



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

February 8, 2021

WARNING LETTER

VIA EMAIL TO info@thekarlfeldtcenter.com
Michael Karlfeldt, ND
The Karlfeldt Center
2921 S. Meridian Rd
Meridian, ID 83642

Re: Unsubstantiated claims for Coronavirus prevention and treatment

Dear Mr. Karlfeldt:

This is to advise you that FTC staff reviewed your website at www.thekarlfeldtcenter.com in January 2021. We have also reviewed your social media websites at <https://www.facebook.com/michael.karlfeldt>, <https://www.facebook.com/healthmadeco/>, <https://instagram.com/thekarlfeldtcenter>, and <https://www.youtube.com/channel/UCvXFa69NKV3Ohlv1ewwFvwQ>, where you direct consumers to your website at www.thekarlfeldtcenter.com to purchase supplements including Viressence, Mineral Matrix, and IonBiome, and to schedule services including Hydrobaric Oxygen Treatment, Nutritional and Immune Boosting IVs, and Photodynamic Therapy. We have determined that you are unlawfully advertising that certain products treat or prevent Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or cure claims on your websites include:

- A page on your website at <https://www.thekarlfeldtcenter.com/corona-virus-what-you-need-to-know/> titled “The Corona Virus – What You Need to Know” states: “**A Word from Dr. Karlfeldt About the Corona Virus**,” followed by an embedded video titled “Worried about the Corona Virus?” that is also available at <https://www.youtube.com/watch?v=m2Oj0lbqsmA>. In this video you state:

- “Hello, I am Dr. Karlfeldt. One of the issues we are dealing with right now is the Coronavirus.... The key though when you are fighting something like the Coronavirus, there are certain components that you need to address and by supporting your immune system properly and also turning on what is called Interferon 1 you are then able to much more efficiently fight off something like the Coronavirus. One of the issues with the Coronavirus is the inflammatory, like the cytokine reaction that it triggers and it is that that what really brings an individual down. We need to control the inflammatory component, we need to support the immune system and we also need to support the cell wall membrane integrity....
- The things, if you want to have the ultimate support in regards to something like the Coronavirus, this would be the pack that I would suggest. I know that this looks like a lot but I want to make sure that I give you all the different components that can really help you feel protected, feel safe, and have a stronger immune system. This is not just for Coronavirus; it's for any kind of virus and also just to support your immune system as a whole. So one component you get Vitamin D3. D is crucial, these fat-soluble vitamins are crucial for the immune system and it is very very antiviral. I do that along with Vitamin A and this is a micellized form of Vitamin A, which means that it is more easily absorbed and it can actually get in and protect your cell wall membrane better. Both Vitamin D and Vitamin A are strongly antiviral...
- And then we have Viressence.... [I]f you really want to have good support then doing all of these in combination would be a good thing. Viressence contains antiviral herbs like St. John's Wort... it is so strong it has gone through studies in regards to fighting off HIV and killing the HIV virus, that's how powerful it is and it is supported with other herbs... fantastic antiviral.... In addition to that... you need minerals... they are like the keys that turn systems on or off. The Mineral Matrix is one that I really love... to do a few drops of this a day really brings minerals into the cells so they can function properly.... Here is a product called IonBiome which is one of the products that I really love.... When you are dealing with something like the Coronavirus... you want to calm that inflammatory reaction down and a lot of the inflammation are triggered through the gut... [A]nytime you are dealing with any type of immune challenges and want to protect yourself against viruses, bacteria, etc. then supporting the gut becomes key.... So we have the IonBiome that works for the gut that you take orally but then you have the same product you have a spray that you do in each nostril.... you also need to feed your nasal passages with good bacteria. That's where adding something like the IonBiome to bring good bacteria into your nasal passages to create that additional defense against bacteria, viruses, things that you are exposed to....

- Then zinc, zinc is crucial also for the immune system, so it works along with Vitamin D, Vitamin A, and also something called Vitamin C.... Then vitamin E and something called Phosphatidylcholine.... so we are actually adding the nutrients to heal your cell wall membrane... and the vitamin E helps to calm down the inflammation along that cell wall membrane. These two in combination actually helps to heal the membrane so the virus has a harder time to penetrate and exist within the cell.... And then last but not least, this is something that is really important when you are dealing with something like the Coronavirus or any type of immune system challenge, is that you need to calm down that inflammatory response. Hemp oil is amazing in that it calms that inflammation and it also supports the production of Interferon 1 which is something that we need to fight off something like the Coronavirus.... Let's say you are already sick, dealing with something acute... using a form of colloidal silver... it actually deactivates the virus.... This is your protection so that your health does not suffer and that you don't have to run around in fear thinking that you don't have tools to protect yourself.”

Following this video, the webpage states: “Purchase your Viral Acute Complete or Viral Immune Complete Package from the Karlfeldt Center’s online store to help your body fight off any virus and stay healthy!...” You provide links to purchase these packages at <https://store.thekarlfeldtcenter.com/products/viral-acute-complete-package> and <https://store.thekarlfeldtcenter.com/products/viral-immune-complete-pack>.

- In a March 4, 2020 post on Instagram at <https://instagram.com/thekarlfeldtcenter>, you state: “Coronavirus: Take action now to boost your immune system! <https://www.youtube.com/watch?v=haerQxB2Gps>. Now through March, get both the Glutathione and Meyer’s IV’s for just \$150! Don’t forget to check out our Coronavirus Supplement packs! <https://store.thekarlfeldtcenter.com/> #CoronavirusOutbreak #Coronavirus....” The post includes a carousel of three images that state:
 - “Dr. Karlfeldt’s package of supplements to help your body fight off any virus, including the Coronavirus, at the first signs! VIRAL ACUTE COMPLETE PACKAGE” [accompanying a photo of supplements including Vitamin A, Vitamin D3, Echinacea, Vitamin C, and Silver]
 - “Dr. Karlfeldt’s ultimate package of immune system boosting supplements to help your body fight off any virus, including the Coronavirus, and help you stay healthy! VIRAL-IMMUNE ULTIMATE PACK” [accompanying a photo of supplements including hemp, Viressence, Vitamin A, E-True, Zinc, IonSinus, Vitamin C, Vitamin D3, Ion Gut Health, Matrix Minerals, and Phosphatidylcholine]
 - “In March, get two vital immune boosting IV’s, Glutathione and Meyer’s Cocktail, for just \$150! IMMUNE BOOSTING IV PACK”.

- On your social media site at <https://www.facebook.com/michael.karlfeldt>:
 - In a post on December 17, 2020, you state: “An exciting study done on therapies we use at the Karlfeldt Center,” and share a post from Weber medical GmbH that states: “NEW STUDY BY DR. WEBER ON COVID-19. Together with several colleagues, Dr. Weber recently conducted a study in acute COVID-19 patients. The aim of the study was to find out, whether Photodynamic Therapy with Riboflavin (Vitamin B2) was able to help people in the early stages of infections, and whether it would mitigate the progression of the disease. The protocol consisted of highly dosed Riboflavin-5-Phosphate, taken orally and used as a spray locally, combined with treatments of the laser watch and specifically designed adapters for the nose and the throat containing UV and blue diodes. ...The full study can be accessed here:
<https://medclinres.org/pdfs/2020/successful-reduction-of-sars-cov-2-viral-load-by-photodynamic-therapy-pdt-verified-by-qpcr-a-novel-approach-in-treating-patients-in-early-infection-stages-mcr-20.pdf> ...#Coronavirus #COVID19”
 - In a post on December 14, 2020, you state: “Since the Corona virus is not meeting any of Koch’s postulates (see below) as the cause of CoVid19/20/21 etc., are the serious cases we are seeing any different than sepsis?... For more information, watch the presentation I did back in April - Daily Immune Boosting Tips #18...” The post includes a link to a YouTube video titled “Daily Immune Boosting Tips #18 – Interested in taking your health to a completely new level?,” available at https://www.youtube.com/watch?v=kU3_UJtAjUE. The video description on YouTube states: “Find peak performance and complex disease resolution with Nutritional drips. The Karlfeldt Center offers specialized drips and services not available anywhere else in Idaho. Learn from Dr. Karlfeldt what is available to quickly get you back on track towards optimum health! We are offering telephonic appointments! Call 208-338-8902! Schedule your appointment here! [link to <https://www.thekarlfeldtcenter.com/contact-us/>]” In this video, which includes a slide presentation, you state:
 - “Sepsis is a potentially life-threatening condition caused by the body’s response to an infection and in this case we are looking at the infection of the coronavirus.... This excessive response actually damages the lungs or damages multiple organ systems and that is exactly what we are seeing with the coronavirus.... Let’s look at plasma Vitamin C levels in human sepsis... What is interesting with sepsis is that the Vitamin C levels in the blood is always subnormal and the levels of Vitamin C directly correlates with the incidence of multiple organ failure.... You can see how important it is to make sure that your Vitamin C levels are appropriate, and... the levels of Vitamin C directly correlate with survival... If you do the Vitamin C IV, they’ve seen that Vitamin C easily moves into this alveolar space... and what the Vitamin C does is it opens up these fluid channels to

promote the clearance of this fluid that accumulates in the lungs and also helps to reduce inflammation along the lining so that you can more easily transport oxygen in and out. It also totally shuts down that NET formation, those neutrophils spewing its genetic material which is very inflammatory and very toxic for the lungs....”

- As you display a slide titled “Predicted and Actual Mortality with IVC” you state: “[I]n the Vitamin C group you have the expected mortality but here is the actual mortality so you can see that mortality is reduced by like 75% using IV Vitamin C so it is a really beautiful treatment in regards to what we are looking at with the coronavirus.”
- As you display a slide titled PhotoDynamic Therapy (PDT), you state: “Then we have a therapy called PhotoDynamic Therapy, or PDT, and what that is is actually when you introduce dyes that are photosensitizers... you can either do it systemically, locally, or you can do it orally. What it does is it attaches to pathogens. So it would attach to like the coronavirus or it would attach to the Epstein Barr virus... and stain them... and so you have an accumulation of these photosensitizers and you illuminate them with a laser light and you can do that intravenously... and as the blood passes by it gets treated continuously. So all the stained pathogens, they absorb the light and then oxidize and you kill them.”
- As you display a slide titled “Photozensitizer” that lists Curcumin, Riboflavin, Methylene Blue, and ICG, you state: “Methylene Blue is a very exciting substance. It has been around for a long time but in regards to PhotoDynamic therapy it is becoming more and more of a powerful player because all the other aspects of things it does in the body and so it really enhances the killing effect in addition to many other components... [T]he Methylene Blue, they have used that in studies in regards to the Corona Virus with great success.... Chloroquine... is actually a derivative of Methylene Blue and they use Chloroquine in combination with Zinc very effectively for people dealing with COVID-19.”
- As you display a slide titled “What Are Nutritional IVs?,” you state: “They are actually intravenous infusions infused with nutritional functional substances to achieve better health and healing. They are usually mixed in some kind of fluid like saline... or a sugar solution or it can just be sterile water...” As you display the following slide titled “Why Do We Need Them,” you state: “ This is what becomes important when you’re dealing with something like the coronavirus, any kind of health crisis – the stronger the individual is, the healthier the person is, the less likely they are to succumb to a stressor like the coronavirus. So the key is then to optimize health so that when you have these kind of pandemics that come through that we can move through them much

faster... Intravenous IVs become really powerful because it enters directly into the blood stream, directly into the cells so you don't have to worry about what's going on in the gut."

- As you display a slide titled "How about the corona virus?," you state: "So going back to the coronavirus, what becomes important: boost the immune system, it becomes really important. IV Vitamin C is a powerful, powerful tool. We talked about the photosensitizers like Methylene Blue, Riboflavin, and Curcumin, really important. And then using the Intravenous laser therapy..."
- During a question and answer segment, you state: "What supplements can a nursing mother take to protect against the virus? So a fantastic protocol that I have used and has been really effective, I have had patients that I have done telemedicine with and they were really not in a good place, the liposomal C and then also in addition to that your heavy dose of Vitamin C, just plain ascorbic acid. You can do the combination and when you are sick, when you are dealing with the virus you actually burn up so much more vitamin C than you normally would so a medical doctor would say you need about 200-250 mg a day but in reality when you are dealing with a heavy viral load you can take up to 200 grams... and Zinc and Vitamin D... and also you want to do NAC can be very powerful and Quercetin can be really powerful.... Can a nursing mother use IV Vitamin C? Yes, that is a fantastic way to support both the immune system of the baby and the mother to do IV Vitamin C or a Myers and Glutathione is a really great combination because Vitamin C and Glutathione work hand in hand meaning that they recycle each other and they enhance each other and then the other nutrients in the Myers cocktail also helps to recycle so you get more bang for your buck with the Glutathione."
- In response to the question "Are IVs only preventative or can you come in if you are sick or infected with the virus?" you state: "...So if you are sick with an infectious agent but it does not present as an infectious something that you can infect other people with, so if you don't have a fever, you don't have severe body aches and you don't cough on everybody then you can definitely come in and get IVs to battle the virus directly. We do that a lot. People are sick, they come in and get IVs and then they get better. But then using it for preventative is fantastic."
- You conclude the video by stating, "There are really powerful tools that are available and the best thing is to not obviously wait until you are sick. The best is always prevention so try to get some of these IVs and if you feel like you need a little guidance as to what supplements to take I'd be happy to help but the best is prevention and making sure that you are in a good place healthwise so when you have things like this in the community you are strong..."

- In a post on October 9, 2020, you state: “This type of therapy along with many others is what we offer at The Karlfeldt Center....” You share a post from Weber medical GmbH that states: “RESEARCH UPDATE ON LLLT IN COVID19. Scott Sigman et al. published a second case report on the treatment effects of supportive #LowLevelLaserTherapy (#Photobiomodulation) in a COVID-19 patient. The morbidly obese Asian female patient was suffering from #COVID19 #pneumonia after contracting the #coronavirus. On top of conventional treatment, she received half an hour of low-dose laser therapy daily... The treatment success of this case report aligns with the first case report that Dr. Sigman and his team published in early August and suggests that Low-Level-Laser Therapy can be combined safely and effectively with conventional treatment in patients with severe COVID-19.... #FightCoronavirus.”
- In a post on August 29, 2020, you state: “Another example of therapies we do at the Karlfeldt Center,” and share a post from Weber medical GmbH from August 13, 2020 that states: “CASE REPORT: LASER THERAPY IN #COVID19 PATIENT. Last week, researchers from the USA, Canada and Italy published an update on how #LaserTherapy could help in the fight against the #coronavirus #pandemic. For the first time, they applied supportive PBMT in a severe case of COVID-19 #pneumonia, with very high success! ‘A 57-year old African American man with severe COVID-19 received 4 once-daily PBMT [#Photobiomodulation Therapy] sessions by a laser scanner with pulsed 808 nm and super-pulsed 905 nm modes for 28 min. The patient was evaluated before and after treatment.... The patient reported substantial improvement in the Community-Acquired Pneumonia assessment tool. This report has presented supportive PBMT in a patient with severe COVID-19 pneumonia. Respiratory indices, radiological findings, oxygen requirements, and patient outcomes improved over several days and without need for a ventilator.’... #corona... #covidcasereports.”
- In a post on June 4, 2020, you state: “We are already doing a version of this at The Karlfeldt Center treating your whole blood volume about 60 times in one treatment with ultraviolet, blue and red laser light along with photosensitizers that attach themselves to the pathogen to make them more sensitive to the light and easier to kill....” You provide a link to a Newsweek.com article titled “Russia developing coronavirus treatment that disinfects the body with UV light from inside,” available at <https://www.newsweek.com/russia-developing-coronavirus-treatment-that-disinfects-body-uv-light-inside-1508350>.
- In a post on June 1, 2020, you state: “Another therapy we offer at the Karlfeldt Center. <https://www.thekarlfeldtcenter.com/hyperbaric-oxygen-therapy/>.” You also share a post from Informed Choice Washington dated May 28, 2020 that states: “Hyperbaric Oxygen Treatment for COVID-19...IT’S WORKING!...”

HBOT is showing excellent results for treating COVID-19! Clinical Trials are now underway and some hospitals are using it successfully under ‘Compassionate Use.’ One doctor could not stop smiling when her critically ill patient, who hadn’t spoken or eaten in days, and was so weak he couldn’t open his eyes, left his room on a gurney, but ‘he was returned to the ICU, sitting up in a wheelchair, chattering away, with his eyes wide open!’ Tune in tomorrow, Friday May 29, at 8 am Pacific Time, when two M.D.s well-versed in the science and healing potential of HBOT explain why THIS should be the standard of care for most COVID-19 patients....”

- In a post on May 20, 2020, you share a link to a video titled “FDA Approved Stem Cell Study – Daily Immune Boosting Tips #41,” that is available at <https://www.youtube.com/watch?v=VIUQcIpl2-E>. In this video, you state: “An interesting development, something that you never really thought about that FDA would approve such a thing, they actually approved using stem cell therapy for COVID-19. They are doing an FDA approved study on stem cell therapy, umbilical cord stem cell therapy, for patients that have been heavily impacted by COVID-19. So it just proves the impact that stem cell therapy has on your immune system and also in regulating obviously the cytokine storm or inflammatory response that COVID-19 is known to cause. Obviously doing stem cell therapy, we do offer that here at our clinic.... we do it intravenously, it is amazing to support the body’s own healing process. A cheaper way to do it, this is a new product that’s out on that market that we are just introducing here at The Karlfeldt Center, are these stem cell patches. The company is Life Wave, it is X39. If you want some more information just let us know, somebody can contact you and chat a little more about it and see if that’s something that works for you. What they do, they have a crystal pattern that stimulates your own stem cells and stimulates your stem cell activity.... Obviously, you can do the IVs that we offer here and that’s a powerful treatment but it just costs a lot. That’s like \$11,000 something. We combine it with our hyperbaric oxygen therapy and nutritional IVs just to kind of activate, and also intravenous laser therapy, to really juice up the stem cells when you are getting them intravenously. Or as I said, if you want to go less expensive and it is very doable and there is a way to get them wholesale as well, you can do these X39 patches. You just peel them, slap them on where you need them and as I said we can have someone contact you and guide you through that if you would like and it is a powerful powerful treatment. You leave it on for 12 hours and then peel it off, rest for 12 hours and then put on another one.”
- In a post on May 15, 2020 you state: “Glutathione IV’s are offered at the Karlfeldt Center” and share a link to a research paper titled “Endogenous deficiency of glutathione as the most likely cause of serious manifestations and death in patients with novel coronavirus infection (COVID-19): a hypothesis based on literature data and own observations” that is available at

https://www.researchgate.net/publication/340917045_Endogenous_deficiency_of_glutathione_as_the_most_likely_cause_of_serious_manifestations_and_death_in_patients_with_the_novel_coronavirus_infection_COVID-19_a_hypothesis_based_on_literature_data_and_ow.

- In a post on May 15, 2020, you state: “Methylene blue is something we use at the Karlfeldt Center for patients dealing with chronic infections and cancer. You can read more about it in the article below.” You provide a link to a research paper titled “A Cohort of Cancer Patients with No Reported Cases of SARS-CoV-2 Infection: the Possible Preventive Role of Methylene Blue,” available at <https://riviste.fupress.net/index.php/subs/article/view/888/548>.
- In a post on April 25, 2020, you provide a link to a video titled “Daily Immune Boosting Tips #23 – What is Pathogenic Priming,” available at <https://www.youtube.com/watch?v=3JvweyiQgWY>. In this video you state:

“...What is interesting with the coronavirus is that a lot of the different proteins in it are very similar to what we have as human beings... we have something called pathogenic priming or immune enhancement and what that means is that the immune system, when it reacts with the coronavirus, it breaks down the coronavirus into small components and then checks out the different proteins that the Coronavirus consists of and then develops an immune reaction to those components. But if then we have different components within the coronavirus that is very similar to our own human protein, the immune system will then start to react to our own human protein, and that is what is called pathogenic priming or immune enhancement. You would think that immune enhancement is good... but the issue is when the immune system is enhanced against your own tissue. So what should you do in regards to that? The key is to try to keep the viral load as low as possible so that the immune system does not become over reactive. One of the tools that we offer here... We use the same thing as they would do to clean the blood at a hospital where they use a photosensitizer that they inject into the bag of blood that will then attach to the pathogen. Then they use a laser light to kill the virus. We do that here as well intravenously. And the photosensitizers that we use, one is Methylene Blue and the other one is Vitamin B2, Riboflavin, and you introduce those prior to a patient then getting intravenous laser light which means that we are actually treating your blood directly in your vein which means it is a very sterile environment and as the pathogens are passing by they are then being killed. So it is a great way to reduce the viral load to control this pathogenic priming that takes place.”
- In a post on April 24, 2020, you state: “Here’s another reason why I suggest people to come in to the Karlfeldt Center for glutathione IV along with Myers with extra vitamin C IV as a preventative measure. www.thekarlfeldtcenter.com” and provide a link to case report titled “Efficacy of glutathione therapy in

relieving dyspnea associated with COVID-19 pneumonia: A report of 2 cases,” available at

<https://www.sciencedirect.com/science/article/pii/S2213007120301350>.

- In a post on April 18, 2020, you state: “Just another one of all the therapies we offer at The Karlfeldt Center. Why wait until you are affected? Prevention and pre-treatment is the key to success if you want to stay healthy. www.thekarlfeldtcenter.com,” and provide a link to a video titled “Vitamin B2, UV Light Could Stop COVID-19” that YouTube has removed for violating its Community Guidelines.
- In a post on April 17, 2020, you provide a link to a video titled “Daily Immune Boosting Tips #19 – Natural Vaccine?,” available at <https://www.youtube.com/watch?v=MI-sl3UnDoE>. In this video you state:
“What we do here at the Karlfeldt Center, though, if you want to use it as a preventative measure – and this is something you can do obviously not only when you are sick but if you want to make sure you want to decrease the viral load in the body. We use what is called a photosensitizer and this is another treatment that they do in New York. It’s amazing, New York that got hit the hardest tried to figure out other ways to beat it and they are doing a good job. So one way is they take the blood of somebody that has been infected of the coronavirus and they put Methylene Blue in it and irradiate it with red laser light. What that does is that the Methylene Blue, and this is Methylene Blue right here so we have it at the Center, Methylene blue stains the pathogens, it attaches itself to the pathogens like the coronavirus.... and then after having them stained you irradiate that with red laser light and that then oxidizes these pathogens and kills them.... So what you can do, what we do here at the Center is you can take the Methalyne Blue orally, or another thing that we do is something that’s called Riboflavin it is actually just vitamin B2, both of them are very powerful photosensitizers and they attach themselves to the pathogen and then we use intravenous laser... red light, so you do that intravenously so every time then that the blood passes by, the pathogens that are stained with the photosensitizer they oxidize and die. So this way you can then sterilize your own blood from these different pathogens using a photosensitizer and then follow that up with an intravenous laser light.”
- In a post on April 16, 2020, you state: “In case you weren’t able to make it or would like to refer back to the information packed presentation I did yesterday Nutritional IV Drips and the Current Global Health Crisis, here is the link. If you feel this information is valuable, please share. Also, to make sure you do not miss out on my extensive library of health tips, subscribe to my YouTube Channel.” You provide a link to a video titled “Daily Immune Boosting Tips #18 – Interested in taking your health to a completely new level?” that is available at https://www.youtube.com/watch?v=kU3_UJtAjUE and described above.

- In a post on March 6, 2020, you state: “My business page is in Facebook jail for suggesting immune supportive solutions to the corona virus scare, so I am posting it here instead. Boost your immune system to fight off viruses! Find the packs here: <https://store.thekarlfeldtcenter.com/>.” You provide a link to a video titled “Worried about the Corona Virus?” available at <https://www.youtube.com/watch?v=m2Oj0lbqsmA> and described above. You also provided a link to this video in a Facebook post on February 19, 2020.
- In a post on March 4, 2020, you state: “Coronavirus: Take action now to boost your immune system! Now through the end of March, get both the Glutathione and Meyer’s IV’s for just \$150! Schedule today! 208.228.8902 <https://www.thekarlfeldtcenter.com/#coronavirus...>” You provide a link to a video titled “Coronavirus: What can you do? Boost your immune system!,” available at <https://www.youtube.com/watch?v=haerQxB2Gps>. In this video you state:

“I am not afraid of the coronavirus because I know I have plenty of tools to boost my immune system to fight it. What I am concerned about though, is the reaction within the community. So I feel it becomes our personal responsibility to make sure that we keep our immune system strong to minimize the impact on the community. The impact is both financially, personally, health wise, and we have seen that take place in so many other places around the world.

The best way to protect oneself is by boosting our immunity, and that is not just by running out and getting a vaccine, because when you are getting a vaccine you actually focus your immune system on the specific pathogen that you are getting a vaccine for, so then you are less resistant against other pathogens like the coronavirus. So again, boost your immune system. And because of that we are offering here at the Karlfeldt Center a kind of a coronavirus watch special and that includes a Myers cocktail. So these are intravenous nutrients that you get directly in your blood stream which means that you impact your immune system directly without having to depend on your gut, you know, what it absorbs and what it doesn’t absorb. So here it all hits your blood stream immediately. A Myers cocktail is a blend of Vitamin C, which is fantastic to boost the immune system, minerals, B vitamins, all of that just to increase your immune system’s ability to fight off the virus. And then we add glutathione with that. Glutathione does a number of things. It feeds the immune system, so the immune system, the white blood cells cannot act without glutathione. Another one is that it actually supports the white blood cells to produce the proper antibodies. So it is making the immune system smarter and better producing antibodies against the virus that we are attacked against. And it also supports the white blood cells’ ability to attack the virus and it also reduces the virus’s ability to replicate so if the virus can’t

replicate it really can't do any damage in the body. The immune system will soon take over and kick in.

We are offering this instead of, yeah it's about \$100 savings just on the IVs alone. For about \$150 dollars both Myers cocktail and glutathione IV. And not only that, we are also waving the fee that you would have to pay to get IV clearance which means that you can just call in, schedule an appointment to get your Myers and glutathione. The nurse will assess you and we can get you in and get you boosted....so come on in, schedule an appointment, boost your immunity and let's make sure that the coronavirus does not hit Boise.”

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 and services identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products and services 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 and an order may require that you pay back money to consumers. 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.

Within 48 hours, please send a message to Richard Cleland, Assistant Director, via electronic mail at rcleland@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 Richard Cleland at 202-326-3088.

Very truly yours,

Serena Viswanathan
Associate Director
Division of Advertising Practices