**IN THE CIRCUIT COURT OF CULLMAN COUNTY, ALABAMA**



**STATE OF ALABAMA, ex rel. ATTORNEY GENERAL STEVE MARSHALL**

**Plaintiff,**

**v.**

**AURORA MOBILE IV and WELLNESS LLC d/b/a AURORA IV and WELLNESS; AMANDA PHILLIPS MEDDERS; & CHRIS MEDDERS**

**Defendants.**

**Case No.** CV 25-043

## VERIFIED COMPLAINT FOR INJUNCTIVE, DECLARATORY, AND OTHER RELIEF

The State of Alabama, by and through Attorney General Steve Marshall, submits this complaint against Aurora Mobile IV and Wellness, d/b/a Aurora IV and Wellness; Amanda Phillips Medders; and Chris Medders. The allegations set forth in this complaint are based upon information acquired during the State's investigation. The State alleges the following:

## I. Introduction

1. Aurora Mobile IV and Wellness LLC ("Aurora") is a clinic that offers consumers, among other things, intravenous infusions of medications and/or vitamins, pain management drugs, and weight loss drugs. *See* www.auroramobileiv.com (last accessed November 5, 2025). Amanda Phillips Medders started the business in 2024, (Ex. 1), and now runs it with her husband, Chris Medders. (Ex. 2)

2. Among the products Aurora offers its weight loss patients are tirzepatide and semaglutide injections. *See* (Ex. 3); also available at https://www.auroramobileiv.com/blank (last accessed November 5, 2025). The defendants promote these products as being pharmaceutical-grade medications. *See id.* The problem, however, is that the defendants are not actually providing their patients with pharmaceutical-grade drugs. Rather, they are providing patients with injections of research-grade drugs that are not intended for human consumption. *See, e.g.,* (Exs. 4 and 5). The defendants' conduct presents a clear danger to the health and safety of their patients, and it must be stopped.

3. The Attorney General is authorized to seek injunctive relief when he has reason to believe that a person or business is engaging in acts or practices that violate Alabama's Deceptive Trade Practices Act, which is what the defendants are doing here. *See* Ala. Code § 8-19-8(a).

4. Among other things, the Deceptive Trade Practices Act prohibits:

   a. "Causing confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services," Ala. Code § 8-19-5(2);

   b. "Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or qualities that they do not have or that a person [or company] has sponsorship, approval, status, affiliation, or connection that he or she [or it] does not have," Ala. Code § 8-19-5(5);

   c. "Representing that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they are of another," Ala. Code § 8-19-5(7);

   d. "Advertising goods or services with intent not to sell them as advertised," Ala. Code § 8-19-5(9); and

   e. Engaging in "unconscionable, false, misleading, or deceptive act[s] or practice[s] in the conduct of trade or commerce." Ala. Code § 8-19-5(27).

The defendants' conduct – advertising pharmaceutical-grade drugs but dispensing research-grade drugs to patients without their knowledge or consent – violates each of these provisions.

5. Given the extent of the defendants' violations, the Attorney General, acting under the Deceptive Trade Practices Act, seeks an order dissolving Aurora Mobile IV and Wellness LLC; prohibiting the defendants from ever again operating in the healthcare industry in Alabama; and directing the defendants to pay damages, civil penalties, costs, and fees.

## II. Jurisdiction And Venue

6. This Court has subject matter jurisdiction over this case because the Attorney General has authority to initiate a suit against any person who has engaged in, is engaging in, or is about to engage in, any act or practice declared unlawful under the Deceptive Trade Practices Act. Ala. Code § 8-19-8(a).

7. Venue is proper in Cullman County because the defendants have conducted business in Cullman County at all relevant times, and many of the unlawful acts or practices at issue in this case were committed, and are still being committed, in Cullman County. *See* Ala. Code § 8-19-11(b).

## III. Parties

8. The State of Alabama, acting through Attorney General Steve Marshall, brings this action under Sections 8-19-8, 8-19-10, and 8-19-11 of the Code of Alabama to obtain permanent injunctive relief, damages, civil penalties, and other equitable relief for the defendants' violations of the Deceptive Trade Practices Act. The Office of the Attorney General has investigated the defendants' conduct and has determined that they have violated, and are still violating, the Deceptive Trade Practices Act and that they will continue to do so even if given an opportunity to

appear before the Attorney General to discuss a resolution of the State's claims pursuant to the provisions of Section 8-19-8(a) of the Code of Alabama.[1]

9. Defendant Aurora Mobile IV and Wellness LLC is an Alabama corporation formed by Amanda Phillips Medders in 2024. *See* (Ex. 1). Aurora Mobile IV and Wellness LLC operates in Cullman County, Alabama from its clinic located at 219 Compass Way SW, Cullman, Alabama 35055.

10. Defendant Amanda Phillips Medders, an Alabama resident, is the incorporator and co-owner of Aurora Mobile IV and Wellness LLC. *See* (Exs. 1 and 2). At all times material to this complaint, acting alone or in concert with others, Amanda Medders formulated, directed, controlled or had the authority to control, and/or participated in the acts and practices set forth in this complaint.

11. Defendant Chris Medders, an Alabama resident, is the co-owner of Aurora Mobile IV and Wellness LLC. *See* (Ex. 2). At all times material to this complaint, acting alone or in concert with others, Chris Medders formulated, directed, controlled or had the authority to control, and/or participated in the acts and practices set forth in this complaint.

[1] In light of this determination, the Attorney General was not required to offer the defendants an opportunity to meet to discuss a resolution of the State's claims before filing this action. *See* Ala. Code § 8-19-8(a).

## IV. Commerce

12. At all times material to this complaint, the defendants have maintained a substantial course of trade or commerce in Alabama, as "trade or commerce" is defined in Section 8-19-3(14) of the Code of Alabama.

## V. Factual Background

13. Aurora Mobile IV and Wellness LLC, operating as Aurora IV and Wellness, opened in 2024. *See* (Ex. 1). The business offers its patients various intravenous infusion services, "including vitamin C infusions, hydration therapy, and immune-boosting blends." *See* (Ex. 4); also available at https://www.auroramobileiv.com (last accessed November 5, 2025). In addition to these services, Aurora also offers weight loss drugs, specifically tirzepatide and semaglutide injections. *See* (Ex. 3); also available at https://www.auroramobileiv.com/blank.

14. Aurora promotes its tirzepatide and semaglutide injection services by telling its patients and prospective patients that they can "[a]chieve [their] weight loss goals with these powerful, *pharmaceutical grade* peptides." *See* (Ex. 3); also available at https://www.auroramobileiv.com/blank (emphasis added). This is a lie. The defendants are not providing their patients with pharmaceutical-grade drugs; they are instead giving them potentially dangerous, research-grade drugs that are not suitable for human consumption. *See, e.g.,* (Exs. 5, 6, and 7). The State now brings

this action to protect the public health and safety by stopping these dangerous business practices.

### A. The Defendants Are Falsely Representing That Their Tirzepatide and Semaglutide Medications Are Pharmaceutical-Grade Drugs.

#### 1. The defendants are giving their patients research-grade drugs rather than the pharmaceutical-grade drugs they advertise.

15. At issue here are the defendants' misrepresentations of the nature of their two weight-loss products: tirzepatide and semaglutide. Both drugs are peptides, sold to patients as weight loss aids. *See* (Ex. 3).

16. Tirzepatide is sold as an injectable drug under the brand names Mounjaro and Zepbound. It "is a dual agonist for the glucagon-like peptide-1 (GLP-1) and glucose-dependent insulinotropic polypeptide (GIP) receptors." Khashayar Farzam; Preeti Patel, *Tirzepatide*, Treasure Island (FL): StatPearls Publishing, available in the National Library of Medicine, https://www.ncbi.nlm.nih.gov/books/NBK585056 (last updated February 20, 2024). Tirzepatide "leads to significantly improved glycemic control and weight reduction in patients with [Type 2 diabetes], maximizing benefits similar to GLP-1 medications such as semaglutide . . . [and] is currently utilized as a second-line diabetes medication akin to GLP-1 drugs, such as semaglutide, and is administered once weekly via subcutaneous injection with incremental dosage adjustments." *Id.*

17. Semaglutide, sold as an injectable drug under the brand names Ozempic and Wegovy, is "a glucagon-like peptide-1 (GLP-1) receptor agonist[.]" Sharath Kommu; Philip Whitfield, *Semaglutide*, Treasure Island (FL): StatPearls Publishing, available in the National Library of Medicine, https://www.ncbi.nlm.nih.gov/books/NBK603723 (last updated February 11, 2024). Ozempic has been approved by the Food and Drug Administration ("FDA") for the treatment of Type 2 diabetes. *Id.* "It is not approved for weight loss, but some physicians prescribe it to be used for weight loss." UCDavis Health, *Ozempic for weight loss: Does it work, and what do experts recommend?*, available at https://health.ucdavis.edu/blog/cultivating-health/ozempic-for-weight-loss-does-it-work-and-what-do-experts-recommend/2023/07 (July 19, 2023, updated June 3, 2025). Under the brand name Wegovy, "semaglutide received FDA approval . . . for promoting weight loss in individuals dealing with obesity and overweight [and] is used in combination with a reduced-calorie diet and increased physical activity for long-term weight management in adults with obesity." *Semaglutide*, available in the National Library of Medicine, https://www.ncbi.nlm.nih.gov/books/NBK603723.

18. Of course, Mounjara, Zepbound, Ozempic, and Wegovy are FDA-approved and are subject to the FDA's current good manufacturing practice regulations contained in the Code of Federal Regulations. *See* 21 C.F.R. § 210.1, *et al.*; 21 C.F.R. § 211.1, *et al.* But this case does not involve these name-brand drugs.

Nor does it involve what would traditionally be considered generic drugs, which still must be both FDA approved and "the same as a brand-name medicine in dosage, safety, effectiveness, strength, stability, and quality, as well as in the way it is taken." Food and Drug Administration, *Generic Drug Facts*, available at https://www.fda.gov/drugs/generic-drugs/generic-drug-facts (current as of November 1, 2021). "Generic medicines also have the same risks and benefits as their brand-name counterparts." *Id.*

19. Research-grade drugs, on the other hand, are not approved for any use in human beings. Nevertheless, "some patients and health care professionals may look to unapproved versions of GLP-1 (glucagon-like peptide-1 (GLP-1) receptor agonists) drugs, including semaglutide and tirzepatide, as an option for weight loss." Food and Drug Administration, *FDA's Concerns with Unapproved GLP-1 Drugs Used for Weight Loss*, available at https://www.fda.gov/drugs/postmarket-drug-safety-information-patients-and-providers/fdas-concerns-unapproved-glp-1-drugs-used-weight-loss (current as of September 25, 2025). However, "[t]his can be risky for patients, as unapproved versions do not undergo FDA's review for safety, effectiveness and quality before they are marketed." *Id.*

20. This case deals specifically with research-grade peptides sold by Vera Research. *See* (Exs. 5, 6, and 7). On its website, Vera Research states clearly that, "all products offered by Vera Peptides are intended for professional research only.

We do not sell our peptides for personal or recreational use under any circumstances." (Ex. 6 at 1); also available at https://veraresearch.com/about/ (last accessed November 5, 2025). Furthermore, on the pages of its website where it offers tirzepatide for sale, Vera Research states that "[a]s a **research-grade peptide**, Tirzepatide is available to scientists looking to buy tirzepatide online from reputable suppliers." (Ex. 6 at 3); also available at https://veraresearch.com/product/tirzepatide-5-vials-in-pack/ (last accessed November 5, 2025) (emphasis in original). It also states that its tirzepatide "is intended exclusively for scientific research in controlled environments and *is not for human or veterinary use*." (Ex. 6 at 4) (emphasis added).

21. Similarly, Vera Research states that its semaglutide product is "available *exclusively* for research purposes" and that it is "vital to note that [it] is intended *solely* for experimental use in non-human models, aligning with ethical guidelines for scientific exploration." (Ex. 6 at 6); also available at https://veraresearch.com/product/semaglutide-5-vials-in-pack/ (last accessed November 5, 2025) (emphasis added).

22. As research-grade drugs, Vera Research's peptides are not subject to FDA regulation and are not required to adhere to the same requirements that they be free from contaminants. *See FDA's Concerns with Unapproved GLP-1 Drugs Used for Weight Loss*, available at https://www.fda.gov/drugs/postmarket-drug-safety-

information-patients-and-providers/fdas-concerns-unapproved-glp-1-drugs-used-weight-loss. Ingestion of these drugs not only goes against the manufacturer's explicit instructions, *see* (Ex. 6 at 3-6), it is "risky for patients." *FDA's Concerns with Unapproved GLP-1 Drugs Used for Weight Loss*, available at https://www.fda.gov/drugs/postmarket-drug-safety-information-patients-and-providers/fdas-concerns-unapproved-glp-1-drugs-used-weight-loss. In other words, these drugs are potentially dangerous, and people should not use them. Nevertheless, this is precisely what the defendants are leading their patients to do.

23. On October 9, 2025, Sonya Shedd, a part-time nurse employed by Aurora, stopped at the office because she had clients scheduled to pick up medication that week and wanted to find out whether they had picked up their medication and whether there was anything else she needed to do. (Ex. 5 at ¶¶ 2 and 5). While Sonya was in the office, she witnessed another nurse, Brooke Ray, draw tirzepatide from a vial with a label that read "Vera," which Sonya recognized as a "gray market," or research-grade drug. *Id.* at ¶¶ 6 and 7. Sonya then saw Ray inject that medication into a patient. *Id.* at ¶ 7.

24. After the patient left, Sonya confronted Ray about what she had seen. *Id.* During that conversation, Ray admitted that she had injected the patient with a research-grade version of tirzepatide that was not intended for human consumption. *Id.* Ray further admitted that Aurora had been giving patients injections with

research-grade drugs since approximately May of 2025. *Id.* at ¶ 8. Ray also told Sonya that Amanda Medders told her that what they were doing was legal and would not cause any harm. *Id.* at ¶ 9.

25. Sonya resigned from Aurora immediately after this incident. *Id.* at ¶ 10. She also contacted both the Cullman Police Department and the Alabama Board of Nursing to report what she had seen, *see* (Ex. 8 at 3-4), after which the Cullman Police Department, the Alabama Board of Medical Examiners, the Alabama Board of Nursing, and the Attorney General opened investigations.

26. Investigators from the Board of Medical Examiners and the Board of Nursing visited Aurora on October 22, 2025. *See* (Ex. 9). During that inspection, the investigators specifically looked in the refrigerator where the clinic keeps its drugs and confirmed that the refrigerator held research-grade drugs from Vera Research. *See* (Ex. 5 at ¶ 6; Exs. 7 and 9).

27. While at Aurora's premises, an investigator from the Board of Medical Examiners questioned Brooke Ray and another Aurora nurse, Brooke Hendricks, about these drugs. (Ex. 9) Both Ray and Hendricks claimed the drugs were for Amanda Medders's personal use and that Medders kept pharmaceutical grade medication for Aurora's patients at her home. (Ex. 9 at 2) They further claimed that the pre-filled syringes located in the refrigerator, (Ex. 7), were for Amanda

Medders's patients and that neither of them provided weight loss treatments to patients. (Ex. 9 at 2).

28. Later that same day, officers from the Cullman Police Department also visited Aurora's office. (Ex. 8 at 10) They asked for permission to inspect the premises, including the refrigerator where the clinic stores its drugs. *Id.* Aurora's staff gave permission, and the officers, like the investigators from the Board of Medical Examiners and the Board of Nursing, confirmed that the refrigerator contained research-grade drugs from Vera Research. *Id.*

29. The officers interviewed Brooke Ray while at the clinic. (Ex. 8 at 11-12) Contrary to what she told the Board of Medical Examiners earlier that day, Ray told the officers that she at least told her patients what they were getting and required them to sign a consent form agreeing to receive these drugs. (Ex. 8 at 11).

30. Amanda Medders arrived at the business while the officers were still present. *Id.* at 12. Medders admitted that Aurora provides research-grade drugs to its patients. *Id.* She further claimed that patients sign a consent form notifying them what they are receiving, although she acknowledged that "probably not all of them know it isn't FDA approved." *Id.* at 13-14.

31. On October 24, 2025, an investigator with the Board of Nursing separately interviewed both Brooke Ray and Aurora's nurse practitioner, Blair Gilliland, by phone. (Exs. 10 and 11) In direct contrast to what Ray told the Board

of Medical Examiners and what Sonya Shedd saw, Ray told the Nursing investigator that she did, in fact, treat weight loss patients. *See* (Ex. 10 at 3:23)("I do weight loss as well."). *Compare with* (Ex. 5 at ¶¶ 6 and 7, Ex. 9 at 2). Also contrary to her statement to the Board of Medical Examiners, but in line with what she told the Cullman Police Department, Ray claimed both that Aurora notified its patients what types of drugs they were receiving and that those patients signed consent forms agreeing to receive those drugs. *See* (Ex. 10 at 22:00).

32. Gilliland also told the Board of Nursing's investigator that the clinic told patients what types of drugs they were receiving and that the patients signed consent forms. *See, e.g.,* (Ex. 10 at 9:29). However, her own statements during that interview undercut these claims.

33. First, Gilliland stated multiple times in her interview that she wrote prescriptions for – and Aurora dispensed – compounded drugs, which are not FDA-approved simply because they are compounded. *See* (Ex. 10 at 4:24, 9:43, 19:43). But the peptide drugs dispensed by Aurora are reconstituted, meaning water is added to them before they are administered; they are not compounded. *See* (Ex. 7; Ex. 8 at 11, 13). *See also* 21 U.S.C. § 353a ("As used in this section, the term "compounding" does not include mixing, reconstituting, or other such acts that are performed in accordance with directions contained in approved labeling provided by the product's manufacturer and other manufacturer directions consistent with that labeling.").

34. Second, Gilliland claimed that she told patients, "It's no different than a research chemo drug. Or you going into these studies and these are all [unintelligible]. These drugs are all in the research phase of it." (Ex. 10 at 16:51). However, that statement is hardly accurate because, as discussed above, tirzepatide and semaglutide have been approved by the FDA for some purposes, including for weight loss. *See Tirzepatide*, available in the National Library of Medicine, https://www.ncbi.nlm.nih.gov/books/NBK585056; *Semaglutide*, available in the National Library of Medicine, https://www.ncbi.nlm.nih.gov/books/NBK603723. Indeed, Ozempic is an example of a peptide that is approved for one purpose, the treatment of diabetes, but is often prescribed "off-label" as a weight loss drug. But it is still an FDA-approved drug that is subject to FDA requirements for purity and safety. The drugs being peddled by the defendants are not.

35. Moreover, the issue here is not whether the concept of using peptides to aid in weight loss is being studied – something which would presumably require FDA-authorized human trials outside the setting of a local IV infusion clinic – it is whether the defendants are informing their patients that they are dispensing research-grade drugs that are unsuitable for human use. They are not.

**2. The waiver form the defendants provide their patients is insufficient to advise patients that they are receiving research-grade drugs.**

36. As part of its investigation, the Board of Medical Examiners obtained a copy of the waiver form Aurora gives its patients. (Ex. 12) Likewise, Brooke Ray provided a separate copy of the waiver form to the Cullman Police Department. (Ex. 9 at 10; Ex. 13)

37. However, while the defendants would claim that their waiver form properly notified patients that they were being given research-grade drugs and that it properly obtained their consent to receive those drugs, it does neither.

38. First, the Cullman Police Department interviewed three of Aurora's patients and asked specifically what notice they received about the drugs they were taking. (Ex. 8 at 14-17) Each of those patients told investigators they were not told what type of drugs they were given, nor were they required to sign a copy of the consent form. *Id.*

39. Second, the waiver form does not properly notify those patients who have signed it what medications they are really receiving. The waiver form advises patients that they are receiving peptides and that at least some peptides are considered experimental. (Ex. 12) The form further requires patients to agree that they have read its provisions and understood, among other things, "that some peptides are used 'off-label,' and may not be FDA-approved for this specific

purpose." *Id.* What the waiver form does not do is tell patients that they are receiving research-grade peptides that are not suitable for human use rather than the pharmaceutical-grade peptides advertised by the defendants.

40. Ultimately, the defendants are not even providing all their patients with the waiver form, and the form is, in any event, insufficient even for those patients who do receive a copy. The waiver suggests that the defendants are offering patients an FDA-approved drug that is simply being used "off-label" for a purpose other than what the FDA has approved. There is no doubt that FDA-approved drugs are often used "off-label," *i.e.,* for uses other than those for which they were approved. But to promote the use of a drug as "off-label" implies that there is an "on-label" use for the drug. That is not the case here. Here, there is no "label," as there can be no legitimate use of these drugs in human beings. Indeed, the manufacturer of these drugs has made it abundantly clear that these drugs are intended for laboratory use only and not for human consumption. *See* (Ex. 6 at 3-6). Any assertions the defendants might make to the contrary are false.

### B. The Defendants' Misrepresentations About Their Drugs Violate the Deceptive Trade Practices Act.

41. Section 8-19-5 of the Deceptive Trade Practices Act specifically forbids the following acts and practices in the conduct of trade or commerce:

> (2) Causing confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services.

* * *

(5) Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or qualities that they do not have or that a person has sponsorship, approval, status, affiliation, or connection that he or she does not have.

* * *

(7) Representing that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they are of another.

* * *

(9) Advertising goods or services with intent not to sell them as advertised.

42. The Defendants expressly represent that their peptides are "pharmaceutical grade." *See* (Ex. 3). Inherent in that representation is that the drugs the defendants are dispensing have been approved by the FDA for some purpose and have been through a process to remove any contaminants and make them safe for human consumption.[2] Despite this, the defendants have been providing patients with

[2] Obviously, any drug carries risk, but FDA-approved drugs are at least subject to the FDA's good manufacturing practice requirements. *See* 21 CFR § 210.1, *et al.*; 21 CFR § 211.1, *et al.* In other words, FDA approved drugs could at least be considered "clean," something that cannot necessarily be said about research-grade drugs. *See FDA's Concerns with Unapproved GLP-1 Drugs Used for Weight Loss,* available at https://www.fda.gov/drugs/postmarket-drug-safety-information-patients-and-providers/fdas-concerns-unapproved-glp-1-drugs-used-weight-loss ("unapproved versions [of GLP-1 drugs] do not undergo FDA's review for safety, effectiveness and quality before they are marketed.").

injections of research-grade drugs that are not intended for human consumption. *See* (Exs. 5, 6, and 7).

43. By making these false claims, the defendants have:

a. Caused consumer confusion or misunderstanding about the "source, sponsorship, approval, or certification of" their peptide drugs, *i.e.* that they come from a source that produces pharmaceutical-grade drugs and that their drugs are, in fact, pharmaceutical-grade drugs suitable for human consumption, in violation of Section 8-19-5(2);

b. Falsely represented that their goods and services "have sponsorship, approval, characteristics, ingredients, uses, benefits, or qualities that they do not have," *i.e.,* that their peptides are pharmaceutical-grade peptides that are suitable for human consumption when they are not, in violation of Section 8-19-5(5); and

c. Falsely claimed that their peptides "are of a particular standard, quality, or grade . . . if they are of another," *i.e.*, that they are pharmaceutical-grade drugs that are suitable for human consumption when they are really research-grade drugs that are not suitable for human consumption, in violation of Section 8-19-5(7).

44. Furthermore, because the defendants are advertising "pharmaceutical grade peptides," *see* (Ex. 3), but are giving their patients research-grade peptides, they are "[a]dvertising goods or services with intent not to sell them as advertised," in violation of Section 8-19-5(9).

**C. The Defendants' Conduct Is Unconscionable.**

45. The Deceptive Trade Practices Act also prohibits "[e]ngaging in any other unconscionable, false, misleading, or deceptive act or practice in the conduct of trade or commerce." Ala. Code § 8-19-5(27). Providing patients with unsafe,

research-grade medications without their knowledge or consent presents a serious danger to those patients' health. It is a textbook example of unconscionable conduct. Thus, on this ground too, the defendants have violated the Deceptive Trade Practices Act.

### D. The Defendants' Conduct Must Be Stopped.

46. Ultimately, the defendants' continued operation poses a threat to public health and safety. It endangers their current patients, who are subjecting themselves to injections of potentially dangerous drugs. It also endangers prospective patients who may seek weight-loss drugs from the defendants and unknowingly receive dangerous drugs. To prevent these harms, the defendants' conduct must be stopped immediately.

## VI. Causes Of Action

47. The State adopts paragraphs 1-46 as if fully set forth herein.

48. The Deceptive Trade Practices Act forbids certain "deceptive acts or practices in the conduct of any trade or commerce." Ala. Code § 8-19-5. The term "trade or commerce" "[i]ncludes, but is not limited to, the advertising, buying, offering for sale, sale or distribution or performance of any service or goods, and any other article, commodity, or thing of value wherever situated and shall include any trade or commerce affecting the people of this state." Ala. Code § 8-19-3(8). The defendants' business – which includes the advertising and selling of weight loss

services, including peptide drugs – constitutes conduct in the course of trade or commerce under the Deceptive Trade Practices Act. *See id.*

49. The Legislature adopted the Deceptive Trade Practices Act because it recognized that "[t]he public health, welfare and interest require a strong and effective consumer protection program to protect the interest of both the consuming public and the legitimate businessperson." Ala. Code § 8-19-2. Businesses and individuals that falsely represent to patients that they are receiving pharmaceutical-grade drugs but secretly supply them with potentially dangerous, research-grade drugs instead constitute a direct threat to the public health, welfare, and interest, and they must not be permitted to continue.

***Deceptive Trade Practices Act Violations: Misrepresentations***

***Counts One - Four***

50. The defendants advertise their peptides as being "pharmaceutical grade." (Ex. 3). Implicit in this representation is that these drugs are safe for human consumption. However, the defendants have instead provided their patients with research-grade peptides that are expressly labeled as being for research purposes only, *see* (Ex. 7), and which the manufacturer has expressly stated are not for human consumption. (Ex. 6 at 2-6) Thus, for every dose of a research-grade peptide the defendants have given to patients without their knowledge or consent, the defendants have:

a. Caused consumer confusion or misunderstanding about the "source, sponsorship, approval, or certification of" their peptide drugs, in violation of Section 8-19-5(2);

b. Falsely represented that their goods and services "have sponsorship, approval, characteristics, ingredients, uses, benefits, or qualities that they do not have," in violation of Section 8-19-5(5);

c. Falsely claimed that their peptides "are of a particular standard, quality, or grade . . . [when] they are of another," in violation of Section 8-19-5(7); and

d. Advertised pharmaceutical-grade drugs with the intent not to sell them as advertised, in violation of Section 8-19-5(9).

***Deceptive Trade Practices Act Violations: Unconscionable Conduct***

***Count Five***

51. The defendants represent to their patients that they provide pharmaceutical-grade peptides, but they are actually giving their patients research-grade peptides that are expressly labeled as being for research purposes only, *see* (Ex. 7), and which the manufacturer has expressly stated are not for human consumption. (Ex. 6 at 2-6) They are also doing this without patients' knowledge or consent. *See* (Ex. 8 at 14-17). This conduct poses a serious threat to the defendants' patients' health and safety, and it is unconscionable. Thus, for each dose of a research-grade peptide the defendants have provided to patients without their knowledge or consent, the defendants have committed an unconscionable act in the course of trade or commerce in violation of Section 8-19-5(27).

## VII. Prayer For Relief

The State respectfully requests that this Honorable Court enter an Order:

A. Holding that the defendants have violated the Deceptive Trade Practices Act as set forth in this complaint and that those violations were continuous and willful under Section 8-19-8(c) of the Code of Alabama;

B. Permanently enjoining the defendants from engaging in the healthcare industry in this state, pursuant to Section 8-19-8(c) of the Code of Alabama;

C. Granting other injunctive relief as authorized by Section 8-19-8 of the Code of Alabama;

D. Directing the defendants to pay damages to all consumers who have suffered loss or injury because of the illegal acts set forth in this complaint as authorized by Section 8-19-10(g) of the Code of Alabama;

E. Imposing the maximum civil penalties allowed under Section 8-19-11 of the Code of Alabama;

F. Ordering payment of attorneys' fees and costs to the Office of the Attorney General pursuant to Section 8-19-11(e) of the Code of Alabama; and

G. Affording any other appropriate relief as this Honorable Court deems just and proper.

Respectfully submitted, this 6th day of November, 2025.

Steve Marshall
*Attorney General*

By:

*/s/ Michael G. Dean*
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## VERIFICATION

I, Michael G. Dean, declare as follows:

A. I am an Assistant Attorney General in the Office of the Attorney General.

B. The Office of the Attorney General has conducted a thorough investigation of the facts described in this Complaint, and the factual statements that are described and asserted are based upon that investigation.

C. I verify under penalty of perjury under the laws of the State of Alabama that the factual statements in this Complaint are true and correct to the best of my knowledge.

Executed this 6th day of November, 2025.

Michael G. Dean
*Assistant Attorney General*

**NOTARY PUBLIC**

My Commission Expires: August 6, 2029