



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

Serena Viswanathan
Acting Associate Director
Division of Advertising Practices

October 16, 2020

WARNING LETTER

VIA *electronic mail* to: ClientService@AMIsantabarbara.com
Age Management Institute Santa Barbara
11 West Figueroa Street
Santa Barbara, CA 93101

Re: Unsubstantiated claims for Coronavirus prevention and treatment

To Whom It May Concern:

This is to advise you that in September 2020 FTC staff has reviewed your websites at <https://www.amisantabarbara.com>, <https://www.instagram.com/amisantabarbara>, and <https://www.facebook.com/amisantabarbara> where you promote products and services you offer, including intravenous therapy and peptide therapy. We have determined that you are unlawfully advertising that certain products or services treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- On your website at <https://www.amisantabarbara.com/covid-19>, accessible by selecting “COVID-19” from your site navigation menu, you state: “CORONAVIRUS UPDATE... Research thus far, states that high doses of Vitamin C through IV Therapy coupled with Peptide Therapy can potentially prevent infection by heightening the immune response to the disease. With the growing concern about Coronavirus, being preventative with your health care is crucial in preparation for any unexpected conditions in your community. At AMI, we are here to educate and assist you in your preventative care of Coronavirus.” Under the heading “What You Can Do To Be Proactive With Your Health,” you state: “**1. IV Therapy**[.] This IV cocktail contains varying concentrations of Vitamin C and Thymosin Alpha 1 and is used to enhance immune function as Vitamin C is a very powerful antioxidant and antiviral, bypassing the gut and delivering it straight to the bloodstream. *IV Therapy drips have been proven incredibly effective in defending against COVID-19.* It is best to use preventatively and has been shown to lower viral load by as much as 80% if and when virus’ [sic] occur. With a higher dose of vitamin C,

supportive vitamins, minerals and amino acid this IV helps to support the immune system and to achieve total immunity **2. Peptide Therapy**[.] Thymosin alpha-1 is the most recommended peptide for immune stimulation. *Thymosin Alpa-1 [sic] is a biological response modifier that has been found to treat several diseases.* Thymosin Alpha-1 activates various cells within the immune system clinically benefiting treatments of disorders where the immune response is impaired. This should be used as a treatment adjuvant and prophylactic ad [sic] can help with many conditions beyond viral illness. Benefits of Thymosin alpha-1: Enhances function of certain immune cells called T and dendritic cells. Help eradicate the unhealthy cells and stop the infection... TO GO BEYOND HYSTERIA AND STRAIGHT TO SCIENCE, CALL OR EMAIL AMI TO SCHEDULE YOUR DEFENSE IV DRIP SERIES TODAY.”

- On your website at <https://www.amisantabarbara.com/super-immune-recoveryantiviral-iv-infusion>, under the heading “Super Immune Recovery/Antiviral IV Infusion,” you state: “This IV is formulated at super high doses and is your go to during cold and flu season, traveling, Covid-19 protection and boosting general immune deficiencies. Our most powerful blend, this [sic] The Main ingredient putting the ‘super’ to your immune system is the addition of Thymosin Alpha-1-peptide which ramps up killer and helper T cells, high dose Vitamin C, extra minerals and amino acids that act as immune system booster [sic] to achieve total immunity. Great for those with auto-immune disease or compromised immune system. Treats acute viral and bacterial infections reducing viral load by as much as 80%...” Under the heading “Thymosin Alpha,” you state: “It enhances the function of T Cells. And T Cells are the Soldier Cells. They’re the ones that kill targeted invaders in the body. The go to peptide for people with autoimmune or compromised immune systems of the elderly as it can be the catalyst that stops an invasion before it even starts. It helps with the removal of acute and chronic infections. It reduces inflammation in the body, It helps eradicate unhealthy cells, including cancer growth.”
- In an Instagram post at <https://www.instagram.com/amisantabarbara/> on April 7, 2020, you state: “**This just in: Arizona doctor believes Vitamin C could be game changer in COVID-19 treatment.** Could a common vitamin prove to be a key in helping treat the coronavirus? Some doctors in both China and New York have been using Vitamin C to try to treat their patients. One Arizona doctor who’s been using this technique for other infections explains why vitamin C might be effective. The key, he says? **Absorption through an IV. ‘When people get sick, the first thing in their body that actually gets depleted is vitamin C,’ said Dr. Steven Katz, a naturopathic physician in Scottsdale.** At AMI, we know immune system function is enhanced by vitamin C supplementation. Our Anti-viral /Immune Recovery IV Therapy works great against flu season, common colds & immune deficiencies. Best to use preventatively and has been shown to lower viral load by as much as 80% if and when virus’ [sic] occur. With a higher dose of Vitamin C, supportive vitamins, minerals and amino acids this IV helps to support the immune system and to achieve total immunity. **You can call or email us at AMI to book your Anti-Viral/Immune Recovery IV Therapy anytime!”**

- In an Instagram post at <https://www.instagram.com/amisantabarbara/> on April 1, 2020 and in a Facebook post at <https://www.facebook.com/amisantabarbara> on April 1, 2020, you state: “At AMI, we wanted to share with you some important information about the benefits of Nebulized Glutathione and how you can be proactive with your health care to **heighten your immune system’s response to viruses like COVID-19**... GSH (reduced glutathione) inhalation is an effective treatment for a variety of pulmonary diseases and respiratory related conditions. Even very serious and difficult-to-treat diseases yield benefits from this effective treatment.... **AMI is now offering a nebulizer treatment to your door!** Our in home treatment is a combination of Glutathione with 3% hydrogen peroxide and hypertonic seawater that help knock out the virally infected cells of your lungs.”
- In an Instagram post at <https://www.instagram.com/amisantabarbara/> on March 25, 2020 and in a Facebook post at <https://www.facebook.com/amisantabarbara> on March 25, 2020, you state: “Vitamin C! Intravenous Vitamin C significantly reduces Covid-19 and boosts your immunity effectively! NY Times sites [sic] it hasn’t been talked about because Vitamin C ‘isn’t a sexy drug.’ Basics is sometimes the very best #biohack #immunesupport-We’ve been saying it! IV C! Sit, Stick, and Drip! We got you.” These posts also include an image of an article headline that reads “New York Hospitals treating coronavirus patients with vitamin C.”
- In an Instagram post at <https://www.instagram.com/amisantabarbara/> on March 21, 2020 and in a Facebook post at <https://www.facebook.com/amisantabarbara> on March 21, 2020, you state: “**Stay at home, we’ll come to you!** We are now offering comprehensive IV therapy to strengthen your immune system from the comfort of your home. Based on current recommended scientific research, our Immune Defense IV drip series, **will heighten your immune system’s response to viruses like COVID-19**... **Step 1: IV Vitamin Therapy**... Vitamin C is a very powerful antioxidant and antiviral, bypassing the gut and delivering it straight [sic] the blood stream has been proven incredibly effective in defending against COVID-19 and killing viruses, bacteria. **Step 2: Peptide Push with Thymosin Alpha**... Thymosin Alpha-1 activates various cells within the immune system... By ramping up your killer T immune cells In [sic] the body you greatly decrease your chances of contracting all know [sic] colds and flus including COVID-19... **Step 4: Nebulizer**[.] During the process you will be nebulizing glutathione to act as an expectorant to clear the lungs of fluid and also kill any bacteria and virus’s [sic] lurking there. **Want to book your in home treatment? Call or email us at AMI!**”
- In an Instagram post at <https://www.instagram.com/amisantabarbara/> on March 14, 2020 and in a Facebook post at <https://www.facebook.com/amisantabarbara> on March 14, 2020, you state: “We all have choices in how we handle the panic and hype of the covid-virus. You will ALWAYS here [sic] us preach the preventative and healthy measures not only during this time of flu season and covid-virus but in your regular daily lifestyle. We have a few methods we suggest that can help ramp up your immune system. IV Therapy

and peptide Thymosin Alpha-1. If you are interested and wanting to do this please call or text the office line... #preventative... #coronavirus #immunitybooster..."

- In an Instagram post at <https://www.instagram.com/amisantabarbara/> on March 6, 2020 and in a Facebook post at <https://www.facebook.com/amisantabarbara> on March 6, 2020, you state: "Our phones have been constantly ringing with questions about IV therapy and prevention of the Coronavirus. Research thus far states that high doses of Vitamin C through IV therapy coupled with Thymosin Alpha 1 can potentially prevent infection by heightening the immune response to the disease. Please be medically aware that because this disease is relatively new all medical advice is subject to change. At this point, we can offer this IV therapy as a potential prevention modality. This is not a treatment for active disease." In the Instagram post, you further state: "High Dose Vitamin In [sic] high doses it converts to hydrogen peroxide which is an oxidizing agent that is very toxic to viruses and bacteria but does not damage normal cells. Thymosin alpha-1 (TA-1) – This is the most recommended peptide for immune stimulation. This should be used as a treatment that supports the immune system in case of viral infections. Give us a call if you want learn more about help and support with Coronavirus!"

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 or services identified above. Thus, any coronavirus-related prevention or treatment claims regarding such product or service 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.

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
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Division of Advertising Practices