunge



A stunning 62% reduction in pain is reported according to the WOMAC pain index and a 47% pain reduction by the Visual Analog Scale (VAS) after just 90 days respectively. Both are highly respected pain indexes. After just one week, impressive results were evident. WOMAC reported a 12% pain reduction and VAS a 13% reduction.

Source: *Int. J. Med. Sci.* on ingredient ApréFlex<sup>®</sup>


### Joint Stiffness Greatly Improves



Researchers reported an impressive decrease in stiffness measured by the acclaimed WOMAC STIFFNESS SCORE Index. In 90 days, it found a 60% drop in stiffness. In just 7 days results were *also* reported to reduce stiffness a respectable 12%.

Source: *Int. J. Med. Sci.* on ingredient ApréFlex<sup>®</sup>

### Mobility and Movement Get Much Better



There was an extraordinary 49% improvement in mobility and movement according to WOMAC functional ability scores in just 90 days. And a 10% improvement in a week! The Lequesne Algofunctional Index reported a 36% improvement after 90 days, along with a 9% improvement after just one week.

Source: *Int. J. Med. Sci.* on ingredient ApréFlex<sup>®</sup>

G. January 2016 Letter to Neurocet customers:



4737 North Ocean Drive #111  
Fort Lauderdale, FL 33308-9927  
1-800-981-9901

Dear Friend,

As you can see, I've attached a Million Dollar Bill to the top of this letter.

Why have I done this?

Well, you made a very intelligent decision ordering Neurocet a few weeks ago.

And you know what? Not enough people in business these days take the time to acknowledge and really appreciate their customers. So I've sent you this million dollar bill as my unique way of saying...

**Thanks a Million!**

I truly mean that from the bottom of my heart. Without loyal customers like you – Nordic Clinical would be out of business and thousands of people wouldn't get the kind of superior health care we have to offer.

So again, thank you! What's more...

**Congratulations!**

*That's right.* Congratulations on taking the first step towards high-potency pain relief for almost every kind of joint pain and stiffness that's troubling you.

Chronic pain affects nearly 100 million folks across the nation. But now, you have in your hands a powerful, scientifically proven, solution that's *guaranteed* to bring you a higher degree of relief than you've ever felt. Relief that's safe... 100% natural... and inexpensive.

Neurocet is a revolutionary *breakthrough* in pain relief. Why? Because it is clinically proven to quickly boost your body's natural supply of endorphins – and knock out pain with **48 times the power of morphine!** *(continued)*

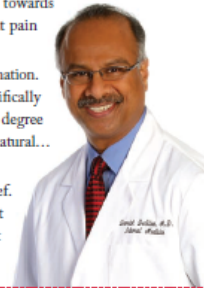
**STUDY SAYS ENDORPHIN LEVEL TRIPLED IN 90 MINUTES**

**BEFORE NEUROCET:**  
Endorphin Deficiency  
- PAIN INCREASES

**AFTER NEUROCET:**  
Endorphins Build Up  
- PAIN PLUNGES

**ENDORPHINS SOAR!**

*Endorphins are your body's natural pain stoppers. In vitro study referenced by Arnold Fox, M.D.*



**NEUROCET SAVINGS CERTIFICATE - RECEIVE YOUR ORDER FASTER! CALL TOLL-FREE 1-800-981-9901**

*Return in enclosed envelope with first-class postage to: NORDIC CLINICAL, 4737 N. OCEAN DRIVE #111, FT. LAUDERDALE, FL 33308-9927*

H. Excerpt from www.nordicclinical.com:

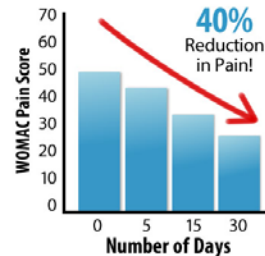
**Take control of your pain with clinically studied ingredients in this revolutionary 3-in-1 formula\***

Neurocet is the only true, fast-acting formula that gets to the root of your pain by addressing it in 3 different ways rather than one. Neurocet quickly soothes joint pain and stiffness, cools inflammation, and promotes certain endorphins – the body's own powerful pain relievers\*.

It's the first and only joint pain supplement to combine dl-phenylalanine with clinically researched AprèsFlex® and Fruitex-B®, to provide the most advanced, fast-acting relief\*.

What's more, in human clinical trials, its ingredients have been shown to deliver significant results in as little as five days, with additional benefits over two weeks\*.

**Clinical Trial Results With AprèsFlex®**





\*\*\*

In a double-blind, randomized, placebo-controlled study, 59 subjects with pain were given 100 mg of AprèsFlex or a placebo daily for 30 days. Three different tests were administered to measure pain, stiffness, and physical function.

- AprèsFlex showed a 14.8% better reduction in pain than placebo starting in 5 days\*
- The AprèsFlex group reported a 40.1% improvement in pain relief, a 41.3% improvement in stiffness, and a 38.8% improvement in physical function after 30 days\*

In other research, AprèsFlex® was shown to reduce 5 inflammatory markers - including COX-1, COX-2 and 5-LOX enzymes that ignite inflammation\*.

\*\*\*

\*These statements have not been evaluated by the Food and Drug Administration. These products are not intended to diagnose, treat, cure or prevent any disease.

(accessed May 15, 2019)

### **Advertising and Marketing of Regenify and Resetigen-D**

24. Since at least May 2015, Defendants have advertised, offered for sale, distributed, and sold Regenify to consumers. Since at least December 28, 2015, Defendants have advertised, offered for sale, distributed, and sold Resetigen-D to consumers. Regenify and Resetigen-D are identical products, containing a blend of 31 vitamins, minerals, and herbal ingredients. Combined net sales of Regenify and Resetigen-D totaled approximately \$31 million between 2015 and mid-2018.

25. Defendants have advertised and marketed Regenify and Resetigen-D through direct-to-consumer mailers, letters, and postcards. Defendants also have advertised Regenify and Resetigen-D through the websites, regenifynow.com, regenifyfx.net, and regenifyspecial.com (Regenify websites) and resetigen-d.com, resetigen-dadvanced.com, and resetigen-dnow.com (Resetigen-D websites). The suggested retail price for a one-month supply of Regenify or Resetigen-D is \$39.95 plus \$7.95 shipping and handling; however, unit sales prices range from \$19.95 to \$39.95 depending upon quantities ordered.

26. Direct mail advertisements for Regenify and Resetigen-D also are glossy, multipage, magazine-style pieces, which contain numerous references to supposed research on the product or its ingredients conducted by prestigious medical schools and universities, and testimonials from purported medical professionals and customers attesting to the product's benefits. The mailers' central theme is that Regenify and Resetigen-D stimulate the body to repair and restore its own cells, thereby reversing or repairing age-related damage in the cells, skin, muscles, tissues, and organs. Specifically, Defendants have represented that Regenify and or Resetigen-D provide numerous benefits, including, but not limited to: repairing every type of human cell; reversing age-related health conditions by repairing human cells; significantly lowering unhealthy cholesterol; significantly improving memory and brain function; significantly accelerating recovery from injury; decreasing body fat, increasing lean muscle mass, and promoting rapid weight loss; eliminating bone, joint, and muscle pain; eliminating arthritis or arthritis-related pain; eliminating tinnitus or ringing in the ears; eliminating asthma; and eliminating psoriasis, eczema, cold sores, and warts.

27. Defendants have also represented that several of these benefits are clinically or scientifically proven.

28. To induce consumers to purchase Regenify and Resetigen-D, Defendants have disseminated or caused to be disseminated advertisements containing the following statements and depictions, among others:

A. Cover page of Regenify Winter 2017 mailer:

**DISCOVERED!**

The Most Important Health Pill Of The 21st Century

Journal Of Scientific Breakthrough Winter 2017

# Regenify

The Breakthrough Pill That Will **Rejuvenate Your ENTIRE Body...**

2 TRILLION of YOUR CELLS  
Cleansed, Fed and Repaired  
EVERY SINGLE DAY!

Harvard, Yale, Stanford, Johns Hopkins, Oxford...  
31 Clinically Tested, Scientifically Studied, 100% Proven Ingredients...

- ✓ Brain
- ✓ Heart
- ✓ Lungs
- ✓ Liver
- ✓ Cholesterol
- ✓ Joints
- ✓ Bones
- ✓ Kidneys
- ✓ Intestines
- ✓ Sex
- ✓ Blood Sugar
- Skin & More...

Cells Cleansed, Fed & Repaired!  
**TOTAL CELLULAR REJUVENATION**

You Can Try It Now - WITHOUT A Prescription and Its **GUARANTEED** To Work for a LIFETIME.

**Reset Your Organs, Cells and Body To "Starting Point Perfect"** (See Pg.12)

B. Page 2 of Regenify Winter 2017 and Summer 2017 mailers:

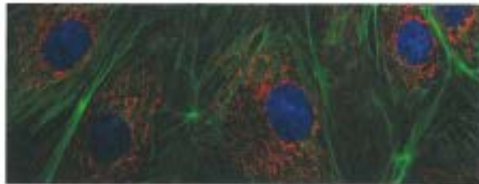
# Regenify Capsules

## Rejuvenate Your Entire Body From Head To Toe



### *Regenify Is A Miracle Of Modern Medicine*

Regenify is a miracle - in the true sense of the word. One pill a day allows your body to repair 2 trillion cells every 24 hours ... Head to toe rejuvenation... from hair growth to skin problems... to joint, heart, & bone health... to brain function.. and more... every system in your body is actually repaired and reset, with 1 little pill containing 31 Powerful ingredients...



### 30 Days To Total Cellular Rejuvenation

Your body contains 50 trillion cells - and those cells make up 100% of you. Everything from the hair on your head to the soles of your feet - and everything in between is made from those 50 trillion cells. Unfortunately - as we age - those cells become worn and damaged - causing ALL the disease, and all the ailments known to science. By cleansing, feeding and repairing your cells - you can actually REVERSE all the problems of growing older.... and breakthrough Regenify is the answer.

One Regenify capsule repairs 2 trillion cells every 24 hours - so every 25 days with a daily dose of Regenify - EVERY Single Cell in your body will be reset to "Starting Point Perfect" (see sidebar). You can actually fix the problems that effect you - inside and out. Regenify is truly a medical breakthrough - proven by science and confirmed by thousands of people worldwide...



### Regenify Boosts Cellular Hair Growth By 73.5%

Hair growth starts on the cellular level - deep within the scalp. Regenify has been PROVEN to BOOST Hair Growth by an astonishing 73.5% by repairing the skin cells that surround the hair follicles... leading to a thick, healthy head of hair. Guaranteed.

### Reset Your Organs, Cells & Body To "Starting Point Perfect"



When you are born - your body is "Starting Point Perfect"... the 50 Trillion Cells in your body are unused, undamaged, strong, young and fresh. The ability to grow bigger, stronger, faster is automatically built into your cellular makeup. But as we age - the cells in our body begin to degrade, begin to lose the ability to grow, begin to wear out... and at some point our cells become so damaged that our bodies are taken over by a spiderweb of disease or run flat by old age - and we die. Of course aging is inevitable - but feeling young, looking young - being strong, and living a superb quality of life CAN be achieved - through cellular regeneration. With Regenify you can actually reset your organs, cells and body to "Starting Point Perfect"... arresting and REVERSING damage done to your body by time...

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.

C. Excerpt from page 6 of Regenify Winter 2017 and Summer 2017 mailers:

# 31 Ingredients Restore 2 Trillion Cells - Per Day!

## Clinical RESEARCH PROVES THE POWER Of Regenify

Researchers from top universities have studied Regenify's 31 Powerful ingredients... and have now released hundreds of papers to the best known peer review publications in the country.

The 31 ingredients found in every single capsule of Regenify are measured and mixed in perfect proportion - to guarantee that all 50 trillion of the cells in your body will be cleansed in less than 30 days. Guaranteed.



### How 14th Century Secrets, Improved By Science... Unlocked The **Secret To** **Restoring The Entire Mind & Body**

Regenify scientists were able to examine the biology of the starfish, along with 14th asian cures, to unlock the secrets to restoring mind and body health. Through hours of clinical testing and analysis - 31 unique vitamins, minerals and compounds were proven to be the key to feeling better, healing faster, and living well. These 31 PURE ingredients are expertly sourced, carefully measured, and found in every capsule of Regenify.... GUARANTEED to regenerate 2 Trillion of YOUR cells every 24 hours...



D. Excerpt from page 8 of Regenify Winter 2017 mailer:



# Regenify:

Regenify is now the #1 choice of Top Athletes Worldwide - to **enhance performance on and off the field** - and to aid in lightning fast recovery times after workout - and after injury. Regenify is **PROVEN** to aid in muscle growth, **aid in strength, aid in reflex times, and aid in improving overall performance** - Regenify's 31 **POWERFUL** Ingredi-

## Regenify Speeds Rehab By 368%

Regenify is the top choice for trainers and physical therapists, to help aid in rehab and recovery. Injuries across the spectrum have been shown to heal 368% **FASTER** with Regenify... making some injuries go from life changing to "no big deal".

### The New Carl Zeiss Cell Observer SD Lets Doctors SEE The POWER of Regenify

"By using the new Carl Zeiss Cell Observer - we can actually watch how Regenify reacts with damaged cells. To put a very complicated biological process into easy to understand terms - we can watch "dirty, damaged cells" "scrubbed clean and repaired" by the 31 ingredients in Regenify.

### Thanks to 30 Days Of Regenify I Am Pain Free and Active Again!"

After suffering a really bad climbing accident (and struggling through years of rehab) - I thought I'd never be active again... but seriously... with 30 days of Regenify, I was a good as new! Don't know how it works... but it does!

- E. Excerpt from page 15 of Regenify Winter 2017 and Summer 2017 mailers:



### 97.4% Increase In Brain Function... Memory... Response Times

Studies at The University of Moscow have shown that Regenify's 31 powerful ingredients caused memory function, brain function, and mental response times to increase by an astonishing 97.4% in just 28 days. The ability to retain facts, the ability to solve complex math problems, the ability to learn a language, and the ability to play an instrument were PROVEN to be EASY with a 28 day course of Regenify.

F. Excerpt from page 10 of Regenify Winter 2017 and Summer 2017 mailers:



**Rejuvenate Your Knee Joints With One Bottle Of Regenify**

Anyone who has had knee replacement surgery will tell you... its a fix - but its a very painful fix, a fix that is far from perfect, and a fix that has a very long recovery time. Regenify has recently been described as "nature's knee replacement"... for its ability to completely repair damaged knees (even the worst cases) in just under 30 days, with inter-cellular stimulation. By flooding damaged knee cells with Regenify - the body is shoved into a "Hyper-Drive" repair mode... causing damaged tissue, bone, muscle, and cartilage cells to be replaced with healthy "starting point new" cells. Try Regenify for 30 days - and feel the healing that your body can be taught to do by itself. Call now for your 30 day Risk Free Trial of Regenify.

**Eliminate Back Pain Forever WITHOUT Risky Surgery**



Your body has the ability to repair itself - to reverse the terrible pain of a bad back caused by nerve or disc damage. There is no need for risky surgery if Regenify can help your body help itself by repairing damaged cells. Please try Regenify for 30 days... let all 50 trillion cells in your body be brought back to "starting point new" - see how your back pain can be 100% eliminated.

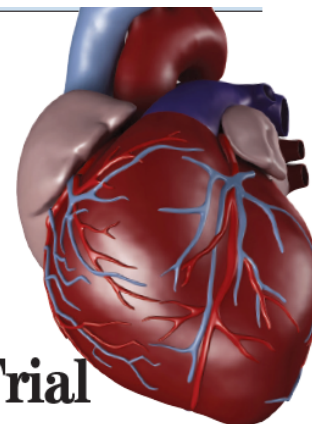
G. Excerpt from page 15 of Regenify Winter 2017 and Summer 2017 mailers:

**Drastically LOWER Your Cholesterol...**

**Clear Your Arteries... & Get Your Heart Pumping STRONGER Than EVER Before...**

Lower your Cholesterol, Clear Your Arteries, and get your heart pumping stronger than ever before - and do it with Regenify. With every Regenify capsule you take - 31 PURE, POWERFUL ingredients will enter your bloodstream and course through your veins - repairing 2 trillion cells (every 24 hours) along the way. Literally repair your heart and your arteries from the inside out... on a CELLULAR level. If you are 18 or 88 - you will FEEL the difference a healthy heart makes!

**For Your 30 Day Risk Free Trial**





- H. Excerpt from page 17 of Regenify Winter 2017 and Summer 2017 mailers:

**Get Thin FAST !  
Unneeded Fat Cells  
Are ELIMINATED**

Regenify has PROVEN to be the ULTIMATE FAT BUSTER. Since EVERY one of the 50 trillion cells in your body are washed over with Regenify in less than a month - unneeded fat cells are targeted for elimination. Your body knows that you don't need the extra fat to survive - so when Regenify "sees" these extra fat cells, they are targeted for destruction. You will lose weight FAST - really FAST. But you will not lose healthy muscle (like you would through dieting or fasting) - you will actually GAIN healthy muscle! This works because your body is actually being REPAIRED with Regenify... and it is obvious that a healthy body is one LOW in FAT and HIGH in Lean, Strong Muscle. Try Regenify for 30 days - and see and feel the difference it will make for you. Call 1-800-931-9246 for your FREE 30 Day Risk Free Trial today.

- I. Excerpt from page 20 of Regenify Winter 2017 and Summer 2017 mailers:

## 44 Common Skin Issues **REVERSED** at the Cellular Level



Cold Sores, Acne, Psoriasis, Warts, Eczema... and More

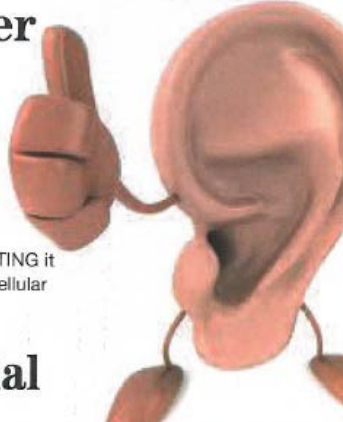
All 44 of the most common skin conditions known to dermatologists - can be ELIMINATED with Regenify. Cold Sores, Acne, Psoriasis, Warts, Eczema... and More... are all healed from within. Unlike dangerous, expensive creams and pills - Regenify allows your body to actually heal itself - attacking, destroying and replacing EVERY SINGLE Damaged cell - with new healthy cells. Try Regenify for yourself. It takes LESS than 30 days for all 50 trillion cells in your body to be washed and repaired. In less than a month - your skin will be reset to "Starting Point Perfect" .. as smooth as a baby's skin!

J. Excerpt from page 21 of Regenify Winter 2017 and Summer 2017 mailers:

**End Ringing In The Ears. Regenify The Tinnitus Buster**

**FINALLY!!!** QUIET Your Buzzing, ringing, hissing in the ears - FOREVER. Regenify's 31 ingredient formula penetrates DEEP into the inner ear CELLS - repairing damage done by noise and time. Before Regenify there has NEVER been a real treatment for tinnitus - and Regenifying isn't just a treatment... because Regenify isn't masking the noise - it is ELIMINATING it by repairing the body from within - on a micro cellular level. Try Regenify today - its GUARANTEED.

**30 Day Risk Free Trial**



K. Excerpt from page 18 of Regenify Winter 2017 and Summer 2017 mailers:



**Asthma?**  
 Not Me... Not  
 Anymore  
 Regenify Made Me  
 Feel Normal For  
 The First Time In  
 My Life

After a runner friend of mine told me how Regenify helped him increase his lung capacity - I thought maybe it would help my asthma... but I never dreamed it would get rid of it! My life long troubles breathing are gone! For the first time in my life I feel like a normal person. The cells in my lungs are now "starting point perfect!"

**It Only Took Two Weeks  
 To Beat My Arthritis With  
 Regenify**

I'm just a homemaker from Iowa - I don't know about these fancy scientific things - but what I do know is that this Regenify ENDED my arthritis suffering in 14 days! For the first time in years I



can sew, quilt, open jars... I can do all the things I used to do when I was young - WITHOUT PAIN. The good lord made me... and prayer delivered Regenify to my door! Thank You.

L. Cover page of Resetigen-D 2016 mailer:

The Biggest Health Discovery of All Time  
And Only A Select Few Know About it...

# Resetigen-D

2016

## Rebuild Your Body Cell by Cell

Meet the New Pill that  
Restores and Repairs Every  
Single Cell in Your Body.

It Only Happens Once in A Lifetime...

**Backed by the Greatest  
Minds in the World...**

Harvard, Yale,  
Stanford, Johns  
Hopkins, Oxford:  
31 Clinically  
Tested,  
Scientifically  
Studied,  
100% Proven  
Ingredients...



**Hair** \_\_\_\_\_

Thick, Shiny FULL HEAD  
OF HAIR - in 30 days

**Brain** \_\_\_\_\_

Memory & Response Times  
INCREASED

**Skin** \_\_\_\_\_

Cold Sores, Acne,  
Warts, Eczema GONE

**Heart** \_\_\_\_\_

Healthy Heart - The Core  
Of The Body!

**Lungs** \_\_\_\_\_

Increase Lung Capacity  
73% in 30 Days!

**Liver** \_\_\_\_\_

Wash Away Years Of  
Toxins - on a cellular level

**Kidneys** \_\_\_\_\_

Regenerated Kidney cells  
= Super Metabolism!

**Sex** \_\_\_\_\_

Reset Your Sexual Clock  
to 18 Years Old!

**Joints** \_\_\_\_\_

Move Freely - WITH  
OUT PAIN - Guaranteed!

**Bones** \_\_\_\_\_

Strong Bones and Teeth -  
The Body's Framework

**Intestines** \_\_\_\_\_

IBS ELIMINATED - Bowel  
Function at 100%

**Blood Sugar** \_\_\_\_\_

Regulate Blood Sugar - All  
Day - Every Day!

**Cholesterol** \_\_\_\_\_

Resetigen-D - The ULTIMATE  
CHOLESTEROL BUSTER!

**Reboot Every Organ and Cell in Your Body  
and Feel Young and Alive Again!** (See Pg. 32)



M. Page 3 of Resetigen-D 2016 mailer:



**The POWER To Regenerate Cells Has Been Known To Nature For Millennia... Now It Has Been Discovered By Modern Science.**

**Feel young. Grow hair.  
Lose fat. And so much more.**  
Resetigen-D empowers your body to repair damaged cells and heal fast.

Starfish have graced the oceans for the last 450 million years - and for all that time - they have held the ability (and the secret) to use their CELLS to regenerate limbs, lost to age or accident. Although modern science hasn't yet reached the point that allows us to regrow limbs - it has come VERY close - by unlocking some of these centuries old secrets of the sea. Breakthrough Resetigen-D now allows the HUMAN body to use its OWN CELLS to repair damage caused by the ravages of time. One pill a day has been PROVEN in the laboratory to KICK START 2 trillion cells EVERY 24 HOURS... causing the body to heal. Excess fat is eliminated, old skin is rejuvenated, sore joints are lubricated... even the mind is made sharper. So although you can't grow a new limb - you can reset the body you have to "Starting Point Perfect". Feeling good is just a phone call away...



**Reset Your Organs, Cells & Body To "Starting Point Perfect"**

When you are born - your body is "Starting Point Perfect" ... the 50 Trillion Cells in your body are unused, undamaged, strong, young and fresh. The ability to grow bigger, stronger, faster is automatically built into your cellular makeup. But as we age - the cells in our body begin to degrade, begin to lose the ability to grow, begin to wear out... and at some point our cells become so damaged that our bodies are taken over by a spiderweb of disease or run flat by old age - and we die. Of course aging is inevitable - but feeling young, looking young - being strong, and living a superb quality of life CAN be achieved - through cellular regeneration. With Resetigen-D you can actually reset your organs, cells and body to "Starting Point Perfect"... arresting and REVERSING damage done to your body by time...

**IN THIS ISSUE...**

- Restore Your Body "Washing" 2 Trillion Cells... Every 24 Hours
- Also - **The 1 YEAR Guarantee!**
- Page 4&5: See What DOCTORS Have To Say
- Page 6&7: Thirty One POWERFUL Ingredients
- Page 8&9: Top Athlete's LEGAL Choice
- Page 10&11: Back, Joint & Muscle Pain GONE!
- Page 12&13: 30 Day Head To Toe Rejuvenation
- Page 14&15: Your questions ANSWERED!
- Page 16&17: Cellular Beauty RESTORER!!!
- Page 18&19: Fight Disease From WITHIN!
- Page 20&21: Be STARTING POINT PERFECT
- Page 22&23: SAVE 60% NOW!!!

N. Excerpt from page 6 of Resetigen-D 2016 mailer:

## Clinical RESEARCH PROVES THE POWER Of Resetigen-D



Researchers from Harvard, Yale, Oxford, Johns Hopkins, and Stanford have studied Resetigen-D's 31 Powerful ingredients... and have now released hundreds of papers to the best known peer review publications in the country.

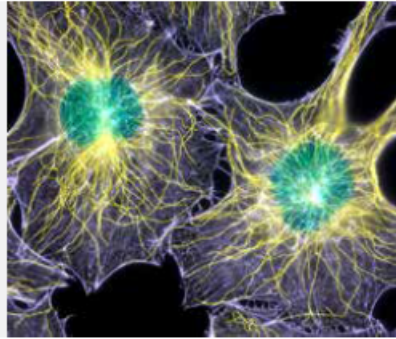
The 31 ingredients found in every single capsule of Resetigen-D are measured and mixed in perfect proportion - to guarantee that all 50 trillion of the cells in your body will be cleansed in less than 30 days. Guaranteed.

### The "Rotten DIRTY SECRET" of Overseas Supplement Makers

Unlike countless supplements found on the internet, Resetigen-D is produced in The United States - under highly regulated, highly controlled conditions. When you order Resetigen-D - you are Guaranteed 100% pure ingredients. Period. Never, ever, take your chances ordering online. It is a dirty industry secret - supplements can legally be made overseas (very cheaply) where there are no regulation, and where there is no oversight. Overseas supplements can actually be made in dirty basements from contaminated ingredients - or worse. Trust Made In AMERICA Resetigen-D. It is Guaranteed Pure & Guaranteed Safe.



O. Excerpt from page 18 of Resetigen-D 2016 mailer:



**E**very disease - every one - starts small in the cells of the body. Heart, lung, kidney, skin, brain, ovary... they are all the same in the sense

that they are all parts of us made from cells. Apart from good diet and regular exercise (something that most of us don't do - if we are honest) the ONLY way to keep cells healthy and free from the damage that age causes - is with Resetigen-D. Think of your body as a classic car... wash it, repair it, replace bad parts - and it will last for 100 years. Neglect it, and it will rust away and breakdown within a decade. By using Resetigen-D daily - you are washing, repairing and rejuvenating the cells in your body - all 50 trillion of them... every 30 days. You are removing the "rust and damaged cells" that cause disease and death... and you are replacing them with cells that are "starting point perfect".

### **When In My Office, Patients Ask Me About The Benefits Of Resetigen-D - This Is What I Always Tell Them...**



When patients ask me about Resetigen-D - I always tell them the same thing... "TRY IT - There's no reason not to." Regardless of your current physical condition, and regardless of what ails you - Resetigen-D will be of tremendous benefit to your mind, your body and your overall appearance. Resetigen-D is literally the most effective supplement EVER released - because it targets all 50 trillion cells in your body - repairing things you probably don't know need help. If your liver or kidneys are 10% damaged - you would have no idea - but Resetigen-D will repair them anyway -and you will feel GREAT - even if you don't know why.

P. Excerpt from page 15 of Resetigen-D 2016 mailer:

## Can Resetigen-D Keep Your Cholesterol Under Control... Arteries Clear and Free Your Heart Pumping Healthy and Strong?

*Try it Now and SEE FOR YOURSELF!*

Lower your Cholesterol, Clear Your Arteries, and get your heart pumping stronger than ever before - and do it with Resetigen-D. With every Resetigen-D capsule you take - 31 PURE, POWERFUL ingredients will enter your bloodstream and course through your veins - repairing 2 trillion cells (every 24 hours) along the way. Literally repair your heart and your arteries from the inside out... on a CELLULAR level. If you are 18 or 88 - you will FEEL the difference a healthy heart makes!





**Your RISK FREE 30 Day Trial Of Resetigen-D Is Waiting All You Have To Do Is Call 1-800-962-6787**

Try Resetigen-D for yourself. See what it looks like - and see what it feels like to restore EVERY SINGLE CELL In Your Body - in less than a month!!!



**97.4% Increase In Brain Function... Memory... Response Times**

Studies at The University of Moscow have shown that Resetigen-D's 31 powerful ingredients caused memory function, brain function, and mental response times to increase by an astonishing 97.4% in just 28 days. The ability to retain facts, the ability to solve complex math problems, the ability to learn a language, and the ability to play an instrument were PROVEN to be EASY with a 28 day course of Resetigen-D.

**Thousands Of Satisfied Customers Know The Healing POWER Of Resetigen-D**

Thousands of people worldwide know the HEALING POWER of Resetigen-D - its time for you to try too! With just 1 pill a day - you will restore 2 trillion cells in your body every 24 hours - and restore all 50 trillion cells in your body EVERY MONTH! See how you look when your hair is thick and shiny, see what you look like when your skin is rejuvenated and repaired, and see what your body looks like when it is stripped of excess fat! But best of all - experience what it FEELS like to reset your system to "Starting Point Perfect"... with your heart, eyes, ears, lungs, brain, kidneys, liver, joints and more... all working at 100% peak performance! Try Resetigen-D today. It is guaranteed - or your money back.





Q. Cover page of Resetigen-D Fall 2016 mailer:

Secret Health Formula of The Rich And Famous Revealed! P.14

SCIENCE FOR A LONGER HEALTHIER LIFE

# Uncover


Latest Research Fall 2016

**Mad Scientist or Genius?**

This doctor's new pill helps you get **Endless Energy, Look 20 Years Younger, Never Get Sick Again and... LIVE PAST 106 YEARS OLD** (So why doesn't everyone know about it yet?)

Sir Jeff Sherwin. Pioneer in Stem Cell Research

30 Days to Perfect Health  
Every Organ In Your Body, Rebuilt, Cell by Cell



**THEY SAY IT CAN DO MIRACLES...**  
Fix any medical worry... restore almost any organ in your body to its optimum state...  
Find out how you can try it for yourself inside.



R. Excerpt from page 2 of Resetigen-D Fall 2016 and Winter 2017 mailers:


## 30 Days to Perfect Health

### Every Organ In Your Body, Rebuilt, Cell by Cell

Your body contains 50 trillion cells - and those cells make up 100% of you. Everything from the hair on your head to the soles of your feet - and everything in between

is made from those 50 trillion cells. Unfortunately - as we age - those cells become worn and damaged - causing ALL the disease, and all the ailments known to science. By cleansing, feeding and repairing your cells - you can actually REVERSE all the problems of growing older.... and breakthrough Resetigen-D is the answer.

One Resetigen-D capsule repairs 2 trillion cells every 24 hours - so every 25 days with a daily dose of Resetigen-D - EVERY Single Cell in your body will be reset to "Starting Point Perfect". You can actually fix the problems that effect you - inside and out. Resetigen-D is truly a medical breakthrough - proven by science and confirmed by thousands of people worldwide...



**INSIDE:**  
Restore Your Body "Washing" 2 Trillion Cells... Every 24 Hours Also - The 1 YEAR Guarantee!

Page 4&5: See What DOCTORS Have To Say  
Page 6&7: Thirty One POWERFUL Ingredients  
Page 8&9: Top Athlete's LEGAL Choice  
Page 10&11: Back, Joint & Muscle Pain GONE!  
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Page 14&15: Your questions ANSWERED!  
Page 16&17: Cellular Beauty RESTORER!!!  
Page 18&19: Fight Disease From WITHIN!  
Page 20&21: Be STARTING POINT PERFECT  
Page 22&23: SAVE 60% NOW!!!

### Resetigen-D Is A Miracle Of Modern Medicine



Resetigen-D is a miracle - in the true sense of the word. One pill a day allows your body to repair 2 trillion cells every 24 hours ... Head to toe rejuvenation... from hair growth to skin problems... to joint, heart, & bone health... to brain function.. and more... every system in your body is actually repaired and reset, with 1 little pill containing 31 Powerful ingredients...

Resetigen-D - Rebuild Your Body Cell by Cell

S. Excerpt from page 6 of Resetigen-D Winter 2017 Mailer:

## 2-Trillion Cells Washed and Repaired Every Day!

### Clinical RESEARCH Doesn't Lie!

Researchers from Harvard, Yale, Oxford, and Johns Hopkins have studied Resetigen-D's 31 Powerful ingredients... and have now released hundreds of papers to the best known peer review publications in the country.


The 31 ingredients found in every single capsule of Resetigen-D are measured and mixed in perfect proportion - to guarantee that all 50 trillion of the cells in your body will be cleansed in less than 30 days. Guaranteed.

Resetigen-D works for a number of reasons. The ABSOLUTE Purity of the ingredients... The STRICT manufacturing process (in The USA)... And the EXACT measurements of EACH of the 31 ingredients that go into EVERY capsule. To simplify things GREATLY - imagine a cake batter... Eggs, Flour, Sugar, Vanilla... combine them just right and you have an AWARD WINNING recipe that WORKS... but if your measurements are off (even by a little) you have nothing more than a mess.

Resetigen-D is Guaranteed to work... because it is expertly formulated and expertly manufactured... to a science.

**31 PURE Healing Nutrients In Every Capsule**

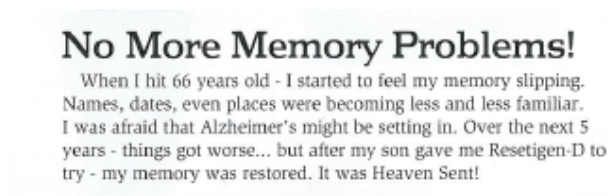
Vitamin A	Biotin	Iron
Vitamin C	Pantothenic	Choline
Vitamin D	Acid	Inositol
Vitamin E	Calcium	Silica
Vitamin K	Magnesium	Boron



T. Excerpt from page 9 of Resetigen-D Winter 2017 mailer:



U. Excerpt from page 12 of Resetigen-D Winter 2017 mailer:




V. Excerpt from page 19 of Resetigen-D Winter 2017 mailer:



W. Excerpt from page 11 of Resetigen-D Winter 2017 mailer:

### Back Pain Vanishes!



Your body has the ability to repair itself - to reverse the terrible pain of a bad back caused by nerve or disc damage. There is no need for risky surgery if Resetigen-D can help your body help itself by repairing damaged cells. Please try Resetigen-D for 30 days... let all 50 trillion cells in your body be brought back to "starting point new" - see how your back pain can be 100% eliminated.

### A Note From The Best Surgeon in NY...

Although it sounds strange coming from an ER surgeon - I always tell my children, my family and my friends - avoid surgery at all costs. There are so many risks - risk of infection, risk of medical mistake (Joan Rivers being a perfect example), risk to the body itself... that something bad will eventually happen - something that you may not recover from. If it is at all possible - I highly advocate trying to heal the body from within. It is, in many, many cases, absolutely possible. Of course, sometimes surgery is truly needed - and in those cases I recommend healing the body along with the surgery. And the ONLY way I know to do that - the ONLY way I recommend doing that - is with one pill of Resetigen-D taken every day. The inner-cellular stimulation and the healing that it causes is nothing short of miraculous.

X. Excerpt from page 20 of Resetigen-D Winter 2017 mailer:



### End Annoying Ringing In The Ears.

**FINALLY!!! QUIET** Your Buzzing, ringing, hissing in the ears - FOREVER. Resetigen-D's 31 ingredient formula penetrates DEEP into the inner ear CELLS - repairing damage done by noise and time. Before Resetigen-D there has NEVER been a real treatment for tinnitus - and Resetigen-D isn't just a treatment... because Resetigen-D isn't masking the noise - it is ELIMINATING it by repairing the body from within - on a micro cellular level. Try Resetigen-D today - its GUARANTEED.

## Reverse All 44 Common Skin Problems in Days



**Cold Sores, Acne, Psoriasis, Warts, Eczema Symptoms Disappear**

All 44 of the most common skin conditions known to dermatologists - can be ELIMINATED with Resetigen-D. Cold Sores, Acne, Psoriasis, Warts, Eczema... and More... are all healed from within. Unlike dangerous, expensive creams and pills - Resetigen-D allows your body to actually heal itself - attacking, destroying and replacing EVERY SINGLE Damaged cell - with new healthy cells. Try Resetigen-D for yourself. It takes LESS than 30 days for all 50 trillion cells in your body to be washed and repaired. In less than a month - your skin will be reset to "Starting Point Perfect" .. as smooth as a baby's skin!

Y. Letter to Resetigen-D customers:

The advertisement features a central white bottle of Resetigen-D capsules. The bottle label includes the product name 'Resetigen-D' and 'Other Ingredients: 600 mg 60 Capsules'. The background is a human silhouette composed of various colorful, abstract shapes representing cells. Text elements include: a blue banner at the top stating 'Clinically Tested and Supported By the Most Impressive Medical Minds in the World!'; a red starburst graphic on the right saying 'SPECIAL CUSTOMER ONLY FREE GIFT INSIDE!'; a vertical red banner on the left with the text 'Take advantage of our FREE GIFT offer on your next order of Resetigen-D!'; and a green banner at the bottom stating 'Re-activate 2 Trillion Cells Every 24 Hours to Look and Feel Young Again!'.

Page 1



**BREAKING NEWS! From the makers of**

*Dear Friend,*

Recently, you gave your body a precious gift:

***The gift of cellular regeneration with Resetigen-D.***

**Resetigen-D helps restore every single cell in your body to "Starting Point Perfect."**

This miracle pill has already begun to help **rejuvenate your organs, cells and body - reversing the damage that's been done to your body over time.**

Today I congratulate you for making such a wise health decision... and I'd also like to offer you **another "gift"** in the process.

You see... I'm pleased to offer you a **FREE 3-MONTH SUPPLY** to help you continue your cellular "rebirth" - and maintain your supply of Resetigen-D. **Here's why:**

**It's vitally important that you continue the process of repairing your body's damaged cells - allowing you to look and feel years younger.**

This medical breakthrough is - **right now** - hard at work fixing the problems that impact your daily health... both inside and out. You don't want that hard work to go for naught simply because your supply of Resetigen-D has run out.

That's why I've authorized a special, customer-only **FREE GIFT** to thank you for trying Resetigen-D!

To help ensure that your supply doesn't run low - I'd like to give you a 3-month supply **FREE of charge!**

Simply order a 3-month supply of Resetigen-D today and I'll **DOUBLE your order by giving you an additional 3-month supply completely FREE!** Again, this special **BUY 3, GET 3 FREE** offer is my way of thanking you for giving Resetigen-D a try.

But this offer is time-sensitive: **You must order within 7 days of receiving this letter to claim your discount.**

Please call 1-800-982-5877 or return the order form below to take advantage of this time-sensitive offer today!

*Best regards,*

  
*Terry Wilson*  
Terry Wilson, Product Manager, Resetigen-D

**Call 1-800-982-5877 Today!**

**P.S.** One Resetigen-D capsule repairs 2 trillion cells every 24 hours. You've already experienced the transformation as the cells in your body are washed, fed, and repaired - back to "Starting Point Perfect." Take a moment now to continue your body's total cellular rejuvenation - and **CLAIM YOUR FREE GIFT!**

**RESETIGEN-D SAVINGS CERTIFICATE: FOR FASTEST ORDERING, CALL TOLL-FREE 1-800-982-5877**

Return in enclosed envelope with first-class postage to: **Resetigen-D**, 2355 Westwood Blvd #360, Los Angeles, CA 90064



Page 2

29. Defendants also represent that medical doctors, including but not limited to gastroenterologists, neurologists, nephrologists, pulmonologists, cardiologists, rheumatologists, and other specialists, recommend Regenify and Resetigen-D for the treatment of numerous diseases and health conditions:

A. Pages 4 and 5 of Regenify Winter 2017 mailer:

**Regenify Will Make You Feel GREAT—**

<b>Nephrologist (Kidney)</b> "Kidney disorders may become a thing of the past, thanks to Regenify."	<b>Allergist</b> "I've never seen more allergies reversed more quickly! Regenify is a miracle"
<b>Pathologist (Tissues)</b> "I think Regenify is the gateway to living a disease free life. Thank God."	<b>Cardiologist</b> "Regenify is amazing. I've seen stress test numbers improve 325% in 30 days."
<b>Pulmonary Physician (Lung)</b> "The results of Regenify for athsma sufferers in nothing short of a miracle."	<b>Dermatologist Psychiatrist</b> "If you want perfect skin - Regenify is the answer... the SAFE answer."
<b>Ophthalmologist</b> Regenify is the first supplement that actually improves eye disorders."	<b>Rheumatologist</b> "30 days of Regenify is like having all the joints in your body lubricated!"
<b>Oncologist</b> "Oncology is a very serious business. Regenify actually gives me real hope!"	<b>Urologist</b> "No one wants to see me - with Regenify, they usually don't have to a second time."
<b>Podiatrist</b> "I've solved more problems with Regenify in the last year than you can imagine."	<b>Psychiatrist</b> "Regenify is now my first choice to treat depression and anxiety. Good stuff."

# All These Doctors Can't Be Wrong...



**(ENT) Ear Nose & Throat**  
"I've seen it all... Sight, hearing, tinnitus, all as good as new - with 30 days of Regenify"

**Gastroenterologist**  
"If you want to fix Acid Reflux or IBS for good - try Regenify. It WORKS."

**General Practitioner**  
"Nothing is better for post-baby recovery and a post baby body - than Regenify."

**Gynecologist**  
"The total elimination of PMS Symptoms is now possible with Regenify."

**Neurologist**  
"Regenify is PROVEN to enhance memory function and response time. Truly Amazing."

**Obstetrician**  
"Look - get Regenify and you will not have to see me - ever. It is an all body WONDER."



B. Page 5 of Resetigen-D 2016 mailer:



**Nephrologist (Kidney)**

"Kidney disorders may become a thing of the past, thanks to Resetigen-D."

**Pathologist (Tissues)**

"I think Resetigen-D is the gateway to living a disease free life. Thank God."

**Pulmonary Physician (Lung)**

"The results of Resetigen-D for asthma sufferers is nothing short of a miracle."

**Ophthalmologist**

Resetigen-D is the first supplement that actually improves eye disorders."

**Oncologist**

"Oncology is a very serious business. Resetigen-D actually gives me real hope!"

**Podiatrist**

"I've solved more problems with Resetigen-D in the last year than you can imagine."

**Allergist**

"I've never seen more allergies reversed more quickly! Resetigen-D is a miracle"

**Cardiologist**

"Resetigen-D is amazing. I've seen stress test numbers improve 325% in 30 days."

**Dermatologist**

"If you want perfect skin - Resetigen-D is the answer... the SAFE answer."

**Rheumatologist**

"30 days of Resetigen-D is like having all the joints in your body lubricated!"

**Urologist**

"No one wants to see me - with Resetigen-D, they usually don't have to a second time."

**Psychiatrist**

"Resetigen-D is now my first choice to treat depression and anxiety. Good stuff."

**(ENT) Ear Nose & Throat**

"I've seen it all... Slight, hearing, tinnitus, all as good as new - with 30 days of Resetigen-D"

**Gastroenterologist**

"If you want to fix Acid Reflux or IBS for good - try Resetigen-D. It WORKS."

**General Practitioner**

"Nothing is better for post-baby recovery and a post baby body - than Resetigen-D."

**Gynecologist**

"The total elimination of PMS Symptoms is now possible with Resetigen-D."

**Neurologist**

"Resetigen-D is PROVEN to enhance memory function and response time. Truly Amazing."

**Endocrinologist**

"Look - get Resetigen-D and you will not have to see me - ever. It is an all body WONDER."



30. Defendants have not conducted any clinical trials to substantiate the advertised health claims for Neurocet, Regenify, or Resetigen-D. Nor are there any competent and reliable human clinical trials of equivalent products. Existing studies of individual ingredients contained in the above products are not competent and reliable scientific evidence supporting the advertised health claims because such studies: do not take into account potential interactions among ingredients; test different dosages of the ingredients; are unrelated to the health claims advertised; or have critical flaws in methodology, such as improper controls or randomization. In addition, Defendants have fabricated testimonials representing that medical doctors, including but not limited to gastroenterologists, neurologists, nephrologists, pulmonologists, cardiologists, rheumatologists, and other specialists, recommend Regenify and Resetigen-D for the treatment of numerous diseases and health conditions. Defendants also have fabricated consumer testimonials purporting to represent the actual experiences, findings, opinions, or beliefs of consumers who have used Regenify and or Resetigen-D.

31. Based on the facts and violations of law alleged in this Complaint, the FTC has reason to believe that Defendants are violating or are about to violate the laws enforced by the Commission because, among other things:

- a. Defendants continue to make pain relief claims for Neurocet on the website nordicclinical.com;
- b. Defendants have engaged in their unlawful acts and practices repeatedly over a period of at least four and a half years; and
- c. Defendants remain in the business of marketing and selling health-related ingestible products and maintain the means, ability, and incentive to continue their unlawful conduct.

**VIOLATIONS OF THE FTC ACT**

32. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits “unfair or deceptive acts or practices in or affecting commerce.”

33. Misrepresentations or deceptive omissions of material fact constitute deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

34. Section 12 of the FTC Act, 15 U.S.C. § 52, prohibits the dissemination of any false advertisement in or affecting commerce for the purpose of inducing, or which is likely to induce, the purchase of food, drugs, devices, services, or cosmetics. For the purposes of Section 12 of the FTC Act, 15 U.S.C. § 52, Neurocet, Regenify, and Resetigen-D are either “foods” or “drugs” as defined in Section 15(b) and (c) of the FTC Act, 15 U.S.C. § 55(b), (c).

**Count I**

**False or Unsubstantiated Claims for Neurocet**

35. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of Neurocet, including through the means described in Paragraph 23, Defendants have represented, directly or indirectly, expressly or by implication, that Neurocet:

- A. Eliminates or significantly reduces pain, including joint pain, back pain, arthritis pain, chronic pain, and headaches;
- B. Provides pain relief that lasts significantly longer than that of other popular pain drugs, including pain relief that lasts for 5 days;
- C. Provides pain relief that lasts significantly longer than that of other popular pain drugs, including pain relief that lasts 26 times longer;
- D. Provides pain relief that is stronger than morphine, including pain relief that is 48 times stronger;

- E. Significantly reduces inflammation and joint stiffness; and
- F. Significantly increases joint flexibility and mobility.

36. The representations set forth in Paragraph 35 are false or misleading or were not substantiated at the time the representations were made.

37. Therefore, the making of the representations as set forth in Paragraph 35 constitutes a deceptive act or practice and the making of false advertisements in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a), 52.

## **Count II**

### **False Claims for Neurocet**

38. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of Neurocet, including through the means described in Paragraph 23, Defendants have represented, directly or indirectly, expressly or by implication, that Neurocet is clinically or scientifically proven to:

- A. Eliminate or significantly reduce pain, including joint pain, back pain, arthritis pain, chronic pain, and headaches;
- B. Provide pain relief that lasts significantly longer than that of other popular pain drugs, including pain relief that lasts for 5 days;
- C. Provide pain relief that lasts significantly longer than that of other popular pain drugs, including pain relief that lasts 26 times longer;
- D. Provide pain relief that is stronger than morphine, including pain relief that is 48 times stronger;
- E. Significantly reduce inflammation and joint stiffness; and
- F. Significantly increase joint flexibility and mobility.

39. The representations set forth in Paragraph 38 are false.

40. Therefore, the making of the representations as set forth in Paragraph 38 constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a), 52.

### **Count III**

#### **False or Unsubstantiated Claims for Regenify and Resetigen-D**

39. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of Regenify and Resetigen-D, including through the means described in Paragraph 28, Defendants have represented, directly or indirectly, expressly or by implication, that Regenify and Resetigen-D:

- A. Repair or reverse age-related damage in human cells;
- B. Repair or reset human cells to their original state;
- C. Repair or reverse damage to the body's skin, muscles, tissues, bones, joints, and organs by repairing or reversing damage to human cells;
- D. Repair or reverse all age-related health conditions;
- E. Significantly lower unhealthy cholesterol;
- F. Significantly improve memory and brain function, including by as much as 97.4%;
- G. Significantly accelerate rehabilitation and recovery from injury, including by as much as 368%;
- H. Decrease body fat, increase lean muscle mass, and promote rapid weight loss;

- I. Eliminate or significantly reduce bone, joint, and muscle pain;
- J. Eliminate or significantly reduce arthritis or arthritis-related pain;
- K. Eliminate or significantly reduce tinnitus or ringing in the ears;
- L. Eliminate or significantly treat asthma; and
- M. Eliminate or significantly treat psoriasis, eczema, cold sores, and warts.

40. The representations set forth in Paragraph 39 are false or misleading or were not substantiated at the time the representations were made.

41. Therefore, the making of the representations as set forth in Paragraph 39 constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a), 52.

#### **Count IV**

##### **False Claims for Regenify and Resetigen-D**

42. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of Regenify and Resetigen-D, including through the means described in Paragraph 28, Defendants have represented, directly or indirectly, expressly or by implication, that Regenify and Resetigen-D are clinically or scientifically proven to:

- A. Repair or reset human cells to their original state;
- B. Repair or reverse all age-related health conditions;
- C. Improve memory and brain function, including by as much as 97.4%; and
- D. Accelerate rehabilitation and recovery from injury, including by as much as 368%.

43. The representations set forth in Paragraph 42 are false.



44. Therefore, the making of the representations as set forth in Paragraph 42 constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a), 52.

### **Count V**

#### **Fictitious Consumer Endorsements**

45. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of Regenify and Resetigen-D, including through the means described in Paragraph 28, Defendants have represented, directly or indirectly, that consumer endorsements contained in their Regenify and Resetigen-D advertisements represent the actual experiences, findings, opinions, or beliefs of consumers who have used Regenify and or Resetigen-D.

46. In truth and in fact, Defendants fabricated the consumer endorsements contained in the Regenify and Resetigen-D advertisements, and these endorsements do not represent the actual experiences, findings, opinions, or beliefs of consumers who have used the products.

47. Therefore, the making of the representation as set forth in Paragraph 45 constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Section 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a), 52.

### **Count VI**

#### **Fictitious Medical Doctor Endorsements**

48. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of Regenify and Resetigen-D, including through the means described in Paragraph 29, Defendants have represented, directly or indirectly, that the endorsements of medical doctors contained in their Regenify and Resetigen-D advertisements, including but not limited to endorsements attributed to gastroenterologists, neurologists, nephrologists,

pulmonologists, cardiologists, rheumatologists, and other specialists, represent the actual experiences, findings, opinions, or beliefs of medical doctors regarding the efficacy of Regenify and Resetigen-D in treating diseases and health conditions.

49. In truth and in fact, Defendants fabricated the medical doctor endorsements contained in the Regenify and Resetigen-D advertisements, and these endorsements do not represent the actual experiences, findings, opinions, or beliefs of medical doctors regarding the products.

50. Therefore, the making of the representation as set forth in Paragraph 48 constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a), 52.

#### **CONSUMER INJURY**

51. Consumers have suffered and will continue to suffer substantial injury as a result of Defendants' violations of the FTC Act. In addition, Defendants have been unjustly enriched as a result of their unlawful acts or practices. Absent injunctive relief by this Court, Defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

#### **THIS COURT'S POWER TO GRANT RELIEF**

52. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt and redress violations of any provision of law enforced by the FTC. The Court, in the exercise of its equitable jurisdiction, may award ancillary relief, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies, to prevent and remedy any violation of any provision of law enforced by the FTC.

**PRAYER FOR RELIEF**

53. Wherefore, Plaintiff FTC, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and the Court's own equitable powers, requests that the Court:
- A. Enter a permanent injunction to prevent further violations of the FTC Act by Defendants;
  - B. Award such relief as the Court finds necessary to redress injury to consumers resulting from violations of the FTC Act, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies; and
  - C. Award Plaintiff the costs of bringing this action, as well as such other and additional relief as this Court may determine to be just and proper.

Respectfully submitted,  
ALDEN F. ABBOTT  
General Counsel

Dated: April 17, 2020

/s/Mamie Kresses  
MAMIE KRESSES (A5502188)  
EDWARD GLENNON  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.  
Mailstop CC-10528  
Washington, D.C. 20580  
202-326-2070, mkresses@ftc.gov  
202-326-3126, eglennon@ftc.gov  
202-326-3259 (facsimile)

Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

**Certificate of Service**

I hereby certify that on April 17, 2020, I served the attached **COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF** via electronic mail on the following counsel:

ANDREW B. LUSTIGMAN  
SHELDON LUSTIGMAN  
Olshan Frome Wolowsky  
1325 Avenue of the Americas  
New York, N.Y. 10019  
alustigman@olshanlaw.com  
slustigman@olshanlaw.com  
(212) 451-2300

Respectfully submitted,

/s/ Mamie Kresses  
MAMIE KRESSES  
EDWARD GLENNON  
Federal Trade Commission  
Division of Advertising Practices  
600 Pennsylvania Ave., N.W., Suite CC-10528  
Washington, D.C. 20580  
(202) 326-2070 (Kresses); mkresses@ftc.gov  
(202) 326-3126 (Glennon); eglennon@ftc.gov  
Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
Federal Trade Commission
(b) County of Residence of First Listed Plaintiff
(c) Attorneys (Firm Name, Address, and Telephone Number)
Mamie Kresses/Edward Glennon (202.326.2070/202.326.3126)
Federal Trade Commission
601 Pennsylvania Ave., NW (CC 10528) Washington, DC 20580

DEFENDANTS
(See attached) Mile High Madison Group, Inc.; Nordic Clinical, Inc.;
Encore Plus Solutions, Inc.; Le Groupe Mile High Madison, Inc.;
Clinique Nordique, Inc.; Vittorio DiCriscio; Vito Proietti
County of Residence of First Listed Defendant Kent County, DE
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
Attorneys (If Known)
Andrew B. Lustigman/Sheldon Lustigman (212.451.2300)
Olshan Frome Wolowsky LLP
1325 Avenue of the Americas, New York, NY 10019

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
X 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
PTF DEF
Citizen of This State X 1 1 Incorporated or Principal Place of Business In This State
Citizen of Another State 2 2 Incorporated and Principal Place of Business In Another State
Citizen or Subject of a Foreign Country 3 3 Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)
CONTRACT
110 Insurance
120 Marine
130 Miller Act
140 Negotiable Instrument
150 Recovery of Overpayment & Enforcement of Judgment
151 Medicare Act
152 Recovery of Defaulted Student Loans (Excludes Veterans)
153 Recovery of Overpayment of Veteran's Benefits
160 Stockholders' Suits
190 Other Contract
195 Contract Product Liability
196 Franchise
TORTS
PERSONAL INJURY
310 Airplane
315 Airplane Product Liability
320 Assault, Libel & Slander
330 Federal Employers' Liability
340 Marine
345 Marine Product Liability
350 Motor Vehicle
355 Motor Vehicle Product Liability
360 Other Personal Injury
362 Personal Injury - Medical Malpractice
PERSONAL INJURY
365 Personal Injury - Product Liability
367 Health Care/Pharmaceutical Personal Injury Product Liability
368 Asbestos Personal Injury Product Liability
PERSONAL PROPERTY
370 Other Fraud
371 Truth in Lending
380 Other Personal Property Damage
385 Property Damage Product Liability
FORFEITURE/PENALTY
625 Drug Related Seizure of Property 21 USC 881
690 Other
LABOR
710 Fair Labor Standards Act
720 Labor/Management Relations
740 Railway Labor Act
751 Family and Medical Leave Act
790 Other Labor Litigation
791 Employee Retirement Income Security Act
IMMIGRATION
462 Naturalization Application
465 Other Immigration Actions
BANKRUPTCY
422 Appeal 28 USC 158
423 Withdrawal 28 USC 157
PROPERTY RIGHTS
820 Copyrights
830 Patent
835 Patent - Abbreviated New Drug Application
840 Trademark
SOCIAL SECURITY
861 HIA (1395ff)
862 Black Lung (923)
863 DIWC/DIWW (405(g))
864 SSID Title XVI
865 RSI (405(g))
FEDERAL TAX SUITS
870 Taxes (U.S. Plaintiff or Defendant)
871 IRS—Third Party 26 USC 7609
OTHER STATUTES
375 False Claims Act
376 Qui Tam (31 USC 3729(a))
400 State Reapportionment
410 Antitrust
430 Banks and Banking
450 Commerce
460 Deportation
470 Racketeer Influenced and Corrupt Organizations
480 Consumer Credit (15 USC 1681 or 1692)
485 Telephone Consumer Protection Act
490 Cable/Sat TV
850 Securities/Commodities/Exchange
X 890 Other Statutory Actions
891 Agricultural Acts
893 Environmental Matters
895 Freedom of Information Act
896 Arbitration
899 Administrative Procedure Act/Review or Appeal of Agency Decision
950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)
X 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
15 U.S.C. 53(b)
Brief description of cause:
Suit to address violations of FTC Act, 15 U.S.C. 45(a), 52

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$
CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No X

VIII. RELATED CASE(S) IF ANY
(See instructions): JUDGE DOCKET NUMBER

DATE 04/17/2020 SIGNATURE OF ATTORNEY OF RECORD /s/ Mamie Kresses

FOR OFFICE USE ONLY
RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE



**PARTIES:**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

MILE HIGH MADISON GROUP, INC.,  
a Delaware corporation;

NORDIC CLINICAL, INC.,  
a Delaware corporation;

ENCORE PLUS SOLUTIONS, INC.,  
a Florida corporation;

LE GROUPE MILE HIGH MADISON, INC.,  
a Quebec corporation;

CLINIQUE NORDIQUE, INC.,  
a Quebec corporation;

VITTORIO DICRISCIO,  
individually and as an officer, director, or control  
person of Mile High Madison Group, Inc., Nordic  
Clinical, Inc., Encore Plus Solutions, Inc., Le  
Groupe Mile High Madison, Inc., and Clinique  
Nordique, Inc.;

and

VITO PROIETTI,  
individually and as an officer, director, or control  
person of Mile High Madison Group, Inc., Nordic  
Clinical, Inc., Encore Plus Solutions, Inc., Le  
Groupe Mile High Madison, Inc., and Clinique  
Nordique, Inc.,

Defendants.

Case No. \_\_\_\_\_

ATTACHMENT TO CIVIL COVER  
SHEET

**Attorneys for Plaintiff Federal Trade Commission:**

Mamie Kresses (FL Bar No. A5502188)  
Edward Glennon  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.  
Mailstop CC-10528  
Washington, D.C. 20580  
202-326-2070, mkresses@ftc.gov  
202-326-3126, eglennon@ftc.gov  
202-326-3259 (facsimile)

**Attorneys for Defendants:**

Andrew B. Lustigman  
Sheldon Lustigman  
Olshan Frome Wolowsky  
1325 Avenue of the Americas  
New York, NY 10019  
212.451.2300 or 2258  
alustigman@olshanlaw.com  
slustigman@olshanlaw.com  
212.451.2222 (facsimile)



Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*: \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc: