



United States of America  
FEDERAL TRADE COMMISSION  
Southwest Region

Dama J. Brown, Regional Director  
Federal Trade Commission – Southwest Region  
1999 Bryan Street, Suite 2150  
Dallas, Texas 75201

May 22, 2020

**WARNING LETTER**

*Via U.S. Mail and Email: info@dramovmedical.com*

Dramov Naturopathic Medical Center  
9735 Southwest Shady Lane, #104  
Tigard, Oregon 97223

Re: Unsubstantiated Claims for Coronavirus Prevention and Treatment

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your website at <https://www.dramovmedical.com> on May 13, 2020. We have determined that you are unlawfully advertising that certain products prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims on your website include the following representations on a page accessible by clicking a prominent hyperlink on your homepage labeled “COVID-19 / CORONAVIRUS INFORMATION”:

- You claim, under the heading “Viral Infection and Immune Support” that “COVID-19 is a virus, and just like many other viral infections, the BEST treatment you can do for yourself is to support your immune system....”
- On this same page, you further claim that “At this point, there is no vaccine, and unfortunately, sometimes vaccines do not offer the complete protection we desire. So coupled with healthy lifestyle choices and a healthy diet, I recommend a combination of supplements to help support and strengthen the immune system and help your body fight viral infections. All supplements are not created equal, and quality is EXTREMELY important, which is why one of the manufacturers I use is Metagenics. Here is a link to the bundled products I recommend for immune support. The bundle contains a one-month supply for an adult.” Below these claims is a prominent hyperlink labeled “VIRAL IMMUNE SUPPORT BUNDLE” that takes

consumers to your Metagenics retail website, where they can purchase “Viral Immune Support” supplements including “Ultra Potent-C 1000,” “D3 10,000 + K,” and “UltraFlora Immune Booster.” Underneath this hyperlink, you direct consumers to contact your office to purchase vitamin C supplements.

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 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 services and immediately cease making claims that are not supported by competent and reliable scientific evidence.

Within 48 hours, please send a message to Assistant Director Jim Elliott via electronic mail at [jelliott@ftc.gov](mailto:jelliott@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 Reid Tepfer at [rtepfer@ftc.gov](mailto:rtepfer@ftc.gov).

Very truly yours,

Dama J. Brown  
Regional Director, Southwest Region  
Federal Trade Commission