

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

Civil Action No.

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

RENAISSANCE HEALTH PUBLISHING, LLC, a
limited liability company, also d/b/a Renown Health
Products; and

JAMES DIGEORGIA, individually and as an
owner, officer, and managing member of
RENAISSANCE HEALTH PUBLISHING, LLC,

Defendants.

COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF

Plaintiff, the Federal Trade Commission (“FTC”), 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) and 52, in connection with the sale and marketing of Isoprex, a pill that purportedly treats all types of pain and inflammation.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a) and 53(b).

3. Venue is proper in this district under 28 U.S.C. §§ 1391(b)(1), (b)(2), (c)(1), (c)(2), 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) and 56(a)(2)(A).

DEFENDANTS

6. Defendant Renaissance Health Publishing, LLC (“Renaissance Health Publishing”) also doing business as Renown Health Products, is a Florida limited liability company with its principal place of business at 2424 North Federal Highway, Suite 401, Boca Raton, Florida 33431. At all times material to this Complaint, acting alone or in concert with others, Renaissance Health Publishing has advertised, marketed, distributed, or sold Isoprex to consumers throughout the United States.

7. Defendant James DiGeorgia (“DiGeorgia”) is a managing member and 75% owner of Renaissance Health Publishing. At all times material to this Complaint, acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control, or participated in the acts and practices of Renaissance Health Publishing, including the acts and

practices set forth in this Complaint. Mr. DiGeorgia has played a major role in developing and formulating Isoprex by working with the manufacturers. He has also played a major role in drafting the direct mail brochures promoting Isoprex as well as reviewing brochures that others drafted. In addition, he personally reviewed scientific material about the ingredients. Defendant DiGeorgia continues to play a significant role in the day-to-day management of the company, where his responsibilities include product development, market development, and corporate planning. Defendant DiGeorgia resides in this district and, in connection with the matters alleged herein, transacts or has transacted business in this district and throughout the United States.

COMMERCE

8. 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

9. Since at least 2008, and continuing thereafter, Defendants have advertised, promoted, offered for sale, and sold Isoprex to the public using direct mail brochures and websites such as www.isoprex.com and www.renownhealthproducts.com. Isoprex is an ingestible pill consisting primarily of a combination of various herbs and spices.

10. Since at least 2014, Defendants’ primary method of advertising has been multi-page direct mail pieces targeting seniors. Defendants sell a single bottle of Isoprex for \$49.95 plus shipping and handling. From January 2014 to November 2018, Defendants generated more than \$ 2.4 million in gross sales minus refunds of Isoprex.

11. The direct mail advertisements disseminated by Defendants contain numerous endorsements from individuals. Many of these consumer endorsers were employees, relatives of employees, or professionally associated with employees or owners of Renaissance Health Publishing.

12. To induce consumers to purchase Isoprex, Defendants have disseminated or caused to be disseminated advertisements containing the following statements and depictions:

A. A direct mail piece distributed at various times between January 1, 2014 and June 16, 2017:

The Joint Pain and Cartilage Hoax – OVER 20 MILLION AMERICANS MAY BE VICTIMS. Are you one of them?



Stop Doing This ONE THING and SLASH Your Chance of an Early Joint Replacement by HALF

Dear Friend,

As a medical doctor, I know that many of you have daily joint pain, especially in your knees and hips. And I know that many of you take ibuprofen, aspirin, naproxen, Advil®, Aleve® or other NSAIDs to relieve the pain. (NSAID, pronounced en-sed, stands for non-steroidal anti-inflammatory drug.)

Doctors commonly recommend NSAIDs for joint pain.¹ It's been the standard treatment for years and years. You feel pain in your knees or hips, you pop a few ibuprofen, knock down a couple of aspirin or Advil®. You think they are harmless. And you think you are relieving inflammation and helping your joints.

Think again.

Here is the shocking news that most doctors don't know... These over-the-counter and prescription pain pills – that just about everybody with joint pain takes – are making your joints worse! Much, much worse.²



Older people with arthritis take the most NSAIDs of anyone.³ They think they are doing the right thing. They're not. Taking an aspirin, ibuprofen or any other NSAID is the worst thing you can do if you have joint pain and cartilage problems. NSAIDs actually block the normal growth of healthy cartilage cells, called chondrocytes. NSAIDs wreck joint cartilage and bone in people with arthritis.

A leading scientist who studied the effects of NSAIDs on bone and cartilage said...

Chondrocytes
(From Greek chondros = cartilage + kytos = cell) are the only cells found in cartilage. They produce and maintain the cartilaginous matrix, which consists mainly of collagen and proteoglycan.

"Never give NSAIDs for stress fractures or for cartilage damage. NSAIDs hate chondrocytes!"
Sigbjørn Dimmen, MD

Discovering this shocking fact motivated me to create my own SAFE dietary supplement for painful joints called Isoprex. I've added 2 new, clinically tested and proven pain relieving, joint lubricating, inflammation fighting ingredients to Isoprex – making it better than ever! One new clinically proven ingredient is 100% effective at draining away painful knee swelling – in the WORST cases! And most importantly, Isoprex is all-natural and safe to take.

I'll tell you all about these incredible new pain fighting ingredients in Isoprex later in this report.

They are sold everywhere – right next to the candy, so of course you think they are safe.

The message simply hasn't gotten out. These are dangerous drugs – especially for older people! Doctors are just now becoming aware of the danger of internal bleeding and the dangers to the heart from taking NSAIDs – but many still don't know that these pain pills wreck your joints.

Because I specialize in cardiology, I know that many of you take a baby aspirin daily to prevent heart attacks. Did you know that you are NOT supposed to take ibuprofen or naproxen along with a daily aspirin – not even occasionally?

Seniors who take a daily aspirin plus an occasional ibuprofen [Advil] or naproxen [Aleve] for pain relief increase risk of ulcers, perforations and internal bleeding by two to three times.

Annual Scientific Meeting of the American College of Gastroenterology, October, 2005.

I tell my heart patients who must take a daily aspirin and who also want pain relief about safe, natural *Isoprex*. And now the United States government's task force has proven me right. They recently told doctors to be very, very careful about giving daily aspirin to people over 60 – and never to give it to people over 80!

THE WALL STREET JOURNAL

Breaking News on Dangers of Daily Aspirin!

February 23, 2010



The U.S. Preventive Services Task Force says taking a daily aspirin may be too dangerous for people over 60. Ask your doctor if aspirin is recommended for you under the new guidelines.

Isoprex Slashes Pain in 5 Days – Naturally!

You want something to get rid of the pain and inflammation in your joints – AND you want it to be safe. I've added a new, all-natural, ingredient to *Isoprex* that gives you **clinically proven pain relief starting in 5 days!**

You don't have to wait months for it to start working! In the new *Isoprex*, you get a **potent pain and inflammation fighter that's 10 times stronger** than the generic brands . . .



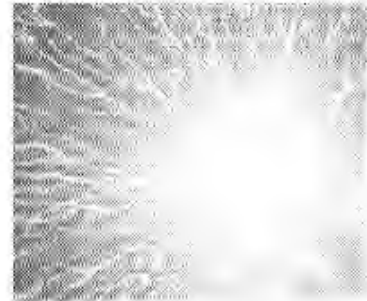
Drains Away WORST Cases of Painful Knee Swelling – 100% Effective!

PLUS I've added a full 40mg per serving of pure, soothing Hyal-Joint™ hyaluronic acid that drains away painful knee swelling and promotes comfortable joint mobility – naturally! With no side effects! **It's 100% effective even in the WORST cases!**

Calms Your Key Pain Receptor!

Too much inflammation makes a key pain receptor – the nociceptive (noh-sih-sep-tive) pain receptor – hypersensitive to every twinge and movement. If you want to get rid of your pain, you must get rid of inflammation and calm down that receptor.

Isoprex Inflammation Fighter helps block the main enzyme that inflames your pain and destroys your cartilage – MMP3. *Isoprex* cools down your joints and calms down your key pain receptor.



Isoprex Helps Relieve Pain

Here are just five of the many testimonials about how Isoprex stopped their pain.



"Definitely Recommend It!"*

"My husband Johnny and I have both been taking it, and to our pleasure Isoprex has helped a lot

I am 58 and have always had foot problems which tend to cause a lot of pain when I am on my feet a lot. I also have a heel spur that would keep me awake at night [Isoprex] has helped tremendously – and sometimes a little help is all you need! We appreciate a good "natural" product and will definitely recommend it."

– Barbara J., Panama City, FL

"My Joint Aches Have Vanished!"*

"I have been taking Isoprex as directed for 9 days and my arthritis pain has vanished. This is a great product. I was taking 3 narcotic pills a day (maximum allowed) and I am happy to be off this prescription and without pain again."

Paul H.

"Nothing Worked... Until Isoprex"*

"My daughter, 17 years old, has had a history of heart ailments which have burdened her for her entire life. We have tried numerous prescriptions and nothing has helped. She also suffers from periodic headaches. She has taken ibuprofen, aspirin, acetaminophen, etc. Again, to no avail. Nothing works. Nothing until now. "She recently tried some Isoprex for a minor headache, and much to our surprise, it went away. The next time she started with chest pains, I was wondering ... if [Isoprex] would do anything. And believe it or not, it did! It made her chest pain bearable to the point that it was almost gone! We couldn't believe it! I just wanted to write to you and tell you: THANK YOU ALL very, very much for creating such a product that would make her pain go away."

– John A.

"Pain Free After One Day!"*



"After reading what Isoprex would do, I sent for 3 bottles. After the first day of taking 6 pills I was pain free

My knee joint is not touching yet, so replacement is not an option now that I have Isoprex.

My knees are 83 years old, so this is a good test of your product. Thanks again for coming out with a non prescription that works."

– Edwin M., Callaway, FL

"Walking without a Cane!"*



I'm 79 years old, and I fell and broke my hip about 7 weeks ago. When in the hospital, the doctor and nurses asked me how my pain was. I kept telling them I had no pain. I am

now walking without a walker or cane. I still don't have any pain. I thought about it, and I decided it was the Isoprex that I had been taking this past year. It really works. It is a great product. I gave my daughter some because she was having a lot of pain in her knee. She ran out and asked me for some more. She said it really worked and helped her.

– Joy M., Ontario, OR

Twenty years ago it was hard to get good information about natural ingredients. But today we have hundreds of scientific studies proving that natural remedies work to stop pain and inflammation – without the dangers of drugs.

**Isoprex's Formula Is Based on the
SCIENCE OF SAFE, NATURAL PAIN RELIEF RESEARCH
2 New Clinically Proven Ingredients**

- ✓ Drain Away Painful Knee Swelling – 100% Effective even in the WORST Cases!
- ✓ Slash Pain in 5 days!
- ✓ Fight Pain-Causing Inflammation

**NEW Ingredient #1 – AprèsFlex
BOSWELLIA – 10 TIMES STRONGER
THAN "GENERIC" BOSWELLIA**

This super potent boswellia extract from the ancient frankincense plant is clinically proven to **slash pain at 5 days!** It's a potent inflammation fighter that defends against the MMP3 inflammatory enzyme that destroys cartilage.

Why is dampening inflammation so crucial to pain relief? You have a key pain receptor called the nociceptive pain receptor. When inflammation in your joints is high, this pain receptor becomes hypersensitive and every slight shock to your joints feels like a grenade going off! You've got to get that inflammation down so your pain receptor isn't on red alert all the time – and you've got to do it safely! AprèsFlex[®] Boswellia blocks joint inflammation so your pain receptor can calm down. Starts Working FAST!! Pain relief starts in 5 DAYS!

AprèsFlex[™] Boswellia at 100mg a day for one month is clinically proven to slash pain and fight inflammation in two gold standard, double blind, placebo controlled studies!¹ It's new, it's natural, it's safe, and it's NOW in Isoprex!



Wow! Severe painful knee swelling disappears! 100% Effective!

**NEW Ingredient #2 – Hyal-Joint[™]
DRAINS AWAY PAINFUL SWELLING IN KNEES
100% EFFECTIVE IN THE WORST CASES!**

Your knee joints are surrounded by a thick, slippery synovial fluid containing hyaluronic acid that cushions them from shock. As cartilage deteriorates, this soothing fluid dries up and thins out, leaving your joints vulnerable to an increase of inflammatory fluid, swelling and more pain.

An amazing study in Spain compared the same kind of hyaluronic acid that's in Isoprex – Hyal-Joint[™] – with Paracetamol (an NSAID). The researchers wanted to see if Hyal-Joint[™] could reduce pain and inflammatory swelling around the knee. Ultrasonography measured the synovial thickness and the amount of swelling caused by excess fluid in 71 patients at 1, 2 and 3 months.

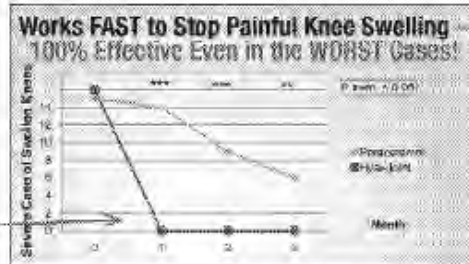
The results were incredible! After taking 80mg of Hyal-Joint[™] daily...

- Only 18% of the subjects in the Hyal-Joint[™] group – that's only 6 out of 33 patients – still had swelling after one month...
- While a whopping 80% of the Paracetamol group – 29 out of 36 – still suffered from swollen knees.

At one month...

- NO CASES of severe swelling were detected in the Hyal-Joint[™] group – it was 100% EFFECTIVE for the Worst Cases!
- 14 out of 15 severely afflicted patients in the NSAID group still had badly swollen knees. The NSAID hardly worked at all.

Plus, the Hyal-Joint[™] group had much less knee pain! Well of course they did! When you drain away all that inflammatory fluid, your knees are going to feel GREAT!



3 "Doctor" Secrets to Making Isoprex Work Even Better....

As a doctor, I know you have to take natural products correctly to get the best relief from pain. Here are my secrets to the most effective pain relief with ISOPREX...

1. **HAVE ACCURATE EXPECTATIONS.** Many people have been told that natural remedies don't work. Not true. Let me tell you ISOPREX WORKS.
2. **TAKE THE RIGHT AMOUNT.** To get the best results with the 2 new ingredients in ISOPREX, I strongly suggest you "front load" your dosage for the first month. Take a **DOUBLE DOSAGE** for one month to match the clinical dosages – that's 4 tablets a day – then drop down to a regular maintenance of 2 tablets a day. You can up your dosage again if you have a flare up.
3. **KEEP TAKING IT – EVEN WHEN YOU TRAVEL.** You want to get your inflammation down and keep it down. Don't let up even for one week. Order the 6-month supply to save money or sign up for my bargain Auto-Ship offer so you don't run out and have to start all over again.

Doctor-Formulated Isoprex Helps Bring Soothing Comfort to...



- ✓ Neck aches
- ✓ Sore muscles
- ✓ Lung and respiratory inflammation
- ✓ Back discomfort
- ✓ Stiff fingers
- ✓ Creaky elbows
- ✓ Tingling nerves
- ✓ Aching hips
- ✓ Inflammation flare-ups
- ✓ Sore, swollen knees
- ✓ Swollen ankles
- ✓ And much more!



The longer you take **Isoprex**, the better it works to relieve your pain – because you are keeping your inflammation down. If you have “breakthrough pain” you can double or triple your dosage as needed.

Unlike dangerous pain pills, Isoprex is safe – even at higher dosages.

Sign Up for My Bargain AutoShip Offer to Get Isoprex Regularly – So You Don’t Run Out and Risk Inflammation and Pain Getting Ahead of You.



There’s only one way to end your risk of increased joint damage, stomach and brain bleeding, erectile dysfunction, dangerous falls, urinary problems, liver damage, hearing loss and more from over-the-counter pain pills – stop taking them!

You don’t have to rely on dangerous pain pills anymore. My safe, all-natural, doctor-formulated **Isoprex** – now with 2 new clinically proven ingredients **AprisFlex™** Roswellia and **Hyal-Joint™** – can slash your pain in 5 days, drain painful knee swelling in 4 weeks – It was 100% effective for the WORST cases, and douse the fires of painful inflammation. Once you get your pain, inflammation and swelling down – keep taking it! You never want to let inflammation and swelling get out of control again.

I personally urge you to order **Isoprex** today – and I strongly recommend that you order the special offers that will save you a lot of money. That way I’ll know that you’ll be taking it regularly. This is so important to me that I’m offering you incredible savings on three bottle, six bottle and the Auto-Ship offers.

I never want you to skimp on your dosage or skip days to save money! That’s why I’m offering such incredible savings.

Isoprex is the answer to safe, effective pain and inflammation relief. I want you to take it daily to stay ahead of inflammation. Keeping inflammation in check is one of the most important things you can do as you get older – it’s a continuing effort. Save money and save yourself from pain by always taking **Isoprex** regularly – and taking enough.

Because I know it works, I guarantee that **Isoprex** will help relieve your pain and inflammation – or your money back. You don’t get that kind of guarantee at the drug store for medications!

With **Isoprex**, you no longer have to worry about the dark side of pain medications – and you can start enjoying your life again without the stiffness, inflammation and pain that make you feel old.

To Your Healthy, Pain-Free Life,

William S. Gruss, MD

For Renown Health Products



P.S. I urge you to follow my “doctor secrets” on page 10 to get the best pain and inflammation results from **Isoprex**. Order the 6-bottle supply at the lowest price, get **FREE Shipping**.

Order Today Toll FREE at 1-866-479-3538.

Isoprex Helps Relieve Pain – So You Get Your Life Back!



Do you suffer from ...?

- Sore swollen knees
- Aching hips
- Headache
- Sore muscles
- Backache
- Stiff fingers and joints
- Inflammation


When you have pain you walk like an old person – stiff and hunched over. Other people start thinking of you as “old” and you do too. It doesn’t have to be that way. Plus, ***Isoprex*** can work fast. Some customers report it stopped their pain in **ONE DAY**. The ingredients in ***Isoprex*** have all been shown to be safe and many of them work as well or better than dangerous over-the-counter and prescription pain pills.

Isoprex’s New Ingredients –

- ***Clinically Proven!***
- ***Soothing Pain &
Inflammation Relief!***
- ***Drains Away
Painful Swelling!***



- B. Another direct mail brochure for Isoprex distributed at various times between January 1, 2014 and June 16, 2017, states:


 **American Journal of Pain and Inflammation**

Don't Let the "DEATH ENZYME" Speed You Toward Your Grave

The answer may be a new miracle pain-relieving formula!

People who suffered with pain for years were...
PAIN-FREE in as little as one day!

*See real testimonials!
Page 16*



*Thanks to this revolutionary new formula, you could be too - and it's **GUARANTEED** to work!*

- ✓ 83-year-old knees are pain-free after one day!
- ✓ Walking with no cane or walker... pain-free!
- ✓ Full relief after 30 years of back pain!
- ✓ Arthritis pain vanished after 9 days!
- ✓ 11 months of severe pain nearly gone in 9 days!
- ✓ No specialist or drug helped... but this did!
- ✓ Joint and foot pain disappeared!
- ✓ Sleeps like a baby after pain disappears!

Please read this urgent bulletin *NOW* to discover relief for your own pain and inflammation!

Their Secret is Isoprex!

Even the sweetest asthma and the meanest persistent pain disappear when you use Isoprex. The case studies below are from real people who had real problems, just like yours. If Isoprex helped them, it can help you, too!

"I used to use my asthma inhaler every day. Now I use it... once in twice a year. Thanks, Isoprex!"

Christy, born in Ft. Lauderdale, Florida, was a true believer in the power of Isoprex. Christy suffered from asthma all her life. She couldn't go anywhere without her prescription inhaler, and usually had to use it at least once a day.

When she caught a cold, she suffered allergies, or when there was bad pollen in the air, the asthma got even worse. Unbearable eyes, sneezing, she started feeling drained to the inhaler, and started nearly always feeling like she was gasping for breath. She knew the inhaler was pumping dangerous substances into her lungs, which scared her. But what could she do?

Christy was fed up. She wanted to be free from asthma, and she tried the inhaler.

She found out about Isoprex and started taking it a little over a year ago. Asthma went from a chronic disease, and Christy hated the anti-inflammatory prescription inhaler. Isoprex would help reduce the inflammation and help her breathe easier.

She started with a dose of four tablets a day. Within six weeks she did not need to use the inhaler every day, and before long she did not even carry it with her anymore. She could breathe again, and didn't feel that terrifying oppression on her lungs.

Now, just a year later, Christy is free from her inhaler. At most, she uses it once or twice a year. When she feels something like a cold coming on she just up her Isoprex dosage for a few days and waits off her asthma. No need for an inhaler, thanks to Isoprex!

Christy feels good that Isoprex is all natural and she doesn't have to put any steroids or chemicals into her body anymore. She also appreciates that the pills are small and easy to swallow. But most of all, Christy appreciates being free from asthma for the first time in her life!

"I'm pain-free for the first time in years. Thanks, Isoprex!"

Cliffhanger Patrick McFarlane started taking Isoprex five weeks ago. He tried to suffer months of shoulder pain from an old injury that caused severe arthritis.

His doctor prescribed Vicodin, but stopped prescribing it after a few months because of concerns that the painkiller is possibly addictive. That left Patrick without any strong pain relief.

So he started taking over-the-counter NSAIDs, sometimes swallowing up to nine a day. He also started suffering daily headaches and gastrointestinal problems.

His shoulder pain was not getting any better, so he discontinued using heat and ice on it in the evenings. This helped a little, but not enough.

Patrick became disgusted with his NSAID routine. They weren't working, and he began suffering daily headaches. So he stopped taking any pain killers at all.

His shoulder pain was still excruciating, but when he stopped the NSAIDs, his headaches and gastrointestinal problems disappeared. Far from helping pain, they seemed to be causing it! That's when Patrick heard about Isoprex and decided to try it.

He started with a dosage of four a day, and within five days he felt relief from his years-long shoulder pain. Within two weeks nearly all the pain was gone.

Within three weeks, he says, he forgot he ever had excruciating shoulder pain.

Patrick's wife notices that he isn't wincing in pain every time he turns his head. He isn't using the heating pad every night, doesn't wake up with a stiff neck, or any morning, and does not feel fatigued and shoulder sore all the time.

Patrick is now a believer. He says he doesn't ever want to be without Isoprex again, and wishes for it never had another NSAID as long as he lives.



"I'm pain-free thanks to what I call 'The Isoprex Advantage.'"

A former competitive athlete, Geoff reported that he'd, 14, and 1.5 disks in his back three different times. Now, 46, Geoff is still competitive as a runner and squash player. But now that he's older, he sees that it takes a little more time to recover than it used to. And the pain after a game or a run can be pretty severe.

He tried all the pain relievers. First aspirin, but after a rise those didn't work, anymore. When his back was really bad, his doctor prescribed Percocet, until he found out one day that it causes liver damage.

As Geoff got older, he realized that even though he was physically able to compete in sports, the time it took to recover was longer. He tried glucosamine, which failed to work for him. Then a friend recommended Isoprex. He decided to try what he called "The Isoprex Challenge." He reported to run an 8K race with four weeks to train.

Geoff's initial pain while training was minimal, which he attributed to Isoprex. Thus, the race. At the finish line, he laughed with a younger friend about who would be the better athlete on Monday. On Sunday, his legs were a bit sore. By Wednesday, he was feeling almost 100%. In contrast, his buddy, age 34, was still sore.

Geoff hit physical recovery time by using Isoprex each day. The all-natural supplement gives him lots of energy on his runs. Plus, he's feeling better joint function, decreased inflammation, and safe, gentle, pain relief without the worry of side effects or other prescription drugs.

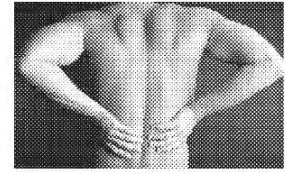
Today, Geoff is pain-free thanks to what he calls "The Isoprex Advantage." You could be, too!

Stop Your Pain and Inflammation by Stopping 5-LOX.

Science has discovered a powerful way to stop 5-LOX from doing its damage. It's called boswellia acid, and it is derived from the ancient frankincense tree.

Numerous studies prove boswellia acids are powerful painkillers, and that they actually inhibit development of inflammatory disease. Since 2010 there have been over 500 studies on the therapeutic mechanisms and qualities of boswellia acid.

But with your body's complex systems, you need more than just the world's most powerful pain reliever to stop your pain and inflammatory disease.



You need other ingredients as well. Ingredients that protect your whole body. Ingredients that:

- Help to rebuild cartilage
- Break down proteins in damaged tissue
- Protect against bronchial inflammation
- Attack headaches
- Block bone breakdown
- Support DNA repair
- Prevent formation of inflammatory proteins
- Strengthen immune function
- Aid normal cell division
- Control production of vital proteins
- Stimulate immune system activity
- Reduce oxidative cell damage
- Kill bacteria

That's why Isoprex, packed with powerful pain- and inflammation-fighting ingredients, is the world's most powerful pain reliever.

Isoprex is Packed with 12 Powerful Ingredients to Stop Pain and Inflammation!

The World's Most Powerful Pain Reliever!

There is no more powerful 5-LOX fighter than the boswellia formulation in Isoprex. Called **ApresFlex® Boswellia**, this patent-pending extract prevents damaging arachidonic acid from attacking your cells and joints.

One study found that boswellia reduces swelling as well as non-steroidal anti-inflammatory drugs (NSAIDs) like Aleve® (naproxen), or Advil® (ibuprofen), but without the stomach damage associated with NSAIDs. In other studies, boswellia decreased pain, swelling, and morning stiffness as well as NSAIDs, minus side effects.

ApresFlex® Boswellia promotes healthy joints and connective tissues, and fights respiratory and digestive problems. In a recent clinical study, **ApresFlex Boswellia** showed significant improvements in joint comfort, function and mobility. If you haven't found relief with joint supplements like glucosamine, try Isoprex with **ApresFlex Boswellia** for dramatic relief.

Be warned: You can find boswellia in other supplements, but they don't tell you that boswellia isn't easily absorbed into your system. That's why we use a super-advanced, patented and proprietary formula that has gone through a special process to extract the active ingredient, AKBA, for faster absorption and quicker therapeutic benefit.

Your Joints' Best Friend!

Isoprex contains a full 40mg per serving of pure, soothing **Hyal-Joint™ hyaluronic acid** that drains painful swelling and promotes comfortable joint mobility naturally!

Knee joints are surrounded by thick, slippery synovial fluid containing hyaluronic acid that cushions them from shock. Synovial fluid is an essential part of the joint; it is a viscous liquid that lubricates the joint. Think of it as your "shock absorber."

Hyal-Joint hyaluronic acid is a unique natural product with a high content of sodium hyaluronate, the chief component of synovial fluid. It also contains collagen, the main protein present in joints and the key to flexible, strong tissue. **Hyal-Joint hyaluronic acid** stimulates the production and regeneration of cartilage, helping to literally rebuild your joints.

The American College of Rheumatology recommends injecting hyaluronic acid directly into joints affected by arthritis. However, recent findings show that hyaluronic acid administered orally lessened arthritic pain in clinical

study. More significantly, **Hyal-Joint hyaluronic acid** stimulates production of new joint fluid within two to four weeks of beginning supplementation.

Put Rheumatoid Arthritis on the Run!

Several clinical studies show that **bromelain** is as effective and possibly more effective than anti-inflammatory prescription drugs in relieving your pain and inflammation. It reduces swelling and helps relieve strains, bruises, backaches, as well as hay fever, gastrointestinal problems, sinusitis, and swollen feet and hands.

At least four studies using **bromelain** demonstrated its effectiveness in the treatment of minor injuries (bruises, sprains, strains, hematomas, lacerations, abrasions) as well as severe injuries (low back pain, fractures, minor surgery). Research also shows that **bromelain** is effective with rheumatoid arthritis, and 73% of patients studied had good to excellent results.

Tags Away Your Ibuprofen Forever!

Hops is best known as a flavoring in beer, but when researchers tested a concentrated extract, they discovered pain-killing powers beyond even their highest expectations.

An extract of **hops** blocks pain-causing COX-2 enzymes for a whole nine hours, equal to 400mg of ibuprofen.

Hops does not inhibit COX-1, though, which means you don't have to worry about ruining your stomach lining, like you would with other pain medications.

Block Chronic Pain and Inflammation!

Turmeric is known to fight arthritis, diabetes, heart disease, osteoporosis, and the processes underlying Alzheimer's disease. It may also help prevent both rheumatoid arthritis and osteoporosis.

Turmeric blocks a pathway that leads to breakdown in bone, and prevents the formation of inflammatory proteins that destroy joint tissue. But it's most important quality is its ability to inhibit chronic inflammation that leads to pain and disease.

Keep Bones Strong!

Calcium deficiency is a silent ailment. In most cases you won't notice you're deficient until your bones fracture or break. **Calcium** prevents osteoporosis, a condition that makes your bones porous and weak, leading to fractures that could take a long time to heal.

Say Goodbye to Migraine Headaches!

Numerous studies have shown that **feverfew** relieves migraine headaches. In one study, a daily **feverfew capsule** decreased both the number and severity of migraines patients suffered.

After reviewing the published literature on **feverfew** and migraines, researchers at the University of Exeter concluded that **feverfew** is "likely to be effective in the prevention of migraine" headaches.

Attack Asthma, Pneumonia, and Flu!

Baikal skullcap contains important flavonoids and alkaloids with antihistamine-like effects, making it a significant treatment for both acute asthma attacks and allergic eczema.

Baikal skullcap is also effective in treating inflammatory conditions of the digestive and eliminatory systems, and clinical studies show it is effective with both pneumococci and influenza virus. It also appears to inhibit COX-2 as well as 5-LOX.

Support Your DNA!

Clinical research shows that this little-known compound, **cat's claw bark**, is a powerful anti-inflammatory and antioxidant that supports DNA repair, joint health, immune function, and normal cell division.

In addition, scientists recently discovered that **cat's claw bark** can protect cartilage, the "shock absorber" where bones meet. Loss of cartilage leads to osteoarthritis. In a clinical study, patients recorded significant reduction of pain in just one week. In a separate study, patients with rheumatoid arthritis reported an improvement in painful, swollen joints.

Stimulate Your Immune System!

Numerous studies show that **vitamin D3** is a very potent inflammation fighter. Researchers found those suffering from chronic pain have very low levels of vitamin D. But to correct this deficiency it's important to take the right form of vitamin D.

Vitamin D3 is closer to the natural form produced by your body from sunlight, and it's three times more potent for fighting pain than vitamin D2.

Vitamin D3 has a powerful role in supporting immunity, and controlling inflammation, two vital processes that are tied to a host of age-related diseases.

Kill Bacteria Before It Takes Hold!

Laboratory studies have shown that **feverfew** relieves chronic inflammation, and urinary tract infections. The leaf has been used to treat respiratory infections, chronic inflammation, and urinary tract infections.

Protect Up!

Isoprex includes **Bioperine™**, a proprietary extract of black pepper, for one simple reason: To make sure your body absorbs this huge payload of inflammation fighters and painkillers.

Many supplements don't get absorbed well because of poor quality ingredients. And some compounds are naturally harder for your body to absorb. Clinical studies show that **Bioperine** can increase supplemental nutrient absorption up to 60% for some nutrients.

All the Ingredients You Need for Powerful Pain Relief!

There is no more powerful anti-inflammation and pain-relief supplement in the world. Only Isoprex contains this revolutionary combination of 12 potent ingredients.

Powerful ingredients like these are essential when you're fighting equally powerful pain, inflammation, and disease. I see Isoprex working for my patients every day. And I can hardly wait to add your story to the long list of successes.

Successes that include eliminating pain, eliminating asthma, walking without a cane for the first time in years, eliminating sore joints... and foot pain... and hip pain... and knee pain.

Successes that include cutting back on prescription drugs, and eliminating pain and ailments when no drug could.

Successes that should include you! **Urge you to give Isoprex a try.**




isoprex.com

* * *


C. Another direct mail brochure for Isoprex distributed at various times in 2018 states:

JOINT BREAKTHROUGH: Medical researchers finally uncover the REAL ANSWER to healthy joints...

**Isoprex Halts The Dangerous
“Big MAC Attacks”
That Are Affecting Your Joints!**



Feel what it's like to LIVE again!



The unique science-based supplement with 12 powerful, joint relievers and protectors

Order NOW and SAVE up to 33%!



Isoprex Works 3 Ways:

- 1. Increases joint comfort and movement**
- 2. Inhibits dangerous 5-LOX**
- 3. Promotes healthy joints**

William Gruss, MD, says...

“The supplement I recommend to make joints healthy is called **Isoprex**. It is designed to prevent the destructive “MAC attacks” that batter your joints.

“Unlike other supplements, **Isoprex** works three ways to give you the healthiest joints you’ve had in years. All so you can walk, stand, bend, and grasp in comfort.”



Isoprex is the most complete full body support supplement available!

Call 1-866-479-3538 and SAVE up to 33%!

Or return the easy order form on page 8. You are completely covered by my risk-free 100% money-back guarantee.

2 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.

NATURAL HEALTH NEWS REPORT

ISSUE #181

This **NEW** discovery will change everything about how doctors treat arthritis...
Stanford Medical School researchers discover the real cause
of joint pain that conventional medicine has completely missed.

This new natural breakthrough can... **RELIEVE Pain AND REBUILD Joints**



"It's a paradigm change."

—William Robinson, Professor of Rheumatology, Stanford University

- Now for the first time you can:
- ✓ **RELIEVE** pain
 - ✓ **REDUCE** Inflammation
 - ✓ **REPLENISH** joint "oil"
 - ✓ **REBUILD** joints
 - ✓ **RESTORE** mobility

D. Another direct mail brochure for Isoprex distributed at various times between January 1, 2014 and June 16, 2017 states:

Journal of Natural Joint Health

If you suffer from joint or muscle pain, If you've tried all sorts of remedies but nothing really works,
This news could literally change your life.

New "Wonder" Nutrient Targets the Hidden Cause of Joint Pain

- ▶ Relieves painful swelling in 100% of even the worst cases!
- ▶ Runs circles around America's #1 prescribed pain drug – *but with no harmful side effects!*



"In just days, my pain has gone from a 10 to a 4. Thank you very much ... for this natural wonder."
— Lydia A.



"My arthritis pain has vanished!"
— Paul H.

"I can see why this is one of the most popular pain fighting powers out there. **It's incredible.**"
— Rebecca G.



See what it can do for you!

ALSO INSIDE:

- 3 doctor treatments that make your pain WORSE
- 5 easy steps to complete pain relief
- The "safe" pain pill that kills 458 people every year!

As a board-certified medical doctor, I know the physiology of joint health and how pain happens. As a naturopathic healer, I know the newest breakthroughs in natural healing.

That's why I can guarantee you that **Isoprex** with Hyal-Joint will support every key part of your joint health — from synovial fluid replenishment, to inflammation relief, to getting rid of your pain — **naturally, effectively, and safely!**

And you'll find it a thousand times better than what you're currently taking for pain...

Hyal-Joint: up to 4X More Powerful Than Regular HA!

It used to be that to replenish synovial fluid, doctors would have to shoot its main component, hyaluronic acid (HA), into your joints with a syringe. That was obviously very painful and costly.

Fortunately, HA capsules have become available. But most HA capsules contain only that — HIA.

Hyal-Joint's special patent-pending formula includes HA plus two other vital components of synovial fluid: **collagen** and a protein called **proteoglycan**. So it's a more complete solution.

And compared to regular HA, Hyal-Joint's HA is up to **4 times more active in nourishing synovial fluid!**

The result: Hyal-Joint restores your fluid and soothes your joints like nothing else available!

Put Hyal-Joint's soothing action to work for you with **Isoprex**. Order now by calling toll-free **1-866-479-3538** or visiting **www.isoprex.com/D42**.



DOCTOR PAIN MISTAKE #2:
They routinely prescribe a pain drug that kills 458 people every year.

Doctors know NSAID pain relievers are risky; that they can cause everything from nausea and ulcers to full-on heart attacks and strokes.

Since Biblical times, boswellia has been treasured for its remarkable ability to reduce painful swelling and stiffness.

But because it's made from the thick resin of the *Boswellia serrata* tree, boswellia is notoriously difficult for your body to absorb. So even though it's a fantastic pain reliever, people weren't always getting the benefits.

That's why I was thrilled to find a new, much more bioavailable form of boswellia for **Isoprex** called **AprèsFlex**.

AprèsFlex a quantum leap above other inflammation fighters.

AprèsFlex absorbs faster ... works better ... and lasts longer than any other inflammation fighter I've come across.

- ✓ Absorbs **52% better** than all previous boswellia extracts!
- ✓ Is **10 times more concentrated** than regular boswellia!
- ✓ Targets all **5 of the body's top inflammatory markers**—not just 1 or 2 as with most pain relievers.

I'm proud to bring you AprèsFlex as part of **My strongest formula ever for joint pain and inflammation relief**

- ✓ Erases joint pain and stiffness starting in as little as 5 days
- ✓ Restores your soothing "joint oil" so you can move with ease
- ✓ Significantly reduces agonizing inflammation
- ✓ Promotes healthy joint cartilage
- ✓ Helps rebuild healthy joints



Try **Isoprex** today, and save up to **\$99**. Just call **1-866-479-3538** or go to **www.isoprex.com/D42**.

So as a "safer" alternative, they prescribe acetaminophen, found in several prescription and over-the-counter drugs. In fact, acetaminophen is now America's top-prescribed pain drug.

Well, talk about out of the frying pan and into the fire!

Acetaminophen overdose is actually the leading cause for calls to Poison Control Centers across the US — more than 100,000 instances per year — and, each year, is responsible for:

- ✳ More than 56,000 **emergency room visits**
- ✳ 2,600 **hospitalizations**
- ✳ An estimated 458 deaths due to **acute liver failure**

This situation has become so alarming that the FDA requires all of these drugs to carry a "black box" warning of severe liver damage.



"Acetaminophen ... may be among the most dangerous medicines on the market."

—Dr. Joseph Mercola

There Is Absolutely No Reason To Put Yourself At This Risk!

The Hyal-Joint compound in **Isoprex** is **9 TIMES AS EFFECTIVE AS Acetaminophen IN RELIEVING PAIN** but is 100% natural and has **NO** bad side effects of any kind!

Reduces painful swelling in 100% of even the worst cases!



In a recent Spanish study, 71 patients with knee pain were given either Hyal-Joint or acetaminophen.

After just one month, a mere 18% of the Hyal-Joint group still had painful swelling.

But of those who took the pain drug, a full 80% were still suffering from swollen knees!

(next page, please)

Clearly and obviously, any effective joint supplement MUST inhibit MMP-3 enzymes.

And the supplement proven most effective for doing that? **AprèsFlex!**

AprèsFlex stopped MMP-3 enzymes 41.36% better than the next best boswellia product!

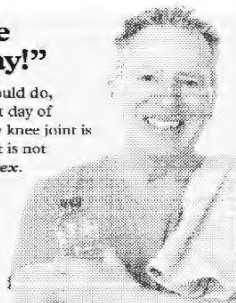
No wonder **Isoprex**, with its AprèsFlex compound, is helping so many people **NOT** just stop their pain, but also help their joints and cartilage heal themselves!

In fact, many **Isoprex** users have been able to cancel joint replacement surgery because their cartilage is becoming healthier!

"Pain Free After One Day!"

"After reading what **Isoprex** would do, I sent for 3 bottles. After the first day of taking 6 pills I was pain free. My knee joint is not touching yet, so replacement is not an option now that I have **Isoprex**. My knees are 83 years old, so this is a good test of your product. Thanks again for coming out with a non prescription that works."

— Edwin M., Callaway, FL



Isoprex relieves your tender joints in these 5 critical ways.

When you get the key nutrients missing from other joint supplements ...

When you stop cartilage destruction in its tracks ...

When you take leading-edge all natural compounds with scientifically proven results ...

... suddenly your life gets a whole lot brighter!

VIOLATIONS OF THE FTC ACT

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

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

15. 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, Isoprex is either a “food” or “drug” as defined in Section 15(b) and (c) of the FTC Act, 15 U.S.C. § 55(b) and (c).

COUNT I

False or Unsubstantiated Efficacy Claims

16. Through the means described in Paragraph 12, Defendants have represented, directly or indirectly, expressly or by implication, that Isoprex:

- A. Relieves pain, including muscle pain, joint pain, headache, and arthritis;
- B. Reduces inflammation and swelling, including joint inflammation and knee swelling;
- C. Rebuilds joints and repairs damaged joint cartilage;
- D. Is 100% effective in relieving inflammation and swelling; and
- E. Provides pain relief comparable or superior to over-the-counter drugs.

17. The representations set forth in Paragraph 16 are false or misleading, or were not substantiated at the time the representations were made.

18. Therefore, the making of the representations as set forth in Paragraph 16 of this Complaint 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) and 52.

COUNT II

False Proof Claims

19. Through the means described in Paragraph 12, Defendants have represented, directly or indirectly, expressly or by implication, that Isoprex is clinically proven to:

- A. Relieve pain, including muscle pain, joint pain, headache, and arthritis pain;
- B. Reduce inflammation and swelling, including joint inflammation and knee swelling;
- C. Rebuild joints and repair damaged joint cartilage;
- D. Relieve 100% of inflammation and swelling; and
- E. Provide pain relief comparable or superior to over-the-counter drugs.

20. In truth and in fact, Isoprex is not clinically proven to:

- A. Relieve pain, including muscle pain, joint pain, headache, and arthritis pain;
- B. Reduce inflammation and swelling, including joint inflammation and knee swelling;
- C. Rebuild joints and repair damaged joint cartilage;
- D. Relieve 100% of inflammation and swelling; and
- E. Provide pain relief comparable or superior to over-the-counter drugs.

21. Therefore, the making of the representation as set forth in Paragraph 19 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) and 52.

COUNT III

Failure to Disclose Material Connections with Endorsers

22. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of Isoprex, Defendants have represented, directly or indirectly, expressly or by implication, that the consumer endorsements of Isoprex in their advertising, including those set forth in Paragraph 12, reflect the experiences and opinions of Isoprex users.

23. In numerous instances in which Defendants have made the representation set forth in Paragraph 22 of this Complaint, they have failed to disclose, or disclose adequately to consumers, that the consumer endorsers appearing in their advertising had material connections to the Defendants. Specifically, Defendants did not disclose that the consumer endorsers were compensated in connection with their endorsement, and some of the consumer endorsers were employees, relatives of employees, or professionally associated with employees or owners of Defendant Renaissance Health Publishing. For example, Geoff Garbacz, who is identified in the advertisement as a consumer endorser named Geoff, is also an associate of Defendant DiGeorgia and an individual who was compensated for copywriting services he provided to Renaissance Health Publishing. The consumer endorser identified as Christy Lorenzo is also an employee of Renaissance Health Publishing, while the consumer endorser identified as John A. is a relative of an employee at Renaissance Health Publishing. These facts would be material to consumers in evaluating the consumer endorsements for Isoprex in connection with a purchase or use decision.

24. Defendants' failure to disclose or disclose adequately the material information described in Paragraph 23, above, in light of the representation described in Paragraph 22, above, constitutes a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

CONSUMER INJURY

25. 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

26. 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

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 future violations of the FTC Act by Defendants;

B. Award such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the FTC Act, including, but not limited to, 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 the Court may determine to be just and proper.

Respectfully submitted,

Alden F. Abbott
General Counsel

Dated: 4/15/2020

/s/ Sydney Knight
SYDNEY M. KNIGHT
EDWARD GLENNON
Federal Trade Commission
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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.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS Federal Trade Commission

DEFENDANTS Renaissance Health Publishing, LLC; James DiGeorgia

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Palm Beach County, FL (IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address, and Telephone Number) Federal Trade Commission Sydney Knight, 600 Pennsylvania Ave, NW.,

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys (If Known) Joel Rothman, Esq. Aaron Wernick, Esq.

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 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)

- Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1 Incorporated or Principal Place of Business In This State
2 2 Incorporated and Principal Place of Business In Another State
3 3 Foreign Nation
4 4
5 5
6 6

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 (Excl. Veterans), 153 Recovery of Overpayment of Veteran's Benefits, 160 Stockholders' Suits, 190 Other Contract, 195 Contract Product Liability, 196 Franchise
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 - Med. Malpractice
CIVIL RIGHTS: 440 Other Civil Rights, 441 Voting, 442 Employment, 443 Housing/Accommodations, 445 Amer. w/Disabilities - Employment, 446 Amer. w/Disabilities - Other, 448 Education
REAL PROPERTY: 210 Land Condemnation, 220 Foreclosure, 230 Rent Lease & Ejectment, 240 Torts to Land, 245 Tort Product Liability, 290 All Other Real Property
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
PRISONER PETITIONS: Habeas Corpus: 463 Alien Detainee, 510 Motions to Vacate Sentence
Other: 530 General, 535 Death Penalty, 540 Mandamus & Other, 550 Civil Rights, 555 Prison Condition, 560 Civil Detainee - Conditions of Confinement

Click here for: Nature of Suit Code Descriptions

- FORFEITURE/PENALTY: 625 Drug Related Seizure of Property 21 USC 881, 690 Other
LABOR: 710 Fair Labor Standards Act, 720 Labor/Mgmt. Relations, 740 Railway Labor Act, 751 Family and Medical Leave Act, 790 Other Labor Litigation, 791 Empl. Ret. Inc. Security Act
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, 490 Cable/Sat TV, 850 Securities/Commodities/Exchange, 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)

- 1 Original Proceeding, 2 Removed from State Court, 3 Re-filed (See VI below), 4 Reinstated or Reopened, 5 Transferred from another district (specify), 6 Multidistrict Litigation Transfer, 7 Appeal to District Judge from Magistrate Judgment, 8 Multidistrict Litigation - Direct File, 9 Remanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S)

(See instructions): a) Re-filed Case YES NO b) Related Cases YES NO

VII. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity): Federal Trade Commission Act, 15 U.S.C. 53(b). Deceptive advertising

LENGTH OF TRIAL via days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

DATE April 15, 2020 SIGNATURE OF ATTORNEY OF RECORD /s/ Sydney Knight

FOR OFFICE USE ONLY

RECEIPT # AMOUNT IFP JUDGE MAG JUDGE