



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

Serena Viswanathan
Associate Director
Division of Advertising Practices

December 22, 2020

WARNING LETTER

VIA EMAIL TO admin@xceedacu.com

Kelsey Schwind Fernandez
Xceed Wellness
Xceed Acupuncture
7627 Lake St #201
River Forest, IL 60305

Re: Unsubstantiated claims for Coronavirus prevention and treatment

To Whom It May Concern:

This is to advise you that FTC staff reviewed your websites at <https://xceedacupuncture.com/> and <https://xceedwellness.com/> in December 2020. We have also reviewed your social media website at <https://www.facebook.com/xceedwellnessadmin/>, where you direct consumers to your website at <https://xceedwellness.com/> to purchase supplements including Silver Flower and Golden Flower. We have determined that you are unlawfully advertising that certain products treat or prevent Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or cure claims on your websites include:

- The home page of your website at <https://xceedwellness.com/> includes an image of a boxing glove punching a coronavirus with the caption “Yes You Can Fight COVID-19 and Other Viruses NATURALLY! And we will explain how without the hype and confusion.” Further down the page you state:

“ For nearly twenty years, I have successfully treated thousands of people naturally in my Chicago Suburb clinic and have now decided to focus my experience and knowledge on helping people like you successfully fight against viruses... Fact: There is no cure for any virus. Truth is, because a virus is in a perpetual state of mutation, there is no “cure” for any virus, including COVID-19... We can however, build up our own immune system naturally to effectively fight viruses and improve our quality of life without breaking the bank... [This text is followed by a button labeled “Read More” that links to <https://xceedwellness.com/pages/strong-immune-system>.] Viruses haven’t got a chance against a strong immune system. We offer all natural herbal formulas to help build your immune system and improve your health and quality of life.”

- A page on your website at <https://xceedwellness.com/pages/strong-immune-system> titled “Fighting Viruses & Disease Naturally” states:

“Your Immune system is the body’s own natural armor. It is capable of much more than you may think. When it is in poor condition, it can't fight off viruses and diseases like it can when it is strong and healthy.... Strengthening your immune system is quite easy with the right natural herbal formulas and supplements.... When you combined [sic] the right natural herbal formulas for specific ailments, including COVID-19, the common cold and flu, the results are amazing. What’s more, there are no side effects or addictions to worry about with natural herbs.... The Wei Labs (COVID-19 herbal formula) can’t cure the virus, however it is very effective at slowing/stopping its progression into the deeper tissue of the body.... The COVID-19 herbal formula available here, stops that natural progression, reduces symptom severity, and speeds up the healing process naturally. Its [sic] like supercharging your own immune system for the battle.... XceedWellness.com was created to allow patients quick and cost effective access to a variety of high quality herbs and herbal formulas without the need to physically visit a practitioner.”

- A page on your website at <https://xceedwellness.com/collections/covid-19/products/covid-19-treatment-silver-flower-formula> states:

“Silver Flower Formula helps alleviate respiratory symptoms caused by acute respiratory tract viral infection and inflammation due to the cold or flu, as well as coronavirus disease (COVID-19). **This formula addresses individuals who are symptomatic or diagnosed with the Coronavirus who are experiencing mild, moderate, and even severe symptoms. How Does Silver Flower Work?** This herbal formula contains 20 all-natural herbal ingredients that have been used in many clinical trials all over China, including, Wuhan. **The Silver Flower ingredients have shown symptom relief and negative test results from 214 coronary pneumonia patients with a success rate of 90%.**”

- A page on your website at <https://xceedwellness.com/collections/covid-19/products/golden-flower> states:

“Golden Flower is all natural herbal tea and is used to support the respiratory system and strengthen your immune function. Great to have on hand, as it helps prevent the Coronavirus, as well as cold & flu from infecting individuals through immediate germ removal and immune support.”

- A page on your website at <https://xceedwellness.com/collections/covid-19>, titled “COVID-19 & Flu Formula” and accessible by selecting “COVID-19 & Flu Formula” from your website navigation menu, states:

“How Does Golden Flower Work? This all-natural herbal tea from Wei Labs helps prevent the Coronavirus from infecting individuals through immediate germ removal and immune support. The ingredients work together to remove germs from the throat, respiratory tract, and heart. At the same [sic], enhancing and supporting the immune system.

All-Natural Ingredients:

- *Flos Lonicaræ* – kills germs immediately from the throat and upper airways....
- *Milkvetch Root* – enhances immune function...

WEI LABS – TREATMENT

+Silver Flower+

This formula addresses individuals who are symptomatic or diagnosed with the Coronavirus who are experiencing mild, moderate, and even severe symptoms.

How Does Silver Flower Work? This herbal formula from Wei Labs contains 20 all-natural herbal ingredients that have been used in many clinical trials all over China, including, Wuhan. These ingredients have shown symptom relief and negative test results from 214 coronary pneumonia patients with a success rate of 90%.

This COVID-19 herbal formula is the same formula that was successfully used to treat hundreds of patients at the very epicenter of the Coronavirus ... Wuhan, China. And I can tell you, I felt a peace of mind when I received mine and I'm sure you will too.

[Click Here for Full COVID-19 & Flu Protocol](https://cdn.shopify.com/s/files/1/0483/9541/9806/files/COVID-19_FLU_Recommended_Wellness_Protocol.pdf?v=1602098080) [link to webpage titled “COVID-19 FLU Recommended Wellness Protocol” at https://cdn.shopify.com/s/files/1/0483/9541/9806/files/COVID-19_FLU_Recommended_Wellness_Protocol.pdf?v=1602098080]

[Click Here for COVID-19 Case Studies](https://cdn.shopify.com/s/files/1/0483/9541/9806/files/Practitioner_COVID_Case_Studies.pdf?v=1602098531)” [link to webpage titled “Pactitioner COVID-19 Case Studies” at https://cdn.shopify.com/s/files/1/0483/9541/9806/files/Practitioner_COVID_Case_Studies.pdf?v=1602098531]

- The webpage titled “COVID-19 FLU Recommended Wellness Protocol” available at https://cdn.shopify.com/s/files/1/0483/9541/9806/files/COVID-19_FLU_Recommended_Wellness_Protocol.pdf?v=1602098080 and that is linked from your website as described above, states:

“Wellness Recommendation Based on TCM theory, the SARS-CoV2 virus and its infection-induced immune reaction is viewed as Cold Evil Qi. The wellness recommendation for COVID-19 includes Silver Flower. Silver Flower Formula helps expel Cold Evil Qi in the respiratory tract, vascular system, and other organs of the body. It helps alleviate respiratory symptoms caused by acute respiratory tract viral infection and inflammation due to the cold or flu as well as coronavirus (COVID19)... Silver Flower helps clear symptoms of fever, cough, sore throat, nausea, breathing difficulties, diarrhea, and fatigue.... While calming down the overwhelming immune system and avoiding the damage to the epithelial cells, it also helps to enhance the cellular immunity to maintain healthy levels of T cells to help the body eradicate the viral infection....

The use of Silver Flower does not require a full diagnosis of SARS-CoV2 infection. It is recommended as long as patients are experiencing any flu or cold symptoms such as a cough, itchy or sore throat, fever, fatigue, shortness of breath, or diarrhea.... However, if the symptoms persist, are partially reduced, or the symptoms are caused by influenza or COVID-19 it is recommended to continue taking the formula for a total of 2 weeks.

In order to boost the immune system for those who have not become infected/do not have symptoms, Golden Flower is recommended. Golden Flower is also recommended for individuals who have just finished taking Silver Flower to recalibrate their immune system.... It is recommended to keep Golden Flower on hand during COVID-19 pandemic as well as the flu season and to take it as needed....”

- The webpage titled “Pactitioner COVID-19 Case Studies” available at https://cdn.shopify.com/s/files/1/0483/9541/9806/files/Practitioner_COVID_Case_Studies.pdf?v=1602098531 and that is linked from your website as described above, states:

“Complete Symptom Resolution in Positive Coronavirus Patient... A 25-year-old female patient who was a very active restaurant worker, started experiencing flulike symptoms on March 15th, 2020. The patient had lost her sense of smell and

taste. She was tested on the 24th for COVID-19 and was confirmed positive on the 27th.... The patient started taking Silver Flower (three capsules, three times daily) and Golden Flower (one teaspoon, two times daily) from Wei Labs. Within two days, her body aches had improved by 50%. By the third morning, she started to expel chest congestion and after day three, the patient's body aches/pains and congestion were almost completely gone. All symptoms were resolved by day six however, the patient is finishing their two-week course of Silver Flower and will continue taking Golden Flower for further support....

Positive Coronavirus Patient Cleared 8 Days After Silver Flower Usage... A 69-year-old male in Seattle Washington who has high blood pressure, type II diabetes, high cholesterol, and a history of arthritis returned from Panama on March 15th. On the 19th, he started to notice a cough, fatigue, and loss of appetite. The patient started to get concerned on the 23rd when he developed a 101-degree fever with severe chills and mild body aches.... The patient was bed ridden. On the 30th of March, he tested positive for COVID-19. On the 6th of April, he started taking Silver Flower from Wei Laboratories, 3 cap 3x/day. Within the first five days of starting Silver Flower, the patient's symptoms incrementally improved by 50%. The patient was able to get out of bed to walk around the house as well as eat solid food. He was cleared by his primary doctor eight days later."

- The home page of your website at <https://xceedacupuncture.com/> displays a red banner that states: "A strong immune system helps fight against COVID-19."

Further down the page you state: "CLICK THE LINK BELOW FOR NEW COVID-19 FORMULA INFO," followed by a button labeled "COVID-19/FLU FORMULA AVAILABLE" that links to https://cdn.shopify.com/s/files/1/0483/9541/9806/files/Xceed_Newsletter_Link.pdf?v=1603901870. Further, you state: "If you would like to order herbs and/or supplements, please call 708.689.0473 I will be filling orders and shipping directly via U.S. mail."

Consumers who click on the "COVID-19/FLU FORMULA AVAILBLE" button are taken to a newsletter that states:

"Hi there. Its me, Kelsey Fernandez.... This is very important information regarding a **New COVID-19 Protection Formula**.

Important...Please read carefully....

Since having to close my River Forest clinic (Xceed Acupuncture) I have focused my time and energy on finding a way to help people protect themselves naturally against the COVID-19 virus...

Not long ago I spoke with one of the managers at Wei Labs and found out he had been diagnosed with COVID-19. After lengthy conversation, I was amazed that he actually **BEAT the virus in just a few days without hospitalization** by using a proprietary herbal virus formula they had created.

And YES – the COVID-19 formula is available – but there’s a caveat.

The Wei Labs herbal formulas are not sold directly to patients, but are offered only through approved, licensed practitioners. As a result, you would normally have to find an approved practitioner and pay for an acupuncture and/or nutritional consultation to have access to their herbal formulas.

UNTIL NOW!

I decided to create a simple, cost effective way to get this **[MUST HAVE]** COVID-19 protection formula in the hands of as many people as possible. So I **am offering you this EXCLUSIVE INVITATION to my new herbal formula website**, featuring ALL the Wei Labs Formulas.

I am giving you access for two reasons...

1) It will assure you get the very same [high-demand] herbal formula that coronavirus patients have already taken and experienced ‘complete symptom resolution’

2) By offering you this COVID-19 Protection Formula, and many other amazing formulas online, **without the need of a live consultation, is not only safer, but**

Can save you \$100 or more

So please prepare yourself and your family and take advantage of my pre-launch, consultation-free, invitation to my new website now and secure your proprietary COVID-19 Protection Formula ASAP.

By the way... The COVID-19 herbal formula I’m making available to you now, is **the same formula that was successfully used to treat hundreds of patients at the very epicenter of the Coronavirus...Wuhan, China....**

Don’t wait...secure your COVID-19 Flu protection formulas now while supplies last.

Go to this live link for more info.

COVID-19/Flu Formula Link” [link to https://xceedwellness.com/collections/covid-19?utm_campaign=test-email&utm_medium=email&utm_source=seguno]

- The Cover Photo on the Xceed Wellness Facebook page at <https://www.facebook.com/xceedwellnessadmin/> is an image of a boxing glove punching a coronavirus with the text: “YES YOU CAN FIGHT COVID-19 NATURALLY! NEW COVID-19 HERBAL FORMULA AVAILABLE[.] MORE INFORMATION AT: XceedWellness.com”.
- On the Xceed Wellness Facebook “About” page at <https://www.facebook.com/pg/xceedwellnessadmin/about/> you state: “Xceed Wellness offers [Practitioner Grade] natural herbal formulas designed to protect and improve your quality of life naturally. Formulas are designed to combat viruses, such as Coronavirus/COVID-19, SARS, Influenza, the common cold, and much more... For those NOT interested in vaccinations – medications, we offering (sic) PhD created all natural therapeutic formulas for coronavirus, COVID-19, SARS, flu influenzas, cold, cardiovascular, immune system... COVID-19 Protocol...”
- In a December 2, 2020 Facebook post, you state:

“Protect yourself and loved ones from viruses, including COVID-19, cold and flu now with new, all natural therapeutic formulas delivered to your home. For more information and to order, go to: <https://xceedwellness.com/>

These formulas are the very same [high-demand] herbal formulas that coronavirus patients have already taken and experienced ‘complete symptom resolution’ and are the same formulas that were successfully used to treat hundreds of patients at the very epicenter of the Coronavirus...Wuhan, China.

I can tell you, I felt a peace of mind when I received mine and I’m sure you will too. Go to <https://xceedwellness.com/> now.”

The post includes an image that states: “**SUPERCHARGE YOUR IMMUNE SYSTEM[.] MULTI-VIRUS FORMULA NOW AVAILABLE [.]** Doctor created, all natural herbal [therapeutic] virus and Flu formulas are now available. Tests show they are effective in both prevention and recovery in virus/flu patients. **Get Yours Now....**”

[December 2, 2020 Facebook post at <https://www.facebook.com/xceedwellnessadmin/>]

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable

Kelsey Schwind Fernandez

December 22, 2020

Page 8

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 identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products 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 immediately cease making claims that are not supported by competent and reliable scientific evidence.

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