

Serena Viswanathan Associate Director Division of Advertising Practices United States of America FEDERAL TRADE COMMISSION Washington, D.C. 20580

July 22, 2021

# CEASE AND DESIST DEMAND

VIA EMAIL TO kristy@gspiusa.com

Kristy Hunt Green Star Products, Inc. 1302 Highway 93 North, Unit #8 Victor, MT 59875

Re: Unsubstantiated claims for Coronavirus prevention or treatment

Dear Ms. Hunt:

This is to advise you that in June and July, 2021 FTC staff reviewed your websites at <u>https://gspiusa.com</u> and <u>https://vssmt.net</u>. We also reviewed your social media websites at <u>https://www.facebook.com/VSSMT.net</u> and <u>https://twitter.com/gspitoday</u>, where you direct consumers to your website at <u>https://vssmt.net</u> to purchase the Viro Spectrum Shield dietary supplement. We have determined that you are unlawfully advertising that Viro Spectrum Shield prevents or treats Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims include:

• In a section of the home page of your website at <u>https://gspiusa.com</u> under the heading "TODAY" you state:

"Read our feature in USA Today's Special Publication 'America Forward', dedicated to the COVID-19 Crisis. Click the link to read issue online. See Page #69 [link to <u>https://usatodayspecial-</u><u>va.newsmemory.com/?special=USA+TODAY++America+Forward&date=20210525</u>]</u>

Consumers who click on the hyperlink above can access an USA Today special edition titled America Forward. At page 69 of this publication is an advertisement for Viro Spectrum Shield that states:

"There is more than a vaccine to fight against this Pandemic, it is time to explore a new option... Something all Natural and Safe... Is available to everyone!

For over 38 years an all-natural product has been shared privately with ill people, showing amazing results against all types of virus.

This testing provided evidence that the formula had Broad Spectrum Antiviral Capabilities against many types of viruses. MRI's testing program clearly indicated efficacy results from 93% to 99.9% against the COVID-19 Virus while also remaining non-toxic. MRI Management stated, this formula should be considered of, 'Strategic National IMPORTANCE.'

Simultaneous with MRI testing program, extremely sick volunteers, many of whom tested positive for COVID-19, decided to take VSS and the results were unmistakable. All volunteers recovered quickly from their painful symptoms and respiratory problems, many within 24 - 48 hours. No volunteers required hospitalization.

\*No side effects or negative reactions have been reported. \*Many people use this formula as a preventative with no reports of new COVID-19 infections.

The formula is simple, a proprietary blend of blend of natural herbs containing high concentrations of flavonoids & ligands, which when combined in a natural state, are far more powerful than they are when separated.

\*Learn more about benefits of natural compounds at <u>www.gspiusa.com/vss-science</u>.

The natural antiviral that surprised everyone, now carries the Name Viro Spectrum Shield, and as of January of 2021 has been made available to the public. The formula is being prepared to distribute all over the world by Green Star Products, who is working to get this formula into every medicine cabinet. Use Coupon Code 'World 21' for a 15% discount on your supply of Viro Spectrum Shield

Visit: https://www.vssmt.net

Learn more about Viro Spectrum Shield at <u>https://www.vssmt.net/FAOS</u>

To discuss Distribution, contact Green Star Products via the website: <u>https://www.gspiusa.com</u> Green Star Products, a public company (OTC:GSPI)"

• On the home page of your website at <a href="https://gspiusa.com">https://gspiusa.com</a> below a graphic logo with the text "Viro Spectrum Shield," you state:

"introducing Our newest project . . .

## NEW DISTRIBUTION CONTRACT WITH BIOTECH RESEARCH, LLC

'Green Star Products has secured the exclusive distribution rights for three countries in South America: Brazil, Peru, and Colombia. These three countries have been extremely hard hit by the Covid-19 virus. Green Star has important connections in these countries and has already been able to send VSS to help people in these countries.' Presently, Green Star Products is planning to send additional supplies of VSS to all three countries.

'Viro Spectrum Shield' HAS BEEN TESTED by a Federally Accredited Laboratory and has been successfully proven to inhibit COVID-19 Virus in vitro. VSS WAS SPECIFICALLY TESTED and found to be effective against the COVID-19 Virus as well as the A/H1N1, A/H2N3, and the B/H2N3 viruses...

### NO ONE ELSE CAN MAKE THAT STATEMENT.

Lab testing clearly indicates that VSS has Broad-Spectrum Antiviral Capabilities. Additionally... infected people with serious flu-like symptoms, including those who have been tested positive for the COVID-19 Virus, have experienced significantly improved health and reduction of symptoms, usually in 24 to 48 hours or less.

Documented Testimonials and Accredited Lab results speak for themselves, no other claims are made.

#### LEARN MORE

Go to[] the VSS Website to learn more or Purchase VSS for yourself. Use coupon Code: *GSPI15* at checkout to get a 15% discount for our loyal GSPI stockholders."

• On a page on your website at <u>https://gspiusa.com/about</u>, there is a graphic that appears to be a portion of a Viro Spectrum Shield product label, which states:

"Viro Spectrum Shield (VSS) is a proprietary blend of natural herbs. . . tested for efficacy by a United States Accredited Federal Laboratory and shown to . . . broad-spectrum antiviral capabilities. VSS was specifically tested 'in-vitro'. . . effective against the *COVID-19* virus as well as A/H1N1, A/H3N2, B/H3N2 flu . . ."

Also on this page, under the heading "FIGHTING AGAINST COVID-19, NATURALLY," there is substantially similar text as that on the homepage below a graphic logo with the text "**Viro Spectrum Shield**" described above.

• On your website at <u>https://vssmt.net/</u> there is a banner at the top of every page on the website that states:

"Tested 99.9% Effective against the COVID-19 Virus In vitro by a US Fed Accredited Lab"

There is also text on every page of the website that states:

# "Viro Spectrum Shield

USE AS A PREVENTATIVE MEASURE AGAINST COVID-19..."

• On the home page of your website at <u>https://vssmt.net</u>/ you state:

"FACT LAB TESTED: Lab-tested by the Prestigious MRIGlobal, a federally accredited lab that contracts with the Department of Defense, CDC, Department of Energy, and others.

Lab tests prove VSS to be 99.9% Effective when used as a preventative and 93% effective against the active virus in vitro.

Tested Effective against the COVID-19 Virus as well as the A/H1N1, and other seasonal flu viruses.

VSS has Broad-Spectrum Antiviral Capabilities.

Infected people with serious flu-like symptoms, including those who have been tested positive for the COVID-19 Virus, have experienced significantly improved health and reduction of symptoms, usually in 24 to 48 hours or less...

USE VIRO SPECTRUM SHIELD TO HELP FIGHT SYMPTOMS OF COVID-19 OR SEASONAL FLU.

VSS CAN ALSO BE USED AS A PREVENTATIVE MEASURE BY TAKING ONE 1-CAPSULE EVERY OTHER DAY."

In a Twitter post on July 6, 2021 at <a href="https://twitter.com/GSPITODAY/status/1412466087023636486">https://twitter.com/GSPITODAY/status/1412466087023636486</a> you state: "@GSPITODAY wants @WHCOVIDResponse to know... We can add our Formula to the arsenal for all of those who do not want to use a lab created vaccine to help protect them from COVID-19; Our formula fights viruses without potentially dangerous reactions."

[Post includes a Viro Spectrum Shield logo with the caption "Viro Spectrum Shield – USE AS A PREVENtative measure against COVID-19..." and a link to https://vssmt.net]

> In a second Twitter post on July 6, 2021 at <u>https://twitter.com/GSPITODAY/status/1412447587295121409</u> you state: "\$GSPI @GSPITODAY is being featured on 'Business and Industry Today' as the Business of the month: <u>https://businessandindustrytoday.co.uk</u> @bait\_uk A great article, showcasing GSPI and Viro Spectrum Shield. So much support for a #COVID19 preventative that will complement a healthy lifestyle."

Consumers who click on the hyperlink in the Twitter post reach the "Business and Industry today" website, which includes an article titled, "The best kept secret, that they long to share!" available at <u>https://www.businessandindustrytoday.co.uk/the-best-kept-secret-that-they-long-to-share/</u>. That article states:

"... VSS is a proprietary blend of natural herbs and native plants which has been proven to the help human body's natural defence [sic] system. Currently available in capsule form as a dietary supplement, the VSS has been tested by a Federally Accredited laboratory and has been successfully proven to inhibit the COVID-19 Virus in Vitro....

VSS has a multitude of benefits for users and has been proven to be effective in fighting against the COVID-19 Virus...

Kristy [Hunt] continued, 'We're the only thing out there that you can take after being infected, that's been tested in a lab to fight the virus. The only one! Nobody else has come out with any research or any independent testing like we have; our testing was performed by the Federally Accredited Laboratory, Midwest Research Institute (MRIGlobal), who are also performing COVID-19 testing for the US Government. In fact, over a 10 year period, MRIGlobal has successfully tested our Broad-Spectrum Antiviral VSS formula. Specifically, it was tested in 2009 and again in 2020 against four different viruses in vitro including COVID-19, and it has shown high efficacy against all these viruses. Testing also confirmed, when used as a preventative, the formula had 99.9% efficacy against the COVID-19 virus. We have something natural, that you have never heard of and it can help you feel better.""

 In a Twitter post on July 5, 2021 at <u>https://twitter.com/GSPITODAY/status/1412148058066853888</u> you state: "Independence from Big Pharma to protect from COVID . . ."

[Post includes a Viro Spectrum Shield logo with the caption "Viro Spectrum Shield – USE AS A PREVENtative measure against COVID-19..." and a link to https://vssmt.net]

• In a Twitter post on June 23, 2021 at https://twitter.com/GSPITODAY/status/1407755170423836678 you state: "vssmt.net Has a special going . . . @GSPITODAY wants this in every Medicine Chest. . . . Use as a Preventative Measure against COVID-19 \*Fed Accred Lab tests Prove it."

[Post includes a Viro Spectrum Shield logo with the caption "Viro Spectrum Shield – USE AS A PREVENtative measure against COVID-19..." and a link to https://vssmt.net]

- In another Twitter post on June 23, 2021 at <a href="https://twitter.com/GSPITODAY/status/1407751002317492226">https://twitter.com/GSPITODAY/status/1407751002317492226</a> you state: "@GSPITODAY Needs to get this out, we have the Pill/Preventative for COVID-19..."
- In a Twitter post on June 21, 2021 at <u>https://twitter.com/GSPITODAY/status/1407003832064696323</u> you state: "... Our Formula has helped people safely for 38 years, Proven 99.9% effective to Prevent COVID-19 i.v. by Fed Accred Lab that works with the CDC...."
- In a Twitter post on June 17, 2021 at <u>https://twitter.com/GSPITODAY/status/1405631698541301760</u> you state: "@GSPITODAY, \$GSPI already has the ANTIVIRAL Pill to Treat COVID 19, Your own Fed Accredited lab (MRI Global) tested it . . ."

[Post includes a Viro Spectrum Shield logo with the caption "Viro Spectrum Shield – USE AS A PREVENtative measure against COVID-19..." and a link to https://vssmt.net]

- In a second Twitter post on June 17, 2021 at <u>https://twitter.com/GSPITODAY/status/1405630297719205893</u> you state:
   "MRIGlobal' already tested the COVID ANTIVIRAL PILL you are looking for: Viro Spectrum Shield. . . ."
- In a Twitter post on June 16, 2021 at
   <u>https://twitter.com/GSPITODAY/status/1405266818906791936</u> you retweet a June
   13, 2021 post from @CblocHD and state: "Here is a link from a Twitter ad that went
   out over the weekend..." The June 13, 2021 @CblocHD Twitter post states:
   "#ViroSpectrumShield is a COVID-19 treatment that is all-natural to take if you get
   infected to reverse your symptoms in 2 days or to use as a preventative by taking one
   capsule every other day as a supplement. via @viro\_shield"
- In a Twitter post on June 4, 2021 at <a href="https://twitter.com/GSPITODAY/status/1400833562866184196">https://twitter.com/GSPITODAY/status/1400833562866184196</a> you state "\$GSPI is happy to announce that the USA TODAY Special Publication 'America Forward' is

now available to view Online! See Viro Spectrum Shield information on Page # 69. . . ." [Includes link to USA Today special edition "America Forward" described above]

- In a Facebook post on June 2, 2021 you state: "Viro Spectrum Shield has been featured in the new USA Today Special Publication 'America Forward' about the COVID-19 crisis on 6/1/21. Find it on Newstands [sic] today. See us on page # 69. You can also visit our website at :www.vssmt.net."
- In two separate Twitter posts on May 18, 2021 at <a href="https://twitter.com/GSPITODAY/status/1394689424936423424">https://twitter.com/GSPITODAY/status/1394689424936423424</a> and <a href="https://twitter.com/GSPITODAY/status/1394689421950160900">https://twitter.com/GSPITODAY/status/1394689421950160900</a> you state: "Remember to share this info with those you care about; w/ this or any flu, VSS can help reverse symptoms, heal, or be used as a preventative measure, while improving all-around cell health. @GSPITODAY Remember we have a disc code to save 15% 'Twitter'." [Posts both include a Viro Spectrum Shield logo with the caption "Viro Spectrum Shield – USE AS A PREVENtative measure against COVID-19..." and a link to https://vssmt.net]
- In a Twitter post on April 29, 2021 at <u>https://twitter.com/GSPITODAY/status/1387798841416577026</u> you state: "Many have asked: VSS is available to the public, has been since Dec. There's a website until all distribution channels are established . . ." [Post includes the Viro Spectrum Shield logo with the caption "Viro Spectrum Shield – USE AS A PREVENtative measure against COVID-19..." and a link to <u>https://vssmt.net</u>]
- In a Twitter post on April 9, 2021 at <u>https://twitter.com/GSPITODAY/status/1380564860606373889</u> you state: "GSPI distributes the Formula developed by BTR; 'Viro Spectrum Shield'. Tested effective by the same Fed accredited lab who created COVID testing protocols. All Natural Ingredients, Non-Toxic, Tested 99.9% effective. Broad-spectrum=many viruses. Check it" [Post includes the Viro Spectrum Shield logo with the caption "Viro Spectrum Shield – USE AS A PREVENtative measure against COVID-19..." and a link to https://vssmt.net]
- In a Twitter post on April 8, 2021 at <u>https://twitter.com/GSPITODAY/status/1380217613150658560</u> you state: "USA Today Publication comes out May 1st! Full-page article about our 'Viro Spectrum Shield Product', we ARE GETTING NOTICED! There is NO other NATURAL product on the Market that fights COVID-19. We are the ONLY one of our kind, no others to treat After infected to fight COVID."

• In a Facebook post on December 24, 2020 you state:

"Press Release 12/18/20 December 18, 2020|COVID-19...

New Research Data Indicates 99.9% Effective Against the COVID-19 Virus SALT LAKE CITY, UT – December 18, 2020 (GLOBE NEWSWIRE) – Green Star Products, Inc. (USOTC: GSPI) today announced it received new data from a US Federally Accredited Laboratory stating, 'In three replications at 3% and 10% concentration [of normal dosage of Viro Spectrum Shield], 100% of the cells were protected from signs of infection by the SARSCoV-2 [COVID-19] virus, in vitro'.

Additionally, Viro Spectrum Shield (VSS) was specifically tested and found to be effective against the COVID-19 virus as well as the A/H1N1, A/H2N3, B/H2N3 flu viruses in vitro, which demonstrates its Broad-Spectrum Antiviral Capability. VSS was also tested and found to be non-toxic in vitro.

Furthermore, over the past nine months numerous infected volunteers with serious flu-like symptoms, including those who have tested positive for COVID-19, have experienced significantly improved health and reduction or elimination of symptoms usually within 24 to 48 hours or less with no side effects. None of these people needed hospitalization.

Biotech Research makes no claims for VSS. The evidence and results speak for themselves!

Unlike vaccines, which can only protect you if you were vaccinated before you were infected, VSS can be taken before or after you, unfortunately, get/catch the virus and begin to show symptoms. Therefore, it's a very good idea to have VSS in your home if you ever need it . . ."

[Post includes the Viro Spectrum Shield logo with the caption "We beat COVID-19 every day! Successful Results speak for themselves" and a link to https://vssmt.net]

- In a December 12, 2020 Facebook post you state: "BOGUS ADS FOR 'CURES' to COVID-19, HOW AM I DIFFERENT? . . . We feel and have 'proven' with Lab Results and 100's of testimonials, that our Formula is assisting people in recovering from COVID-19 symptoms. There is no other claim being made. . . ."
- In a December 4, 2020 Facebook post you state:
  - "... WHAT WE CAN PROVE:

We have had 100's of people take our supplement as 'volunteers'

We have many written, videotaped, and documented testimonials from all over the world, stating our formula reversed COVID symptoms within an average range of 24-48 hours.

We have never received any reports of side effects

No one has ever reported that their symptoms did not improve

A federally Accredited Lab, approved to test COVID per 'federal testing protocols', has verified that 'Viro Spectrum shield is shown to inhibit the COVID-19 Virus in vitro'. We have that in writing.

In 2009 the same Accredited Lab verified that the same formulation was effective against H1N1 and other viruses, in a Broad Spectrum format...

For perspective, we won't claim anything we cannot prove...

No one is sure what to believe on the internet, but this is the best way to reach the population, to offer this formula, and hope to beat the COVID infection when/if it reaches you or your loved ones."

• In a December 3, 2020 Facebook post you state:

"The Pandemic is active and sweeping the planet, we have a way to help your body fight against it. All-natural, NOT a vaccine, reverses symptoms in 24-48 hours. Lab Tested by a Federally Accredited Lab. YOU NEED THIS IN YOUR MEDICINE CABINET! Have VSS ready to use at first signs of 'Flu-like' symptoms.

GOTO WWW.VSSMT.NET TO LEARN MORE. [Post includes the Viro Spectrum Shield logo with the caption "**We beat COVID-19 every day!** SUCCESSFUL RESULTS SPEAK FOR THEMSELVES..." and a link to https://vssmt.net]

 In a second December 3, 2020 Facebook post you state: "We are ready to introduce: Viro Spectrum Sheild to the Public! VSS is a Homeopathic Supplement that has been Lab Tested (by a Federally Accredited Lab) and shown effective at inhibiting multiple Viruses, including H1N1 and the COVID-19 viruses. Research has proven that people who have been tested positive for COVID -19 see symptoms disappear in 24-48 hours after taking VSS. See our Website for more information, and purchase VSS to help protect your family and friends. <u>www.VSSMT.net</u> [Post includes the Viro Spectrum Shield logo with the caption "We beat COVID-19 every day!

# SUCCESSFUL RESULTS SPEAK FOR THEMSELVES..." and a link to https://vssmt.net]

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 product identified above. Thus, any coronavirus-related prevention or treatment claims regarding such product are not supported by competent and reliable scientific evidence. You must immediately cease and desist making all such claims.

You are also advised to review all other claims for your product 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 certifying that you have ceased making unsubstantiated claims for the product identified above. If you have any questions regarding compliance with the FTC Act, please contact Mr. Cleland at 202-326-3088.

Very truly yours,

Serena Viswanathan Associate Director Division of Advertising Practices

cc: USA Today Network, Studio Gannett
 via email to Michelle Washington <u>mjwashington@usatoday.com</u>
 Twitter via email to <u>dc-help@twitter.com</u>
 Facebook via email to <u>consumerpolicy@fb.com</u>