

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

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)	
In the Matter of)	
)	
Your Therapy Source, LLC,)	
a Texas limited liability company,)	
)	File No. 171-0134
Neeraj Jindal,)	
an individual, and)	
)	
Sheri Yarbray,)	
an individual.)	
)	

AGREEMENT CONTAINING CONSENT ORDER

The Federal Trade Commission (“Commission”) has initiated an investigation of certain acts and practices of Your Therapy Source, LLC, Neeraj Jindal, and Sheri Yarbray, collectively “Proposed Respondents.” The Commission’s Bureau of Competition has prepared a draft administrative complaint (“Draft Complaint”). The Bureau of Competition and Proposed Respondents enter into this Agreement Containing Consent Order (“Consent Agreement”) to resolve the allegations in the Draft Complaint through a proposed Decision and Order (“Decision and Order”), both of which are attached, to present to the Commission.

IT IS HEREBY AGREED by and between Proposed Respondents, by their duly authorized officers and attorneys, and counsel for the Commission that:

1. Proposed Respondent Your Therapy Source, LLC is a limited liability company organized, existing, and doing business under and by virtue of the laws of the State of Texas, with its headquarters and principal place of business located at 8624 Mid Cities Boulevard, Suite 200, North Richland Hills, Texas 76182.
2. Proposed Respondent Neeraj Jindal is an individual and owned Fit 4 Life Therapy, LLC, d/b/a Integrity Home Therapy (“Integrity”) from 2013 until he sold Integrity in August 2017. His principal address is located at 1901 Long Prairie Road, Suite 220-75, Flower Mound, Texas 75022.
3. Proposed Respondent Sheri Yarbray owns Your Therapy Source, LLC, and has been its Chief Executive Officer for more than 10 years. Her principal address is

located at 8624 Mid Cities Boulevard, Suite 200, North Richland Hills, Texas 76182.

4. Proposed Respondents admit all the jurisdictional facts set forth in the Draft Complaint.
5. Proposed Respondents waive:
 - a. any further procedural steps;
 - b. the requirement that the Decision and Order contain a statement of findings of fact and conclusions of law;
 - c. all rights to seek judicial review or otherwise to challenge or contest the validity of the Decision and Order entered pursuant to this Consent Agreement; and
 - d. any claim under the Equal Access to Justice Act.
6. This Consent Agreement is for settlement purposes only and does not constitute an admission by Proposed Respondents that the law has been violated as alleged in the Draft Complaint, or that the facts as alleged in the Draft Complaint, other than jurisdictional facts, are true.
7. Proposed Respondents shall submit an initial compliance report, pursuant to Commission Rule 2.33, 16 C.F.R. § 2.33, no later than 30 days after the date on which Proposed Respondents execute this Consent Agreement and subsequent compliance reports every 30 days thereafter until the Decision and Order becomes final. After the Decision and Order becomes final, the reporting obligations contained in the Decision and Order shall control and the reporting obligations under this Consent Agreement shall cease. Each compliance report shall set forth in detail the manner in which Proposed Respondents have complied, have prepared to comply, are complying, and will comply with the Consent Agreement and the Decision and Order. Proposed Respondents shall provide sufficient information and documentation to enable the Commission to determine independently whether Proposed Respondents are in compliance with the Consent Agreement and the Decision and Order.
8. Each compliance report submitted pursuant to Paragraph 7 above shall be verified in the manner set forth in 28 U.S.C. § 1746. Proposed Respondent Neeraj Jindal and Proposed Respondent Sheri Yarbray shall each verify his or her compliance report. Each compliance report by Proposed Respondent Your Therapy Source, LLC, shall be verified by the Chief Executive Officer or other officer or employee specifically authorized to perform this function. Commission Rule 2.41(a), 16 C.F.R. § 2.41(a), requires that the Commission receive an original and 2 copies of each compliance report. Proposed Respondents shall file a paper original of each compliance report with the Secretary of the Commission and electronic copies of

each compliance report with the Secretary at ElectronicFilings@ftc.gov, and with the Compliance Division at bccompliance@ftc.gov.

9. This Consent Agreement, and any compliance reports filed pursuant to this Consent Agreement, shall not become part of the public record of the proceeding unless and until the Commission accepts the Consent Agreement. If the Commission accepts this Consent Agreement, the Commission will place it, together with the Draft Complaint, the proposed Decision and Order, an explanation of the provisions of the proposed Decision and Order, and any other information that may help interested persons understand the order on the public record for the receipt of comments for 30 days.
10. This Consent Agreement contemplates that, if the Commission accepts the Consent Agreement, the Commission thereafter may withdraw its acceptance of this Consent Agreement and notify Proposed Respondents, in which event the Commission will take such action as it may consider appropriate. If the Commission does not subsequently withdraw such acceptance pursuant to the provisions of Commission Rule 2.34, 16 C.F.R. § 2.34, the Commission may, without further notice to Proposed Respondents:
 - a. issue and serve its Complaint (in such form as the circumstances may require); and
 - b. issue and serve its Decision and Order in disposition of the proceeding.
11. The Decision and Order shall become final upon service. Delivery of the Complaint and the Decision and Order to Proposed Respondents by any means provided in Commission Rule 4.4(a), 16 C.F.R. § 4.4(a), or by delivery to United States counsel for Proposed Respondents identified in this Consent Agreement, shall constitute service to Proposed Respondents. Proposed Respondents waive any rights they may have to any other manner of service. Proposed Respondents also waive any rights they may otherwise have to service of any Appendices attached or incorporated by reference into the Decision and Order, if Proposed Respondents are already in possession of such Appendices, and agree that they are bound to comply with and will comply with the Decision and Order to the same extent as if they had been served with copies of the Appendices.
12. The Complaint may be used in construing the terms of the Decision and Order and no agreement, understanding, representation, or interpretation not contained in the Decision and Order or the Consent Agreement may be used to vary or contradict the terms of the Decision and Order.

13. By signing this Consent Agreement, Proposed Respondents represent and warrant that:
- a. they can fulfill all the terms of and accomplish the full relief contemplated by the Decision and Order; and
 - b. all parents, subsidiaries, affiliates, and successors necessary to effectuate the full relief contemplated by this Consent Agreement and the Decision and Order are parties to this Consent Agreement and are bound as if they had signed this Consent Agreement and were made parties to this proceeding, or are within the control of parties to this Consent Agreement and the Decision and Order.
14. Proposed Respondents have read the Draft Complaint and the proposed Decision and Order. Proposed Respondents agree to comply with the terms of the proposed Decision and Order from the date they sign this Consent Agreement. Proposed Respondents understand that once the Commission has issued the Decision and Order, they will be required to file one or more compliance reports setting forth in detail the manner in which they have complied, have prepared to comply, are complying, and will comply with the Decision and Order. When final, the Decision and Order shall have the same force and effect and may be altered, modified, or set aside in the same manner and within the same time as provided by statute for other orders. Proposed Respondents further understand that they may be liable for civil penalties in the amount provided by law for each violation of the Decision and Order.

RESPONDENTS	FEDERAL TRADE COMMISSION
<p>_____</p> <p>By: Sheri Yarbray, individually and as Chief Executive Officer of Your Therapy Source, LLC</p> <p>Dated: _____</p>	<p>_____</p> <p>By: Robert S. Canterman Attorney Bureau of Competition</p>
<p>_____</p> <p>Daniel A. Kotchen, Esq. Kotchen & Low LLP Counsel for Ms. Sheri Yarbray, individually, and for Your Therapy Source, LLC</p> <p>Dated: _____</p>	<p>_____</p> <p>Kara L. Monahan Deputy Assistant Director Bureau of Competition</p>
<p>_____</p> <p>By: Neeraj Jindal</p> <p>Dated: _____</p>	<p>_____</p> <p>Markus H. Meier Assistant Director Bureau of Competition</p>
<p>_____</p> <p>William E. Berlin, Esq. Hall, Render, Killian, Heath & Lyman, P.C. Counsel for Mr. Neeraj Jindal</p> <p>Dated: _____</p>	<p>_____</p> <p>Haidee L. Schwartz Deputy Director Bureau of Competition</p>
	<p>_____</p> <p>D. Bruce Hoffman Director Bureau of Competition</p> <p>Dated: _____</p>