



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 21, 2020

WARNING LETTER

Via U.S. Mail and Email to: info@pureprescriptions.com

Pure Prescriptions, Inc.
5670 El Camino Real Drive
Carlsbad, California 92008

Re: Unsubstantiated Claims for Coronavirus Prevention

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your website at <https://pureprescriptions.com> on May 14, 2020. We have determined that you are unlawfully advertising that certain products prevent Coronavirus Disease 2019 (COVID-19).

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

- You claim, in a blog post titled “Do This to Help Lower Your Risk of Getting Coronavirus!”: “Vegetables are high in micronutrients. So if you aren’t getting five to nine servings a day, then I recommend supplementing with NewGreens, which is a superfood supplement that gives you a significant portion of your required produce for the day. When you don’t get the proper nutrients you need and you consume excessive alcohol, and then your sleep is compromised – this is a recipe for a long flu season.... COVID-19 may be more serious than the average flu or other common viruses. Although statistics are still coming in, it has a greater than one percent mortality rate, which is a higher percentage than the typical flu. Obviously a lot more people are living than dying, so it is important to temper your fear, but it is more dangerous than other types of illnesses, so it is critical to know what to expect and how to combat becoming infected.”

- At the end of this same blog post is the statement “RECOMMENDED PRODUCTS” with links to your online store to purchase “Innate Immune Support” supplement and the “NewGreens Minted Superfood Drink.”
- In an embedded video titled “Do This to Help Lower Your Risk of Getting Coronavirus!” in this same blog post, you claim: “so those are a few things about the covid-19, you have to follow a lot of the same practices that we just talked about for normal flu season.... All those things that we talked about absolutely apply... we talked about those 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 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 or 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 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.

Very truly yours,

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