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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Federal Trade Commission,

Plaintiff,

v.

Quantum Wellness Botanical Institute, LLC, a
limited liability company;

Fred Auzenne, individually, and as an officer
of Quantum Wellness Botanical Institute,
LLC;

and

Maria Gutierrez Veloso, also known as Maria
Dulce Veloso and Danica Collins,
individually,

Defendants.

No.

COMPLAINT FOR PERMANENT
INJUNCTION AND OTHER
EQUITABLE RELIEF

1 Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint alleges:

2 1. The FTC brings this action under Section 13(b) of the Federal Trade
3 Commission Act (“FTC Act”), 15 U.S.C. § 53(b), to obtain permanent injunctive relief,
4 rescission or reformation of contracts, restitution, the refund of monies paid,
5 disgorgement of ill-gotten monies, and other equitable relief for Defendants’ acts or
6 practices in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a), 52, in
7 connection with the labeling, advertising, marketing, distribution, and sale of
8 ReJuvenation, a product that purportedly stimulates the production of human growth
9 hormone and stem cells and reverses the aging process.

10 **JURISDICTION AND VENUE**

11 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331,
12 1337(a), and 1345.

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

15 **PLAINTIFF**

16 4. The FTC is an independent agency of the United States Government
17 created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act,
18 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting
19 commerce. The FTC also enforces Section 12 of the FTC Act, 15 U.S.C. § 52, which
20 prohibits false advertisements for food, drugs, devices, services, or cosmetics in or
21 affecting commerce.

22 5. The FTC is authorized to initiate federal district court proceedings, by its
23 own attorneys, to enjoin violations of the FTC Act and to secure such equitable relief as
24 may be appropriate in each case, including rescission or reformation of contracts,
25 restitution, the refund of monies paid, and the disgorgement of ill-gotten monies.
26 15 U.S.C. §§ 53(b).

DEFENDANTS

1
2 6. Defendant Quantum Wellness Botanical Institute, LLC (“Quantum
3 Wellness”) is an Arizona limited liability company with its principal place of business at
4 7432 E. Tierra Buena Lane, #120, Scottsdale, Arizona 85260. Quantum Wellness
5 transacts or has transacted business in this District and throughout the United States. At
6 times material to this Complaint, acting alone or in concert with others, Quantum
7 Wellness has advertised, marketed, distributed, or sold ReJuvenation to consumers
8 throughout the United States.

9 7. Defendant Quantum Wellness filed a petition for Chapter 11 bankruptcy on
10 November 11, 2017 in the Bankruptcy Court for the District of Arizona in a case styled
11 *Quantum Wellness Botanical Institute LLC*, No. 2:17-bk-13721-EPB. The Bankruptcy
12 Court confirmed Defendant Quantum Wellness’s Chapter 11 Plan on December 14, 2018.
13 The confirmation discharged any pre-confirmation debts. Thus, the FTC seeks monetary
14 relief against Defendant Quantum Wellness only for conduct occurring post-
15 confirmation; it does not seek monetary relief for conduct pre-confirmation. The FTC
16 also seeks injunctive relief against Defendant Quantum Wellness.

17 8. Defendant Fred Auzenne (“Auzenne”) is the Chief Executive Officer of
18 Quantum Wellness and owns 50% of PLU Holdings, LLC, which holds a controlling
19 interest in Quantum Wellness. At times material to this Complaint, acting alone or in
20 concert with others, he has formulated, directed, controlled, had the authority to control,
21 or participated in the acts and practices of Quantum Wellness, including the acts and
22 practices set forth in this Complaint. As Chief Executive Officer of Quantum Wellness,
23 Defendant Auzenne has overseen the day-to-day management of Quantum Wellness;
24 among other things, he has reviewed and approved the advertising and marketing for
25 ReJuvenation and has evaluated substantiation for claims made therein. Defendant
26 Auzenne resides in this District and, in connection with the matters alleged herein,
27 transacts or has transacted business in this District and throughout the United States.
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1 13. On or about February 12, 2016, Defendant Quantum Wellness purchased
2 most of the assets of the former Quantum Wellness CA from Defendant Veloso. The
3 purchased assets included the ReJuvenation product, among others, and “all marketing
4 materials and lists,” including the websites ReJuvenationAntiAging.com,
5 JournalOfAntiAgingBreakthroughs.com, and QuantumWellnessBotanicalInstitute.com.

6 14. Defendants also entered a Consulting Agreement dated February 12, 2016,
7 pursuant to which Defendant Quantum Wellness engaged Defendant Veloso to, among
8 other services, supervise, edit, and otherwise contribute to the creation of advertising
9 copy for ReJuvenation.

10 15. Since February 2016, Defendants Quantum Wellness and Auzenne have
11 advertised, offered for sale, distributed, and sold ReJuvenation to consumers.

12 16. Defendant Veloso changed the name of Quantum Wellness CA to Velocity
13 Partners, LLC in June 2016, and dissolved the company in December 2016.

14 17. During the respective periods Defendants have sold ReJuvenation, they
15 have advertised and marketed it through direct-to-consumer mailers, postcards, and
16 emails, and on their websites, ReJuvenationAntiAging.com,
17 JournalOfAntiAgingBreakthroughs.com, and QuantumWellnessBotanicalInstitute.com.

18 18. The direct-to-consumer mailers have contained articles that discuss human
19 growth hormone and stem cells, and have included numerous claims attesting to the
20 benefits of ReJuvenation. The toll-free telephone number to order the product typically
21 appears on every other page. The articles have contained testimonials from consumers
22 and doctors describing the benefits of ReJuvenation.

23 19. Consumers could purchase ReJuvenation from Defendants through their
24 websites, by calling the 800-number on Defendants’ mailers and postcards, or by mailing
25 in the order form included in Defendants’ mailers. The suggested retail price for a one-
26 month supply of ReJuvenation is \$49.95 but the Defendants have sold ReJuvenation for
27 \$39.95 to \$49.95, depending upon the quantity ordered. For example, Defendants have
28 offered discounts for larger quantity purchases.

1 20. Defendants have represented that ReJuvenation provides extraordinary
2 health benefits. Specifically, Defendants have represented that ReJuvenation effectively
3 stimulates the body's production of human growth hormone and stem cells, and that
4 ReJuvenation increases the body's production of human growth hormone by as much as
5 682% and can add billions of stem cells to your body.

6 21. Defendants have represented that this increased production of human
7 growth hormone and stem cells causes numerous anti-aging benefits, including, but not
8 limited to: reversing the aging process in cells, skin, muscles, tissues, and organs, and
9 significantly repairing age-related damage to the body's organs, tissues, joints and
10 muscles; reducing the appearance of wrinkles, lines, and furrows; decreasing body fat,
11 increasing lean muscle mass, and helping users shed excess weight; and significantly
12 improving memory and cognitive function.

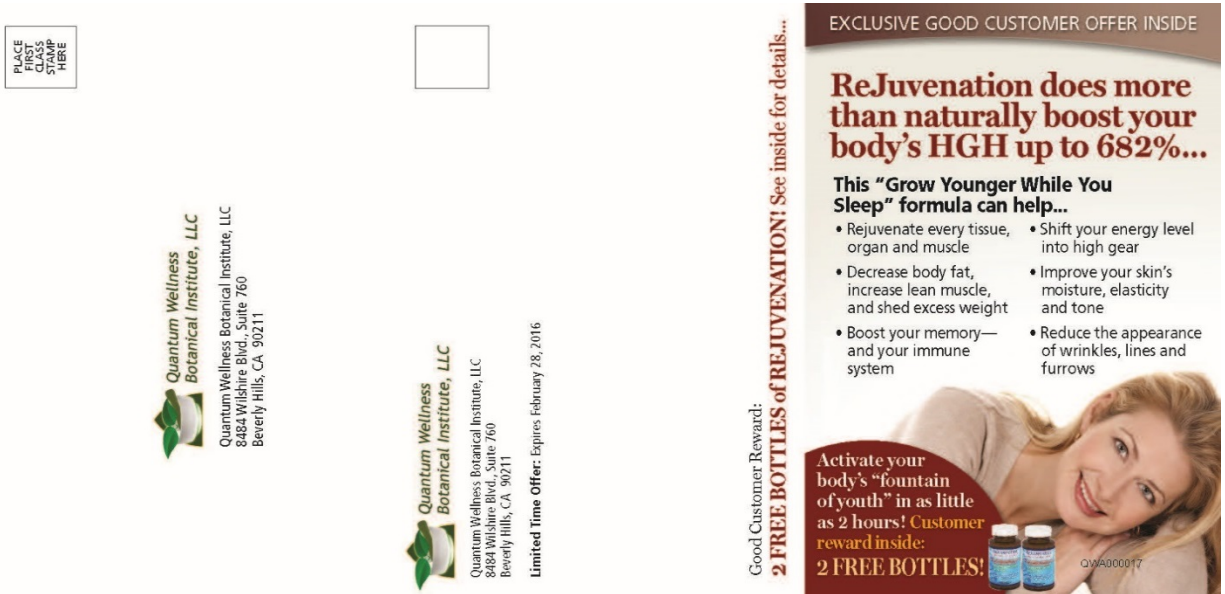
13 22. Defendants also have represented that ReJuvenation can repair or reverse
14 numerous diseases or conditions including, but not limited to: repair heart attack damage
15 and prevent or heal heart disease; reverse blindness and eye damage; repair brain damage
16 from stroke, Alzheimer's disease, and Parkinson's disease; reverse deafness and hearing
17 loss; and reverse Crohn's disease.

18 23. Defendants also have represented that the benefits of ReJuvenation are
19 clinically or scientifically proven. Defendants have not conducted any clinical trials to
20 substantiate the advertised health claims for ReJuvenation. Nor are there any competent
21 and reliable human clinical trials of equivalent products. Existing studies of individual
22 ingredients contained in the above products are not competent and reliable scientific
23 evidence supporting the advertised health claims because such studies: do not take into
24 account potential interactions among ingredients; test different dosages of the ingredients;
25 are unrelated to the health claims advertised; or have critical flaws in methodology, such
26 as improper controls or randomization.

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1 24. To induce consumers to purchase ReJuveneration, Defendants have
2 disseminated or caused to be disseminated advertisements for ReJuveneration. These
3 advertisements contain the following statements and depictions among others:

4 A. Postcard distributed in or around February 2016:



B. Email Offer distributed in or around March 2014:

Brought to you by Think-Outside-the-Book Publishing, LLC

Stem cell study reveals ...
**Stunning Age Reversal
and Three-Fold Increase in Lifespan!**

* * *

When an increased number of stem cells are released from your bone marrow into the bloodstream, you're tapping into a *virtual goldmine of youth* -- or what the NIH calls the "renewable source of replacement cells and tissues" which supports your body's daily self-renewal. There's a [biological age calculator on the following webpage](#) that automatically calculates **how young you could become** with the help of this revolutionary discovery.

If you wish to stop the havoc that time wreaks on your body -- the lines and wrinkles ... chronic diseases ... decreased energy ... memory loss ... poor eyesight ... and all the signs of "normal aging" -- this marine extract has been shown to help your body repair and maintain itself so it's **always in peak condition and youthful performance**.



It is the equivalent of **pressing the Reset button** on your body's self-renewing mechanism ... erasing years of aging ... supporting the normal (and healthy!) functioning of your body ... and becoming young again -- *while you sleep*.

[Restart your body's self-renewing mechanism](#) ... and stay "forever young" ... live a long and healthy life ... and never grow old. When you [click here](#), you'll also discover how to naturally **increase your body's "youth hormones" by 682%** -- and **start growing younger in as little as 120 minutes**.

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If the links above are not working, just copy & paste the following website address onto your Internet browser:

<http://www.RejuvenationAntiAging.com>

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C. Cover page of the Winter 2017 mailer:

Special Issue **The Journal of Natural Longevity** Winter 2017 • \$6.95

**TIME MAGAZINE'S Breaking Anti-Aging News:**  
**Doctors trigger billions of anti-aging cells in your body**

**Proprietary technology stimulates Stem Cells & HGH to reproduce like rabbits!**



**AARP raves, "These cells enable the body to heal, grow and renew tissue."**

**These age-defying, illness-defeating cells are like lasers targeting your:**

- Circulatory System & Health
- Brain & Nervous System
- Wrinkled Skin
- Energy Levels
- Belly Fat
- Vision
- And so **MUCH** more

**It Works or It's FREE**

**MAYO CLINIC** says they "offer great promise for new treatment." (story continues on page 2) ➔

D. Page 5 of the Winter 2017 mailer:

# versing, health-building now in one pill!”

**“INCREDIBLE RESULTS.”**



**“Since starting ReJuveneration™ I have more energy. And I am always complimented on the appearance of my skin—I look much younger than my age of 61!”**

—Linda A., Dillsboro, Indiana

that, but I do say that you can now unlock the very same secrets of cellular life extension inside your own stem cells. I believe that adding 10, 15, 20+ quality years is absolutely possible.

### **Dramatically Increase Your HGH Level with Nature’s Secret**

Secondly, **ReJuveneration™** also supports dramatic increases in your human growth hormone (HGH) level. HGH is one of the most powerful health-enhancing, anti-aging compounds in your system.

Our proprietary amino acid blend includes a potent nutrient that is the **ONLY** known food source for boosting your HGH

## ReJuveneration has *remarkable* power to help you:

- Focus and stay alert
- Strengthen your heart
- Reduce wrinkles
- Improve your memory
- Look much younger
- Dramatically cut stress
- Boost your energy level
- Support the detoxification of your body
- Regulate normal cholesterol
- Elevate your mood
- Increase muscle mass
- **And MUCH More...**

level. This has remarkable anti-aging effects, as well as the ability to help restore your overall health. Let’s take a closer look at both breakthroughs...yours in one pill!

### **DISCOVERY #1: Sending your level of age-fighting STEM CELLS soaring**

As someone with a lifelong interest in health, I consider stem cells to be “mini-miracles” that travel your entire body via your bloodstream. Adult stem cells possess the incredible ability to immediately repair and rejuvenate your body.

If you have a cognition concern and you’re worried about a poor memory, or lack of focus—

your stem cells seek out this problem and begin repairing it by literally transforming themselves into fresh, new brain cells.

These wonders can turn themselves into *every* type of cell in the human body, including liver, skin, heart, brain, joint, muscle, pancreatic, eye, blood cells—any kind of cell in your entire body. Now imagine billions of new stem cells being added to your bloodstream!

### **This Incredible Capability is Confirmed by America’s Top Stem Cell Experts...**

Stem cells are now being called the future of modern medicine.

*(continued on next page)*

## **It Works For You—OR IT’S FREE!**

SAVE UP TO \$88.84 when you purchase the Great Deal and get 1 FREE REPORT and FREE SHIPPING by calling **1-800-339-4732** or returning the Order Form on page 27.

**NEW!**



**Not Sold in any Store!**

**Order Now! Call Toll-Free 1-800-339-4732**

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E. Cover page of the Spring 2016 mailer:

Spring 2016 **The Journal of Natural Longevity** \$6.95

# Flood your body with youth hormones... **NATURALLY!**

## Increase your HGH up to 682%

**Stunning age reversal study:**  
**Stem cells boost life span three-fold**

**Repair every aging cell in your body**  
—damaged tissues and organs, too!

**Visibly fade wrinkles overnight**  
No injections or surgery

**Try this, skip that!**  
Anti-aging treatments that waste your money

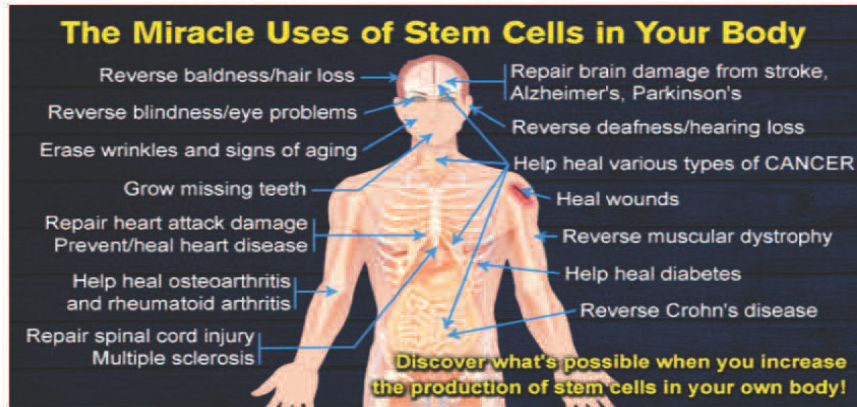
**A Solution for Hair Loss?**

**2 FREE BOTTLES plus 2 FREE GIFTS!**

**Discover how to press your body’s “reset” button—and grow younger while you sleep!**

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F. Page 6 of the Spring 2016 mailer (original highlighting):



The American Medical Association reports that current studies are researching how stem cells may be used to prevent or cure diseases and injuries such as Parkinson's disease, type 1 diabetes, heart disease, spinal cord injury, Alzheimer's disease, strokes, burns and more. Stem cells could also be used someday to replace or repair tissue damaged by disease or injury.

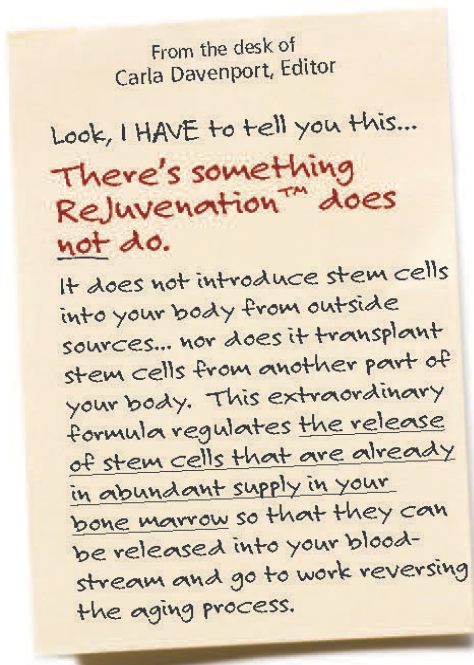
**But there's a catch...**

The body can renew itself in this manner **ONLY** when it has a sufficient number of adult stem cells. If your body had the optimal number of stem cells it would be able to renew itself every day, and and repair whatever needs repairing (or healing). As a result, it would be almost impossible to grow old or suffer from chronic disease.

Unfortunately, as we age our self-renewing stem cell "machine" starts to break down. As your body ages it just does not have as many stem cells as it did when you were younger. That's where the age-reversing formula developed by Quantum Wellness Botanical Institute researchers comes in.

Appropriately called Rejuvenation™: Growing Younger While You Sleep™, this proprietary formula is so unique and revolutionary that there is no other

formulation on the market like it— especially one that helps your body grow younger while you sleep!





## G. Pages from ReJuvinationAntiAging.com (original highlighting):

ReJuvination: Growing Younger While You Sleep™

## Can You Press the RESET Button and Really Start Growing Younger ... As You Sleep?

**W**hat if restoring your youth, health and wellness were as easy as pressing a RESET button in your body? On a computer or electronic device, a reset button is a button that resets the device to its initial state – and restarts from a point in time before the mistake occurred.



Likewise, you can virtually reset the condition of your body, your physical appearance and your health to its *initial state before aging occurred*.

How? By employing the 2 greatest anti-aging discoveries of the century... **activating your body's self-renewing mechanism with stem cells...** and **stimulating your pituitary gland to naturally produce youthful levels of HGH.**

Just take a look at all that's possible when you employ these anti-aging discoveries that are both present in [ReJuvination: Growing Younger While You Sleep™](#). You can...

- Rejuvenate every tissue, organ and gland** of the body to levels you enjoyed when you were young
- Improve your skin's elasticity and tone**, thereby reducing wrinkles, furrows and lines
- Heighten sexual drive** and stamina
- Decrease body fat** and increase lean muscle mass; eliminate unwanted weight gain
- Dramatically boost memory** and mental clarity; improve learning ability
- Increase energy levels** and vitality to unprecedented levels
- Shift the immune system to high gear**
- Enhance feelings of well-being**; combat moodiness
- Foster deep, restful sleep**
- Support detoxification** of the liver and improve liver function
- Boost energy** and elevate mood
- Feel as energetic as a teenager**, no matter what your age may be
- Slow down or even **halt aspects of the normal aging process**
- Strengthen your heart** and have improved cardiovascular health

<http://rejuvenationantiaging.com/new/>[5/26/2017 1:47:19 PM]

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ReJuvenation: Growing Younger While You Sleep™

**Have clearer vision**, healthy gums and bronchial health



Now, it's easy to reset your biological clock and turn back the hands of time. Just take 2 capsules of [ReJuvenation™](#) in the morning. They will jumpstart the process of growing younger in as little as 2 hours and keep you feeling youthful, vibrant and energized all day.

Then, take 2 capsules in the evening just before bedtime... and **wake up looking and feeling younger than you did 10 years ago**. These 2 capsules will work hand in hand with the restorative powers of sleep to help your body produce youthful levels of HGH and stem cells.

[ReJuvenation™](#) will help accelerate your body's natural nighttime repair and renewal... enabling you to wake up to a **brand new you!**

And there's no risk to you when you try [ReJuvenation: Growing Younger While You Sleep™](#) because you're covered by our...

## "Bottom-of-the-Bottle" Guarantee

Try [ReJuvenation™](#) for yourself for 30 days. Take 4 capsules a day and use up one entire bottle of [ReJuvenation™](#). If it doesn't make you look and feel dramatically younger... or if you're not happy with it for any reason... just send it back within 30 days of receiving your shipment for a full refund of the purchase price. You have one whole month to prove to yourself that it works! And all your FREE bonuses are yours to keep as our way of saying thanks for giving [ReJuvenation™](#) a try!



**Press the RESET button below** – and discover for yourself how fast you can start growing younger with [ReJuvenation™](#) – and find out how you can get **2 bottles of [ReJuvenation™](#) absolutely FREE.**



## Your Biological Age Calculator:

<http://rejuvenationantiaging.com/new/>[5/26/2017 1:47:19 PM]



1 H. Pages from ReJuvEnationAntiAging.com (original highlighting):

2 ReJuvEnation: Growing Younger While You Sleep™

3 It's no wonder why stem cell therapy has become the rage among those  
4 seeking to recapture their youth. People have been willing to pay between  
5 **\$10,500 to \$20,000 for a stem cell treatment** that gives an instant "facelift"  
6 effect. Others have turned to equally expensive (and risky) **stem cell**  
7 **transplantation.**

8 Some have resorted to using stem cell nutritional supplements – not knowing  
9 that many of them have *toxic ingredients and contaminants*. More importantly,  
10 most of the stem cell supplements do not have the ability to mobilize stem cells  
11 and distribute them to parts of the body that need them.

12 **The secret behind the stem-cell-enhancing**  
13 **power of ReJuvEnation™**

14 Unlike other anti-aging therapies, *ReJuvEnation™* does not introduce stem  
15 cells into your body from *outside sources*... nor does it transplant them from  
16 another part of your body. Instead it regulates the release of stem cells that are  
17 already in abundant supply in your bone marrow to be released into the  
18 bloodstream.



20 *ReJuvEnation™* contains a powerful marine  
21 extract from an extraordinary species of  
22 seaweed (not to be confused with the common  
23 seaweed *Laminaria Japonica*). This marine  
24 extract has been **scientifically shown in**  
25 **clinical studies to increase the release of**  
26 **adult stem cells into the bloodstream...** and  
27 **mobilize those stem cells** so that they can  
28 migrate to the parts of the body that need repair and renewal.

This unique marine extract has also been shown to **support detoxification**  
**of the body from chemical build-up...** and also **burn body fat**.

*ReJuvEnation™* also contains 2 of the best stem-cell-  
enhancing super nutrients from *goji berries* and *reishi*  
mushrooms. A study in China shows that polysaccharides  
from goji berry (*Lycium Barbarum*) increase the number of  
stem cells in the body and cause the blood of older people to  
**revert to a markedly younger state**.



Reishi mushrooms (*Ganoderma Lucidum*), which are  
particularly revered by the followers of the Taoist  
tradition as the "**Elixir of Immortality**" has not only  
been shown to increase stem cell production in the  
body, but has been used for centuries to support  
radiant health and **longevity**.

Hence, *ReJuvEnation™* delivers the youth restorative power of adult stem  
cells – without the risk and expense of stem cell transplantation and injections.

25 <http://rejuvenationantiaging.com/new/>[5/26/2017 1:47:19 PM]



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I. Page 7 of the Spring 2016 mailer (highlighting in original):

**ReJuvEnation™** is formulated from a revolutionary marine extract that has been *scientifically proven* in clinical studies to not only increase the release of adult stem cells into the bloodstream but also to mobilize those stem cells so that they can migrate to the parts of the body that need repair and renewal.

Adult stem cells have been hailed as one of the most exciting breakthroughs in anti-aging. People have been willing to fork over *as much as \$20,000* for a stem cell treatment to recapture their youth with an “instant facelift.” Still others have turned to equally expensive (and risky) stem cell transplantation.

*What befuddles me is this...*

Why go to such extremes when you can simply jumpstart your body's own natural stem cell engine (press the reset button!) with **ReJuvEnation™**. **ReJuvEnation™** helps restore your body and all its organs, tissues, joints and muscles to the way they were 10, 20, even 30 years ago with just 2 capsules twice a day!

Have I mentioned that researchers also took two of the most powerful anti-aging superfoods on the planet and added them to the formulation, too? The goji berry and reishi mushroom, both well-known for their role in increasing longevity, are powerful stem cell boosters!

*Next page, please...*

## You could be the next ReJuvEnation™ sensation!

“I’ve been a beauty therapist for over 30 years. I have found amazing results with **ReJuvEnation™**. **My skin is smooth, fine lines have gone, jaw line is firmer...** I have told all my clients about this amazing product.”

—Margaret A Geelong, Victoria, Australia

“It has given me the energy I’ve wanted and has **made me feel younger.**”

—Brian C., West Jordan, Utah

“The skin on the top of my hands was paper thin and after taking **ReJuvEnation™** for 2 weeks my skin is thicker and no longer dry. **I am really impressed.**”

—Alex S., London, Ontario

“I am more alert, **my memory has improved, most of my back pain has gone.** ... the product is working for me, thank you.”

—Knud S., Brisbane, Queensland

“Wrinkles are disappearing... **my face is looking years younger.**”

—James G., Edmonton, Alberta

“Since starting **ReJuvEnation™** I have more energy and... am always complimented on the appearance of my skin.

**I look much younger than my age of 61.**”

—Linda A., Dillsboro, Indiana



**Try it for yourself RISK-FREE and see how you can get 2 FREE BOTTLES and 2 FREE GIFTS!**

*See page 23 for details.*

**Order Now! Call Toll-Free 1-800-339-4732**

QWA000081

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J. Excerpts from QuantumWellnessBotanicalInstitute.com (May 2019):

Q. How does Rejuvenation work?

A. Rejuvenation combines two of the best anti-aging therapies (stem cell and Human Growth Hormone enhancement) together into one synergistic formula that optimizes the anti-aging benefits to the user. Unlike the currently available stem cell and HGH supplements and therapies, Rejuvenation does NOT introduce stem cells or HGH (from outside sources) into the body, but instead, helps the body produce healthy levels of stem cells and HGH on its own, thereby achieving anti-aging effects without injections -- and without adverse effects.

25. Based on the facts and violations of law alleged in this Complaint, the FTC has reason to believe that Defendants Quantum Wellness and Auzenne are violating or are about to violate laws enforced by the Commission because, among other things, they continue to make claims challenged by this Complaint, remain in the dietary supplement business, and maintain the means, ability, and incentive to resume their unlawful conduct

**VIOLATIONS OF THE FTC ACT**

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

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

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

**Count I**

**False and Unsubstantiated HGH and Stem Cell Claims**

29. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of Rejuvenation, including through the means described in Paragraph 24, Defendants have represented, directly or indirectly, expressly or by implication, that Rejuvenation:

1 a. Effectively stimulates or increases the body's production of human growth  
2 hormone, including by as much as 682%; and

3 b. Significantly increases stem cells in the body.

4 30. The representations set forth in Paragraph 29 are false or misleading or  
5 were not substantiated at the time the representations were made.

6 31. Therefore, the making of the representations as set forth in Paragraph 29 of  
7 this Complaint constitutes a deceptive act or practice and the making of false  
8 advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC  
9 Act, 15 U.S.C. §§ 45(a), 52.

10 **Count II**

11 **False and Unsubstantiated Anti-Aging Claims**

12 32. In numerous instances in connection with the advertising, marketing,  
13 promotion, offering for sale, or sale of ReJuvenation, through the means described in  
14 Paragraph 24, Defendants have represented, directly or indirectly, expressly or by  
15 implication, that ReJuvenation:

16 a. Reverses the aging process and repairs age-related damage in cells, skin,  
17 muscles, tissues, joints, and organs;

18 b. Reduces wrinkles, lines, and furrows; and

19 c. Improves memory and cognitive function.

20 33. The representations set forth in Paragraph 32 are false or misleading or  
21 were not substantiated at the time the representations were made.

22 34. Therefore, the making of the representations as set forth in Paragraph 32 of  
23 this Complaint constitutes a deceptive act or practice and the making of false  
24 advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC  
25 Act, 15 U.S.C. §§ 45(a), 52.

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**Count III**

**Other False or Unsubstantiated Treatment Claims**

35. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of ReJuvenation, through the means described in Paragraph 24, Defendants have represented, directly or indirectly, expressly or by implication, that ReJuvenation:

- a. Repairs heart attack damage and prevents or heals heart disease;
- b. Reverses blindness and eye damage;
- c. Repairs brain damage from stroke, Alzheimer’s disease, and Parkinson’s disease;
- d. Reverses deafness and hearing loss;
- e. Reverses Crohn’s disease; and
- f. Decreases body fat, increases lean muscle mass, and helps users shed excess weight.

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 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), 52.

**Count IV**

**False Proof Claims**

38. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of ReJuvenation, through the means described in Paragraph 24, Defendants have represented, directly or indirectly, expressly or by implication, that ReJuvenation is clinically or scientifically proven to:

- a. Increase the body’s production of human growth hormone by as much as 682%;

- b. Increase the body's production of stem cells;
- c. Reverse the aging process in cells, skin, muscles, tissues, and organs; and
- d. Repair age-related damage to the body's organs, tissues, joints, and muscles by stimulating the release of stem cells into the bloodstream.

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

40. Therefore, the making of the representations as set forth in Paragraph 38 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), 52.

#### **CONSUMER INJURY**

41. 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**

42. 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**

43. 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:



1 A. Enter a permanent injunction to prevent future violations of the FTC Act by  
2 Defendants;


3 B. Award such relief against Defendants Auzenne and Veloso as the Court  
4 finds necessary to redress injury to consumers resulting from Defendants'  
5 violations of the FTC Act, including, but not limited to, rescission or reformation  
6 of contracts, restitution, the refund of monies paid, and the disgorgement of ill-  
7 gotten monies;

8 C. Award such relief against Defendant Quantum Wellness as the Court finds  
9 necessary to redress injury to consumers resulting from that Defendant's violations  
10 of the FTC Act after December 14, 2018, including, but not limited to, rescission  
11 or reformation of contracts, restitution, the refund of monies paid, and the  
12 disgorgement of ill-gotten monies; and

13 D. Award Plaintiff the costs of bringing this action, as well as such other and  
14 additional relief as the Court may determine to be just and proper.

15 DATED this 3<sup>rd</sup> day of February, 2020.

16  
17 Respectfully submitted,  
18 Alden F. Abbott  
19 General Counsel

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