

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

**COMMISSIONERS: Joseph J. Simons, Chairman
 Maureen K. Ohlhausen
 Noah Joshua Phillips
 Rohit Chopra
 Rebecca Kelly Slaughter**

In the Matter of

**Your Therapy Source, LLC,
 a Texas limited liability company,**

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DOCKET NO. C-4689

II. Respondents

2. Your Therapy Source, LLC is a limited liability company organized, existing, and doing business under and by virtue of the laws of the State of Texas, with its principal address at 8624 Mid Cities Boulevard, Suite 200, North Richland Hills, Texas 76182. Your Therapy Source is a therapist staffing company operating in the Dallas/Fort Worth, Texas area.
3. At all times relevant to this Complaint, Neeraj Jindal owned Fit 4 Life Therapy, LLC, , a therapist staffing company operating in the Dallas/Fort Worth, Texas area. As owner, Mr. Jindal was responsible for business and financial operations. Mr. Jindal sold Integrity in August, 2017, to a new owner who had no prior affiliation with Integrity or involvement in the conduct alleged in this Complaint. 1901 Long Prairie Road, Suite 220-75, Flower Mound, Texas 75022.
4. Sheri Yarbray owns Your Therapy Source and has served as the Chief Executive Officer since she founded the company over ten years ago. As Chief Executive Officer, Ms. Yarbray is responsible for business and financial operations. Ms. Hills, Texas 76182.

III. Jurisdiction

5. within the meaning of Section 4 of the Federal Trade Commission Act, as amended, 15 U.S.C. § 44.
6. Respondents , including the practices and conduct alleged herein, are in commerce or affect commerce, as Section 4 of the Federal Trade Commission Act, as amended, 15 U.S.C. § 44, defines .

IV. Overview of Therapist Staffing Companies

7. Therapist staffing companies contract with home health agencies to provide therapists, including physical therapists, physical therapist assistants, occupational therapists, occupational therapist assistants, and speech therapists, to treat home health agency patients .
8. Home health agencies pay therapist staffing companies a negotiated rate referred to as a bill rate to provide therapists to treat home health agency patients. The bill rate is the primary source of revenue for therapist staffing companies.
9. Therapist staffing companies contract with or employ therapists to provide services to home health agency patients. Therapists provide an initial patient evaluation and then may treat or supervise a therapist assistant to treat the patient during a patient visit. Therapist staffing companies pay therapists a rate per patient visit or per patient

17. replied that if all therapist age,
 bunch of flip-
one therapist staffing company to contract with others paying higher rates. In her reply
text message, Ms. Yarbray wrote agree but we need to get everybody to do it[.]
18. On March 10, 2017, shortly after exchanging text messages with Ms. Yarbray,
agent informed Mr. Jindal that Your Therapy Source was willing to lower pay rates.
19. On March 17, 2017, followed up with Ms. Yarbray in another text
message. He

26.

WHEREFORE, THE PREMISES CONSIDERED, the Federal Trade Commission on this twenty-sixth day of October, 2019, issues its Complaint against Your Therapy Source, LLC, Neeraj Jindal, and Sheri Yarbray.

By the Commission