



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Serena Viswanathan
Associate Director
Division of Advertising Practices

February 5, 2021

WARNING LETTER

VIA EMAIL TO membership@palmhealth.com

Lauren Munsch Dal Farra, M.D.

CEO

Palm Integrative Health, LLC, d/b/a PALM Health

9160 Clayton Rd.

Ladue, MO 63105

Re: Unsubstantiated claims for Coronavirus prevention or treatment

Dear Dr. Dal Farra:

This is to advise you that FTC staff has reviewed your website at <https://www.palmhealth.com> in December 2020 and January 2021. We also reviewed your social media websites at <https://www.facebook.com/PALMHealthStl/>, <https://www.instagram.com/palmhealth/>, and <https://twitter.com/PalmHealthSTL>, where you promote treatments you provide, including IV infusions, salt therapy, BioMat and PEMF sessions, and acupuncture, as well as supplements you sell on your website at <https://www.palmhealth.com/>, including the “COVID-19 Immune-Boosting Supplement Pack,” the “COVID-19 Exposure Supplement Pack,” and the “COVID-19 Treatment Supplement Pack.” We have determined that you are unlawfully advertising that certain products or services prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims include:

- On a page on your website titled “What Can You Do to Prevent Getting COVID-19?” you state:

“What more can you do to stay healthy during COVID-19? Dr. Sita Kedia and Dr. Lauren Munsch Dal Farra recommend the following:...

“**Boost your immunity.** Support your immune system by... taking supplements...

Engage in wellness therapies. Boost your immune system with acupuncture, salt room sessions, BioMat and Cell Recharge (PEMF Mat) sessions, IV nutrition therapy, and other wellness therapies. Acupuncture sessions help boost immunity by reducing stress, improving the quality of sleep, relieving anxiety, and regulating hormonal balances. Salt inhalation has been shown to improve respiratory health and decrease energetic stress. Studies show that infrared light from the BioMat and PEMF mat may be beneficial in boosting the lymphatic, circulatory, and detoxification systems, aiding in preventing, as well as speeding recovery from, viral and bacterial infections. Immune-supporting IV therapy infusions deliver vitamins and minerals directly into your bloodstream to provide a strong boost to your system....

Take immune-boosting supplements. Micronutrients and plant-based botanicals can optimize your immune function and help fight viruses. They can also help shorten the duration of illness and reduce the severity of symptoms. The PALM Acute Immune Support Pack is a 5-day high-dose vitamin and mineral boost best taken at the onset of a cold or virus, or with anticipated travel. The PALM Café also crafts Immunity Shots from a combination of ingredients known to help boost immune function. Nutritional supplements such as vitamin C, vitamin D, NAC, and zinc can be taken daily for immune protection. Regular supplement use is best discussed with your medical provider, who can make personalized recommendations, or in a nutrition supplement consult.”

[\[https://www.palmhealth.com/what-can-you-do-to-prevent-getting-covid-19/\]](https://www.palmhealth.com/what-can-you-do-to-prevent-getting-covid-19/)

- You offer several supplement products for purchase on your website, including the following supplement packages, described as follows:
 - “COVID-19 Immune-Boosting Supplement Pack
\$100.00
Keep your immune system healthy and strong with our provider-recommended COVID-19 Immune-Boosting Supplement Pack. This pack includes vitamin C (ascorbic acid), zinc, vitamins D and K, and NAC (N-acetyl cysteine).”
 - “COVID-19 Exposure Supplement Pack
\$150.00
If you have been exposed to someone with COVID-19, help prevent yourself from developing a case of the virus with our provider-recommended COVID-19 Exposure Supplement Pack. This pack includes vitamin C (ascorbic acid), zinc, vitamins D and K, NAC (N-acetyl cysteine), quercetin, and curcumin.”

- “COVID-19 Treatment Supplement Pack
\$250.00

If you have been diagnosed with COVID-19, help your body fight off the virus and reduce the severity of your symptoms with our provider-recommended COVID-19 Treatment Supplement Pack. This pack includes vitamin C (ascorbic acid), zinc, vitamins D and K, NAC (N-acetyl cysteine), liposomal glutathione, resveratrol, quercetin, and curcumin.”

[<https://www.palmhealth.com/shop/supplements/>;
<https://www.palmhealth.com/shop/supplements/immune-boosting-supplement-pack/>;
<https://www.palmhealth.com/shop/supplements/exposure-supplement-pack/>;
<https://www.palmhealth.com/shop/supplements/treatment-supplement-pack/>]

- On a page on your website titled “Updates on COVID-19” you state:

“Stay updated with official communications and updates about COVID-19, as well as recommendations for boosting your immune system from our CEO and Chief Medical Officer.

Learn more about **COVID-19 Antibody Testing** at PALM Health, and shop our **Supplements** for immune support.” (emphasis in original)

[<https://www.palmhealth.com/updates/>]

- In a Facebook post on October 19, 2020 you state:

“What more can you do to stay healthy during COVID-19? Dr. Sita Kedia and Dr. Lauren Munsch Dal Farra recommend these seven tips to support your immune system:

1. Eat well.
2. Hydrate.
3. Sleep.
4. Reduce stress.
5. Engage in wellness therapies.
6. Take immune-boosting supplements.
7. Protect your mental health.

Read the full article to learn more: [link to a page on your website at <https://www.palmhealth.com/what-can-you-do-to-prevent-getting-covid-19/> described above.] #integrativemedicine #functionalmedicine #immunesystem #immunehealth #stayhealthy #prevention.”

October 19, 2020 Instagram and Twitter posts include a link to the same page on your website and contain substantially similar text. The Instagram post contains the additional hashtag #immunesupport, and both the Instagram and Twitter posts contain the additional hashtag #immunity.

[October 19, 2020 posts at <https://www.facebook.com/PALMHealthStl/>, <https://www.instagram.com/palmhealth/> and <https://twitter.com/PalmHealthSTL>]

- In a Facebook post on August 28, 2020 you state:

“Keep your immune system healthy and strong with our provider-recommended COVID-19 Immune-Boosting Supplement Pack for general health and prevention. The \$100 pack (\$130 value) includes vitamin C (ascorbic acid), zinc lozenges, vitamin D-K, and NAC (N-acetyl cysteine).” The post includes a link to a page on your website at <https://www.palmhealth.com/shop/supplements/immune-boosting-supplement-pack/> described above.

Instagram and Twitter posts on August 28, 2020 include a link to the same page on your website and contain substantially similar text. The Instagram post includes the hashtags #immunesupport, #immunebooster, and #supplementsthatwork.

You published similar posts promoting the COVID-19 Immune-Boosting Supplement Pack on Facebook and Instagram on July 31, 2020, and on Facebook, Instagram, and Twitter on May 14 and July 29, 2020.

[August 28, 2020 posts at <https://www.facebook.com/PALMHealthStl/>, <https://www.instagram.com/palmhealth/> and <https://twitter.com/PalmHealthSTL>]; July 31, 2020 posts at <https://www.facebook.com/PALMHealthStl/>, <https://www.instagram.com/palmhealth/>, and May 14 and July 29, 2020 posts at <https://www.facebook.com/PALMHealthStl/>, <https://www.instagram.com/palmhealth/> and <https://twitter.com/PalmHealthSTL>]

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product or service can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products and services identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products and services are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

You are also advised to review all other claims for your products and services and immediately cease making claims that are not supported by competent and reliable scientific evidence.

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Violations of the FTC Act may result in legal action seeking a Federal District Court injunction and an order may require that you pay back money to consumers. In addition, pursuant to the COVID-19 Consumer Protection Act, Section 1401, Division FF, of the Consolidated Appropriations Act, 2021, P.L. 116-260, marketers who make deceptive claims about the treatment, cure, prevention, or mitigation of COVID-19 are subject to a civil penalty of up to \$43,792 per violation.

Within 48 hours, please send a message to Richard Cleland, Assistant Director via electronic mail at rcleland@ftc.gov describing the specific actions you have taken to address the FTC's concerns. If you have any questions regarding compliance with the FTC Act, please contact Richard Cleland at 202-326-3088.

Very truly yours,

Serena Viswanathan
Associate Director
Division of Advertising Practices