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Phone (720) 508-6000

**STATE OF COLORADO**  
**DEPARTMENT OF LAW**

**Consumer Protection Section**

January 14, 2022

**Cease and Desist Notice**

Center for COVID Control  
*Via email:* omer.centerforcovidcontrol@gmail.com

Uzair Omer  
6460 E Yale Ave  
Denver, CO 80222

1750 Blake St.  
Denver, CO 80202

4775 S Broadway  
Englewood, CO 80113

To Whom It May Concern:

This letter is intended to serve as **NOTICE** that the Colorado Attorney General's Office has cause to believe that the above-listed testing sites, each of which is administered by the Center for Covid Control, have engaged in, or are currently engaging in, unfair or deceptive trade practices as defined in § 6-1-105 of the Colorado Consumer Protection Act, §§ 6-1-101 through -1214, C.R.S. ("CCPA").

Specifically, § 6-1-105(1) prohibits, among other things:

- either knowingly or recklessly making a false representation as to the certification of goods, services, or property;
- either knowingly or recklessly making a false representation as to any certification by another;
- either knowingly or recklessly making a false representation as to the approval or affiliation of an entity with goods, services, or property;
- refusing or failing to obtain all governmental licenses or permits required to perform the services or to sell the goods, food, services, or property as agreed to or contracted for with a consumer.

From the Colorado Attorney General's investigation, it appears that each of the above-listed sites is not appropriately certified under the Clinical Laboratory Improvement Amendments of 1988 (CLIA). A CLIA certification is required by the Centers for Medicare & Medicaid Services (CMS) for all non-research, non-forensic laboratory testing performed on humans in the United States.

The Colorado Department of Public Health and the Environment (CDPHE) has requested each site's CLIA certificate and has determined that each site is not appropriately certified. You have therefore failed to obtain all necessary governmental licenses required to perform the tests that your sites offer to Colorado consumers. In continuing to operate each site, you are knowingly and recklessly misrepresenting the certification and approval of each above-listed site.

These regulations—including the necessity of a CLIA certificate—are designed to keep Coloradans safe. The CLIA program is designed to ensure quality laboratory testing and failing to obtain a CLIA certification could put Coloradans at risk. You must therefore **CEASE AND DESIST** operating each of these three testing locations unless and until you can demonstrate to the satisfaction of CDPHE and the Colorado Attorney General that the sites have all necessary certifications to operate in Colorado. You must also provide a description of all controls that you have in place to comply with the legal requirements to operate testing sites in Colorado.

In addition, our Office and the CDPHE have received a significant number of reports that the conditions at your testing sites do not comply with applicable regulations and guidance regarding patient safety—including the appropriate use of personal protective equipment. Knowingly failing to protect the health and safety of your consumers may also violate the CCPA's prohibition of unfair or unconscionable acts and practices. *See* § 6-1-105(1)(kkk), C.R.S.

Please acknowledge receipt of this Notice and your agreement to comply with the terms of this Notice by signing below and returning the signed original document to this office by January 21, 2022.

Failure to submit the signed acknowledgement of this Cease and Desist Notice may result in further enforcement action by the Colorado Attorney General's Office. This office will continue to monitor consumer complaints to ensure your compliance with this demand. Violations of the CCPA may result in further legal action, including but not limited to initiating a legal action against you seeking injunctive relief, penalties, restitution, and disgorgement of profits.

Any questions you have relating to this Notice should be directed to Abigail Hinchcliff at 720-508-6205 or [Abigail.Hinchcliff@coag.gov](mailto:Abigail.Hinchcliff@coag.gov).

Sincerely,

FOR THE ATTORNEY GENERAL

*Abigail M. Hinchcliff*

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Abigail Hinchcliff  
First Assistant Attorney General  
Consumer Protection Section  
Ralph L. Carr Colorado Judicial Center  
1300 Broadway, 7<sup>th</sup> Floor  
Denver, CO 80203  
Tel: (720) 508-6205  
[abigail.hinchcliff@coag.gov](mailto:abigail.hinchcliff@coag.gov)

**ACKNOWLEDGEMENT**

I, Uzair Omer, acknowledge that I have received and reviewed the above-contained notice and advisement. I hereby certify that I, Center for Covid Control, and its officers, agents, servants, and employees, and all persons in active concert or participation with Center for Covid Control who receive actual notice of this letter by personal service or otherwise, agree to CEASE & DESIST the sale of any goods or services to consumers at each of the three sites listed above unless and until Center for Covid Control and I are in full compliance with all requirements of this letter and the CCPA. I represent that I have the authority to sign this acknowledgement on behalf of Center for Covid Control.

\_\_\_\_\_  
Uzair Omer

\_\_\_\_\_  
Date