



LAW & MEDIATION OFFICES OF  
**ELIZABETH YANG**

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March 11, 2019

Christopher J. Centeno, M.D.  
403 Summit Blvd, Suite 201,  
Broomfield, CO 80021

**Re: Notice to Cease and Desist**

Dr. Centeno,

My name is Elizabeth Yang, my office has been retained by Joy Kong and we are hereby issuing you a cease and desist letter. If you are represented by legal counsel, please direct this letter to your attorney immediately and have your attorney notify us of such representation.

You are hereby directed to cease and desist all defamation concerning Joy Kong and her business, Chara Biologics (hereinafter referred to as “Business”).

Joy Kong is an educated and respected professional in the community. She has invested much time in serving the community in her profession and building a positive reputation. Dr. Kong has discovered your statements which are false, destructive, and defamatory.

Under California Law defamation consists of:

- (1) An intentional publication of a statement of fact;
- (2) That is false;
- (3) That is unprivileged;
- (4) That has a natural tendency to injure or which causes “special damage;” and,
- (5) The defendant's fault in publishing the statement amounted to at least negligence.

Your defamatory statements involved our client, Dr. Kong and her Business. You made the following intentional public statements in writing:

1. “...would love to see some criminal prosecutions of clinics scamming the elderly with fake x-ray results of knees before and after magic...[of] stem cell therapy.”

2. "...Chara is another company claiming live stem cells in a likely dead product. Interestingly, it's run by a physician who should know better. More disturbing is Dr. Kong's use of bait-and-switch research that has nothing to do with the product she's pushing.
3. "I call this practice the research bait and switch. Meaning, since Chara has done no actual clinical or lab-based research that would equate with how it compares to bone marrow concentrate, it substitutes research that has nothing or little to do with its product. This is common in this field, and it works because physicians are not yet sophisticated enough to know the difference."

The first statement, statement 1, was made in the comment section directly below Dr. Kong's video titled, "Are All MSCs Created Equal?", so it is clear that your statement was directed towards Dr. Kong and her Business. You have claimed that her Business is "scamming the elderly" by stating that she is using fake x-ray results on her patients, which will have the effect of hurting both her professional reputation as well as her Business's reputation.

Statement 2 and 3 were made on the Regenexx website as a blog post. The blog was titled "CharaCore Umbilical Cord Blood Product Review: Chara Biologics Review" The statements were clearly directed toward Dr. Kong and her Business. Your blog post title is misleading in the sense that you make it seem as if you are reviewing her product and showing evidence that her product contains dead stem cells, however, you show no actual testing of the product on your website. I believe you would call this practice the research bait-and-switch to mislead readers into thinking that you actually tested the product to show that there are no live stem cells. Again, statements such as this will affect both her professional reputation as well as her Business's reputation.

The statements you have made are unfounded and because they concern her professional reputation as well as her Business, there is no need to prove actual damages occurred because they are presumed by the nature of your statements.

Accordingly, we demand that you (1) immediately cease and desist your unlawful defamation of Joy Kong and of her Business including, but not limited to, removing mention of Dr. Kong and her Business in your blog post; and (2) provide us with prompt written assurance within ten (10) days of receipt of this letter that you will cease and desist from further defamation of Joy Kong and of her Business. Delivery of your written assurance will be accepted by either mail or e-mail.

In the event that you fail to do so please be aware that Dr. Kong may seek any and all legal remedies available. Including both civil or criminal proceedings. We are aware that you are domiciled in Colorado, however we can obtain jurisdiction over you because of your knowledge that Dr. Kong and her Business are in California, as evidenced in other statements. Your

statements were directed towards Dr. Kong, her profession, and her Business, which would allow us to obtain jurisdiction over you, see *Calder v. Jones*, 465 U.S. 783 (1984).

Please consider this letter as Dr. Kong's final attempt to resolve this issue in an amicable manner. Should you continue with your defamatory statements, regarding Dr. Kong, her profession, and her Business, we will not hesitate to seek further legal action.

If you have any questions or concerns please do not hesitate to contact me, you will find all my contact information listed at the top of this letter.

Respectfully,

A handwritten signature in black ink, appearing to read 'Elizabeth Yang', written over a horizontal line.

**Elizabeth Yang**

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