

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

COMMISSIONERS: **William E. Kovacic, Chairman**
 Pamela Jones Harbour
 Jon Leibowitz
 J. Thomas Rosch

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| <p>In the Matter of</p> <p>BIOQUE TECHNOLOGIES, INC.,</p> <p>VITTORIO A. BONOMO, individually and as a director of Bioque Technologies, Inc., and</p> <p>CHRISTINE A. GUILMAN, individually and as an officer of Bioque Technologies, Inc.</p> | <p>)</p> | <p>DOCKET NO.</p> |
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COMPLAINT

The Federal Trade Commission, having reason to believe that Bioque Technologies, Inc., a corporation, and Vittorio A. Bonomo, individually and as a director of the corporation, and Christine A. Guilman, individually and as an officer of the corporation (“Respondents”), have violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Bioque Technologies, Inc. (“Bioque”) is a Virginia corporation with its principal office or place of business at 200 Country Club Drive SW, Blacksburg, Virginia 24060.
2. Respondent Vittorio A. Bonomo is a director of Bioque. Individually or in concert with others, he formulates, directs, controls, or participates in the policies, acts, or practices of Bioque, including the acts and practices alleged in this complaint. His principal office or place of business is the same as that of the corporation.
3. Respondent Christine A. Guilman is an officer of Bioque. Individually or in concert with others, she formulates, directs, controls, or participates in the policies, acts, or practices of Bioque, including the acts and practices alleged in this complaint. Her principal office or place of business is the same as that of the corporation.
4. Respondents have labeled, advertised, offered for sale, sold, and distributed Serum GV, a purported cancer treatment, to the public. Serum GV is a topical serum containing annona muricata as the purported active ingredient. Annona muricata, also known as graviola, is an extract from the soursop or guanabana tropical fruit tree. Serum GV is a “drug” within the meaning of Sections 12 and 15 of the Federal Trade Commission Act.
5. The acts and practices of Respondents alleged in this complaint have been in or affecting commerce, as “commerce” is defined in Section 4 of the Federal Trade Commission Act.

6. Respondents have disseminated or have caused to be disseminated advertisements for Serum GV, including but not necessarily limited to the attached Exhibit A. These advertisements contain the following statements:

a. **SERUM GV**

Extraordinarily effective topical skin cancer treatment

Clinically proven and professionally endorsed formulation—active ingredient prevents and helps correct melanoma

Stamp of approval—The medical profession has recognized Serum GV as the only available and effective topical treatment for skin cancer.

Keep the doctor away—Clinical trials and research studies have demonstrated that Serum GV's active ingredient—a glycol isolate of annona muricata—prevents development of melanoma; it has a natural affinity to cancer cells in their earliest stages and destroys them by cutting off their energy supply. Serves as an excellent non-surgical alternative for abnormal skin conditions—such as moles, lumps and warts.

Support System—In cases where cancer has already appeared in the skin tissue, Serum GV boosts the body's own defense system to destroy the cancer cells.

* * *

Gently massage a small amount of Serum GV into and around targeted areas of abnormality — such as moles, lumps, and warts. Apply at least once daily; applying twice will speed up results.

[Exhibit A, Page 1 (bold and italics in original).]

7. Through the means described in Paragraph 6, Respondents have represented, expressly or by implications, that Serum GV:

- a. is an effective treatment for skin cancer, including melanoma; and
- b. prevents melanoma.

8. Through the means described in Paragraph 6, Respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representations set forth in Paragraph 7, at the time the representations were made.

9. In truth and in fact, Respondents did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 7, at the time the representations were made. Therefore, the representation set forth in Paragraph 8 was, and is, false and misleading.

10. Through the means described in Paragraph 6, Respondents have represented, expressly or by implication, that Serum GV:

- a. is recognized by the medical profession as an effective treatment for skin cancer; and
- b. is clinically proven to prevent or treat melanoma.

11. In truth and in fact, Serum GV is not recognized by the medical profession as an effective treatment for skin cancer and is not clinically proven to prevent or treat melanoma. Therefore, the representations set forth in Paragraph 10 were, and are, false and misleading.

12. The acts and practices of Respondents as alleged in this complaint constitute unfair or deceptive acts or practices and the making of false advertisements, in or affecting commerce in violation of Sections 5(a) and 12 of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this _____ day of _____, 2008, has issued this complaint against Respondents.

By the Commission.

Donald S. Clark
Secretary

SEAL: