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

October 2, 2020

WARNING LETTER

VIA Federal Express
Howard Robins, DPM
200 W. 57th Street, Suite 203
New York, NY 10019

Re: Unsubstantiated claims for Coronavirus prevention and treatment

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your websites at <https://ozonedoctor.net> and <https://doctorsbiome.com/> in September 2020. We have determined that you are unlawfully advertising that certain products or services treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- On your website at <https://ozonedoctor.net>, you state: “PUBLICATIONS[:] A Plausible ‘Penny’ Costing Effective Treatment for Coronavirus-Ozone Therapy[.],” followed by a button labeled “ READ MORE” that links to <https://sa1s3.patientpop.com/assets/docs/155739.pdf>. The linked article states, “...Corona viruses, including SARS-CoV-2 (the cause of the condition now named coronavirus disease 2019 or COVID-19), are rich in cysteine, which residues must be intact for viral activity. Sulfhydryl groups are vulnerable to oxidation. Ozone therapy, a very inexpensive and safe modality may safely exploit this critical vulnerability in many viruses, inclusive of SARS-CoV-2.”
- On your website at <https://ozonedoctor.net>, you state: ““Ozone Without Borders[.] ‘Society for the Advancement of Bio-Oxidative therapy,’” followed by a button labeled “MORE INFORMATION” that links to the website <https://ozonewithoutborders.ngo>. The linked website includes the articles below that are available by selecting “Research” and then “COVID-19” from the navigation menu, which leads consumers to a page titled “Medical Ozone for COVID19.”

- “A Novel Approach to Treating COVID-19 Using Nutritional and Oxidative Therapies” (<https://ozonewithoutborders.ngo/wp-content/uploads/2020/07/Novel-Approach-to-Covid-19.pdf>) This article states, “A novel treatment program combining nutritional and oxidative therapies was shown to successfully treat the signs and symptoms of 100% of 107 patients diagnosed with COVID-19. Each patient was treated with an individualized plan consisting of oral, IV [intravenous], IM [intramuscular], and nebulized nutritional and oxidative therapies which resulted in zero deaths and recovery from COVID-19.”
- “COVID-19: How can I cure thee? Let me count the ways.” (<https://ozonewithoutborders.ngo/wp-content/uploads/2020/07/COVID-19-How-can-I-cure-thee-Let-me-count-the-ways.pdf>) This article states, “There already exist numerous ways to reliably prevent, mitigate, and even cure COVID-19, including in late-stage patients who are already ventilator-dependent.... The treatments described below are categorized as having the ability to prevent, to improve, and to cure COVID-19 and other viral syndromes... **Ozone (improves, cures)**[.] Ozone is probably the single most potent antipathogen agent available today. It readily eradicates all pathogenic bacteria, fungi, viruses, and protozoa. It has many routes of administration and can be utilized as an effective monotherapy, although it positively supports all treatment protocols in an adjunctive and usually synergistic fashion as well. [12] Ozone has been documented to cure advanced cases of Ebola virus, for which there are still no known effective mainstream medical therapies. [13] For someone with ready access to ozone, different applications of ozone could certainly be used to prevent COVID-19 and other respiratory viruses as well. (citations omitted)
- On your website at <https://www.ozonedoctor.net/contents/videos>, you post a video titled “Coronavirus from a Perspective Outside the Mainstream,” that states: “I did some research on the basic biochemistry of the coronavirus and it too is rich in these sulfhydryl amino acids, cysteine in particular, so that says to me this should be rather easily treatable with ozone because ozone is going to come along and knock off the fingers so the virus can’t enter the cell. Ozone therapy is extraordinarily safe.... I don’t know if the coronavirus is as bad as what they’re portraying it, or worse.... This is air transmissible, this could become a worldwide pandemic, and if this doesn’t happen, it’s going to happen sooner or later, and I am proposing ozone therapy as a very safe and what I believe is a highly likely effective treatment for this...”
- On your website at <https://doctorsbiome.com/blogs/news/what-can-we-do-in-the-midst-of-covid-19>, in a blog post dated March 11, 2020 and titled “What can we do in the midst of COVID-19?,” you state: “Is there any way we can prepare if COVID-19 continues to spread? Can we actually prevent viruses in general? Can we actually boost our immunity? What we can do is lower our risk of getting a virus.... we can **strengthen our immune system**, which can improve our defense against catching a virus or any

contagious disease. Doctor's Biome contains 15 different strains of probiotics or healthy bacteria, that can help boost your immunity. Since **70% of our immune system is connected to the gut**, making sure our microbiome is well balanced with good bacteria is highly recommended. Probiotics aid in **restoring the intestinal barrier**, which prevents destructive microorganisms from entering our bloodstream. This protects our body from harmful bacteria, thus **boosting our immune defense.**"

- On your website at <https://doctorsbiome.com/blogs/news/why-strengthening-your-immune-system-can-protect-you-against-covid-19>, in a blog post dated August 4, 2020 and titled "Why strengthening your immune system can protect you against COVID-19," you state: "A recent Swedish study published on June 29, 2020 showed that individuals with asymptomatic or mild COVID-19 have a robust T-cell mediated immunity.... SARS-CoV-2-specific memory T cells will likely prove critical for long-term immune protection against COVID-19. This is why making sure your immune system is strong and performing at its optimal best can provide you protection against the virus and may prevent experiencing very extreme symptoms if you do not have a preexisting immune condition or not already immuno-compromised. This study suggests that immune T cells may offer lasting protection against COVID-19... what is certain is that you can lower your risk having a severe case of COVID-19 if you strengthen your immune system. Doctor's Biome contains **15 strains of patented scientifically backed strains** that can help your body replenish healthy bacteria in your gut. Since 70% of your **gut is connected to the immune system**, gut health is directly linked to a **strong immunity.**"
- On the website of *Natural Awakenings Magazine* at <https://www.nycnaturalawakenings.com/2020/06/04/317474/there-is-an-effective-way-to-help-prevent-and-effectively-treat-coronavirus-covid-19->, you sponsored an article titled, "There Is An Effective Way to Help Prevent and Effectively Treat Coronavirus (COVID-19)." The webpage includes a description of your practice, your telephone number, and a link to your website <https://www.ozonedoctor.net/>. The article states:
 - "There is an effective way to help prevent and effectively treat Coronavirus (COVID-19)! What if there were a medicine and a treatment that could help prevent and help treat this viral pandemic?... What if it was now being used in 17 hospitals in Italy and in hospitals in Spain, effectively treating patients with the infection... There is such a medicine, called Medical Ozone, and effective treatment, called Intravenous Ozone Therapy...";
 - "The world already has a most inexpensive, safe, and likely effective remedy for deadly viral diseases, which exploits their redox vulnerability at critical membrane cysteine/tryptophan fusion sites. Ozone therapy could be easily deployed worldwide, even in very poor countries."; and
 - "There are some things the media is not telling you to do but can boost your immune system and help prevent and help minimize this and any infectious

disease.... **The first is BE WELL-HYDRATED.... The second is TO TAKE VITAMIN C FIVE TO SIX TIMES A DAY.... Last, but very much not least, you MUST take a new, first-of-its-kind ‘Living, Next Generation of Smart Bacteria’ probiotic drink called DOCOTRS [sic] BIOME™**, available at DoctorsBiome.com... These three things as a standalone preventive or treatment are what you all need to do before or even after it’s too late. If you have any questions or wish to set up a consultation, feel free to call my office, 212-581-0101, to discuss your problem and see if this wonderful treatment is right for you.”

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 or services identified above. Thus, any coronavirus-related prevention or treatment claims regarding such product or service 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 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
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Division of Advertising Practices