

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Edith Ramirez, Chairwoman  
Julie Brill  
Maureen K. Ohlhausen  
Joshua D. Wright

_____	)	
In the Matter of	)	
	)	DOCKET NO. C-
GENELINK, INC.,	)	
a corporation, also d/b/a	)	
GENELINK BIOSCIENCES, INC.,	)	
and	)	
	)	
FORU <sup>TM</sup> INTERNATIONAL CORPORATION,	)	
formerly known as	)	
GENEWIZE LIFE SCIENCES, INC.	)	
_____	)	

COMPLAINT

The Federal Trade Commission, having reason to believe that GeneLink, Inc., a corporation, and forU<sup>TM</sup> International Corporation, formerly known as GeneWize Life Sciences, Inc. (“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 GeneLink, Inc. (“GeneLink”), also doing business as GeneLink Biosciences, Inc., is a publicly held Pennsylvania corporation with its principal office or place of business at 8250 Exchange Drive, Suite 120, Orlando, Florida 32809.
2. Respondent forU<sup>TM</sup> International Corporation (“forU<sup>TM</sup>”), formerly known as GeneWize Life Sciences, Inc., is a Delaware corporation with its principal office or place of business at 1231 Greenway Drive, Suite 200, Irving, Texas 75038.
3. Respondents have developed, advertised, offered for sale, and sold through a

LifeMap ME DNA Customized Nutritional Supplements, GeneWize Customized Nutritional Supplements, LifeMap ME DNA Customized Skin Repair Serum, and GeneWize Customized t"rwi

**A. LifeMap ME DNA Customized Nutritional Supplement Pamphlet (Ex. A)**

**Healthy Aging is Now as Close as Your DNA!**  
Genetically Customized Nutritional Supplements Made  
Exclusively for You.

\* \* \*

**Why These Aging Genes?**

Although human DNA contains several million natural genetic variations (called SNPs), Genetiki scientists used the following criteria to choose the SNPs for the GeneWize Healthy Aging DNA Assessment:

1. **Valid:** The existence of the SNP is supported by solid, credible, scientific evidence.
2. **Important:** A SNP predicts biochemical processes that are associated with significant physiological disadvantages.
3. **Frequent:** [T]he SNP is relatively common among the general population.
4. **Actionable:** A SNP's negative potential has been scientifically proven to be modulated by nutritional supplementation.

**B. The New Wellness Frontier Brochure (Ex. B)**

By analyzing and understanding your unique genetic strengths and weaknesses, you can eliminate the guesswork and “genetically guide” the optimal nutritional supplement or skincare formulation to match your LifeMap Healthy Aging Assessment™

. . . Research shows that we can measure SNPs and have the ability to impact the expression of our genes through proper nutritional support.

\* \* \*

**What will I feel after taking my LifeMap ME Formula?**

Since everyone's body is different, you'll likely receive unique benefits from your product. Some of the benefits you may notice and some you may not. Some of the most common benefits people report include:

Ability to fall asleep faster  
Longer, deeper sleep . . .

You may or may not experience th

**Do you have a plan to capitalize on this new science?**

\* \* \*

**GeneWize . . . Connecting the Dots**

- x Over 14 Years R&D Prior To Launch
- x Developed significant DNA test for SNPs on “Heavy Lifters”
- x Developed “SNP Boosts” to mitigate, compensate, or bypass SNP effects
- x Powerful health and wellness benefits!

**ONLY comprehensive genetically guided products!**

**A View Into Your Patient or Customer . . .**

- x Patented DNA Collection Kit
- x Sophisticated Assessment
- x Confidentiality
- x Pinpoint Genetic Predispositions
- x Personalized Formula

**Over 500,000 Possibilities**

**With a simple cheek swab . . . .**

**We Assess . . . Others Guess . . .**

**E. Cover Letter to GeneWize Fulfillment Package (Ex. E)**

**LifeMap Essentials™**  
Your Foundation for Optimal Wellness

Welcome and congratulations for taking an important next step toward healthy aging with the most advanced and scientifically proven nutritional supplement programs available – the **LifeMap Nutrition™ System**, which consists of the following:

1. The **LifeMap DNA collection kit** (provided by GeneLink, Inc.)
2. The **LifeMap Essentials™** formula (A non-custom foundation supplement to be taken while awaiting your Healthy Aging Report & DNA guided LifeMap Custom formula)
3. The **LifeMap DNA Healthy Aging Report™** (results in about 4 weeks after mailing your DNA collection kit)
4. The **LifeMap Custom™** formula (A totally customized formula based on your DNA)

**F. GeneWize Official Website, mygenewize.com (Ex. F)**

## LifeMap Nutrition™ System Testimonials

**Seeing is believing but I can't believe what [I] am seeing!**

. . . [T]he best of alls the lack of pain omy knees and hips when running. Running was my passion but severe knee and hip pain kept me from it the last 10 yearslifeMap is renewing me in ways I never thought possible. . . .

Loving life, Margarita Nido Stewart

\* \* \*

**GeneWize has changed my health and my life!**

I'm in my 5<sup>th</sup> month on the LifeMap Custom supplements and I'm amazed by my personal results. So far I've experienced great sleep, great energy, great skin, and much more. Plus, I continually notice even more positive changeprior to taking the LifeMap supplements, my memory wasn'the greatest – but now I feel much sharper mentally! This is very important to me because my Mother had Alzheimer's. . . .

Roberta Johnson, GeneWize Affiliate, Miami, Florida

\* \* \*

## **Thanks for the Memories**

. . . I do have certain health challenges and when I started taking my LifeMap Product, after about a week and a half I was amazed to feel tremendous results! Before, I was getting only about three hours of sleep, now I can finally sleep! My concentration & memory also seem to be improving! . . .

Lina M. Oliver

\* \* \*

was finding the special peace a full seven to eight hours of sleep offers. Problem solved! GeneWize has revolutionized my life and I bless all the company every day for [sic] incredible science. .

..

Kent Riedesel

**G. GeneWize e-lift newsletter: Monthly E-News Exclusively for GeneWize Affiliates (Ex. G)**

Spotlighting Top Leader

Chief Alexander Taku:

My Visionary Source Of Success In GeneWize

. . . I decided to enroll in GeneWize and know my DNA . . . six months ago. . . My health condition prior to this occasion was life-threatening. . . I was a serious diabetic and cardiac patient. . . One would never have imagined . . . that a company would come up with free DNA assessments for all! . . . Six months on the products has produced wonderful results. My blood sugar has stabilized at 80/130 and my diet problem is over, while a recent medical report has revealed the reduction of my heart to normal size. . . For the last six months, I have only been taking my free GeneWize nutritional supplements. . .

**H. GeneWize Affiliate Website, thegenecollective.com (Ex. H)**

Zero limits  
Gene Team

\* \* \*

**I've been fielding a lot of questions about just what Genewize [sic] has done for people.**

**I myself can report deeper sleep and healthier feeling skin. I've talked with a number of people who have experienced improvements in everything from blood pressure to eczema to hormonal issues to arthritis. The most common observations people note are better sleep and improved energy levels. . .**

\* \* \*

I am a Massage Therapist and have had tremendous pain and stiffness in the morning after too many massages for the last few years. I used to take Glucosamine, which did seem to help with the pain and stiffness, but wasn't total relief. After taking



the LifeMap product it hit me one day that I was no longer in pain when I woke in the morning, and the stiffness had disappeared. You see, my Genetic Assessment Report had found that I need maximum support for the cartilage [sic] in my body. Mystery solved! . . . .

Warm Regards, A.R., LMP

\* \* \*

. . . [T]he best of all is the [sic] lack of pain on my knees and hips when running. Running was my passion but severe knee and hip pain kept me from it the last 10 years. LifeMap is renewing me in ways I never thought possible. [sic] Thank you to all those behind the GeneWize Lifemap [sic] Nutrition<sup>TM</sup> System . . . Now, can you imagine what LifeMap is going to do to what we can't see!!!

Loving life, M.N.S.

#### **I. LifeMap ME DNA Skin Repair Serum Pamphlet (Ex. I)**

Historic Evolution in Skin Care  
Genetically Customized Skin Care Made Exclusively for You.

\* \* \*

#### **What Do Your Genes Know That You Don't?**

DNA profiling revolutionized the legal world and now it's doing the same for skin care. Now the same technology can be used to identify a whole new set of perpetrators. The main suspects? Collagen breakdown, sun damage, sensitivity, and oxidative stress caused by free radical activity due to environmental pollution [sic].

So how do you know how susceptible you are to these aging culprits?

Take a minute to swab inside your cheek. Place your DNA sample inside our bar-coded envelope, and send to our lab. We assess six skin health genes to tell you what skin aging problems you're likely to face as you age.

The information is then used to customize a skin repair serum using a combination of active ingredients selected to compensate for particular deficiencies in areas of skin aging, wrinkling,

collagen breakdown, irritation and the skin's ability to defend against environmental stresses.

\* \* \*

### **How Does it Work?**

\* \* \*

The patented, non-invasive simple swab allows you to peek into your predispositions to discover what your genes have to say about your skin aging future.

\* \* \*

### **Clinically Proven Results**

An eight-week, double blind, randomized and controlled clinical study compared the performance of placebo skin care versus the performance of the "genetically-customized" skin care formula containing active ingredients designed for each participant. For those using the genetically-customized formulation, 62% reported substantial reduction in the appearance of wrinkles after 14 days of treatment. After 56 days, the number of participants reporting reduction in the appearance of wrinkles rose to 70%. Similarly, after 14 days, 56% of the participants indicated improved skin firmness and after eight weeks of treatment those with improvements in skin firmness rose to 70%.

\* \* \*

### **LifeMap ME DNA Skin Repair Ingredient List**

Thanks to the custom nature of our product, the ingredient list will represent the latest breakthrough ingredients which have been clinically proven to enhance and diminish aging predispositions.

12. Through the means described in Paragraph 11, respondents have represented, expressly or by implication, that genetic disadvantages identified through respondents' DNA Assessments are scientifically proven to be mitigated or compensated for with nutritional supplementation.

13. In truth and in fact, genetic disadvantages identified through respondents' DNA Assessments are not scientifically proven to be mitigated or compensated for with nutritional supplementation. Therefore, the representation in Paragraph 12 was, Tw (n0io6aet, Tw (n0ioJ-[sv

15. Through the means described in Paragraph 11, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representation set forth in Paragraph 14 at the time the representation was made.

16. In truth and in fact, respondents did not possess and rely upon a reasonable basis that substantiated the representation set forth in Paragraph 14, at the time the representation was made. Therefore, the representation set forth in Paragraph 15 was, and is, false or misleading.

17. Through the use of testimonials, as described in Paragraph 11, respondents have represented, expressly or by implication, that their custom-blended nutritional supplements treat or mitigate diabetes, heart disease, arthritis, and insomnia, among other ailments.

18. Through the means described in Paragraph 11, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representations set forth in Paragraph 17 at the time the representations were made.

19. In truth and in fact, respondents did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 17, at the time the representations were made. Therefore, the representation set forth in Paragraph 18 was, and is, false or misleading.

20. Through the means described in Paragraph 11, including, but not necessarily limited to, the statements and depictions contained in the materials attached as Exhibit I, respondents have represented, expressly or by implication, that their genetically customized skin repair serum is scientifically proven to: (a) reduce the appearance of wrinkles and improve skin firmness; and (b) enhance or diminish aging predispositions, including collagen breakdown, sun damage, and oxidative stress.

21. In truth and in fact, respondents' genetically customized

## Data Security

24. Through sales of purported genetically customized nutritional supplements and skincare products, respondents obtain consumers' personal information, including, but not limited to,



32. In truth and in fact, as set forth in Paragraph 29, respondents have not implemented reasonable and appropriate measures to protect consumers' personal information from unauthorized access. Therefore, the representation set forth in Paragraph 31 was, and is, false or misleading.

33. As set forth in Paragraph 29, respondents failed to employ reasonable and appropriate measures to prevent unauthorized access to consumers' personal information. Respondents' practices are likely to cause substantial injury to consumers that is not reasonably avoidable by consumers themselves and is not outweighed by countervailing benefits to consumers or competition. This practice was, and is, an unfair act or practice.

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

**THEREFORE**, the Federal Trade Commission, this \_\_\_\_\_ day of \_\_\_\_\_, 2014, has