

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY, FLORIDA

ROCA LABS, INC.  
a Florida Corporation.

Case No.:

Plaintiff.

v.

JOHN DOES 1-11,  
Defendants.

**VERIFIED COMPLAINT**

The Plaintiff, ROCA LABS, INC. (hereinafter "ROCA"), hereby files this, its Verified Complaint against JOHN DOES 1-11 (collectively "Defendants"), and in support thereof would allege as follows:

**Nature of the Action**

1. This is an action for defamation arising out of Defendants' false, malicious and defamatory postings on the website PissedConsumer.com (located on the Internet at <http://pissedconsumer.com>). ROCA has previously requested the identifying information of the Defendants from PissedConsumer.com, which has refused to voluntarily provide this information. ROCA is now seeking to obtain the identifying information of Defendants through discovery. ROCA is also seeking a preliminary declaration from the Court that the statements made by Defendants are defamation *per se*, so that ROCA may obtain the defamatory statements de-indexed from search engines such as Google, Yahoo and Bing. As the United States Supreme Court ruled in *Linn v. United Plant Guard Workers of America*,

6. Venue is proper pursuant to Chapter 47, Florida Statutes, because Defendants publish defamatory statements on the internet that are intended to reach this jurisdiction.
7. Defendants are subject to the jurisdiction of this Court pursuant to §48.193(1)(b), Florida Statutes, because they committed tortious acts within this State and this judicial district, causing damage to ROCA within this judicial district. *to wit:* publishing several false and defamatory statements concerning ROCA over the internet and within this judicial district. Plaintiff is currently unaware of the true name and address of the Defendants because said Defendants have published these defamatory statements over the internet without identifying themselves, and Plaintiff has been otherwise unable to obtain the identity of said Defendants absent a subpoena.
8. Any Defendants that are customers of ROCA have purchased weight loss products via contract and said Defendants are subject to a Florida court mandatory jurisdictional litigation clause.

#### **General Allegations**

9. ROCA is a Florida for-profit corporation that was formed in 2006 as Appealing Ventures, Inc. It changed its name to Roca Labs, Inc. in 2009.
10. ROCA manufactures food additives (sometimes referred to as nutraceuticals) and is the inventor of the proprietary Gastric Bypass Alternative® that is an effective weight loss option for people who are trying to lose in excess of 50 pounds.

11. ROCA's products and regimen have been purchased online and used by thousands of people as a surgery-free alternative to gastric bypass.
12. ROCA invests heavily in an online marketing and advertising program that has run in Florida and across the United States.
13. ROCA markets and sells its products and regimen through its website, "www.rocalabs.com," where information on its products and regimen is available and consumers can purchase the product directly.
14. ROCA relies upon its reputation, internet reviews, and the weight loss success stories of its customers to generate new business and attract new customers.
15. Unfortunately, due to the unencumbered nature of the internet, anyone with a keyboard can voluntarily, anonymously and intentionally detract from the thousands of positive stories with just one harmful article, interview, tweet, blog, or posting.
16. Each of the Defendants anonymously posted false, malicious and defamatory content about ROCA on the website PissedConsumer.com.
17. Defendants anonymously published the false statements about ROCA listed below and attached hereto as Exhibit A (herein collectively referred to as "Statements" or as the "Digital Defamation"):
  - a. This product sucks. It's expensive, horrible to drink & doesn't do nothing (See Review #506944 by anonymous).
  - b. This business is a total fraud. BEWARE! (See Review #490848 by anonymous)."
  - c. Roca Labs - Got scammed and sick from this JUNK (See Review #482648 by anonymous).
  - d. Roca Labs - Run don't walk away from this one! SCAM!! (See Review #487885 by anonymous).
  - e. The Company is full of lies and deceit (See Review #482585 by

anonymous).

- f. DO NOT TRUST THESE PEOPLE. They are CROOKS (See Review #480448 by anonymous).
- g. Roca Labs - Don't buy anything from Roca Lab they just sell a regular shake they are stealing your money (See Review #475672 by anonymous).
- h. I have a friend working in the warehouse of this product, he told me that is unsanitary they don't use gloves and hair nets to assemble the packages which comes with containers and spoons, and the product is a fraud doesn't work! (See Review #475672 by anonymous).
- i. Roca Labs is a SCAM (See Review #432655 by anonymous).
- j. Roca Labs- Product and company are PURE SCAM (See Review #413698 by anonymous).
- k. You have a better chance of feeling full if you swallowed a glass of liquid cement and let it harden in your stomach. Do not waste your time, energy or money on them. (See Review #413698 by anonymous).

*l.*

18. Upon information and belief, PissedConsumer.com is owned and/or operated by Opinion Corp. and Consumer Opinion Corp., which are "sister" companies and New York Corporations.

19. PissedConsumer.com is a gripe site where anonymous posters can say anything about any person or business.

20. PissedConsumer.com claims that it does not confirm the identity of any individual who posts information on the website, nor does it verify the authenticity of the posting. PissedConsumer.com's Terms and Conditions provide in part that users "are solely responsible for the content or information [they] publish or display (hereinafter, "post") on Pissed Consumer." *see* <http://pissedconsumer.com/tos.txt>

21. By their own actions, PissedConsumer.com provides an internet haven for anonymous individuals like the Defendants to denigrate, disparage, and defame thousands of small businesses, regardless of the truth or veracity of the posting.

22. PissedConsumer.com vehemently protects the anonymity of individuals who make posts and will not voluntarily release information to ROCA on the individuals who made the defamatory posts without a Court Order.
23. Indeed, part of the allure of PissedConsumer.com is that users can make postings to a very large audience (millions of viewers) and do so anonymously, seemingly without consequences.
24. PissedConsumer.com has stated publicly and in court filings that posts on the website are credible and serve the public purpose of helping individuals make better informed decisions about a product or company. PissedConsumer.com believes that postings are not mere puffery, but will be taken seriously and acted upon by readers. As a “consumer advocacy” site their stated goal is to have their audience of millions of readers rely upon the posts for credible business information. See <http://www.pissedconsumer.com/static/about-us.html>
25. According to their stated policy PissedConsumer.com will only remove false and defamatory reviews from its website if it receives an order from a Court.

### **Pissed Consumer Questions and Answers (FAQ)**

Over the years Pissed Consumer has received an incredible amount of media attention and has become a household name. We receive emails with comments that we're "out to lunch" or "the FAQ is full". Here we have attempted to address some of the questions.

#### **General Questions**

**3. Does PissedConsumer remove reviews from its website?**

Yes. PissedConsumer removes reviews from its website if it receives an order from a Court (see Fla. Individuals and Companies, below) or a notarized letter from the person who posted it. (See "For Posters" below.)

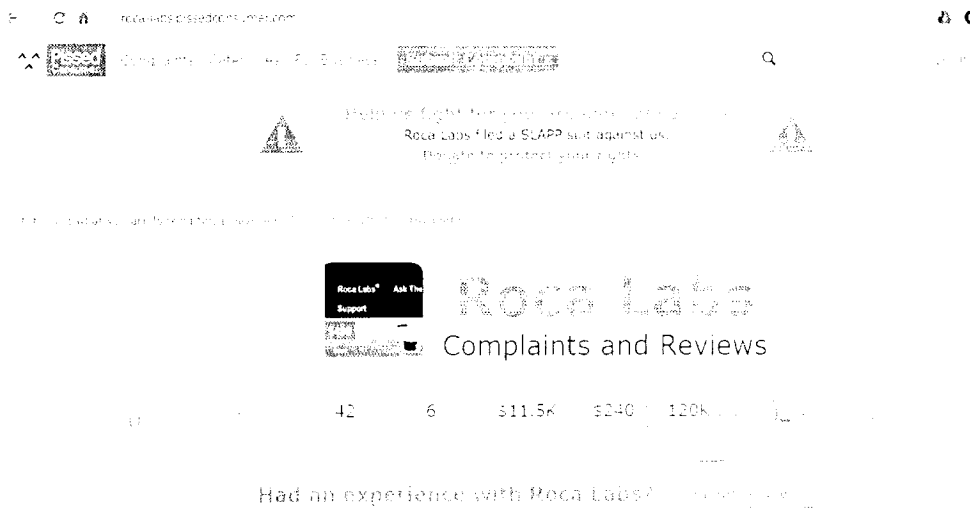
**4. How do I get a court order to remove a review?**

A law firm experienced in internet defamation can assist you.

**5. How do I find out who posted false information about me or my company?**

Pissed Consumer complies with all valid subpoenas issued by the courts. **A useful Subpoena Guide** for obtaining a subpoena that we can honor can be found at [www.vorvys.com/publications-1284.html](http://www.vorvys.com/publications-1284.html)

26. According to published statistics on PissedConsumer.com (highlighted below in red circle), the Digital Defamation has been seen more than 100,000 times.



27. ROCA unsuccessfully attempted to obtain the names of the Defendants from PissedConsumer.com or in the alternative have the defamatory content removed from the site, but it has refused to do so without Court order.

28. All conditions precedent to the maintenance of this action have been performed, excused or waived. Because Plaintiff is unable to learn the identity of the Defendants, the notice set forth in §770.01 Florida Statutes, to the extent that it might be applicable to any of the Defendants, is excused or does not apply with respect to those Defendants.

(Defamation as to John Does 1-11)

**COUNT I**

The Plaintiff ROCA realleges the allegations set forth above in Paragraphs 1-28 herein and sues DEFENDANTS for Defamation and states:

29. This is an action against Defendants for defamation seeking damages in excess of \$15,000.
30. Defendants made and published the false and defamatory Statements (attached as Exhibit "A" herein) of and concerning ROCA over the internet via PissedConsumer.com to third parties all over the world, with the knowledge that the Statements were false, with reckless disregard for the truth of the Statements, and with actual malice and the intent to injure ROCA's reputation.
31. As a direct and proximate result of the publication of the Statements by the Defendants, ROCA has suffered substantial damages, including but not limited to pecuniary loss and injury to reputation.
32. Defendants posts are wholly unfair to ROCA, are untrue, malicious and defamatory. ROCA has no online protections from these public posts.
33. ROCA's business relationships were and continue to be interfered with by Defendants' defamatory postings. As a result, ROCA continues to suffer irreparable harm at the hands of Defendants' defamatory postings.<sup>1</sup>

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<sup>1</sup> A 2011 Harvard Business School study of restaurants revealed that a one-star rating change on Yelp could lead to a difference in revenue of five-to-nine percent. *See HBS Study Finds Positive Yelp Reviews Boost Business*, Harvard Magazine Online (<http://www.harvardmagazine.com/2011/04/yelp-reviews-boost-business>), last retrieved November 3, 2014).

34. Defendants defamed and continue to defame ROCA. As a result, ROCA continues to suffer irreparable harm at the hands of Defendants.
35. The Statements are defamatory in that they directly state or strongly imply that ROCA have engaged in, e.g. fraud, theft, criminal activity, or incompetence with regards to the manufacture, sale and distribution of their product and regimen. Further, because Defendants, in making the Statements, claim to have special or inside knowledge of ROCA's business, as, contracted customers, employees or agents of ROCA, their status as such lend additional credence to the Statements in the minds of any reader.
36. There is no truth to any of the Statements. ROCA is a legitimate business entity, has sold its products to tens of thousands of individuals, and has never been accused by any State or Federal governmental entity of any wrongdoing (fraud, theft, etc.). ROCA's products have helped thousands of individuals change their lives by losing weight.
37. At the time Defendants published the Statements, Defendants knew the Statements and the defamatory meanings and implications of those Statements were false, acted with reckless disregard for the truth by publishing those Statements, and published the statements with actual malice. Defendants intended to injure and have injured ROCA's reputation by publishing these Statements.
38. As a direct and proximate result of the publication of the Statements by the Defendants, ROCA has suffered substantial damages, including but not limited to pecuniary loss, lost sales, lost profits, and injury to its reputation and goodwill.



39. Further, because the Statements impute criminal conduct, or conduct, characteristics or a condition incompatible with the proper exercise of ROCA's lawful business, the Statements are libelous and defamatory *per se*; accordingly, ROCA is presumed to have been damaged by the Statements.

40. The false and defamatory Statements are not privileged and ROCA did not consent to the publication or dissemination of the Statements.

41. Moreover, because the Statements impute conduct, characteristics, or a condition incompatible with the proper exercise of ROCA's lawful business, they are libelous and defamatory *per se* and ROCA is presumed to have been damaged by the Statements.

WHEREFORE, Plaintiff Roca Labs, Inc. demands judgment jointly and severally against Defendants as follows:

- a) Entry of permanent injunction enjoining DEFENDANTS, their agents, representatives, servants, employees and all those acting in concert or participation therewith, from posting defamatory content against ROCA on PissedConsumer.com and other internet sites.
- b) Entry of an order that, upon ROCA's request, any Internet search engines, Web Hosts, are provided with notice of the injunction, cease facilitating access to any or all websites through which Defendants post defamatory content:
- c) Entry of an Order requiring Defendants to account to and pay ROCA damages resulting from Defendants defamatory posts:

- d) Entry of an award of ROCA's costs and reasonable attorneys' fees and investigative fees associated with bringing this action.
- e) Entry of an award of pre-judgment interest on the judgment amount;
- f) Entry of an Order for any further relief as the Court may deem just and proper.

**COUNT II**  
**(Declaratory Judgment)**

The allegations set in forth in paragraphs 1 through 41 are incorporated by reference as if fully repeated herein and ROCA seeks declaratory relief pursuant to FS 86.011 against Defendants and states:

42. This is an action for declaratory relief pursuant to Section 86.011, *Florida Statutes*.

43. There is a bona fide, actual, present practical need for declaratory relief in this matter.

44. A present controversy with ascertainable facts exists between the parties in this matter.

45. DEFENDANTS have intentionally interfered with **ROCA's** economic relationship with potential customers when they made Digital Defamatory Statements on the internet.

46. DEFENDANTS conduct directly and proximately caused **ROCA** monetary damages that continue to accrue, as well as irreparable harm to **ROCA's** reputation.

47. **ROCA** is in doubt as to their rights under Florida law and is in need of a present declaration whether the conduct of DEFENDANTS *i.e.*, the Digital Defamatory Statements, tortiously interfered with **ROCA**'s prospective economic relationship with potential customers.

48. **ROCA** is in doubt as to their rights under Florida law and is in need of a present declaration whether the conduct of DEFENDANTS *i.e.*, the Digital Defamatory Statements, defamed **ROCA** *per se*.

49. **ROCA** seeks relief in order to enforce contractual and legal rights, and does not merely seek legal advice from this Honorable Court.

50. **ROCA**'s right to recovery is dependent upon the Court's finding of facts and/or application of same to Florida law.

51. The parties' interests in this declaration of rights are actual, present, adverse and antagonistic of fact and/or law.

52. Furthermore, the ongoing effect of Defendants' Digital Defamation has caused and continues to cause ROCA substantial damages

53. A Declaratory Judgment obtained immediately will mitigate the ongoing damages suffered by ROCA and allow Plaintiff to seek further relief from search engines such as Google, Yahoo and Bing as more fully described herein.

54. The Defendants acted to conceal their identity and residence in connection with the publishing of Digital Defamation on PissedConsumer.com. The Digital Defamation is commercial defamation, thus *defamatory per se*. The Plaintiff is not a public person pursuant to *New York Times Co. v. Sullivan*, 376 U.S. 254

- (1964). The Digital Defamation is not political speech.
55. The Digital Defamation is attached hereto as *Composite Exhibit A*. The URL sites in *Composite Exhibit A* contain the Digital Defamation in the form of a written instrument. See Florida Statute 49.011(5) and Florida Statute 49.021.
56. The Digital Defamation is digital property and should be considered a *res* which has been continuously located since the date of its publication in Broward County, Florida, as a result of its continuous publication or republication in Broward County, Florida through various Internet search engines such as Google. Venue is thus proper under Florida Statutes 47.011.
57. As a suit for a Declaratory Judgment and a civil action for libel or money damages or other supplemental relief, this Court has all the inherent equitable powers of the Circuit Court available for the proper and complete exercise of its jurisdiction conferred by Chapter 86, Florida Statutes to make a declaration by written Order that the Digital Defamation is in fact defamatory per se or not defamatory per se. See *Title and Trust Company of Florida v. Title Guaranty and Abstract Company of Sanford*, 103 So. 2d 211 (Fla. 2<sup>nd</sup> DCA 1958) and *Porter v. Warner Holding Company*, 328 U.S. 395 (1946).
58. The Defendants have at all times since the publication of the Digital Defamation had minimum contacts with the State of Florida pursuant to *Shaffer v. Heitner*, 433 U.S. 186 (1977) and *Internet Solutions v. Marshall*, 39 So. 3d 1201 (Fla. 2010).
59. A Declaratory Judgment under Chapter 86, Florida Statutes is permissible, in that

the author of the Digital Defamation has chosen anonymity and engaged in a pattern of behavior to conceal his, her or its identity, thus making a Declaratory Judgment by this Court the least onerous remedy directed at the Defendants. Defamatory speech is not protected free speech under the Freedom of Speech Clause of the First Amendment to the United States Constitution. As the United States Supreme Court ruled in *Linn v. United Plant Guard Workers of America*, "it must be emphasized that malicious libel enjoys no constitutional protection in any context" 383 U.S. 53 (1966).

60. The Plaintiff is a manufacturer of food additives (sometimes referred to as nutraceuticals) and is the inventor of the proprietary Gastric Bypass Alternative® regimen that is an effective weight loss option for people who are trying to lose in excess of 50 pounds. Within its competitive space the Plaintiff has numerous imitators and competitors. From time to time competitors, former employees and customers post anonymous defamatory material on various websites which are accessed via and republished on Google, Yahoo, Bing and other search sites.
61. ROCA asserts that the Digital Defamation speech is commercial defamation and expressly not political speech. It is speech related to either restricting competition within the competitive space and/or done with malicious intent to harm or injure ROCA's business reputation, and/or for revenge.
62. The ongoing effect of Defendants' Digital Defamation has caused and continues to cause ROCA substantial damages (estimated in the tens of millions of dollars). A Declaratory Judgment put into place at this point will mitigate the ongoing

damages suffered by ROCA and allow Plaintiff to seek further relief from Google.

63. The Declaratory Judgment sought herein is only a declaration by the Court that the defamation within control of Florida courts is, in fact, defamatory and defamatory per se. The Declaratory Judgment does not seek to expose the identity of the Defendants, and thus, does not violate the Defendants' First Amendment right associated with his, her or its anonymity.
64. Defendants' Statements were originally published on PissedConsumer.com. Any and all posting on PissedConsumer.com are indexed by major search engines (Google, Yahoo and Bing) by way of a live URL link on the search engine pages. In addition PissedConsumer.com adds meta tags and other search engine optimizing technologies to the postings so that they are found quickly in the major search engines.
65. Google has recognized that from time to time anonymous defamatory postings are published within its search pages. Google has adopted a voluntary policy that it will de-index (remove from its search algorithm and its search pages) defamatory postings from other internet service providers such as PissedConsumer.com so long as Google is presented with a judgment that the anonymous posting is in fact defamatory. If this Court enters an order finding the Statements posted by Defendants are defamatory, the Statements will only be removed by the search engine pursuant to its voluntary policy but will remain posted on PissedConsumer.com. Google, Yahoo and Bing have similar policies.

(See <http://www.google.com/transparencyreport/removals/government/>;  
<http://onlinehelp.microsoft.com/en-ca/bing/ff808447.aspx> and  
<http://info.yahoo.com/legal/us/yahoo/utos/en-us/>).

66. In essence, this claim for Declaratory Judgment is merely requesting that pages containing the Digital Defamation be removed from the search engines, *i.e.*, de-indexed. Google, Bing and Yahoo will adhere to their voluntary policy of removal after served a Court order declaring the content defamatory. More importantly, the Declaratory Judgment from this Court will not remove the commercially defamatory statements from PissedConsumer.com, which in fact is the source of the original postings of the Digital Defamation by Defendants. This scenario creates a *de facto* balancing test between the rights of the Plaintiff not to be defamed and the First Amendment rights of Defendants to be heard.<sup>2</sup>
67. This Court has in rem jurisdiction over the Digital Defamation based upon its location, publication, and republication within Broward County, Florida. The Digital Defamation is digital property which is located within the State of Florida and as such is sufficient to confer in rem jurisdiction on this Court. The Plaintiff must invoke the in rem jurisdiction conferred by Chapter 49, Florida Statutes.
68. Florida Statute 49.011(5) allows for service of process by publication when a party requests the legal interpretation and construction of a written instrument such the Digital Defamation which is the subject matter of this Declaratory Judgment.

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<sup>2</sup> Plaintiff asserts, however, that there is no First Amendment implication to defamatory commercial speech. The defamation, over which the Plaintiff seeks a Declaratory Judgment, is clearly not political speech or speech which communicates information with general public interest.

69. It is the conduct of the Defendants which necessitates constructive service of process, pursuant to Chapter 49, Florida Statutes, by such Defendants choosing to publish the Digital Defamation anonymously.
70. Absent such constructive service of process, the Plaintiff has no remedy. Further, Courts have long held that unless otherwise explicitly disallowed by the statute providing for constructive service and conferring in rem jurisdiction, all the inherent equitable powers of the Circuit Court are available for the complete exercise of its in rem jurisdiction conferred by Florida Statutes, Chapter 49. The comprehensiveness of this Court's equitable jurisdiction is not to be denied or limited *in the absence of a clear and valid legislative command*. Unless a statute in so many words, or by a necessary or inescapable inference, restricts this Court's jurisdiction in equity, the full scope of that jurisdiction is to be recognized and applied. *Porter v. Warner Holding Co., supra*. Through the exercise of its equitable jurisdiction conferred by Chapter 86, Florida Statutes, the Court may accord full justice to the parties in interest so that rights in the subject matter (Digital Defamation) may be determined. Only through the exercise of its equitable jurisdiction can this Court do complete rather than truncated justice. *Id.* at 39798; *see also Camp v. Boyd*, 229 U.S. 530, 551-52 (1913).<sup>5</sup>
71. The Plaintiff has conducted a pre-filing diligent search to discover and locate the identity and address of the Defendants, and has been unsuccessful in obtaining

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<sup>5</sup> See Florida Statutes 49.011(5) wherein the Legislature has conferred in rem jurisdiction regarding the construction of a written instrument. The Plaintiff here merely requests that the Court make a declaration and construct the "written instrument" (Digital Defamation) to determine if such written instrument in digital form is defamatory per se.



this information. The Plaintiff has exhausted all non-judicial remedies to attempt locating the Defendants, but the Defendants have concealed himself, herself, or itself in a manner which would prevent him, her, or it from having to enter a legal forum to answer for their defamatory statements about the Plaintiff.

72. The Defendants anonymously caused a written document, the Digital Defamation, to be located, published, republished, and accessible in digital form on various Internet search engines, including, but not limited to Google, Bing and Yahoo. The Digital Defamation continues to be republished as the date of the filing of this Complaint.

73. The Defendants created the defamatory and false postings. The Digital Defamation is defamatory and not protected speech. The Plaintiff is not a public figure.

74. The Digital Defamation is contained in *Composite Exhibit A*.

WHEREFORE The Plaintiff requests that the Court enter a declaratory judgment finding as follows:

- a. That the Digital Defamation is defamatory *per se*;
- b. That the Digital Defamation is not protected speech under the Free Speech Clause of the First Amendment based upon its defamatory nature;
- c. That the Digital Defamation is not opinion or otherwise privileged under common law;

d. That the Defendants be ordered to remove the Digital Defamation. In the event that the Defendants do not remove the Digital Defamation or cannot remove the Digital Defamation, the Plaintiff, may submit this Order, which is directed to the Defendants, to request any Internet search engine to remove the Digital Defamation from their search results (de-index).

e. That the Court's Declaratory Judgment provide that the Court's Order would not be res judicata or have any preclusive effect on Defendants, if his, her or its identity is established in the future in defending a claim for damages on the merits.

Dated: November 14, 2014

Roca Labs, Inc.  
P.O. Box 7898  
Delray Beach, FL 33482-7898  
Tel. 305-998-6150


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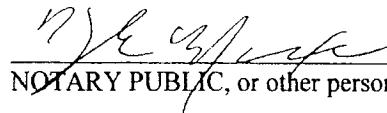
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**VERIFICATION**

I, Don Juravin, as Vice President of Roca Labs, Inc., hereby swear and attest that the factual allegations set for the in the Verified Complaint are true and correct, and I have authority to sign this Verified Complaint

  
Don Juravin  
Vice President, Roca Labs, Inc.

Sworn to and subscribed before me on 11-11-14.

  
NOTARY PUBLIC, or other person authorized to administer an oath

Printed, typed, or stamped commissioned name of Notary Public

Personally known  or produced identification .

Type of identification produced FL Drivers License

My commission expires:



COMPOSITE EXHIBIT "A"

(a) This product sucks. It's expensive, horrible to drink & doesn't do nothing (See Review #506944 by anonymous).

**Roca Labs - Review from Calgary, Alberta**

13 of 42 Roca Labs reviews

(b) This business is a total fraud. BEWARE! (See Review #490848 by anonymous)."

**Roca Labs - Boy am I glad I did not purchase this product!**

10 of 12 Roca Labs Reviews

(c) Roca Labs - Got scammed and sick from this JUNK (See Review #482648 by anonymous).

# Roca Labs - Got scammed and sick from this JUNK

21 of 42 Roca Labs Reviews

1000

Report

Help us fight for freedom of speech. We support free expression and your right to donate to your favorite causes.

Roca Labs Recent Discussed

1,448,122

This review was reported as inappropriate. If you are reporting this review, please provide as much detail as possible to help us investigate. Thank you for your report.

This review was reported as inappropriate. If you are reporting this review, please provide as much detail as possible to help us investigate. Thank you for your report.

Don't get these people involved. They are lying and trying to scam you. Don't fall for their lies. They are trying to scam you and get your money. Don't fall for their lies. They are trying to scam you and get your money.

(d) Roca Labs - Run don't walk away from this one! SCAM!! (See Review #487885 by anonymous).

# Roca Labs - Run don't walk away from this one! Scam!!

18 of 42 Roca Labs Reviews

1884

Report

Help us fight for freedom of speech. We support free expression and your right to donate to your favorite causes.

Roca Labs Recent Discussed

1,448,122

This review was reported as inappropriate. If you are reporting this review, please provide as much detail as possible to help us investigate. Thank you for your report.

This review was reported as inappropriate. If you are reporting this review, please provide as much detail as possible to help us investigate. Thank you for your report.

Don't get these people involved. They are lying and trying to scam you. Don't fall for their lies. They are trying to scam you and get your money. Don't fall for their lies. They are trying to scam you and get your money.

(e) The Company is full of lies and deceit (See Review #482585 by anonymous).

# Roca Labs - REFUND

23 of 42 Roca Labs Reviews

100% 5 4 3 2 1

100% Anonymous 1 review

In February 2018 I had a problem with the formula however my needs could not be met and that is why I left. I had been an open to my doctor's suggestions and had been with the company for 10 years. I had been a loyal customer.

I gave Roca Labs a 1 star review. I had to go to the doctor two months later they have called my insurance and said that I had to pay for the formula. The company did not care and they did not care about the fee. The formula is not working and they are not making it better.

I am not a doctor but I can tell you that they are behind a computer screen.

(f) DO NOT TRUST THESE PEOPLE. They are CROOKS (See Review #480448 by anonymous).

# Roca Labs - You will never get a representative to discuss a refund. These people are crooks.

25 of 42 Roca Labs Reviews

100% 5 4 3 2 1

100% Anonymous 1 review

I have been a customer of Roca Labs for many years. I have been a loyal customer and I have been a fan of the product. However, I have been disappointed in the service I have received from Roca Labs.

I have been a customer of Roca Labs for many years. I have been a loyal customer and I have been a fan of the product. However, I have been disappointed in the service I have received from Roca Labs.

The only way to get a refund is to pay for the product. I have been a customer of Roca Labs for many years. I have been a loyal customer and I have been a fan of the product. However, I have been disappointed in the service I have received from Roca Labs.

I have been a customer of Roca Labs for many years. I have been a loyal customer and I have been a fan of the product. However, I have been disappointed in the service I have received from Roca Labs.

The only way to get a refund is to pay for the product. I have been a customer of Roca Labs for many years. I have been a loyal customer and I have been a fan of the product. However, I have been disappointed in the service I have received from Roca Labs.

100% Anonymous 1 review

Roca Labs Has Discussed

100%

(g) Roca Labs - Don't buy anything from Roca Lab they just sell a regular shake they are stealing your money (See Review #475672 by anonymous).

## Roca Labs - dont buy anything from Roca Lab they just sell a regular shake they are stealing your money

28 of 42 Roca Labs Reviews

The screenshot shows an Amazon product review. The review title is "Roca Labs - dont buy anything from Roca Lab they just sell a regular shake they are stealing your money". The review text reads: "I bought this product in the warehouse of this product, he told me that is unsanitary they don't use gloves and hair nets to assemble the packages which comes with containers and spoons, and the product is a fraud doesn't work!". The review is dated 10/10/2017 and has a rating of 1 star. The reviewer's name is redacted.

(h) I have a friend working in the warehouse of this product, he told me that is unsanitary they don't use gloves and hair nets to assemble the packages which comes with containers and spoons, and the product is a fraud doesn't work! (See Review #475672 by anonymous).

## Roca Labs - dont buy anything from Roca Lab they just sell a regular shake they are stealing your money

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(i) Roca Labs is a SCAM (See Review #432655 by anonymous).







