

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: