



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

1999 Bryan St., Ste. 2150
Dallas, Texas 75201

May 22, 2020

WARNING LETTER

VIA EMAIL TO info@naturalhealth365.com

Natural Health 365
4327 S Highway 27 #187
Clermont, Florida 34711

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC staff has reviewed your website at <https://www.naturalhealth365.com/> on May 18, 2020. We have determined that you are unlawfully advertising that certain products treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- In marketing materials titled “Coronavirus vitamin solution NOT revealed by the mainstream media or government health agencies,” you claim that “[t]he coronavirus pandemic can be dramatically slowed, or stopped, with the immediate widespread use of high doses of vitamin C . . . The physicians of the Orthomolecular Medicine News Service and the International Society for Orthomolecular Medicine urge a nutrient-based method to prevent or minimize symptoms for future viral infection.... Vitamin C: 3,000 milligrams (or more) daily, in divided doses.... It is important to remember that *preventing and treating respiratory infections with large amounts of vitamin C is well established.*”
- In marketing materials titled “Dr. Richard Cheng discusses optimal daily vitamin C intake,” you claim that “instead of taking vitamin C tablets to prevent COVID-19, [Dr. Cheng] recommends taking it in powder form, which is much easier to digest (and absorb). For adults, he advises a total of 5-10 grams of vitamin C powder daily (that converts to 5,000 to 10,000 mg), broken into two or three servings – throughout the day.... These servings will help strengthen the immune system and protect you against viral infections like, COVID-19.... most people don’t know that, vitamin C

administration is being used successfully to treat COVID-19 – even in patients experiencing severe symptoms. Of course, instead of waiting until you get sick to begin a vitamin C protocol, the best course of action is to take preventative measures and boost your intake to the 5-10 grams per day that Dr. Cheng recommends to support a strong immune system.”

- In marketing materials titled “Surprising strategy deployed by major bank against COVID-19 infection,” you claim that “[a]s the confirmed cases of coronavirus continue to rise around the world – especially within the United States, experts continue to look for effective ways to treat the virus.... It’s possible that something as simple as high amounts of vitamin C could be quite effective at avoiding the threat of COVID-19.... As other areas in the world are realizing the importance of vitamin C in the fight against COVID-19, the U.S. government should consider doing the same. Reports from China have already indicated that **high amounts of vitamin C help manage and prevent the virus from doing too much damage**.... you’ll likely need far more vitamin C than you can get from diet alone to give your immune system the help it needs – especially if you’re feeling the effects of COVID-19. Some integrative healthcare providers recommend taking 2,000 mg – 2 to 3 times per day, and if you’re beginning to feel sick, aim to get an initial dose of 3,000 to 6,000 mg and then follow up with additional doses of 1 – 2,000 mg per hour for several days... ”
- In marketing materials titled “High-dose glutathione shows promise in addressing respiratory distress in patients with COVID-19,” you claim:
 - That “glutathione shows significant promise in addressing respiratory distress”;
 - That “oral and IV glutathione work to help address the ‘cytokine storm syndrome’ that leads to respiratory distress in patients who have COVID-19 pneumonia”;
 - and
 - That “zinc and vitamin C [<https://www.naturalhealth365.com/vitamin-c-ascorbic-acid-2454.html>] also may be helpful in reducing the body’s inflammatory response and reducing the production of cytokines.”
- In marketing materials titled “Consider vitamin C for acute respiratory distress syndrome from COVID-19, Medical Journal says,” you claim:
 - That “vitamin C has a long list of health benefits – not the least of which is fighting inflammation and reducing the risk of infections. It’s no wonder a prestigious medical journal advises the use of this powerful antioxidant as a treatment of severe COVID-19 cases”; and
 - That “[d]octors recommend high dose vitamin C as potential treatment for COVID-19 sufferers, backed by decades of scientific research.”

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 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 James E. Elliott via electronic mail at 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 Zachary A. Keller at zkeller@ftc.gov.

Very truly yours,

Dama J. Brown
Regional Director
Southwest Region