



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

Serena Viswanathan  
Associate Director  
Division of Advertising Practices

July 22, 2021

**CEASE AND DESIST DEMAND**

Christopher Peine, D.O.  
Dr. Peter Abraham, D.O.  
Peine Osteopathic Medicine, PLLC  
2717 W Bannock Street, Suite 101  
Boise, ID 83702

Re: Unsubstantiated claims for Coronavirus treatment

Dear Drs. Peine and Abraham:

This is to advise you that FTC staff has reviewed your website at <http://www.peineosteopathic.com/> in July 2021, where you promote Low Dose Immunotherapy (LDI) treatment. We have determined that you are unlawfully advertising that LDI treats Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus treatment claims include:

- On the home page of your website at <http://www.peineosteopathic.com> you state:

“ . . . New Covid-19 Treatment

Dr. Abraham has discovered a new Low Dose Immunotherapy (LDI) treatment to prevent the immune-activated inflammatory response to COVID-19, which is responsible for the symptoms associated with COVID-19. He has now used this on multiple COVID-19 positive and non-positive patients with significant improvement or complete resolution of symptoms within 24 hours. Dr. Abraham has seen resolution of fatigue, muscle aches, nausea, vomiting, loss of smell, congestion, respiratory difficulty, and GI distress. If you are struggling with symptoms and suspect COVID-19 (even without a positive test) or know someone who is, please call the clinic to schedule a telehealth visit: (208) 947-0925. We can mail the LDI treatment or you can have someone pick it up at our clinic. . .”

- On your website at <http://www.peineosteopathic.com/faqs-2/low-dose-immunotherapy/> you state:

“Low Dose Immunotherapy (LDI)

Covid-19 Treatment, from Dr. Abraham

It is my mission to help people achieve optimal health and wellness. Due to the gravity of the pandemic situation, I have decided to make the COVID-19 Low Dose Immunotherapy (LDI) treatment available to anyone suffering from COVID-19 symptoms. As this is a medical treatment with risks, you are required to book a telehealth appointment with our office staff...

It is necessary to clarify that the LDI is not a vaccine nor is it a ‘cure’ for COVID-19 and is only a treatment for symptomatic people suspected of exposure to COVID-19. From the beginning of this pandemic, it was clear to me that this virus did not behave like an infection, but rather more like an ‘allergy’ where the symptoms were caused by the body’s widespread inflammatory response. This inflammatory response is ‘turned on’ in response to a protein that the body perceives as foreign, which is the reason for food and environmental allergies. My hypothesis was that the body was actually responding to the COVID-19 proteins (viruses are not living organisms and are not dangerous to humans by themselves) and if we could tell the immune system to “tolerate” this protein, then we could stop the inflammatory response.

I have been successfully using LDI with hundreds of patients for five years in my clinic to promote ‘immune tolerance’ to proteins that trigger allergies, autoimmune conditions, and inflammation. I decided to try this technique for COVID-19 in the spring of 2020 with a mixture of coronavirus proteins from old strains of the virus. The outcome was complete resolution of symptoms in my first patient. As I continued treating several patients over the summer, I had more success with both acute and chronic symptoms of COVID-19. In the last several weeks I have treated more acute cases and was thoroughly convinced that this treatment was both low-risk and effective. Because of this, I feel ethically obligated to share my findings with the general public. However, like all LDI treatments, this has not been FDA approved so it is your choice whether you feel that is necessary for you to try treatment. . .”

- On your website at <http://www.peineosteopathic.com/faqs-2/low-dose-immunotherapy/>, under the heading “Interview with Dr. Peter Abraham and Dr. Ty Vincent regarding the Coronavirus and LDI” you link to a Youtube video at <https://www.youtube.com/watch?v=NpoTIPU07as>. This video was posted by Global Immunotherapy LLC Telemedicine Provider and is titled “Dr. Peter Abraham and Dr. Ty Vincent discuss the URI antigen and its application to the Coronavirus.” In the video Dr. Abraham states:

“I was thinking wow, we could use LDI for this... Back in the spring, I had a buddy of mine... he had COVID very bad, he couldn't work or do anything for about a month, he probably should have been hospitalized... When I saw him he was still having oxygen saturations in the upper 80s, low 90s, couldn't breathe... And so I gave it to him and the next day he sent me his oxygen saturation screenshot and he's like I'm up in the 90s, mid-90s, upper 90s, and I feel way better....

In the last several weeks, months, I've had patients obviously as coronavirus infections are going up... I started having more of my patients coming and in saying, oh man, I've been really sick... and they've tested positive.... And so far, knock on wood, every patient I've tried it on has gotten better. Pretty much, either full resolution or near resolution, within literally hours to days. I had a patient a week ago, he was referred by somebody else who had COVID and he couldn't get out of bed... tested positive... he had no respiratory symptoms, interestingly, but crushing fatigue, headaches, muscle aches, and GI issues. He couldn't eat, he was vomiting... And I saw him basically a week after the dose and he said I feel great... He said it took about three hours, but everything went away.....”

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 product identified above. Thus, any coronavirus-related treatment claims regarding such product 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.

Violations of the FTC Act may result in legal action seeking a Federal District Court injunction. In addition, pursuant to the COVID-19 Consumer Protection Act, Section 1401, Division FF, of the Consolidated Appropriations Act, 2021, P.L. 116-260, marketers who make deceptive claims about the treatment, cure, prevention, or mitigation of COVID-19 are subject to a civil penalty of up to \$43,792 per violation and may be required to pay refunds to consumers or provide other relief pursuant to Section 19(b) of the FTC Act, 15 U.S.C. § 57b(b).

Within 48 hours, please send a message to Richard Cleland, Assistant Director via electronic mail at [rcleland@ftc.gov](mailto:rcleland@ftc.gov) certifying that you have ceased making unsubstantiated claims for the product or service identified above.

Peine Osteopathic Medicine PLLC

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If you have any questions regarding compliance with the FTC Act, please contact Richard Cleland at 202-326-3088.

Very truly yours,

Serena Viswanathan  
Associate Director  
Division of Advertising Practices

cc: Youtube *via email* to [youtube-gov-support@google.com](mailto:youtube-gov-support@google.com)