



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

Division of Advertising Practices

October 23, 2020

Via Electronic Mail (lbrett@bbbn.org)

Laura Brett, Esq.  
Vice President  
National Advertising Division  
112 Madison Avenue, 3<sup>rd</sup> Floor  
New York, NY 10016

Re: Advertising by International Institute of Health, also d/b/a Doc of Detox, for Black Gold humic acid supplement

Dear Ms. Brett:

We have reviewed the National Advertising Division's referral of International Institute of Health, also d/b/a Doc of Detox, ("Doc of Detox") regarding advertising claims for its Black Gold humic acid supplement.<sup>1</sup> We understand that this referral arose out of a monitoring case. NAD challenged, among other things, claims that Black Gold treats, cures, or prevents a variety of diseases and serious conditions. We understand that Doc of Detox refused to participate in the NAD process. Accordingly, you referred this matter to the Federal Trade Commission for our review.

Following communications with Doc of Detox, we received confirmation that the advertiser has agreed to discontinue all claims, made expressly or by implication, that Black Gold treats, cures, or prevents diseases and serious conditions. Accordingly, we have determined not to take additional action at this time. In reaching this conclusion, we considered a number of factors including resource allocation and enforcement priorities, the nature of any FTC Act violation, and the type and severity of any consumer injury.

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<sup>1</sup> Dr. Darrell Wolfe is the owner and operator of Doc of Detox, a Canadian entity that operates under a variety of names including International Institute of Health, International Health Initiative, and International Training Institute of Health. Both Dr. Wolfe and Doc of Detox are located in British Columbia, Canada, but they have marketed and offered for sale Black Gold to U.S. consumers.

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The staff's decision is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require. The FTC appreciates your referral and the opportunity to assist in supporting the NAD.

Very Truly Yours,

*s/ Carolyn L. Hann*

Carolyn L. Hann  
Chief of Staff for Advertising Practices