

United States of America FEDERAL TRADE COMMISSION Southwest Region

1999 Bryan St., Ste. 2150 Dallas, Texas 75201

June 3, 2020

WARNING LETTER

VIA EMAIL TO joanna@sfdentalwellness.com

San Francisco Dental Wellness 130 Sansome Street San Francisco, California 94104

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC staff reviewed marketing materials you sent by email to consumers on May 15, 2020. We have determined that you are unlawfully advertising that oral peroxide gel treats or prevents Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus treatment or prevention claims in your marketing materials include:

- That "Hydrogen peroxide (H2O2) appears to be another potential treatment for COVID-19";
- That "[t]he potential COVID-19 treatment mainly targets infected cells. Amid the COVID-19 pandemic, H2O2 may help fight the coronavirus . . . The liquid contains oxygen and hydrogen molecules. It is an oxidizing agent, which means that it can kill living cells, such as bacteria";
- That "San Francisco Dental Wellness is now offering a peroxide gel that allows you to use [sic] for 15-20 minutes to help prevent the spread of Covid-19";
- That "[t]he foaming helps clean the area, remove dead cells, and reduce bacteria which helps prevent the spread of the virus and can actually slow it down from spreading to the lungs if you do have it"; and
- That "[w]e are offering Oral peroxide gel with custom fit trays for you. If you know you need to go out, when you return home, use the solution immediately to prevent the virus.

[B]uy 5 solutions get 1 free for \$100. Custom trays are \$75 which can also be used for teeth whitening or non-custom standard trays are \$25."

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 making all such claims.

You are also advised to review all other claims for your products and immediately cease making claims that are not supported by competent and reliable scientific evidence.

Within 48 hours, please send a message to James E. 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 Zachary A. Keller at zkeller@ftc.gov.

Very truly yours,

Dama J. Brown Regional Director Southwest Region