

United States of America FEDERAL TRADE COMMISSION Southwest Region

Dama J. Brown, Regional Director Federal Trade Commission – Southwest Region 1999 Bryan Street, Suite 2150 Dallas, Texas 75201

June 5, 2020

WARNING LETTER

Via U.S. Mail

Breiner Whole-Body Health Center 501 Kings Highway East, Suite 108 Fairfield, Connecticut 06825

Re: Unsubstantiated Claims for Coronavirus Prevention and Treatment

To Whom It May Concern:

This is to advise you that FTC staff reviewed your website at https://wholebodymed.com on May 19, 2020. We also reviewed your social media website at https://www.facebook.com/WholeBodyHealthCenterFairfield and your YouTube channel at https://www.youtube.com/channel/UCBInRuZENi61ZzTR2XGlL3g, where you advertise to consumers your intravenous vitamin C treatment. We have determined that you are unlawfully advertising that certain products or services prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims include the following representations:

On your website homepage, you embed a video (available at https://www.youtube.com/watch?v=q0Xzpo96qtc) in which Dr. Adam Breiner states, "Today I'm getting my immune-boosting IV.... Because with cold and flu season in full force, and as well as the new coronavirus spreading worldwide, keeping your immune system as strong as possible is super important.... We have several IV drips that can... help prophylactically as well as IVs that can be used if you have a current infection. So I highly suggest you call today and book your immune drip to boost your immune system." Beneath this video, you claim: "IMMUNE BOOSTING IV'S[.] Dr. Adam Breiner talks about why get [sic] an IV infusion to help boost the immune system, especially now with the Coronavirus spreading worldwide."

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- On a page on your website titled "VITAMIN C AND THE CORONAVIRUS," you claim: "Whether it be for prevention or treatment of any viral infection, intake of Vitamin C should be high on the list of things to do."
- On this same page, you further claim:

Pertinent to our discussion of the coronavirus, viral pneumonia is the most serious problem. Using intravenous Vitamin C, Dr. Klenner would quickly cure these types of cases. China is now doing a study to test the effect of IV C on patients so afflicted. However, they probably will not see a beneficial outcome. Dr. Klenner warned that practitioners did not get his results because they did not use high enough dosages. For a severe case, Dr. Klenner would use approximately 350 mg/kg every four hours. This dose would be about 25 grams for a 150-pound person. In the current study conducted in China, they are using 12 grams twice a day for seven days. In contrast, Dr. Klenner would continue to use his high dosage until the patient was better and then slowly reduce the amount over time to prevent relapse.

One observation that Dr. Klenner noted, taking a large dose of Vitamin C orally or intravenously during the period of incubation, could prevent the disease from manifesting. These doses were less than what would be needed than if the disease appeared....

My recommendation is to start with 10 grams orally and to titrate up or down as needed. When treating an infection with oral Vitamin C, the amount required will correlate directly to the severity of the infection. The usual oral form of Vit C is sodium ascorbate or the newer liposomal forms. The liposomal types of Vitamin C show a higher rate of absorption."

- On a page on your website titled "IV MENU," you claim: "Get Ready to Experience a Powerful Nutrient Immune Boost. Click on any IV Solution and learn more! YES, we also offer high-dose Vitamin C IV's to help boost your immune system. Fight off viruses with immune-boosting IV's. Call for availability and any special discounts. <u>Read our post on The Coronavirus and Vitamin C</u> [link to page referenced above, titled "VITAMIN C AND THE CORONAVIRUS"].
- In an April 3, 2020 post on your Facebook page, you claim: "In this crucial interview, Dr. Adam Breiner speaks with Dr. Paul Anderson, a leading researcher in IV Vitamin C and nutrient therapies. They discuss how Vitamin C can boost the

immune system, fight viruses, and even help patients suffering from complications of COVID-19. All healthcare professionals and the public at large should watch this and pass it on - it could save someone's life!" You also share a link to a video titled "Intravenous Vitamin C & Viral Infections (Focus on COVID-19)" (available at <u>https://www.youtube.com/watch?v=t0xU3KM3_6Q</u>), in which Dr. Breiner claims: "What do we do to help our bodies? And I know that vitamin C...intravenously can be one of those things to prophylactically help but also maybe treat." This video is also embedded on your website homepage.

• In a March 20, 2020 Facebook post, you claim: "Dr. Adam Breiner answers your questions about the coronavirus and how to combat it with boosting your immune system!" and share a video in which Dr. Breiner states, "We talked about some of the immuno-boosting things that one can do, and, you know, vitamin C is a big one. Go on our website right now and our Facebook page—you'll see also posted there is about vitamin C and the coronavirus. Vitamin C can affect the immune system in such a great way...especially if you're doing like an intravenous drip.... [Y]ou get that infused into your...blood, you're getting is this oxidative cascade within the cells and that means all these cells that can't handle that like the infected cells and the viruses themselves will just...get overwhelmed and die. So it's a great antiviral and anti-inflammatory...."

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 products or 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.

Within 48 hours, please send a message to Assistant Director Jim Elliott via electronic mail at jelliott@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 Reid Tepfer at rtepfer@ftc.gov.

Very truly yours,

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