

UNITED STATE DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

JEUNESSE, LLC, a Florida  
limited liability company,

Plaintiff,

vs.

Case No.: 6:13-cv-1151-Orl-18DAB

WELL-MED GLOBAL, LLC  
a foreign limited liability company,

Defendant,

**FILED**  
*July 30, 2013*  
Date \_\_\_\_\_ Time \_\_\_\_\_  
CLERK, U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO, FLORIDA

**COMPLAINT FOR DAMAGES WITH INJUNCTIVE RELIEF SOUGHT  
AND DEMAND FOR JURY TRIAL**

Plaintiff, JEUNESSE, LLC, through its attorneys, hereby brings this  
Complaint for Damages and Declaratory and Injunctive relief against Defendant,  
WELL-MED GLOBAL, LLC, and states the following:

**Preliminary Statement**

1. This is an action intended to stop the Defendant from negligently or  
willfully and knowingly making, publishing, and disseminating false statements  
related to Plaintiff's products for the benefit of the Defendant, Plaintiff's direct  
competitor, which have caused damage to Plaintiff, and have directly affected  
interstate and international commerce.

2. This is an action for damages and punitive damages arising from and attributable to the Defendant's negligent or willful and malicious attempts to compete unfairly with Plaintiff by making, publishing, and disseminating false statements related to Plaintiff's products.

### **Jurisdiction and Venue**

3. Plaintiff, JEUNESSE, LLC is a Florida limited liability company, with its principal place of business located at 650 Douglas Avenue, Suite 1020, Altamonte Springs, Florida 32714.

4. Defendant, WELL-MED GLOBAL, LLC, is a California corporation with its principal place of business located at 1900 S. State College Boulevard, Suite 250, Anaheim, California 92806.

5. This Court has jurisdiction pursuant to 28 U.S.C. § 1332 because there is complete diversity between Plaintiff and Defendant and the amount in controversy exceeds \$75,000. This Court also has jurisdiction over this matter pursuant to 15 U.S.C. § 1121 and 28 U.S.C. § 1331.

6. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this District because a substantial part of the activities giving rise to the claims alleged herein occurred in this District.

7. The Defendant is subject to the jurisdiction of this Court pursuant to Chapter 48, Florida Statutes, because the causes of action alleged herein arise out of the Defendant:

- a. operating, conducting, engaging in, or carrying on a business, or business venture in the State of Florida, or having an office or agency in this state; and/or
- b. committing a tortious act within this state; and/or
- c. engaging in solicitation or service activities within this state; and/or
- d. products, materials, or things processed, serviced, or manufactured by the defendant anywhere were used or consumed within this state in the ordinary course of commerce, trade, or use.

8. Additionally and alternatively, the Defendant is subject to the jurisdiction of this Court pursuant to Chapter 48, Florida Statutes, because, upon information and belief, at all relevant times hereto, Defendant has been engaged in substantial and not isolated activity within the State of Florida.

9. Defendant, WELL-MED GLOBAL, LLC regularly conducts business in the State of Florida, maintains agents who solicit customers and purchase orders for products in the State of Florida, maintains a branch or Authorized Treatment Center in Florida, and has negligently or willfully and knowingly made, published, and disseminated false statements related to Plaintiff's products in direct competition with JEUNESSE, LLC in the State of Florida. Accordingly WELL-

MED GLOBAL, LLC is amenable to service of process pursuant to Section 48.193, Florida Statutes (2012) and other authority.

### **Facts**

10. Plaintiff, JEUNESSE, LLC, is a limited liability company that has developed and maintains a worldwide multi-level marketing business that distributes products intended to promote health, skin care, and beauty which use innovative stem-cell technology.

11. JEUNESSE, LLC markets its products through a variety of channels, including the internet and distributors.

12. JEUNESSE, LLC is a Florida Limited Liability Company with its principal place of business in Altamonte Springs, Seminole County, Florida.

13. JEUNESSE, LLC began operating in 2009.

14. JEUNESSE, LLC has invested substantial sums of money in order to research and develop its products, and to market and advertise the same. In the course of that long-standing and ongoing effort JEUNESSE, LLC has developed substantial goodwill in the marketplace as between plaintiff and the suppliers of goods and services as well as distributors and consumers.

15. Upon information and belief, WELL-MED GLOBAL, LLC began operating in October of 2012.

16. Upon information and belief, WELL-MED GLOBAL, LLC is a direct competitor of JEUNESSE, LLC.

17. WELL-MED GLOBAL, LLC is a limited liability company that has begun to distribute products skin care products which alleges to also use stem-cell technology.

18. WELL-MED GLOBAL, LLC operates an interactive internet website ([www.wellmedglobal.com](http://www.wellmedglobal.com)) which is accessible in Florida.

19. WELL-MED GLOBAL, LLC's website includes a 108-slide presentation in which WELL-MED GLOBAL, LLC sets forth "The FACTS about Jeunesse:" in which WELL-MED GLOBAL, LLC negligently or willfully and knowingly asserts false statements against JEUNESSE, LLC by stating that JEUNESSE derives the growth products used in its product from E-Coli Bacteria. *See* Pages 74-76 of Exhibit A which is a true and correct copy of the interactive presentation currently available on WELL-MED GLOBAL, LLC's website.

20. Additionally, WELL-MED GLOBAL, LLC is distributing a presentation via electronic mail and in-person presentations which negligently or willfully and knowingly asserts false statements against JEUNESSE, LLC by stating that JEUNESSE derives the growth products used in its product from E-Coli Bacteria. *See* page 43 of Exhibit B.

21. The statements that JEUNESSE, LLC's products are derived from E-Coli Bacteria are false, misleading, unfair and deceptive.

22. Moreover, the "Head to Head Product Comparison" on page 43 of Exhibit B is also false, misleading, unfair and deceptive advertising material

23. The statements being made by WELL-MED GLOBAL, LLC as to JEUNESSE, LLC's products are false and Defendant knew or should have known such statements are false.

24. Not only are the statements false but Defendant, in making the statements above, have deceptively and misleadingly implied dishonesty, unfair dealing and wrongdoing by JEUNESSE, LLC.

25. WELL-MED GLOBAL, LLC's statements are being made to damage JEUNESSE, LLC's business relationships with its current and prospective customers and distributors and to damage JEUNESSE, LLC's good will for the benefit of Defendant's unlawfully competing business.

26. JEUNESSE, LLC's reputation and good will have been damaged as a result of Defendant's defamatory statements and, upon information and belief, Defendant continues to make such defamatory statements to customers and distributors throughout Florida and the United States.

27. Upon information and belief, Defendant has also made defamatory and disparaging statements about JEUNESSE, LLC and JEUNESSE, LLC's

products to many of JEUNESSE, LLC's distributors in an effort to damage JEUNESSE, LLC's business and goodwill and to benefit Defendant's unlawfully competing business.

28. Pursuant to section 688.005, Florida Statutes, the Lanham Act, and the Florida Unfair and Deceptive Trade Practices Act, JEUNESSE, LLC may recover from Defendant its reasonable attorneys' fees and costs in prosecuting this matter. JEUNESSE, LLC has retained the law firm of Cole, Scott & Kissane PA to prosecute this action, and is thereby obligated to pay the firm reasonable attorneys' fees for such services.

29. All conditions precedent to bringing this action have occurred or have been waived.

### **COUNT I - BUSINESS DISPARAGEMENT**

30. This is a cause of action for business disparagement against Defendant which exceeds \$75,000.00, exclusive of costs, interest, and attorneys' fees. JEUNESSE, LLC re-alleges and incorporates herein the allegations contained in paragraphs 1 through 29.

31. As set forth above and herein, Defendant's actions constitute actionable disparagement under Florida law.

32. Upon information and belief, Defendant has been actively defaming and disparaging JEUNESSE, LLC and JEUNESSE, LLC's products to

JEUNESSE, LLC's current and prospective customers, distributors and to the public as a whole.

33. These disparaging statements, among others, by Defendant are clearly made in an effort to damage JEUNESSE, LLC's current and/or prospective business relationships.

34. Defendant's statements are made either negligently or intentionally with the aim of damaging JEUNESSE, LLC's business relationships with its current and prospective customers, distributors and to the public as a whole and damaging JEUNESSE, LLC's good will for the benefit of Defendant's unlawfully competing business.

35. JEUNESSE, LLC's reputation and good will has been damaged as a result of Defendant's disparaging statements and, upon information and belief, Defendant continues to make such statements JEUNESSE, LLC's current and prospective customers, distributors and to the public as a whole throughout Florida and the United States.

36. As a direct and proximate result of Defendant's disparaging statements, JEUNESSE, LLC has been, and will continue to be, damaged.

WHEREFORE, JEUNESSE, LLC demands a judgment against Defendant for damages, costs of this action, injunctive relief, reasonable attorneys' fees and

any such other relief the Court deems appropriate. JEUNESSE, LLC reserves the right to seek to amend this Complaint to add claims for punitive damages.

**COUNT II - TORTIOUS INTERFERENCE WITH ADVANTAGEOUS  
BUSINESS RELATIONSHIPS**

37. This is a cause of action against Defendant for tortious interference with advantageous business relationships which exceeds \$75,000.00, exclusive of costs, interest, and attorneys' fees. JEUNESSE, LLC re-alleges and incorporates herein the allegations contained in paragraphs 1 through 29.

38. As set forth above and herein, Defendant tortiously interfered (and continues to tortiously interfere) with JEUNESSE, LLC's advantageous business relationships with its customers, prospective customers, and distributors.

39. Notwithstanding Defendant's knowledge of the business relationships between JEUNESSE, LLC and its customers, prospective customers and distributors, Defendant has negligently or intentionally interfered and continues to negligently or intentionally interfere with such relationships.

40. As a direct and proximate result of Defendant's interference, JEUNESSE, LLC has been and will continue to be damaged.

WHEREFORE, JEUNESSE, LLC demands a judgment against Defendant for damages, injunctive relief, costs of this action, reasonable attorneys' fees and any such other relief the Court deems appropriate. JEUNESSE, LLC reserves the right to seek to amend this Complaint to add claims for punitive damages.

**COUNT III - FLORIDA DECEPTIVE AND UNFAIR  
TRADE PRACTICES ACT**

41. This is a cause of action against Defendant under the Florida Deceptive and Unfair Trade Practices Act, §§ 501.201, et seq., Florida Statutes (“FDUTPA”), which exceeds \$75,000.00, exclusive of costs, interest, and attorneys' fees. JEUNESSE, LLC re-alleges and incorporates herein the allegations contained in paragraphs 1 through 29.

42. Defendant has engaged in unconscionable, deceptive, and unfair acts and practices in the conduct of its trade by, among other things, defaming and disparaging JEUNESSE, LLC’s business and products to distributors and customers in an effort to unlawfully compete with JEUNESSE, LLC.

43. Defendant's practices offend established public policy, are immoral, unethical, oppressive, unscrupulous, or substantially injurious to consumers and competitors, and violate Defendant's obligations under FDUTPA.

44. JEUNESSE, LLC has and will suffer damages and losses as a result of Defendant's improper and unlawful acts and practices.

45. The damages suffered by JEUNESSE, LLC are irreparable, difficult to quantify and continue to accrue.

WHEREFORE, JEUNESSE, LLC demands judgment in its favor and against Defendant in the amount of all actual damages, together with attorneys' fees, court costs, expenses, pre-judgment interest, a temporary and permanent

injunction enjoining Defendant from engaging in the conduct herein alleged, and such other relief as this Court deems just and equitable.

**COUNT IV - LANHAM ACT**

46. This is a cause of action against Defendant for false and misleading advertising and unfair competition under section 43(a) of the Lanham Act, 15 U.S.C.A. § 1125(a), which exceeds \$75,000.00, exclusive of costs, interest, and attorneys' fees. JEUNESSE, LLC re-alleges and incorporates herein the allegations contained in paragraphs 1 through 29.

47. Defendant has made and continues to make false and/or misleading statements regarding JEUNESSE, LLC and JEUNESSE, LLC's products to distributors and customers throughout the United States.

48. In unlawful competition with JEUNESSE, LLC, Defendant has disparaged and defamed JEUNESSE, LLC and/or JEUNESSE, LLC's products to obtain customers and distributors.

49. These false or misleading statements of fact either have actually deceived or have a tendency to deceive a substantial segment of Defendant's audience (i.e. -- JEUNESSE, LLC's customers, distributors and the public as a whole).

50. Defendant's deceptive statements about JEUNESSE, LLC and JEUNESSE, LLC's products are material, and Defendant has made these false and misleading statements in interstate commerce.

51. JEUNESSE, LLC has been or is likely to be injured as a result of Defendant's false and misleading statements, either by direct loss of sales to the Defendant or by a lessening of goodwill associated with JEUNESSE, LLC and/or JEUNESSE, LLC's products.

WHEREFORE, JEUNESSE, LLC demands judgment in its favor and against Defendant in the amount of all actual damages, together with attorneys' fees, court costs, expenses, pre-judgment interest, a temporary and permanent injunction enjoining Defendant from engaging in the improper conduct herein alleged, and such other relief as this Court deems just and equitable.

**COUNT V - TEMPORARY AND PERMANENT INJUNCTION**

52. This is a cause of action for injunctive relief against Defendant. JEUNESSE, LLC re-alleges and incorporates the allegations contained within paragraphs 1 through 29 as if fully set forth herein.

53. Florida law provides for injunctions where, as here, a party is tortiously interfering with another party's relationships and spreading false statements about the other party to try to gain a competitive advantage.

54. JEUNESSE, LLC has a substantial likelihood of success on the merits in this litigation.

55. Irreparable harm to JEUNESSE, LLC is presumed under the circumstances of this case, including the interference with customer relationships, and disparagement of the reputation of JEUNESSE, LLC and its principals.

56. Additionally, unless restrained and enjoined by Order of this Court, Defendant will persist in causing JEUNESSE, LLC immediate and irreparable injury.

57. JEUNESSE, LLC is without an adequate remedy at law.

58. JEUNESSE, LLC requests that this Court enjoin Defendant from tortiously interfering with JEUNESSE, LLC's advantageous business relationships and from further publishing false and defamatory information concerning JEUNESSE, LLC and JEUNESSE, LLC's products to third parties.

59. Enjoining Defendant will serve the public interest.

60. Based upon the totality of circumstances and the balancing of the respective hardships and equities, the harm to JEUNESSE, LLC far outweighs any possible injury that Defendant might suffer if the injunction is granted. Indeed, JEUNESSE, LLC is merely asking this Court to enjoin Defendant from activities in which Defendant have no legal right to engage in.

WHEREFORE, JEUNESSE, LLC respectfully requests that the Court:

A. Enter a temporary and permanent injunction that prohibits Defendant, and anyone acting on behalf of or in concert or in conjunction with Defendant, from:

- a. Tortiously interfering with JEUNESSE, LLC 's contractual and/or advantageous business relationships;
- b. Publishing false and defamatory information concerning JEUNESSE, LLC and its principals to third parties;
- c. Directing Defendant to remove all false and defamatory information concerning JEUNESSE, LLC from its website;
- d. Requiring Defendant to cease use of the presentation materials attached as Exhibit B and all similar presentation materials;
- e. Requiring Defendant to issue a retraction of its false and defamatory statements concerning JEUNESSE, LLC's products; and
- f. Requiring Defendant to utilize its best efforts to remove the false and defamatory information concerning JEUNESSE, LLC which it improperly disseminated from the public domain, including requesting all persons and entities to cease use of any materials Defendant have created which make false and defamatory statements as to JEUNESSE, LLC.

B. Award to JEUNESSE, LLC any and all additional relief that this Court deems just and reasonable.

**COUNT VI - UNFAIR COMPETITION**

61. This is a cause of action against Defendant for unfair competition which exceeds \$75,000.00, exclusive of costs, interest, and attorneys' fees. JEUNESSE, LLC re-alleges and incorporates herein the allegations contained in paragraphs 1 through 29.

62. Defendant's false and misleading statements concerning JEUNESSE, LLC's products constitute an unfair method of competition.

63. As a consequence of the foregoing, Plaintiff has suffered and will continue to suffer irreparable harm and loss.

WHEREFORE, by virtue of the Defendant's false and misleading statements, Plaintiff, JEUNESSE, LLC, demands judgment in its favor and against Defendant for preliminary and permanent injunctive relief, actual damages, incidental, consequential and special damages, and attorney's fees and costs.

**COUNT VII - TRADE LIBEL**

64. This is a cause of action against Defendant for unfair competition which exceeds \$75,000.00, exclusive of costs, interest, and attorneys' fees. JEUNESSE, LLC re-alleges and incorporates herein the allegations contained in paragraphs 1 through 29.

65. The statements described in this Complaint are false and are not statements of opinions, but of fact.

66. Defendant has falsely and unfairly stated that JEUNESSE, LLC's products are derived from E-Coli bacteria.

67. Defendant, in making the statements described herein, has falsely and unfairly implied dishonesty, unfair dealing and wrongdoing by JEUNESSE, LLC.

68. By reason of the aforesaid acts, JEUNESSE, LLC has lost one or more prospective customers and the terms of dealing with one or more vendors have been materially changed by the vendor(s), and/or the vendor's relationship with the Plaintiff has been terminated, resulting in actual economic harm to the Plaintiff.

69. Defendant defamed JEUNESSE, LLC by making blatantly false statements to the general public, JEUNESSE, LLC's customers, and other business contacts.

70. Defendant's defamatory actions have proximately caused damage to JEUNESSE, LLC.

WHEREFORE, by virtue of the foregoing acts, JEUNESSE, LLC demands judgment in its favor and against Defendant for preliminary and permanent injunctive relief, actual damages, incidental, consequential and special damages, and attorney's fees and costs.

**DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury on all claims so triable.

Dated: July 24, 2013

COLE, SCOTT & KISSANE P.A.  
Counsel for Plaintiff  
Summit Tower, Suite 750  
1900 Summit Tower Blvd.  
Orlando, FL 32810  
Telephone: (321) 972-0025  
Facsimile: (321) 972-0099  
Email: christie.bredahl@csklegal.com  
Jeanna.bond@csklegal.com



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Christie Bredahl, Esq.  
Florida Bar No.: 0055462

JS 44 (Rev. 09/11)

**CIVIL COVER SHEET**

The JS 44 civil coversheet 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.)

**I. (a) PLAINTIFFS**

Jeunesse, LLC, a Florida limited liability company

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

(c) Attorneys (Firm Name, Address, and Telephone Number)

Christina L. Bredahl, Cole, Scott & Kissane, P.A., 1900 Summit Tower Boulevard, Orlando, Florida 32810, (321)-972-0025

**DEFENDANTS**

Well-Med Global, LLC, a foreign limited liability company

County of Residence of First Listed Defendant **Orange County, CA**  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**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                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input checked="" type="checkbox"/> 4 | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5            | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6            | <input type="checkbox"/> 6            |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 370 Other Fraud		<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 371 Truth in Lending		<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 380 Other Personal Property Damage		<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 385 Property Damage Product Liability			<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 350 Motor Vehicle		<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability		<input type="checkbox"/> 720 Labor/Mgmt. Relations	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury		<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice		<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 865 RSI (405(g))	<input checked="" type="checkbox"/> 890 Other Statutory Actions
			<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act		<input type="checkbox"/> 891 Agricultural Acts
					<input type="checkbox"/> 893 Environmental Matters
					<input type="checkbox"/> 895 Freedom of Information Act
					<input type="checkbox"/> 896 Arbitration
					<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
					<input type="checkbox"/> 950 Constitutionality of State Statutes

**V. ORIGIN**

- (Place an "X" in One Box Only)
- 1 Original Proceeding
  - 2 Removed from State Court
  - 3 Remanded from Appellate Court
  - 4 Reinstated or Reopened
  - 5 Transferred from another district (specify)
  - 6 Multidistrict Litigation

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
15 USC 1125 and 28 USC 1332

Brief description of cause:  
Defendant unfairly competing and falsely disparaging Plaintiff's products through channels of interstate commerce

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ **75,001.00**

CHECK YES only if demanded in complaint:  
JURY DEMAND:  Yes  No

**VIII. RELATED CASE(S) IF ANY**

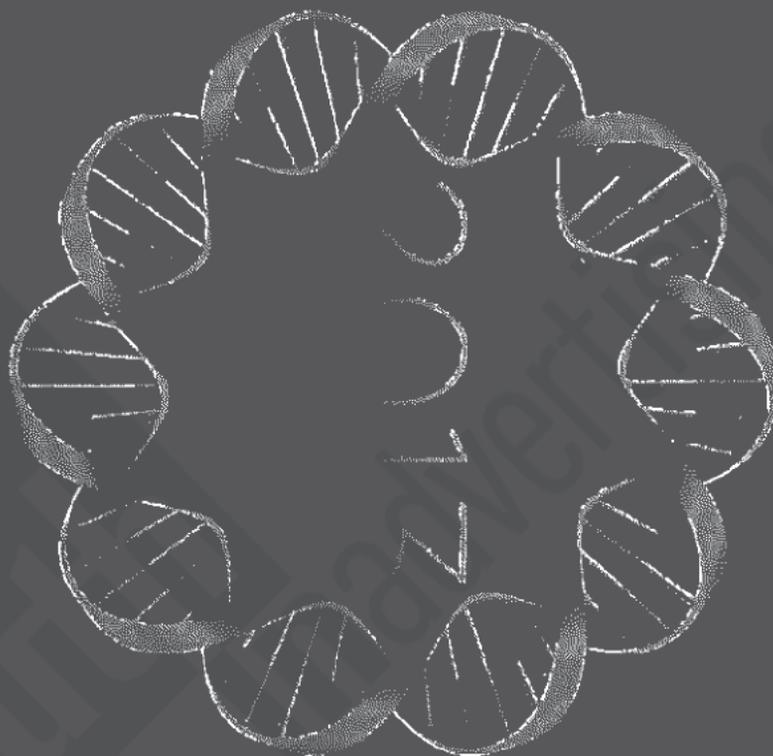
(See instructions): JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE \_\_\_\_\_ SIGNATURE OF ATTORNEY OF RECORD \_\_\_\_\_

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

Well-Med Global presents...



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# Building Your Well-Med Knowledge Base







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# Growth Factor Ingredient



# Real Science

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# Patented Formulations

Press Esc to exit full screen mode.



Here's a reality check:



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Just because something  
isn't a lie...



...doesn't make it true!



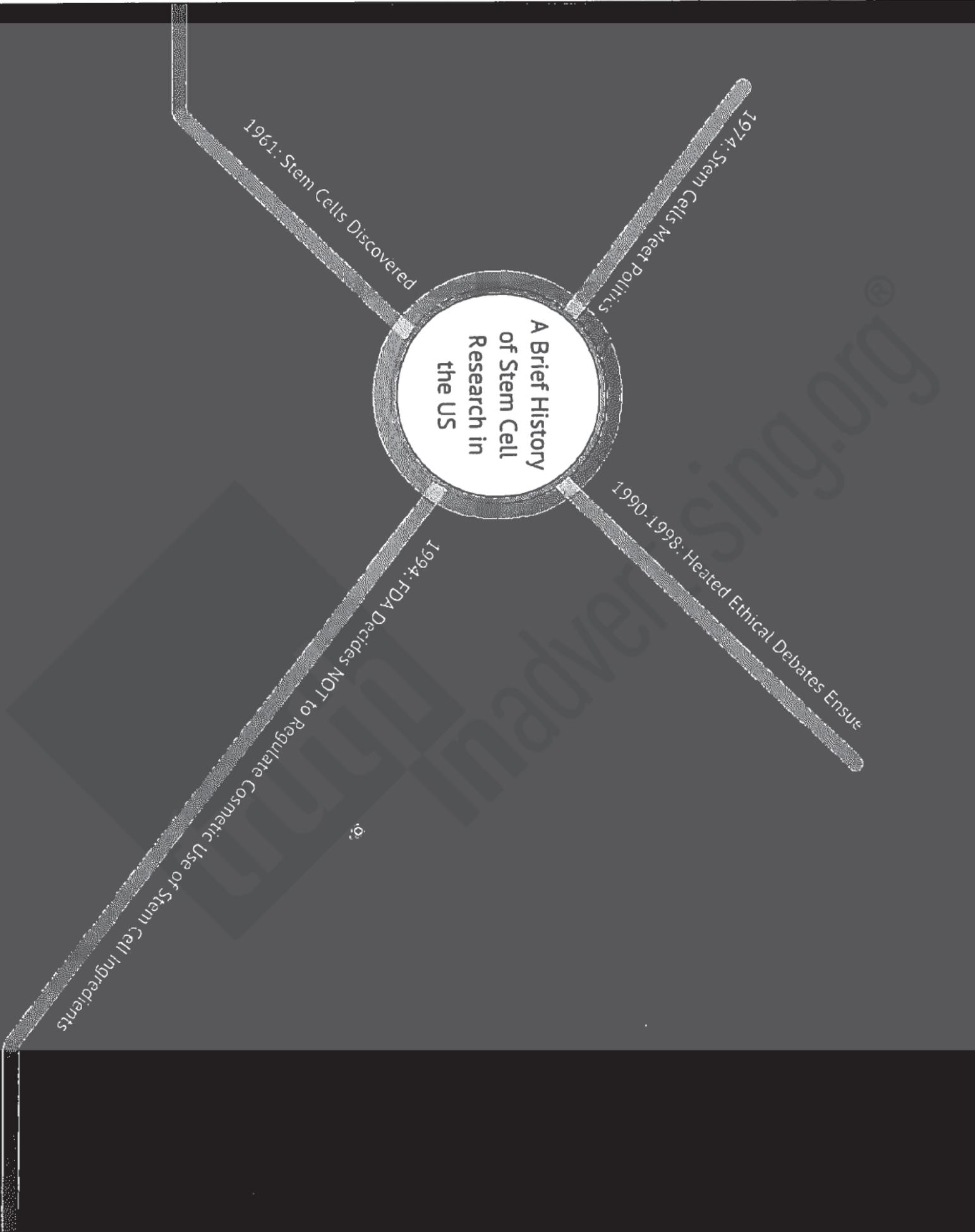
Our Objective today is to  
inform, educate and motivate  
you...



# So let's Inform You...

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A Brief History  
of Stem Cell  
Research in  
the US

1961: Stem Cells Discovered

1974: Stem Cells Meet Politics

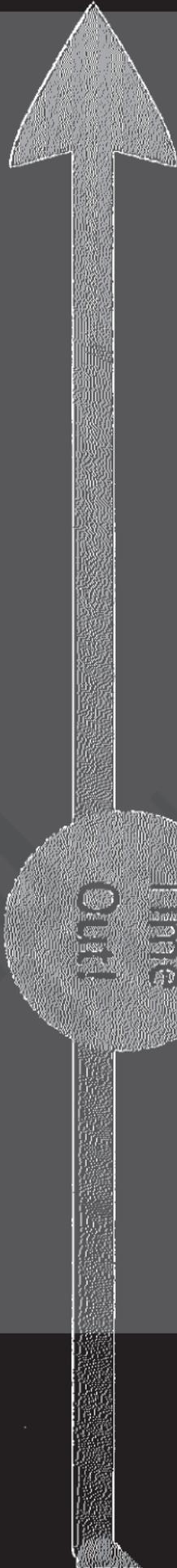
1990-1998: Heated Ethical Debates Emerge

1994: FDA Decides NOT to Regulate Cosmetic Use of Stem Cell Ingredients

# 1961: Stem Cells Discovered

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What is a Stem Cell? A Press Esc to exit full screen mode stem cell is essentially a “blank” cell, capable of becoming another more differentiated cell type in the body, such as a skin cell, a muscle cell, or a nerve cell. It can be likened to a computer hard drive – brilliant in its potential, but useless without applications to run specific functions.



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Stem Cells are the cells that are utilized to run the "applications" for growth, healing, repair and rejuvenation inside of the human body.

They are the most



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Your body has millions of stem cells starting at birth, but the natural production of stem cells starts to slow down by about age 18 - after which you pretty much have your lifetime supply of stem cells.



This is why starting at age 18, you enter the first phase of "negative" aging in your body.



The stem cells inside of everybody are the most prolific the closer to the embryonic state you can get. So fetal (embryonic), and neonatal (newborn) stem cells are the most abundant and active types of stem cells.

This is wh

# 1974: Stem Cells Meet Politics

bio:bio.org®



# 1990-1998: Heated Ethical Debates Ensur

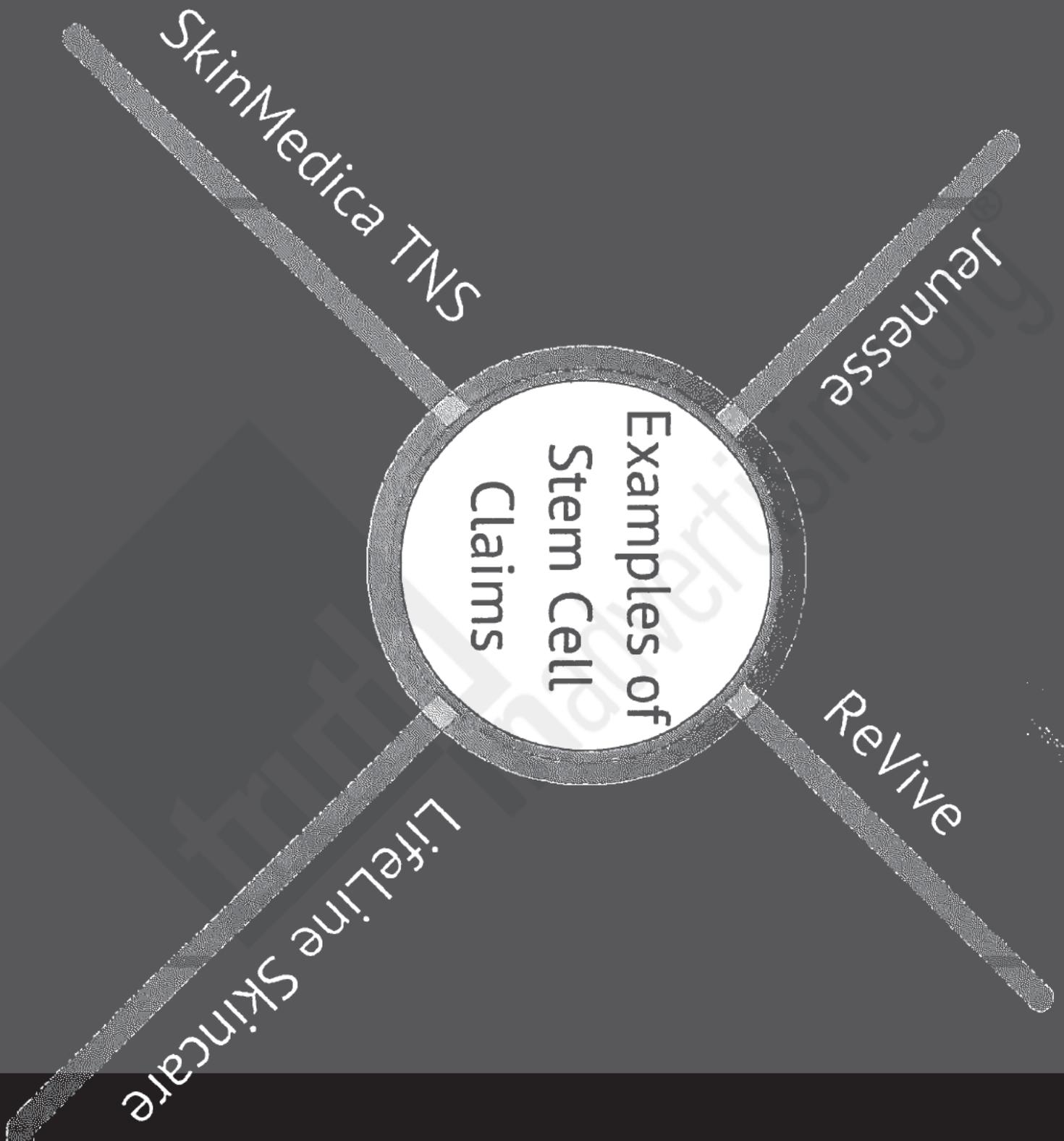






So by 2000, stem cell research guidelines were finally set, and that's when stem cell terminology first started to overtake the beauty industry in a big way.





# SkinMedica TNS

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# Jeunesses

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# ReVive

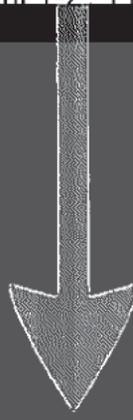
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# LifelLine Skincare

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So now let's educate You...

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In 2005, Dr. Ahmed Al-Qahtani - or  
Dr. AQ as he is known - had a major  
breakthrough in stem cell research...

Press Esc to exit full screen mode.



Dr. Ahmed Al-Qahtani, PhD in Immunology,  
M5 Clinical Microbiology



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To conduct his research, Dr. AQ applied for tissue from a research facility that specializes in screened circumcision tissue from newborn baby boys that were only days old.



Side Note: Dr. A\_Q chose to use foreskin tissue because it is a very rich source of stem cells, and it is easy to access because most parents choose to discard this tissue after circumcision.

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From this circumcision tissue, Dr. AQ developed a technique for extracting the cell line of growth factors from a baby stem cell.



Side Note: By this time, Press Esc to exit full screen mode. the science world knew that it wasn't stem cells that were important, but the growth factors - which are like the "applications" - inside of stem cells that affect change in human biology.

Dr. A\_Q applied a complex (DDDDDD) model to his research that created a major breakthrough in stem cell research, and his extraction technique was so revolutionary that the research community honored Dr. A\_Q by naming the cell line he extracted after him.



So What's a Growth Factor? Growth factors are proteins that activate less specialized cells, or help less specialized cells become more specialized inside the human body. There are 170 growth factors in the human body that activate growth, repair and healing.

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Dr. A\_Q patented his extraction process to protect his intellectual property, thus securing his future, and the future of every product he develops using his breakthrough technique.



Then, Dr. Aoki genetically replicating the growth factors from his extracted cell lines, which created the way for him to create any human growth factor he chooses using his breakthrough methods.

Press Esc to exit full screen mode.



When Dr. AQ combined his two patented methods,  
he created what we know as:



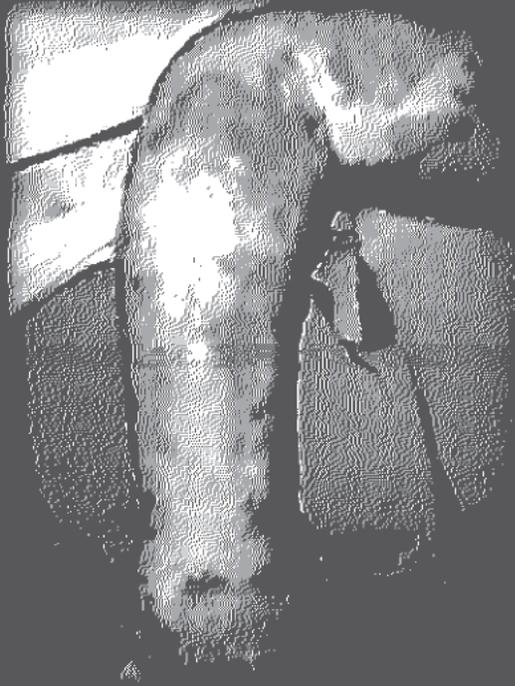
Dr. AQ's first order of business after his breakthroughs was to create a GfT application that integrated his genetically replicated human fibroblast cells - which are skin growth factors - to repair severely damaged skin. And in 2006, he got the chance to participate in an Burn Study in Guadalajara, Mexico - which was a major opportunity.



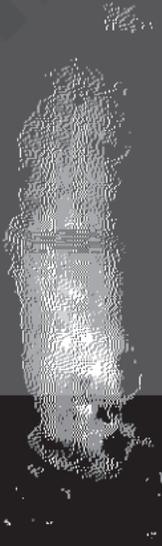
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# Before...





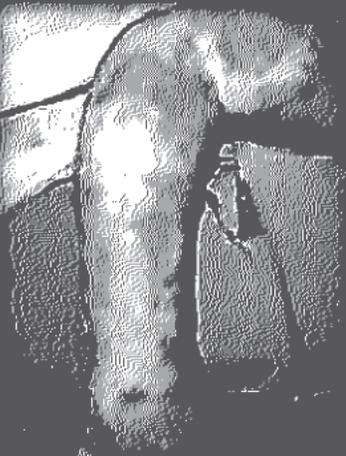
Before...



7 days...



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Before...



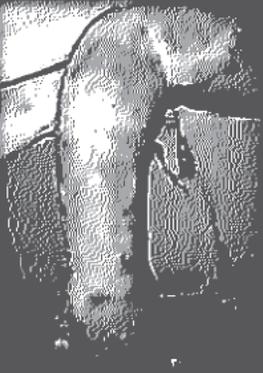
7 days...



14 days...

By 2008, Dr. AQ's serums and GfT applications were the number one selling medical grade skincare products in the world. Currently Dr. A

Dr. AQ's first order of business after his breakthroughs was to create a GfT application that integrated his genetically replicated human fibroblast cells - which are skin growth factors - to repair severely damaged skin. And in 2006, he got the chance to participate in an Burn Study in Guadalajara, Mexico - which was a major opportunity.



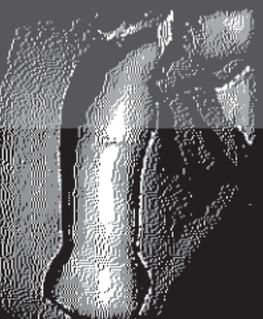
Before...



7 days...



14 days...



21 days...

By 2008, Dr. AQ's serums and GfT applications were the number one selling medical grade skincare products in the world. Currently, Dr. AQ's medical grade GfT products are distributed in 21 countries and counting.

ire...

7 days...

14 days...

By 2008, Dr. AQ's serums and GfT applications were the number one selling medical grade skincare products in the world. Currently, Dr. AQ's medical grade GfT products are distributed in 21 countries and counting.



After experiencing Press-Esc to exit full screen mode with the medical applications of his patents, Dr. AQ dedicated himself to producing premium GfT products that were available to both professionals in the medical field, and to everyday consumers around the world.

# So he developed two lines:

Press Esc to exit full screen mode.





The image features a central logo consisting of the letters "GFT" in a bold, white, sans-serif font. The letters are arranged vertically, with "G" at the top, "F" in the middle, and "T" at the bottom. The logo is set against a dark, circular background that has a textured, stippled appearance. Surrounding the central logo is a circular arrangement of text in a white, sans-serif font. The text is split into three segments: "FACTORY TECHNOLOGY" on the left, "GROWTH" on the right, and "STEM-CELL" at the bottom. The entire logo and text are centered on a dark gray background.

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13-1







SASS

XXX GET



wellmed  
GFT

# VRS™

Vaginal Rejuvenation System

well-med global





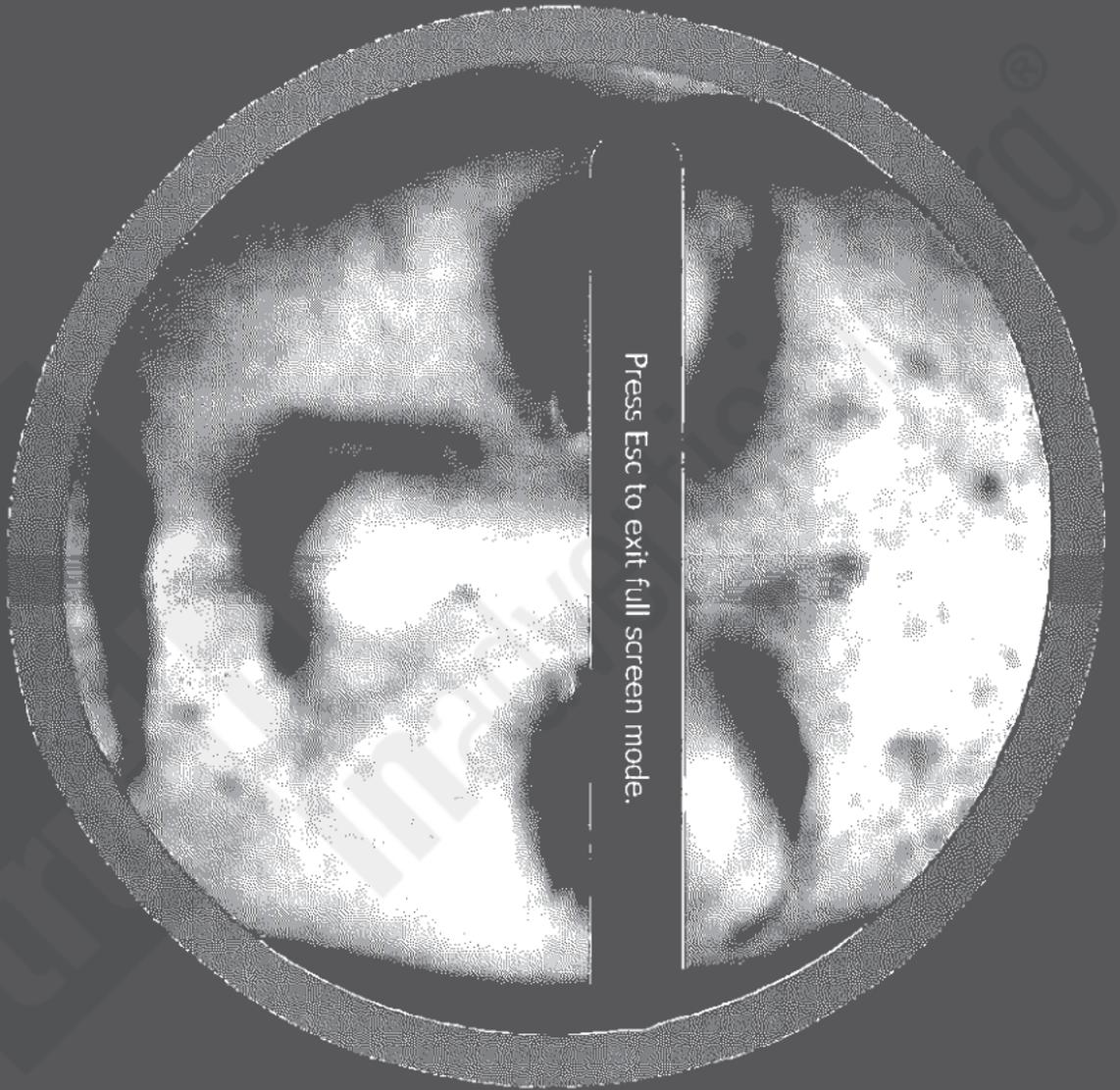
The image features a large, stylized logo for "GFT" in the center. The letters are bold and white against a dark, textured circular background. Surrounding the "GFT" are the words "GROWTH", "STEM-CELL", "FACTOR", and "THERAPY" in a white, sans-serif font, arranged in a circular path around the central logo. A faint "©" symbol is visible to the right of the "STEM-CELL" text.



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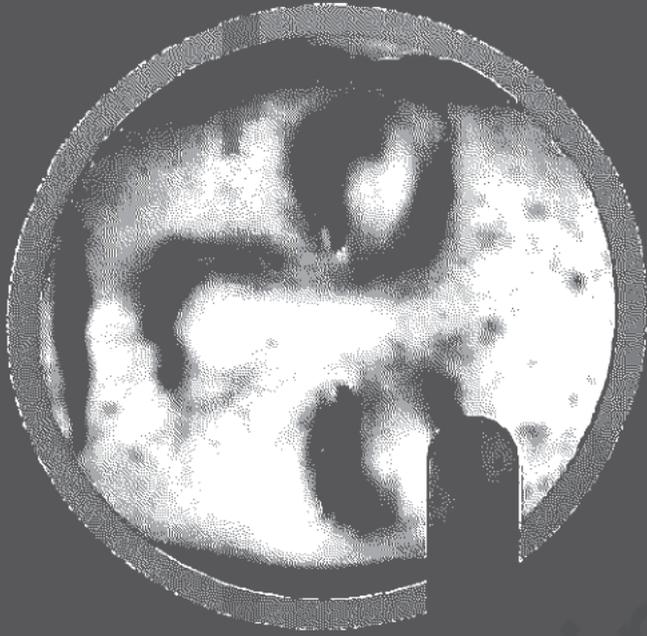
Medical Grade GfT Recovery - offered  
exclusively through our  
Authorized Treatment Center Network





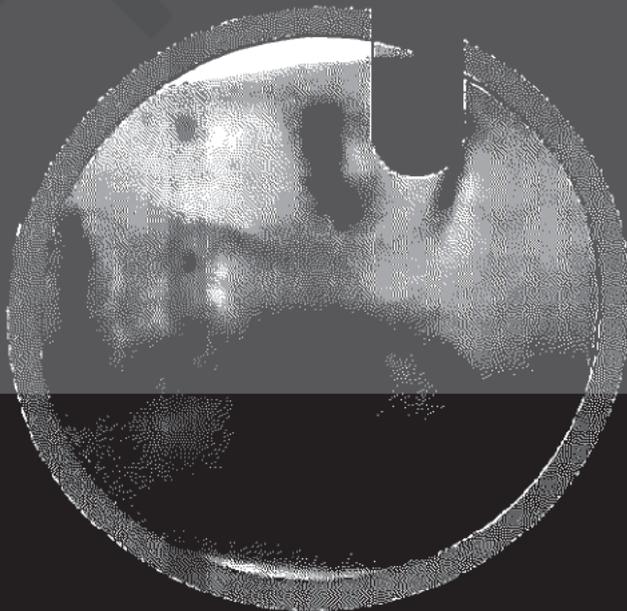
Before...





Before...

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After 8 Weeks

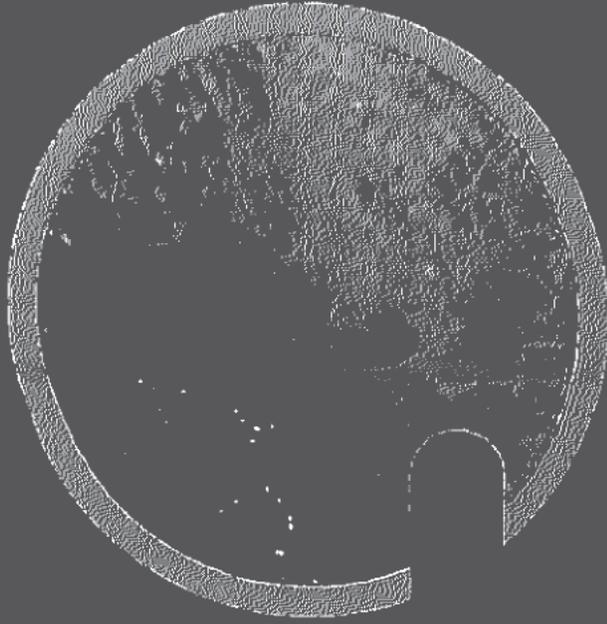






Before...





Before...

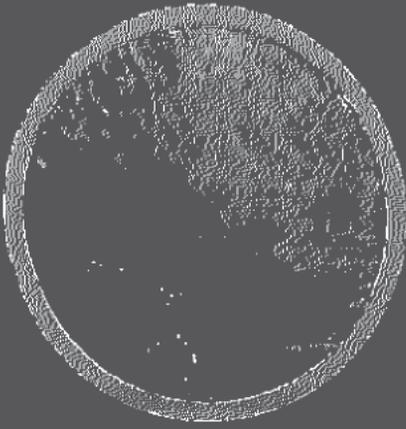
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After 1 Week



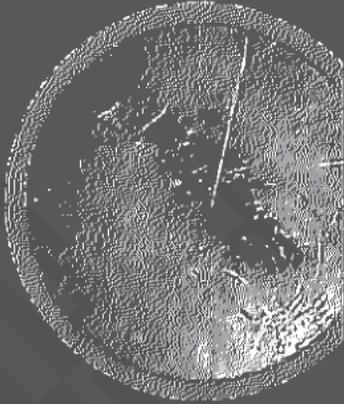
After 8 Weeks



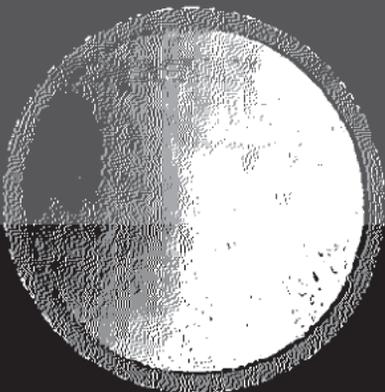
Before...



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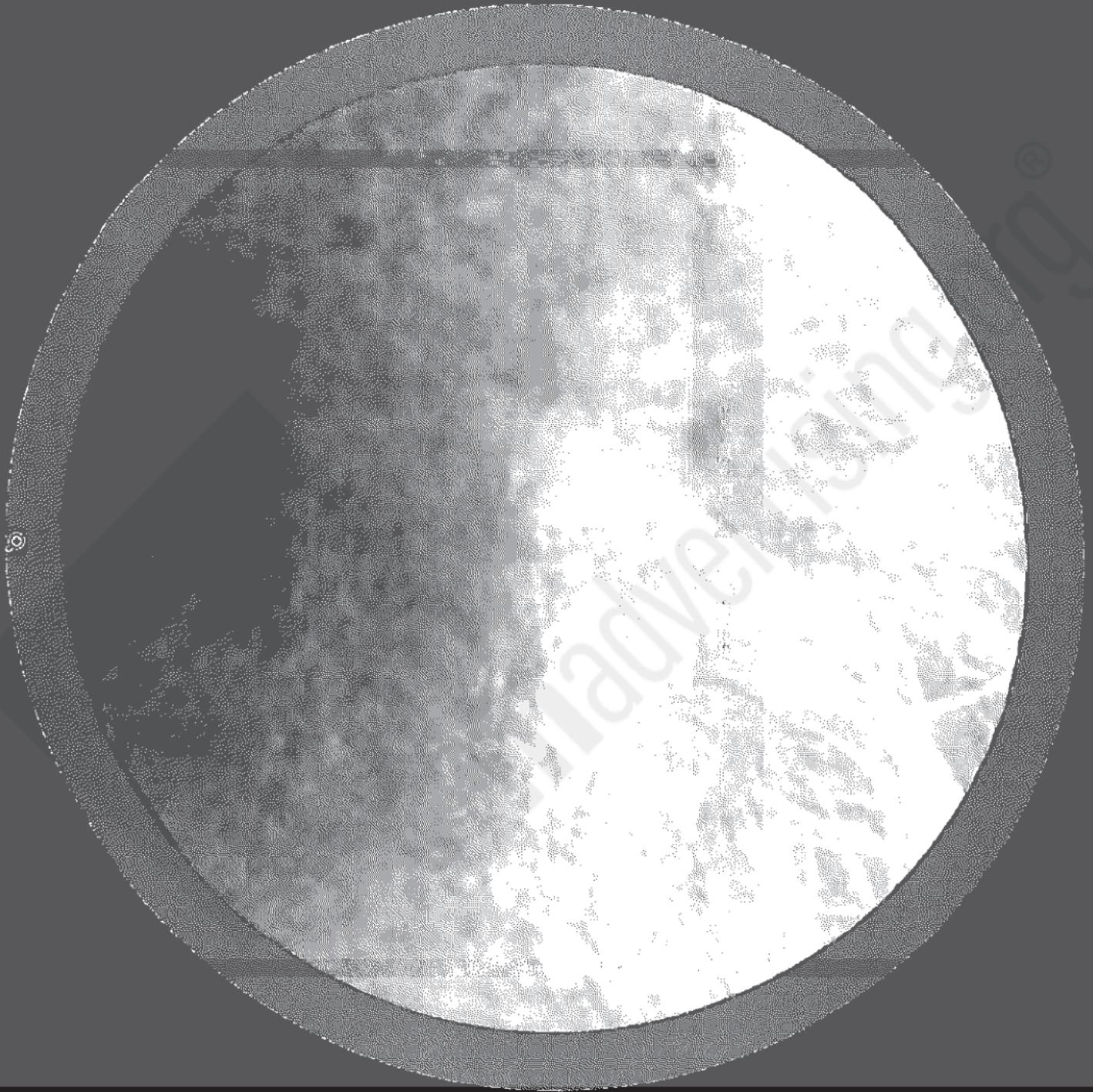


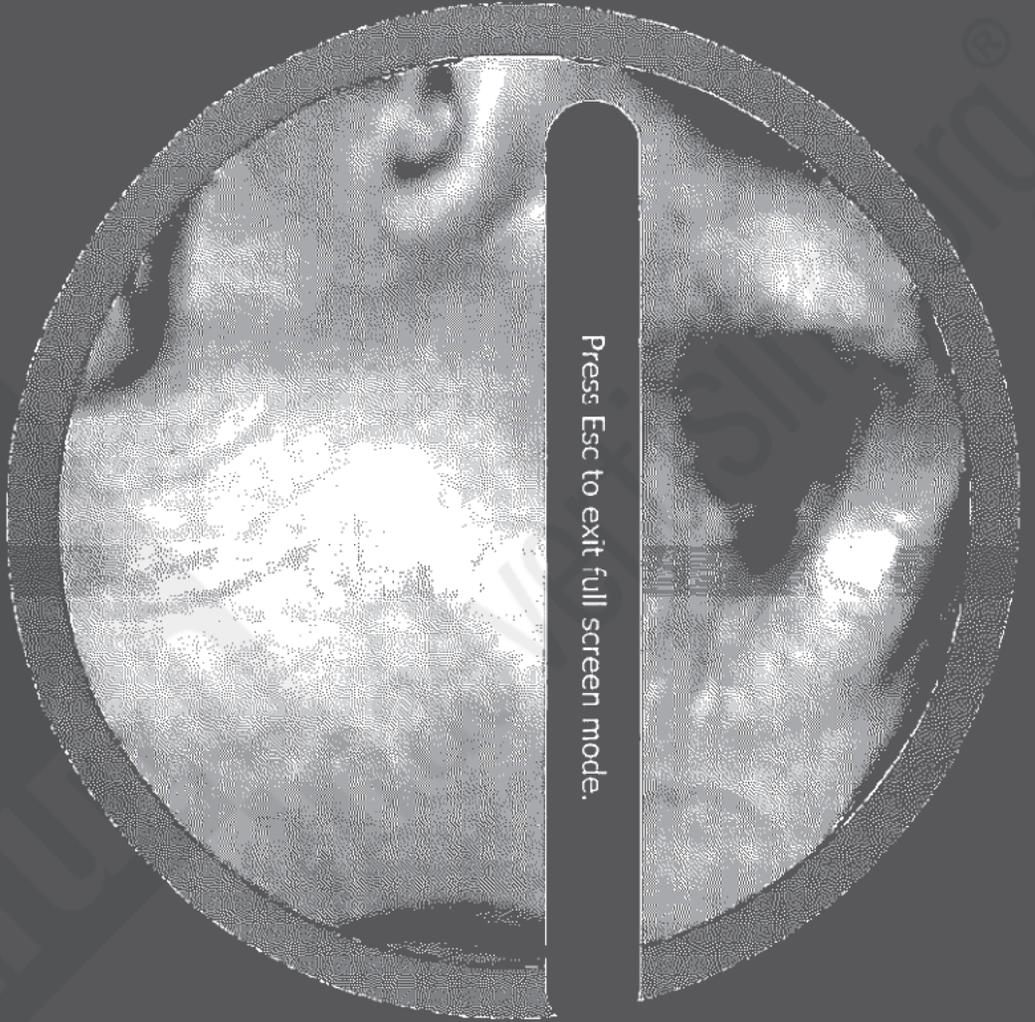
After 1 Week



6 Weeks Later



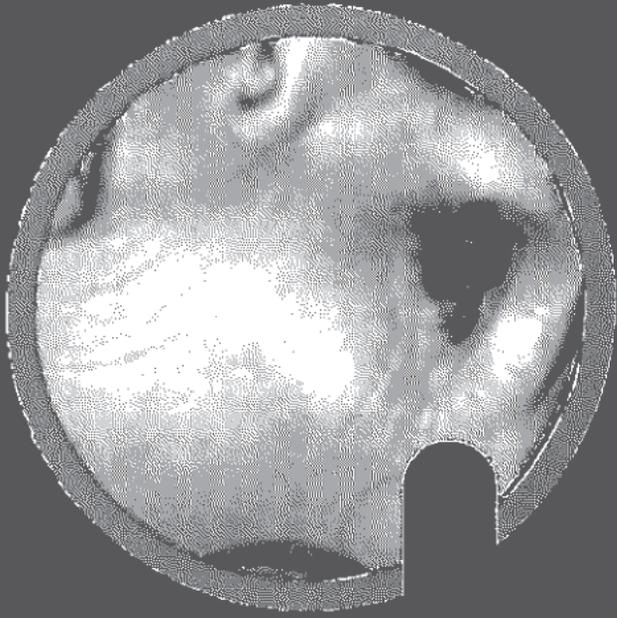




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Before...





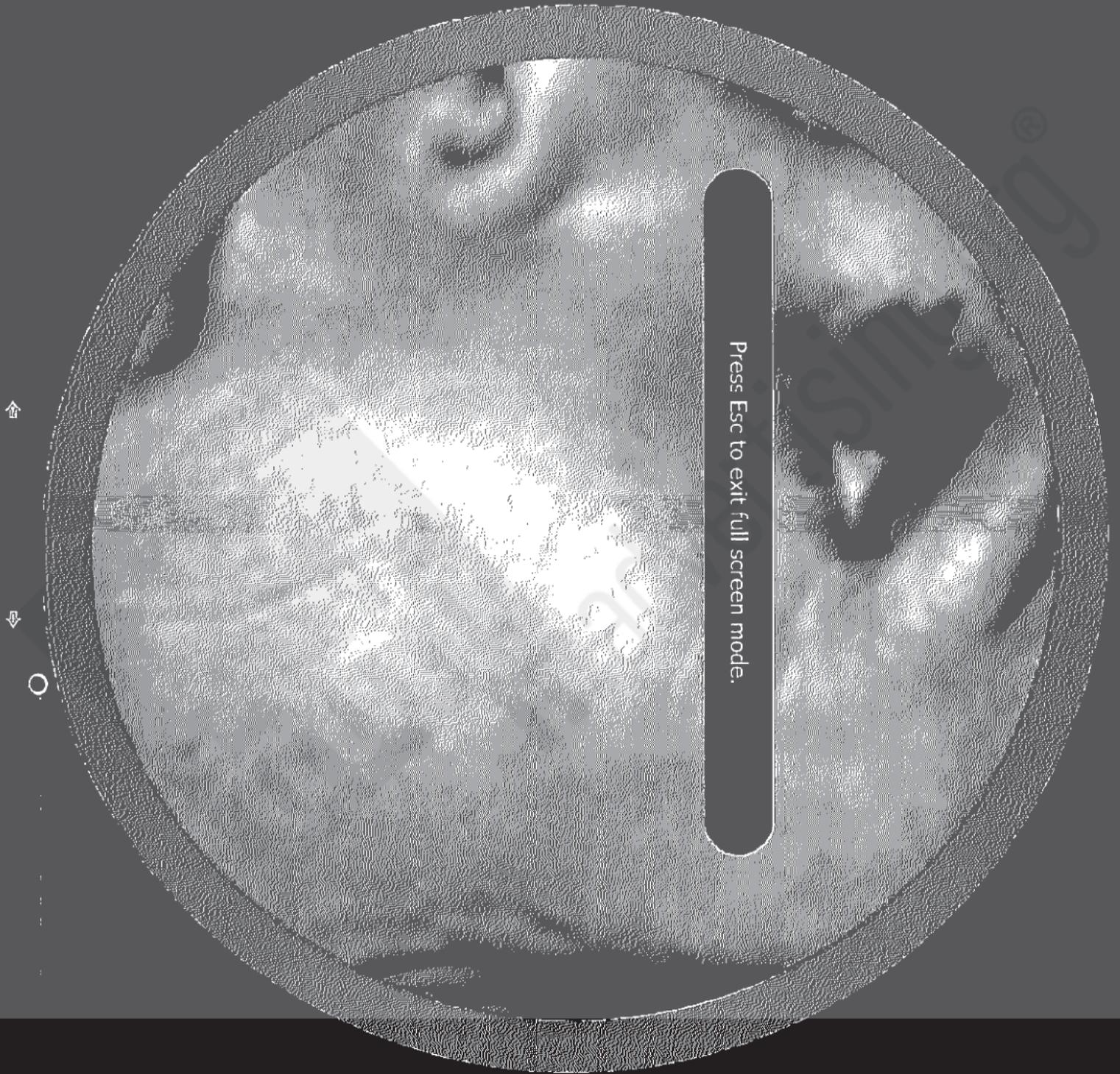
Before...

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After 1 Week





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SkinMedica TNS

Juvenesse

Examples of  
Stem Cell  
Claims

ReVive

Lifeline Skincare

# SkinMedica TNS

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# TNS by SKINMedica: CLAIMS

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- Human Growth Factors
- Foreskin Tissue
- Patented Formula



The CLAIMS are NOT the Whole Story!

The rest is in the social media



Growth Factor Claims: They use a 3 D (DDD) Model where the cells turn acidic on the skin, and die very quickly - which is why this product smells terrible!

5 filed for the TNS product

quickly - which is why this

Patent Claims: The patents filed for the TNS product only apply to this single application – there is no other application that can be derived from the SkinMedica patent.



Remember: Dr. A<sub>Q</sub> can use his 5 D (DDDDDD) patented processes to create any human growth factors he chooses - which means our future is expansive in terms of the products we can take to market and the things Well-Med can develop to help rejuvenate the human body.



Jeunesses

Advertising.org®



# Jeunesse: CLAIMS:

- Growth Factors
- Dramatic Results



# The FACTS about Jeunesse:



Growth Factor Claims: They can honestly claim growth factors in their product, however, they are growth factors that are derived from E-Coli Bacteria!



Dramatic Results Claims: It is biologically impossible for humans to get results of any kind from non-human growth factors!

# ReVive



## Revive CLAIMS:

- Human Cells
- RES (Renewal Epidermal Science)

bio:bio.org®  
madvertising.org



# FACTS about ReVive

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## FACTS about ReVive

Human Cells: They can claim the use of human cells, but the cells that are used are cells that only reside on the surface of the skin, and don't penetrate the top layer of skin. They are not growth factors.

RES Claims: The best thing about the ReVive products are the rich moisturizers used in the product.

These renewal ingredients are all about good, very, very expensive ingredients that don't have any true anti-aging results.



## Lifeline CLAIMS:

- Human Non-Embryonic Stem Cells
- Great Results
- Patents Pending



# FACTS about Lifeline:

truthinadvertising.org®



## FACTS about Lifeline:

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Company History: Lifeline is a Russian company that was cited for various violations in London, England - where they were conducting stem cell research to cure Parkinson's Disease.

0



## FACTS about Lifeline:

Company History: Lineline is a Russian company that was cited for various violations in London, England - where they were conducting stem cell research to cure Parkinson's Disease.

Move to US: So they moved their research labs to the US, where they are now a public company traded under the symbol ISCO.



Stem Cell Claims: To show profits for their shareholders, they released a "human non-embryonic stem cell" skincare line. BUT they never disclose the "human stem cells" they DO use to make their claims.

Pending Patents: Any pending patents

DO use to make their claims.

Pending Patents: Any pending patents this company has applied for reference developments for their Parkinson's research - not their skincare line.

So now you are informed, and educated...



So now you are informed, and educated...

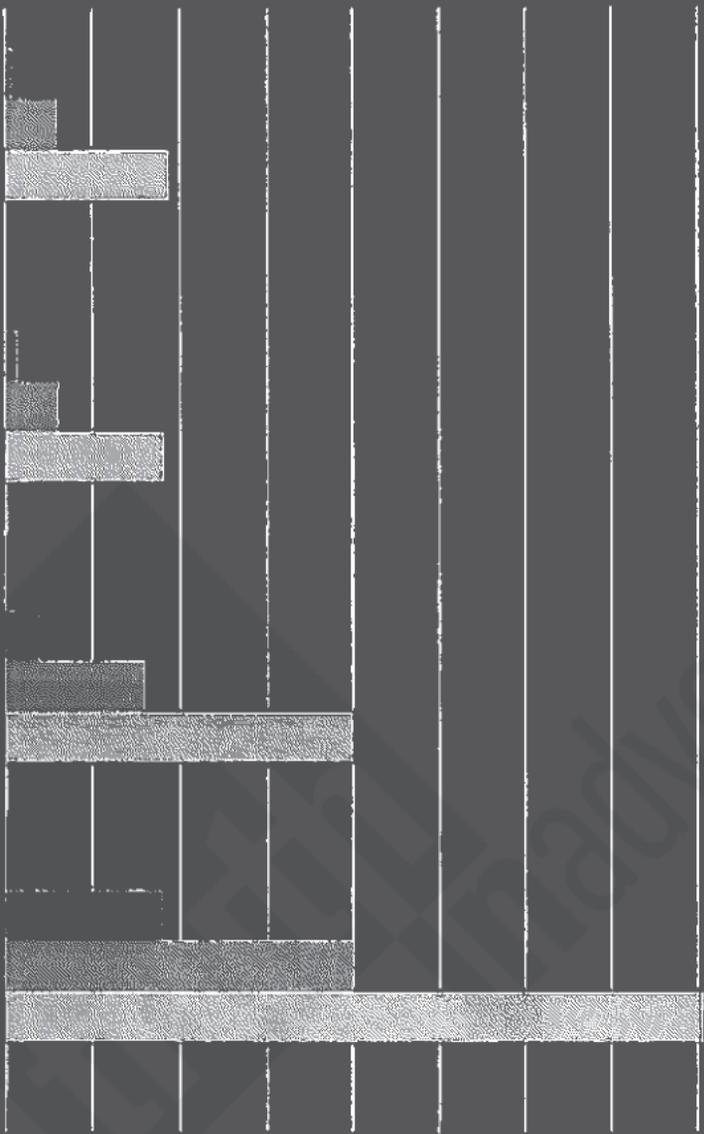
Let's motivate you! Check out the results of our GfT Daily in a head-to-head match up!



# The Results Blow Everything Else Away!

\_\_\_\_\_

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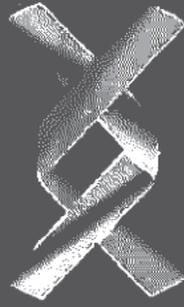
■ ■ ■ ■



# So what does this mean to you?

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13-01

# Brand Consultants

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# Preferred Customers

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# Other Brand Consultants

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# Authorized Treatment Centers

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truth  
institute™

truthinadvertising.org®





# New Advanced Therapies

advertising.org®



# Re-Market to Existing Clients

bio:bio.org®  
advertising.org



# Preferred Customers (Drop Ship)

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# Add Brand Consultants & ATCs



Ship



*The Year of Foundation*



well-med global™

*The Well-Med Story*

*Part 1: Science*

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**EXHIBIT "B"**

## The Well-Med Story: Introduction

To fully understand the science behind the Well-Med Global collection of stem cell based growth factor products, you have to start with understanding the history of stem cell research in the United States.

As with most of the best American stories, Well-Med's story is the product of incredible opportunity, combined with impeccable timing. **Part 1** of our story begins with a brief overview of the ups and downs the scientific community experienced in the area of stem cell research during the past 50 years, and ends with two patented breakthroughs that have changed everything!

So we invite you to follow our journey as we carefully unfold the details for your review, so you can see for yourself why Well-Med Global is the one to watch.

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## A Brief History of Stem Cell Research in the United States

### **1961: Discovery**

Two cancer researchers – Till & McCulluch – confirm the discovery of stem cells on February 1, 1961 while conducting research at the Ontario Cancer Institute. Until this discovery, “stem cells” were only understood in theory, and this discovery opened the door for new breakthroughs in the study and practice of modern medicine.

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## A Brief History of Stem Cell Research in the United States

1961: Discovery

1974: Research Ban

The 93<sup>rd</sup> Congress is caught up in the political backlash from the 1973 Supreme Court decision in the case of Roe vs Wade, and as a result, decides to ban nearly all federally funded stem cell research until proper guidelines can be established.

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## A Brief History of Stem Cell Research in the United States

1961: Discovery

1974: Research Ban

1975: Guidelines Set

The Presidential Council on Bioethics – under Gerald Ford – sets the research guidelines for the use of fetal and aborted fetal tissues – setting the stage for years of political and ethical debate. The use of this terminology casts a dark shadow over stem cell research that will stymie scientific progress in the United States for years to come.

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## A Brief History of Stem Cell Research in the United States

1961: Discovery

1974: Research Ban

1975: Guidelines Set

1980: Reagan Era

Under tremendous political pressure, the Reagan Administration decides not to renew the Ethics Board Guidelines, putting a halt to all federally funded embryonic stem cell research in the United States. Despite this, researchers press forward, seeking ways to conduct ethical, non-political ways to study the use of stem cells in modern medicine.

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## A Brief History of Stem Cell Research in the United States

1961: Discovery

1974: Research Ban

1975: Guidelines Set

1980: Regan Era

1984: Nobel Prize

Stanley Cohen & Rita Levi-Montalcini win the Nobel Prize in Medicine for advancing the role of Epidermal Growth Factors (EGF) in cell biology. This early breakthrough will have a profound impact on Well-Med Global's Chief Scientific Officer & Co-Founder a little more than twenty years later.

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## A Brief History of Stem Cell Research in the United States

1961: Discovery

1974: Research Ban

1975: Guidelines Set

1980: Regan Era

1984: Nobel Prize

1988: New Panel

A new panel is assembled under the umbrella of Transplant Research, and the newly formed Human Fetal Tissue Transplant Panel votes 18 to 3 to lift the ban on federally funded research using embryonic tissues.

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## A Brief History of Stem Cell Research in the United States

1961: Discovery

1974: Research Ban

1975: Guidelines Set

1980: Regan Era

1984: Nobel Prize

1988: New Panel

1990 – 1999: Politics

*This era marks a turbulent time in the history of stem cell research as abortion continues to be one of the primary issues that divide the nation. As a result, the United States falls behind in embryonic stem cell research, while other countries continue to push the ethical lines in the name of science.*

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## A Brief History of Stem Cell Research in the United States

### **1994: Cosmetics**

While all of these political issues were still swirling around, the FDA issues the Federal Food, Drug & Cosmetic Act, which permits the use of "stem cell-derived ingredients" in cosmetics with no direct oversight or restriction from the FDA. This act creates the beginning of one of the greatest marketing plays in the cosmetic industry as beauty brands start creating mock science to develop these new, elusive "stem cell formulas."

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## A Brief History of Stem Cell Research in the United States

### **1994: Cosmetics**

### **2000: Breakthrough**

Finally, on August 25, 2000, the National Institutes of Health (NIH) sets the Stem Cell Research Guidelines, opening the door for possible new scientific breakthroughs.

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## A Brief History of Stem Cell Research in the United States

**1994: Cosmetics**

**2000: Breakthrough**

**2005: Finally**

Then, on **April 26, 2005**, the final Human Embryonic Guidelines are set – making it possible for researchers to access banks of human embryonic and neonatal tissues for ethically based scientific research.

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Time Out!  
Why is this history so  
important?

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## IMPORTANT NOTES

Clearly, the history behind stem cell research is fraught with twists and turns, and as a result, **the terminology used to define this research can get muddied**. And it gets even more murky when you try to combine Science with Cosmetics.

It's just a fact that when it comes to scientifically-based beauty products, **the terminology that is used to define "breakthrough ingredients" is often very misleading, and terribly inaccurate**.

Additionally, all of the controversy and political debate surrounding stem cell research over the past 50 years, combined with the FDA's "hands-off" stance over the use of "stem cells" in cosmetics, has created **tremendous confusion over what is real, and what is just a story**.

**So it is essential that we take a moment to accurately define some key terminology to help you differentiate the Well-Med Science from all the rest.**

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## Key Terminology

### **Stem Cells:**

So let's start by looking at the definition of this controversial, yet incredibly intriguing component of the human body. Here's a very simple definition for this highly complex cell type:

***A stem cell is essentially a "blank" cell, capable of becoming another more differentiated cell type in the body, such as a skin cell, a muscle cell, or a nerve cell. It can be likened to a computer hard drive – brilliant in it's potential, but useless without applications to run specific functions.***

So when researchers were studying stem cells, they were actually focusing their studies on ***the growth factors*** – or the applications – inside the cells that cause them to affect growth and repair inside the body. It is the growth factors – ***not the stem cells*** – that are the catalyst for cellular change and development in the human body.

***So companies that say they have "stem cell" ingredients in their products really only have sexy marketing claims – nothing more.***

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## Key Terminology

### **Growth Factors**

So now that it is clear that growth factors are the most important terminology to consider, let's provide a proper definition:

***Growth factors are proteins that bind to receptors on the surface of the cell, with the primary result of activating cellular proliferation and/or differentiation.***

Simply put, these proteins actively help to increase the number of cells (proliferation), while also helping less specialized cells become more specialized (differentiation).

There are 170 different kinds of human growth factors in the body – each specifically linked to various functions inside the body, and each with their own DNA code.

***However, there are other varieties of growth factors, too – such as growth factors that are derived from botanicals and even bacteria! So most products that make "growth factor" claims are selling you another story – and one that will never truly work on humans.***

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## Key Terminology

### **Neonatal & Embryonic**

Stem cell claims can be further convoluted when you factor in the use of **neonatal** and **embryonic** terminology. The use of both of these terms were partly to blame for so much of the political debate in the first place, yet they are both misused all the time in various cosmetic "stem cell" claims. So let's start by looking at the definition of each:

**Neonatal:** This is an adjective that means of, or relating to newborn children. Neonatal tissue or cells are taken from a newborn baby.

**Embryonic:** This is an adjective that relates to the embryo, or developing fetus. This is prior to the arrival of the newborn, and it is the most controversial of the terms used in relation to the topic of stem cell research.

***You might see products in the US that claim they use "non-embryonic" stem cells as a way to make them sound like a more ethical company – but again, it's just another well-packaged story.***

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The Well-Med Story continues...

So now that we have the history of stem cell research in our grasp, and these key terms sorted out and properly defined, let's look at the Well-Med Science, and meet the man behind our truly amazing breakthrough technology.

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Meet Dr. Ahmed Al-Qahtani,  
Chief Scientific Officer & Co-Found of Well-Med Global



In 2005, Dr. AQ – as he is known – was conducting his own research in the area of stem cells and growth factors, when the new Human Embryonic Guidelines created the **ethical requirements for deriving, storing, distributing and using embryonic cell lines**. These standards helped to create new momentum in the area of embryonic and neonatal stem cell research in the United States.

Dr. Ahmed Al-Qahtani, PhD in  
Immunology, MS in Clinical Microbiology

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## Dr. AQ's Research Breakthroughs & Patents

### **Research Process**

Even though these new ethical standards created the guidelines for using embryonic cells, **Dr. AQ decided to take a neonatal approach instead.**

So in 2005, Dr. AQ applied for tissue from a research facility that specializes in **screened samples from human infants**. He received multiple samples of circumcision tissue from infants that were only days old.

**Dr. AQ specifically chose foreskin tissue because it is a rich source of stem cells**, and it is also easily accessible for research – since most foreskin tissue is discarded after the circumcision is performed.

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## Dr. AQ's Research Breakthroughs & Patents

### **Patents**

From this circumcision tissue, **Dr. AQ developed a technique for extracting the cell line of growth factors from a baby stem cell.**

He applied a complex model to his research that created a major breakthrough. In fact, his extraction technique was so revolutionary that **the research community honored Dr. AQ by naming the cell line he extracted after him.**<sup>1</sup>

**Dr. AQ patented his extraction process<sup>2</sup> to protect his intellectual property**, thus securing his future, and the future of every product he develops using his breakthrough technique.

<sup>1</sup>American Type Culture Collection, ATCC

<sup>2</sup>Method & Composition Patent (US 201110300097 A1)

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Dr. A.Q.'s Research Breakthroughs & Patents

**Patents continued...**

**Then, Dr. A.Q. patented his technique for genetically replicating the growth factors<sup>3</sup> from his extracted cell lines, which created the way for him to create any human growth factor he chooses using his breakthrough methods.**

Remember, there are 170 growth factors in the human body, and by securing his patents for extracting, and genetically replicating human growth factors, the future for Dr. A.Q.'s human growth factor applications are astounding.

**Dr. A.Q. named the combination of these patented breakthroughs in stem cell research Growth Factor technology (GFt), and he has since trademarked the name Growth Factor Induced therapy (or GFIt™).**



<sup>3</sup>Patent (US 20120225029 A1)

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## Dr. AQ's Research Breakthroughs & Patents

### **Early Use of GFT**

Dr. AQ's first order of business after his breakthroughs was to create a GFT application that integrated his genetically replicated human fibroblast cells to repair severely damaged skin.

As he traveled around the world, sharing his medical research with other doctors, his breakthroughs started to gain attention. *In 2006, after Dr. AQ presented at a medical conference in San Diego, one of the doctors – who learned that Dr. AQ had genetically replicated human fibroblast tissue applications in the lab – asked if Dr. AQ would like to take part in a burn study down in Guadalajara, Mexico.*

Dr. AQ agreed to participate, and this study created a true turning point with regard to the "proof of concept" he needed.

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Dr. AQ's Research Breakthroughs & Patents

**2006 Burn Study: Guadalajara, Mexico**

It is a known reality for medical researchers in the United States that securing a true, unbiased medical research study – without any affiliation with a pharmaceutical company – can be incredibly difficult. **So for Dr. AQ to be asked to test his patented human fibroblast applications in a true, international clinical study was a major break.**

Mexico is the leading country in the world for burns, and so finding patients in need of a true healing breakthrough was easy. There were seven young patients included in this study group – all of whom had at least third degree burns. **In many cases, the children included in this study would normally have little hope of a full recovery, so the severity of the situation cannot be overstated.**

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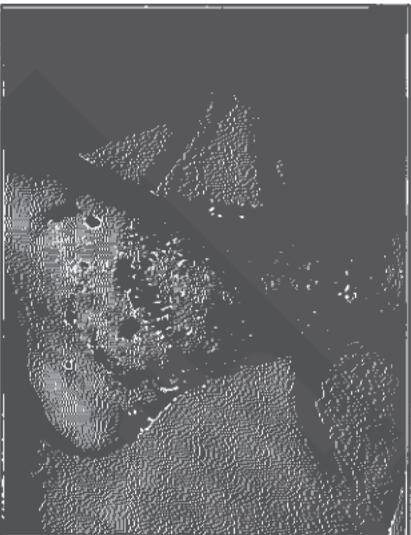
Dr. AQ's Research Breakthroughs & Patents

**2006 Burn Study: Guadalajara, Mexico continued...**

Dr. AQ used his patented GFT applications – which were actual fibroblast skin grafts he genetically replicated in the lab – to repair the severely damaged tissues. Even Dr. AQ didn't expect the results to be so immediate – or so profound – but the follow up pictures the doctor conducting the study sent were nothing short of amazing. Here are two sets of images from the study:



7 Days



14 Days



21 Days

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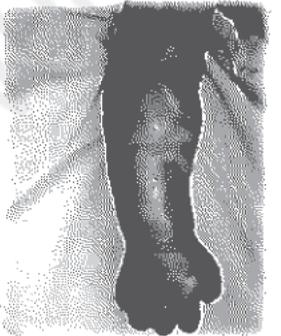
## Dr. A.Q.'s Research Breakthroughs & Patents



Before..



7 Days...



14 Days...



21 Days...

The fact that this technology returned the total health of not only the tissue, **but also promoted circulation and healing of the dermis** was truly a major breakthrough.

This study affirmed the power of Dr. A.Q.'s GFT applications, and laid the groundwork for new applications that would integrate his patented technology to better the lives of others.



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## Other Clinical Studies

### **Other Clinical Studies**

For Dr. AQ, the medical applications for his GfT science were incredibly gratifying, and the fact that he was meeting his one true objective – to help people in need – was paramount to him.

**So starting in 2008, Dr. AQ's main focus was the medical applications for his GfT products, and it didn't take long before his serums and applications were the number one selling medical grade skincare products in the world.** Currently, Dr. AQ's medical grade GfT products are distributed in 21 countries and counting.

Several countries in the Pacific Rim have conducted their own studies and research using his clinical GfT applications, and have reported back to Dr. AQ of their success. **But as such, these studies belong to others, and their findings are not made available for outside distribution – even by Dr. AQ himself.**

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## Other Clinical Studies

### **Other Clinical Studies continued...**

However, **there have been thousands of studies in the US and all over the world on the topic of human growth factors** – the exact field of study that all of Dr. A.Q.'s work and research was conducted – **and these studies truly support and validate Dr. A.Q.'s science and patented work product.**

When asked to show these clinical studies, there is a pub med link that catalogs each study individually:

<http://www.ncbi.nlm.nih.gov/pubmed.?term=growth+factor>

It is important to understand the nature of clinical studies, and how to speak carefully and accurately about the need for such studies when it comes to the Well-Med line of GfT serums and products.

**So let's give you some background, and some research data to work with that pertains specifically to Well-Med's products.**

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"Science-Based" Cosmetics: Do studies matter?

Very rarely do formulators in the cosmetic and beauty industry conduct real scientific testing to back the claims of their products. ***In fact most of the testing that is done on cosmetic formulas are to ensure safety, not efficacy.***

The beauty industry relies heavily on the use of phrases like, "***the appearance of***" and "***noticeably changed,***" which are experientially based quantifiers – not hard scientifically-based measurements of change.

And because the FDA does not regulate cosmetics in the same way that it regulates companies making true medical claims, studies in the world of beauty and anti-aging have very little merit or weight compared to medically based studies. ***So the merging together of "stem cells" and beauty products creates a counter-culture climate for researchers like Dr. A.Q.***

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“Science-Based” Cosmetics: Do studies matter?

**Continued...**

After experiencing such success with the medical applications of his patents, Dr. AQ dedicated himself to producing premium GFT products that were **available to both professionals in the medical field, and to everyday consumers around the world.**

**But this mission to make his products accessible to non-medical consumers transitioned him into a different world where the burden of proof is less about measurable science, and more about personal experiences.**

**So Dr. AQ devised a study of his own to test his serum against other products on the market claiming to have “stem cell” or “growth factor” technology.** His goal was to apply the accepted industry research methods – as well as his own scientific measurement standards – to compare his serums to other products that haven’t been held to the same standards of scientific proof as his medical grade formulations. The following are his findings.

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## Research Paper & Findings

### **Research Notes: Abstract**

**Study Name:** AQ Active Serum\* role in skin rejuvenation and in wrinkle diminishment

**Researchers:** Abdulrahman Ibrahim, Dr. John Grasso, Mina Grasso, Dr. Norman Leaf, Rand Rusher and Dr. Ahmed Al-Qaharani

**Abstract:** Evidence of aging skin appears in the facial and periorbital area and includes wrinkles, discoloration, eyelid bags, circles around the eye, and a sagging look. ***This study investigated a novel skin serum that contains a proprietary mixture of human growth factors and cytokines in combination with antioxidant factors.***

The study, which was completed by 81 male and female subjects between 30 to 78 years of age, revealed that the clinical signs for wrinkles, lower eyelid bags or sagging, dark circles, and skin texture significantly improved on average by 92% after six weeks of twice daily application. These observed clinical improvements were confirmed by the subjects using a questionnaire.

\*AQ Active Serum was the original name for the GfT Daily Serum.

## Research Paper & Findings

### **Abstract continued...**

The subjects further reported that **the overall look of their skin significantly improved by 78% on average.**

All 79\* subjects tolerated the eye cream well and were pleased by the ease of application and the feel of the serum on the skin.

**The efficacy of the serum, excellent tolerability, including the delicate periorbital skin area, and pleasant sensory properties of the product explain why a large majority of subjects (98%) would continue regular use of the AQ product.**

This study corroborates the idea that the topical application of growth factors and cytokines are beneficial in reducing the signs of skin aging of the face, including the area around the eyes.

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\*The study originally include 81 test subjects; two (2) study subjects dropped out of the study.

## Research Paper & Findings

### Research Notes: Results

Of the 81 subjects enrolled, 79 subjects averaged  $52 \pm 9$  years of age (between 30 to 78 years) completed the study.

**Two subjects dropped out of the study for product unrelated reasons.**

Results were tabulated using scores generated by the clinical evaluations, and subject questionnaire.

**All results showed a statistical significant of  $p = 0.05$ .**

All subjects (100%) reported to have tolerated the skin serum well.

**All subjects (100%) liked the way the skin serum felt, while 98% would continue its regular use after the six weeks study period.**

Improvement is shown as difference between the averaged score before (baseline) and the averaged score after treatment expressed in percentages of the averaged baseline score and includes all 79 subjects completing the study.

In conjunction with this study, we performed a comparison study, comparing AQ Active Serum to other products of similar properties or claim similar properties. This study served two purposes: 1) to show how effective AQ Active Serum compared to other products in the market, and 2) be used as a negative control for the study in addition to using a placebo.

**Subjects were asked to evaluate the AQ Active Serum in terms of quantity per bottle, quality of serum, fragrance, re-order and overall satisfaction.**

The before and after pictures included in this study were selected based on the following criteria: skin type; skin damage; age and sex; degrees of improvements

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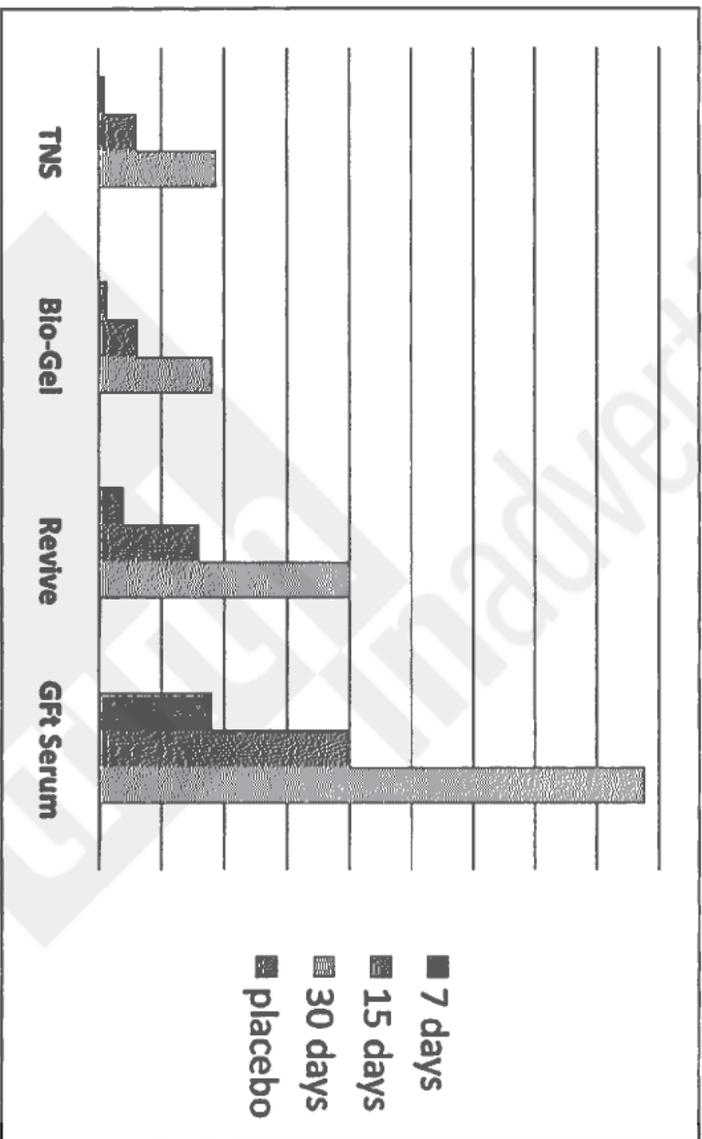
33



## Research Paper & Findings

As you can see, the research abstract indicated the overall measurements using the expected standards of the cosmetic industry – that is, queries of the test subjects on how they felt the use of the product impacted their appearance, as well as the quality of their skin.

So based on this data, this graph provides a visual perspective of the study results based on the use of these four products - plus a placebo - over a 30-day testing cycle:



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## Research Paper & Findings

The next few pages feature several images we are permitted to share from the study. These images were taken with a special camera called the VISIA.

### **About the VISIA:**

The VISIA Complexion Analysis System helps to **create quantitative statements regarding the skin's condition**. The camera sends high-resolution images to a high speed computer, and the computer analyzes factors that influence complexion, and diagrams specific measurements and parameters that can be shown on each image.

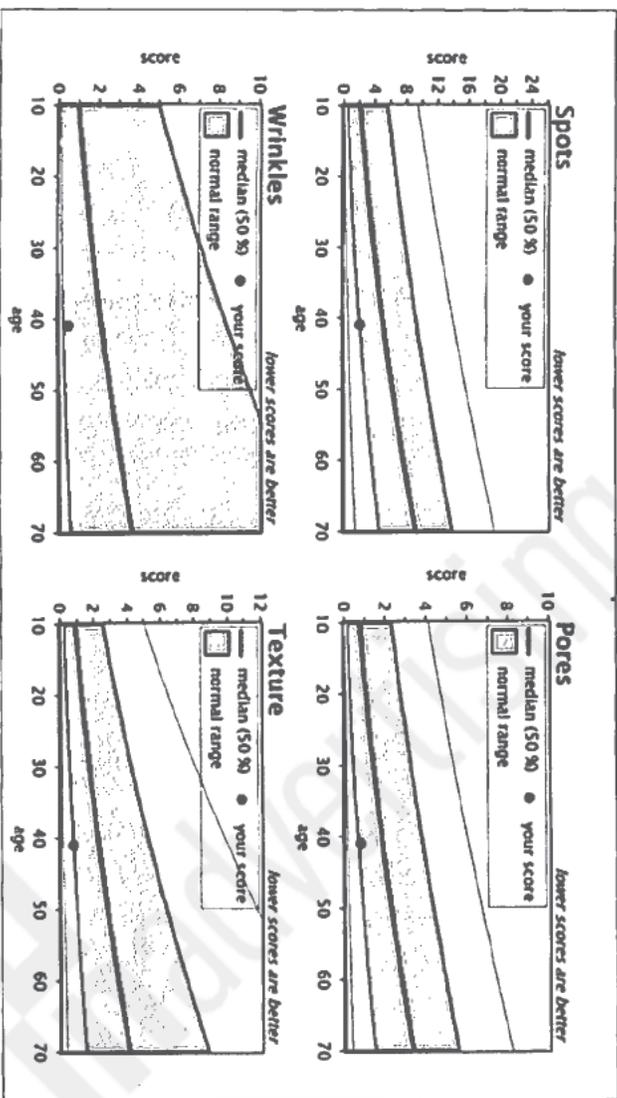
**Additionally, these images can be compared to a database of thousands of other images taken using this system, and then compared and contrasted against the data using categories such as age, skin type, etc.**

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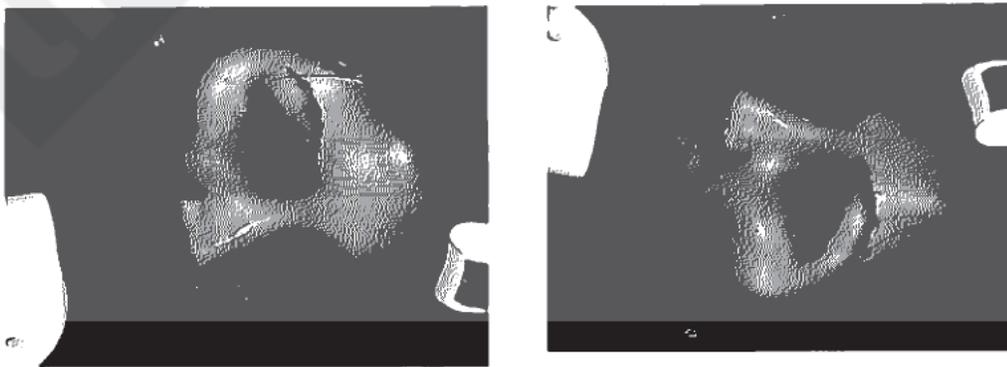
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# VISIA Complexion Analysis Data



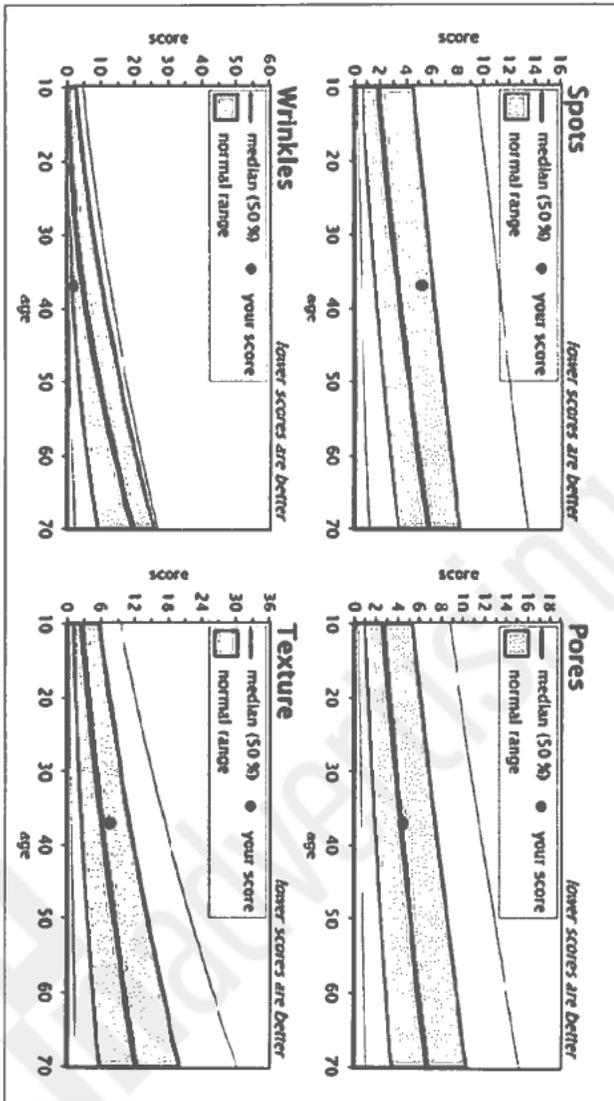
Subject Analysis:		Right Side of Face	Left Side of Face
Spots		83%	75%
Wrinkles		75%	49%
Texture		83%	18%
Pores		81%	62%
UV Spots		93	102
Brown Spots		123	127
Red Areas		87	80
Porphyrins		24	75



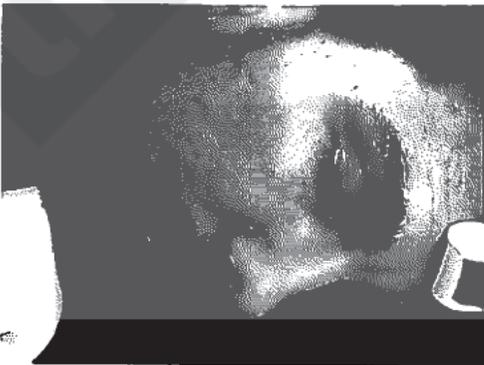
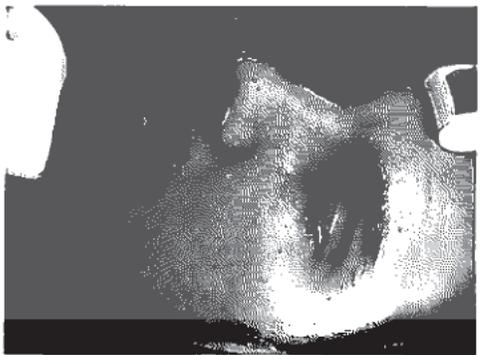
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# VISIA Complexion Analysis Data



Subject Analysis:	Right Side of Face	Left Side of Face
Spots	22%	21%
Winkles	76%	63%
Texture	38%	32%
Pores	47%	54%
UV Spots	158	189
Brown Spots	150	160
Red Areas	82	93
Porphyryns	741	759

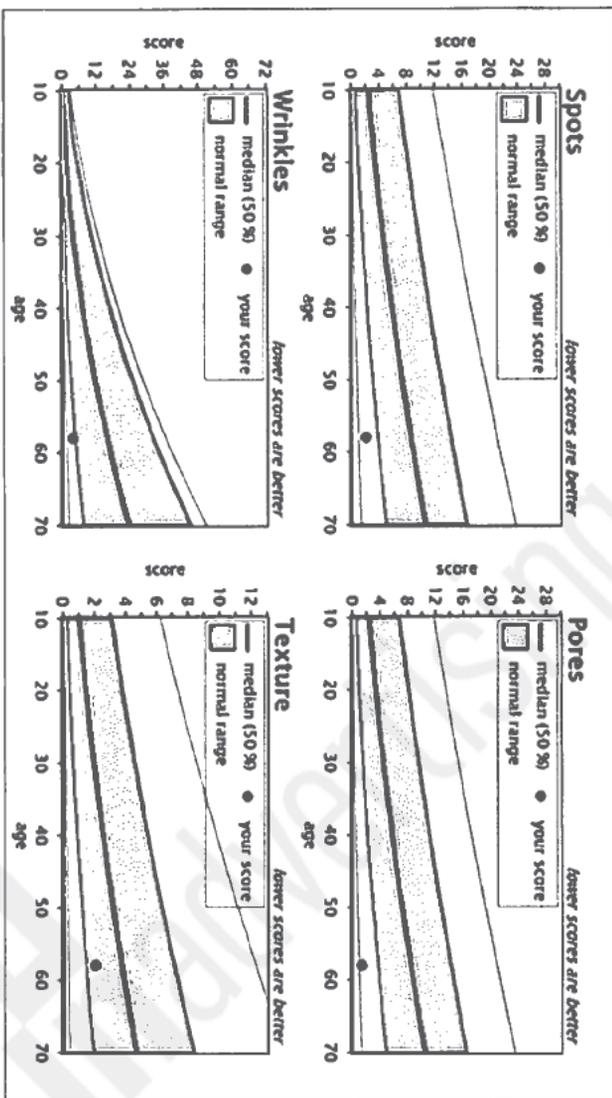


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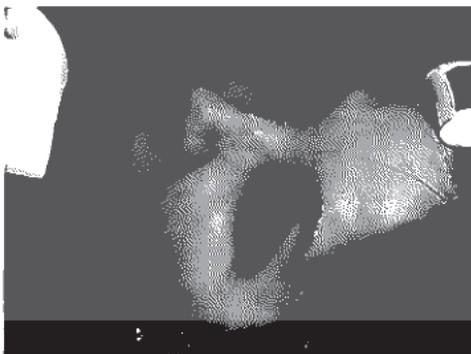
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# VISIA Complexion Analysis Data



Subject Analysis:	Right Side of Face	Left Side of Face
Spots	94%	87%
Wrinkles	87%	97%
Texture	75%	87%
Pores	96%	96%
UV Spots	173	153
Brown Spots	153	121
Red Areas	117	123
Porphyriins	137	184



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Head to Head Product Comparisons

Now let's cover how the **Well-Med GFt Daily Serum** specifically **compares to the products featured in the study** – and other products that have emerged in recent years – **and clarify what part of these product's claims are real science, versus a marketing play.**

**SkinMedica TNS:**

**Product Claims: Real Science Marketing Claim**

Product Claims:	Real Science	Marketing Claim
Human Growth Factors	✓	
Patented Formulation	✓	
Circumcision Tissue	✓	
Dramatic Results		✓

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## Research Paper & Findings

### **SkinMedica TNS Overview:**

It's true that SkinMedica has familiar claims to the Well-Med GfT Daily Serum, and while some of the claims have truth, **the claims are not the whole story.**

The growth factors that were isolated in the SkinMedica science are based on a **3 D (DDD) Replication Model – whereas Dr. AQ's patents are based on his patented 5 D (DDDDD) Replication Model.**

The difference “two D’s” can make is monumental! The TNS formulation has a very limited affect on the skin because **the cellular matter is unstable, and quickly turns acidic, causing the cells to die off** (hence the horrible smell). **Dr. AQ's human growth factors have no rival when compared, and the quality, shelf-life and stability of his serums far surpass TNS because of his patented extraction process.**

**Additionally, the patents filed for the TNS product only apply to this single application – there is no other application that can be derived from the SkinMedica patent. Dr. AQ can use his patented processes to create any human growth factors he chooses - which means our future is expansive in terms of the products we can take to market.**

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Head to Head Product Comparisons

**Bio-Gel**

**Product Claims:**

**Real Science**

**Marketing Claim**

Human Growth Factors		✓
PSP (Processed Skin Proteins)		✓
Patented Formulation		✓
Fetal Skin Cells	✓	
Dramatic Results		✓

**Bio-Gel Overview**

The product claims made by Bio-Gel maintain that they have “growth factors,” but the types of cells they source for their PSP are growth factors in name only.

This product mirrors TNS in the longevity of the cellular matrix they use – in that they have a very limited life-span – but it does have an improved smell. The most important thing to note is that in the comparative study, even after a full 30 days of use, this product barely measured the results of only 7 days of use on the Well-Med GfT because the cells in this formula die off so quickly.

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Head to Head Product Comparisons

**ReVive**

**Product Claims:**

**Real Science**

**Marketing Claim**

Keratinocytes Cells	✓
RES (Renewal Epidermal Science)	✓

**ReVive**

Dr. Gregory Brown is a plastic surgeon who was looking for a way to help his patients stave off the need for plastic surgery by addressing various skin issues – tone, elasticity, etc. So he developed his formulas using skin cells called keratinocytes – which are cells that exclusively reside on the surface of the skin.

Dr. Brown's products have very expensive moisturizing and exfoliating ingredients in them – which gives this product some merit when issues of dryness, and dead surface cells are concerned – but there is no true science to the effects his products have on skin on a cellular level.

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Head to Head Product Comparisons

**Jeunesse**

**Product Claims:**

**Real Science**

**Marketing Claim**

Growth Factors	✓
Dramatic Results	✓

**Jeunesse**

Because it is trendy and relevant in the world of anti-aging to be using stem cells or growth factors, many companies – like Jeunesse – can honestly make “growth factor” claims because they do use growth factors. However, they are not human growth factors, and are in fact derived from *E-Coli* bacteria.

This company is marketing a product that has no true science behind it, but manages to create a story around growth factor-based ingredients that have absolutely no positive impact on human tissues whatsoever.

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Head to Head Product Comparisons

**Lifeline Skincare**

**Product Claims:**

**Real Science**

**Marketing Claim**

Stem Cells		✓
Human Non-Embryonic		✓
Patent-Pending		✓

**Lifeline Skincare**

The story behind Lifeline Skincare goes like this: It is a Russian company that was originally doing stem cell research in London to find a cure for Parkinson's Disease. After being cited for various research violations in England, Lifeline moved the company to the US where it is publically traded under the symbol ISCO.

In order to show profits for shareholders, Lifeline released a "human non-embryonic" stem cell anti-aging line, and has been marketing this product quietly for several years. The science behind their supposed stem cell ingredients is unsubstantiated since they never provide any record or data as to the human cells they do use in their formulations. This product is based on pure marketing claims, and has no real proof of efficacy, and there is no clarity on the pending status of any patents related to this product, and it is believed any pending patents pertain to their other research endeavors.

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