



United States of America  
FEDERAL TRADE COMMISSION  
Washington, DC 20580

December 3, 2025

Anonymous

Re: In the Matter of Southern Health Solutions, Inc. et al., FTC File No. 232-3040

Dear Anonymous:

The Commission's analysis is aided by hearing from a variety of sources and we appreciate your comment regarding the above-referenced matter. The Commission has placed your comment on the public record pursuant to Section 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii).

The proposed order against Southern Health Solutions, Inc., dba Next Medical and NextMed, Robert S. Epstein, and Frank Pat Leonardo III (collectively, "NextMed") settles charges that NextMed misrepresented what was included in the cost of its weight-loss programs, the amount of weight lost by its members, and that testimonials were from actual users of its programs; unfairly distorted consumer reviews on third-party websites; failed to disclose important terms and conditions of their programs including a required one-year commitment; unfairly charged consumers without their express consent; unfairly failed to timely process cancellation and refund requests; and debited consumers' bank accounts on a recurring basis without obtaining written authorization.

The order would prohibit NextMed from misrepresenting material facts about its products and services including the cost of a telehealth service, the timing or manner of any bill or charge, the average results of its users, or that endorsements are from actual or ordinary users; require NextMed to obtain unambiguous affirmative consent before charging consumers, provide clear and conspicuous disclosure of all material terms and conditions of any cancellation or refund policies, and disclose unexpected material connections with endorsers; prohibit distortion of consumer reviews; and require authorization before debiting consumers' accounts. The order would also require the payment of \$150,000 for consumer redress.

The Commission believes the proposed order in the above-titled proceeding offers substantial protections to consumers and has now determined that the public interest would best be served by issuing the Decision and Order in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. Thank you again for your comment.

By direction of the Commission.

April J. Tabor  
Secretary