



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

June 5, 2020

WARNING LETTER

VIA EMAIL TO theherbdoctor@yahoo.com

The Herb Doctor
c/o Tiffani Huckels
9850 Embankment Terrace
Fountain, Colorado 80817

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC staff reviewed your website at <https://www.theherbdoc.com/>, where consumers may purchase various services and supplements, on May 29, 2020. We have determined that you are unlawfully advertising that certain products prevent Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention claims on your website include:

- In marketing materials accessible on your website by selecting “NEWS” from the navigation menu, you claim:
 - In marketing materials titled “Can Vitamin C Help With and Prevent the Coronavirus as well as other Viruses?” you claim that “experts in the field are suggesting that regular dosing of Vitamin C *could help to prevent the Coronavirus* in a similar fashion. . . . they are suggesting that if you’re regularly supporting your immune system with a healthy lifestyle and regular doses of Vitamin C, it could act as a *preventative measure*. . . . an international expert on vitamin therapy[] says, ‘The coronavirus can be dramatically slowed or stopped completely with the immediate widespread use of high doses of Vitamin C. Bowel tolerance levels of C taken in divided doses throughout the day, is a clinically proven antiviral, without equal.’ . . . Vitamin C administered via IV... has long been thought to be the most effective. However, **Micelle Liposomal Vitamin C** [link to <https://www.theherbdoc.com/store/p38/Liposomal-Vitamin-C.html>] is now proving to be just as effective: it’s the only route of administration that’s considered as absorb-able [sic] as intravenous injections, and it’s much

cheaper, more convenient and less invasive.”

- In marketing materials titled “Melatonin and Your Immune System,” you claim that “[t]he possible beneficial effects of melatonin as adjuvant use in COVID-19 in anti-inflammation, anti-oxidation, immune response regulation has been repeatedly demonstrated in respiratory disorder models induced by infections and associated complications. Melatonin has a high safety profile. Although the direct evidence of melatonin application in COVID-19 is unclear, both its use in experimental animal models and in studies on humans has continuously documented its efficacy and safety and its use by COVID-19 patients predictably would be highly beneficial.”
- In marketing materials titled “Adequate Protein Can Help the Body Fight the Flu and Even Coronavirus,” you claim “right now you don’t want to be deficient in protein with influenza and coronavirus floating around. . . . Recovery from viruses requires large quantities of protein and amino acids to build antibodies. So right now, getting enough protein is even more important to support your immune system’s ability to protect you. . . . I recommend to my clients Pure Paleomeal Protein [link to <https://www.theherbdoc.com/store/p53/Pure-Paleo-Meal-Protein-Powder.html>]. This Revolutionary New Formula Was Designed to Replenish Vital Proteins Lost After Years of Gluten Induced Damage.”
- In marketing materials titled “What you and your family need to know about Coronavirus and Viral Infection Prevention,” you claim that “[n]ot having the option of avoiding the virus altogether, the next best strategy might be to try to engineer getting the mildest possible form of the infection, if you are to be infected.... Elderberry [link to <https://www.theherbdoc.com/store/p82/ImmunoBerry-Liquid.html>] has a long traditional use as an effective antiviral.... Neuraminic acid is often used as a point of attack by viruses to attach to the cell using an enzyme they make called neuramidase, which allows them to drill through the outer cell membrane and enter. Elderberry has been shown, like the drug Tamiflu, to block neuramidase.” You then claim that ImmunoBerry™ Liquid, Immunitone Plus™, and Allicillin™ softgels have “a long standing tradition of use and evidence for... supporting the immune system in its ability to fight off viral infections and boost the immune system.”

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 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