



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

Serena Viswanathan  
Acting Associate Director  
Division of Advertising Practices

October 13, 2020

**WARNING LETTER**

VIA EMAIL TO [vibrantlifeoklahoma@gmail.com](mailto:vibrantlifeoklahoma@gmail.com)

Dr. James Warren  
Vibrant Life Oklahoma  
21404 S 4110 Rd.  
Claremore, OK 74017

Re: Unsubstantiated claims for Coronavirus prevention or treatment

Dear Dr. Warren:

This is to advise you that FTC staff has reviewed your website at <https://www.vibrantlifeoklahoma.com> in October 2020. We also reviewed your social media website at <https://www.facebook.com/VibrantLifeOklahoma> where you direct consumers to your website, [www.vibrantlifeoklahoma.com](http://www.vibrantlifeoklahoma.com), to schedule lumen therapy (intravenous ultraviolet light therapy) and other services. We have determined that you are unlawfully advertising that certain products and services prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims include:

- In a Facebook post on August 13, 2020 you state: “Case Report out of Germany on COVID19 Patient using Laser Therapy. This is part of our Lumen Therapy package available right here in the US!”

This post shares an August 13 Facebook post from Weber medical GmbH, with an image labeled “57 y/o with severe COVID-19 pneumonia responded to supportive Laser Therapy.” The shared post also includes an image of a man on a hospital bed receiving laser therapy alongside two sets of chest x-rays marked “Before Laser Therapy” and “After Laser Therapy” alongside an image of a chart of treatment parameters. The shared post 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 . . .

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.’

► Link to full Study: <https://bit.ly/3izLxHN>

#LowLevelLaserTherapy #RedLightTherapy #LightTherapy #corona  
#lunginflammation #covidcasereports #LightcanHeal”

[August 13, 2020 post at <https://www.facebook.com/VibrantLifeOklahoma/>; the Weber medical GmbH post was shared again in a post on August 14, 2020]

- In a Facebook post on June 4, 2020 you state: “We Already performed this therapy” above an image of a large spiky cell illuminated with blue light. The post shares a link to a Newsweek article titled “Russia Developing Coronavirus Treatment That Disinfects the Body With UV Light From Inside.” The linked article states: “Scientists in Russia are developing a treatment for coronavirus that uses ultraviolet (UV) light to disinfect the body from the inside . . . physicists at the Institute of Physics and Power Engineering (IPPE) are currently developing methods to combat viruses, including SARS-CoV-2, which causes COVID-19. . . they have called the project ‘luminous gas.’

‘ . . . We select molecules and gas components that when inhaled remain activated and emit ultraviolet light directly in the lungs. We hope that in addition to coronavirus, our method [can be used to] treat tuberculosis, oncology and other diseases.’”

[June 4, 2020 post at <https://www.facebook.com/VibrantLifeOklahoma/>, sharing link to <https://www.newsweek.com/russia-developing-coronavirus-treatment-that-disinfects-body-uv-light-inside-1508350>]

- In a Facebook post on April 18, 2020 you share photographs of a woman receiving IV treatment and state: “What are we doing??? We are pretreating and immune boosting for virus, microbes<sup>[OB]</sup>. PDT !!”

In response to a comment on this post asking “Price does it work,” James Warren posted a reply stating “It’s been main stream [] in Europe for 30 years. Watch some of the videos posted below.... The name of the therapy is photodynamic therapy. PDT. There’s lots of research,” and then posted additional comments providing links to two YouTube videos: one titled “COVID-19: Treatment by Photodynamic Therapy (PDT) [available at <https://www.youtube.com/watch?v=OojFiZwDN0w>], and another titled “Vitamin B2, UV Light Could Stop COVID-19” [previously available at <https://www.youtube.com/watch?v=Y9IPTZ-5HZ4>].

[April 18, 2020 post at <https://www.facebook.com/VibrantLifeOklahoma/>]

- In a Facebook post on April 3, 2020 you state: “\*\*Vitamin C Infusion - \$85!!\*\*” and share a video in which you state: “...I know that obviously our immune system is at the top of everybody’s minds given the numbers nationally are climbing and certainly the numbers in Oklahoma are also accelerating. So [I] just wanted to tell everyone I’m actually going to be offering \$85 Vitamin C IVs to boost your immune system. Who would benefit from it? Well just about all of us would, but certainly if you’re in that at-risk category of being older than 65 or having an immune issue.... So you need to check in with me on that. Also, for sale, we have liquid Vitamin C— \$40. I still have it in stock, it probably won’t last long...” This post includes a “Book Now” button that leads consumers to the <https://www.vibrantlifeoklahoma.com/> website.

[April 3, 2020 post at <https://www.facebook.com/VibrantLifeOklahoma/>]

- In a Facebook post on March 30, 2020 you share a March 30, 2020 Facebook post from Weber medical GmbH that states:

**\*\* THE POWER OF UV LIGHT THERAPY \*\***

Pathogens have a higher susceptibility to UV irradiation. . . . Further, ultraviolet blood irradiation strengthens the immune system and improves overall health. It has the following therapeutic benefits:... Destroys fungal, viral, and bacterial growth...  
#LowLevelLaserTherapy #Photobiomodulation #Coronavirus #FightTogether #UVLight #UVTherapy #antimicrobial...”

In a comment to this post James Warren states: “Hey guys I have this technology at the ranch you should read this carefully.”

[March 3, 2020 post at <https://www.facebook.com/VibrantLifeOklahoma/>]

- In a Facebook post on March 25, 2020 you share a March 25, 2020 Facebook post from Weber medical GmbH that includes a graphic of large coronavirus and states:

“\*\* Download study on aPDT in MERS-CoV \*\*

In 2016, Keil/Bowen/Marscher researched the effect of Riboflavin + UV Irradiation on the Middle Eastern respiratory syndrome coronavirus (MERS-CoV), which was first identified in Saudi Arabia in 2012 and can also cause pneumonia, just as the current SARS-CoV-2 strain.

They found that ‘Riboflavin and UV light effectively reduced the titer of MERS-CoV in human plasma products to below the limit of detection, suggesting that the treatment process may reduce the risk of transfusion transmission of MERS-CoV’.

Given the similarity of MERS-CoV with the currently spreading #coronavirus, these findings probably also apply to SARS-CoV-2.

Download the full article by clicking the link and get ready to treat Coronaviruses with antimicrobial Photodynamic Therapy: <https://bit.ly/39ksT1E> . . .”

[March 25, 2020 post at <https://www.facebook.com/VibrantLifeOklahoma/>]

- In a Facebook post on March 24, 2020 you state: “US hospital treating coronavirus patients with vitamin C !! Are using about 9 g per day<sup>[0.0010.001]”</sup> The post includes a “Book Now” button that allows consumers to make an appointment with Vibrant Life Oklahoma.

[March 24, 2020 post at <https://www.facebook.com/VibrantLifeOklahoma/>]

- In a Facebook post on March 13, 2020 you state: “I have this Technology” and share a March 13, 2020 Facebook post from Weber medical GmbH that includes a graphic of large coronavirus with the label “Latest research indicates aPDT to be **effective against Corona Viruses.**” The shared post states:

“!! Fighting Viruses with IV UV Laser Therapy and aPDT !!

The world has barely been that sensitive for viruses and their spread before. Therefore, today’s topic is the deactivation of pathogens using Ultraviolet Laser Light, either solely or in combination with a Photosensitizer to achieve antimicrobial Photodynamic Therapy (aPDT) in the context of #coronavirus. . . .

Can this also help with #COVID19?

According to Keil / Bowen / Marschner, it probably can! In 2016 they researched the efficacy of Riboflavin + UV Laser Light treatments for Middle East Respiratory Syndrome Coronavirus (MERS-CoV) and found that “Riboflavin and UV light effectively reduced the titer of MERS-CoV in human plasma products to below the limit of detection, suggesting that the treatment process may reduce the risk of transfusion transmission of MERS-CoV.”

[March 13, 2020 post at <https://www.facebook.com/VibrantLifeOklahoma/>]

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.

Within 48 hours, please send a message to Richard Cleland, Assistant Director via electronic mail at [rcleland@ftc.gov](mailto: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  
Acting Associate Director  
Division of Advertising Practices