

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

FEDERAL TRADE COMMISSION and  
STATE OF GEORGIA

Plaintiffs,

v.

STEVEN D. PEYROUX, individually  
and as an owner and officer of  
REGENERATIVE MEDICINE  
INSTITUTE OF AMERICA, LLC, also  
d/b/a Stem Cell Institute of America,  
LLC, PHYSICIANS BUSINESS  
SOLUTIONS, LLC, and SUPERIOR  
HEALTHCARE, LLC,

BRENT J. DETELICH, individually  
and as an officer of REGENERATIVE  
MEDICINE INSTITUTE OF  
AMERICA, LLC, also d/b/a Stem Cell  
Institute of America, LLC,

REGENERATIVE MEDICINE  
INSTITUTE OF AMERICA, LLC, a  
limited liability company, also d/b/a  
Stem Cell Institute of America, LLC,

PHYSICIANS BUSINESS  
SOLUTIONS, LLC, a limited liability  
company, and

SUPERIOR HEALTHCARE, LLC, a  
limited liability company,

Defendants.

CIVIL ACTION NO.  
1:21-cv-3329-AT



**Corporate Defendants**

**Individual Defendants**

- Superior Healthcare, LLC

- Steven Peyroux

Superior Healthcare, LLC

3. Venue in this district is proper under 28 U.S.C. § 1391(b)(1), (b)(2), (b)(3), (c)(1), (c)(2), and (d), and 15 U.S.C. § 53(b).

4. At all times relevant to this Complaint, Defendants have maintained a  
V X E V W D Q W L D O F R X U V H R I W U D G H L Q R U D I I H F W L Q J F  
in Section 4 of the FTC Act, 15 U.S.C. § 44 and O.C.G.A. § 10392(a)(28).

5. This is an action instituted by the FTC and the State of Georgia. The  
Complaint charges that Defendants engaged in deceptive acts or practices in



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massively from these efforts.

13.

- x <sup>3</sup> & R U S R U D W H ' H I H Q G D Q W A S Regenerative Medicine Institute of America, LLC d/b/a Stem Cell Institute of America, LLC, Physicians Business Solutions, LLC, Superior Healthcare, LLC, and their successors and assigns.
- x <sup>3</sup> ' H I H Q G D Q W A S all of the Individual Defendants and the Corporate Defendants, individually, collectively, or in any combination.
- x <sup>3</sup> , Q G L Y L G X D O ' H I H Q G D Q W A S MD. Peyroux and Brent J. Detelich.
- x <sup>3</sup> 5 H J H Q H U D W L Y H 0 H G L F L Q H e a s J u d i c i a l P r o d u c t , W ' therapy or treatment that either: (1) falls under the definition of Stem Cell Therapy; or (2) involves or is claimed to involve the use of (i) cryopreserved or dehydrated amniotic fluid, tissues, or allografts; (ii) cryopreserved or deh\G U D W H G X P E L O L F D O F R U G : K D U placental tissues or allografts; or (iii) exosomes.
- x <sup>3</sup> 6 W H P & H O O 7 K e a h D a S \ product, therapy, or treatment that involves or is claimed to involve the use of stem cells derived from D P Q L R W L F W L V V X H R U I O X L G W K H S O D F H Q W D blood, adipose tissue, or bone marrow.<sup>2</sup>

ORDERS

BAN ON THE ADVERTISING, MARKETING, PROMOTION, OFFERING FOR SALE, OR SALE OF REGENERATIVE MEDICINE TREATMENT

IT IS ORDERED that Defendants, whether acting directly or through an intermediary <sup>2</sup> including by consulting, planning, participating, facilitating, or

<sup>2</sup> The Court acknowledges that Plaintiffs requested that the Court include a definition for <sup>3</sup> & R Y H U H G 3 U R G X F W V ' W K D W L Q F O X G H G G L H W D U \ V X S S O H P I Plaintiffs requested that Defendants be enjoined from making certain representations U H O D W H G W R W K H V H <sup>3</sup> & R Y H U H G 3 U R G X F W V e any 7 d e t a i l F D V H k supplements, food, or devices <sup>2</sup> it involved Regenerative Medicine Treatment. The Court

advising <sup>2</sup>



participation with any of them, who receive actual notice of this Order <sup>2</sup> are prohibited from directly or indirectly:

a. Failing to provide sufficient customer information to enable the State of Georgia to efficiently administer restitution. If a representative of the State of Georgia requests in writing any information related to restitution, Defendants must provide it, in the form prescribed by the State of Georgia, within 21 days;

b. Disclosing, using, or benefitting from customer information <sup>2</sup> including the name, address, telephone number, email address, social security number, RWKHU LGHQWLI\LQJ LQIRUPDWLRQ RU DQ\ GDWD W account (including a credit card, bank account, or other financial account) <sup>2</sup> that any Defendant obtained prior to entry of this Order in connection with the offering of any Regenerative Medicine Treatment; and

c.



individual who, as of the date of entry of this Order, is or has contracted or





- i. Each Defendant must report any change in: (1) any designated point of primary contact; or (2) the structure of any Corporate Defendant or any entity that Defendant has any ownership interest in or controls directly or indirectly that may affect compliance obligations arising under this Order, including: creation, merger, sale, or dissolution of the entity or any subsidiary, parent, or affiliate that engages in any acts or practices subject to this Order.
  - ii. Additionally, each Individual Defendant must report any change in: (1) name, including aliases or fictitious name, or residence address; or (2) title or role in any business activity, including any business for which such Defendant performs services whether as an employee or otherwise and any entity in which such Defendant has any ownership interest, and identify the name, physical address, and any Internet address of the business or entity.
- c. Each Defendant must submit to the FTC and the State of Georgia notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against such Defendant within 21 days of its filing.
- d. Any submission to the FTC or the State of Georgia required by this Order to be sworn under penalty of perjury must be true and accurate and comply

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perjury under the laws of the United States of America that the foregoing is

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full name, title (if applicable), and signature.

- e. Unless otherwise directed by an FTC representative in writing, all submissions to the FTC pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin: FTC, et al. v. Steven D. Peyroux, et al
- f. Unless otherwise directed by a State of Georgia representative in writing, all submissions to the State of Georgia pursuant to this Order must be sent by overnight courier to Jacquelyn L. Kneidel, Assistant Attorney General, Office of the Attorney General Chris Carr, Consumer Protection Division, 2 Martin Luther King, Jr. Drive, SE, Suite 356, Atlanta, Georgia 30334.

**J. RECORDKEEPING**

IT IS FURTHER ORDERED that Defendants must create certain records for 10 years after entry of the Order and retain each such record for 5 years after creation. Specifically, each Defendant, for any business that such Defendant, individually or collectively with any other Defendants, owns a majority of or controls directly or indirectly, must create and retain the following records:

- a. A copy of each unique advertisement or other marketing material;
- b. Accounting records showing the revenues from all goods or services sold;

- c. Personnel records showing, for each person providing services, whether as numbers; job title or position; dates of service; and (if applicable) the reason for termination;
- d. Records of all consumer complaints and refund requests, whether received directly or indirectly, such as through a third party, and any response; and
- e. All records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the FTC and the State of Georgia.



such Defendant who has agreed to such an interview. The person interviewed may have counsel present.

- c. Plaintiffs may use all other lawful means, including posing, through its representatives, as consumers, suppliers, or other individuals or entities, to Defendants or any individual or entity affiliated with Defendants, without the necessity of identification or prior notice. Nothing in this Order limits the lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1. Nothing in 005 (om)3.008.02 501/TT211.998 (i) or