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

April 30, 2021

WARNING LETTER

VIA EMAIL TO info@prettyhealthnyc.com

Dr. Roxanna Namavar
Pretty Healthy
110 E 60th St. #900
New York, NY 10022

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://www.prettyhealthnyc.com/> in April 2021. We have also reviewed your social media websites at <https://www.instagram.com/prettyhealthy.nyc/>, and <https://www.facebook.com/prettyhealthy.nyc/>, where you direct consumers to your website at <https://www.prettyhealthnyc.com/> to make appointments for treatments including high-dose Vitamin C, Glutathione, and Peptide IV 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 websites include:

- On your website at <https://www.prettyhealthnyc.com/news> you provide a link titled “FEATURED ARTICLE... Know your Real Risk: Inflammation and COVID-19.” The link leads to an article appearing under the byline of Dr. Roxanna Handley-Namavar that states:

“Coronavirus is a disease that can provoke extreme inflammation. In the lungs, this high level of inflammation is what causes shortness of breath and inadequate oxygen intake. Excessive inflammation from coronavirus also results in an increased risk of blood clots, which can lead to heart attacks, strokes and pulmonary embolisms. High preexisting levels of inflammation put you at even greater risk for serious acute complications such as strokes as well as long-term complications such as chronic inflammation and mental health disorders – should you become infected with

coronavirus.... Simple ways to reduce inflammation include...taking supplements that include antioxidants such as NAC (N-acetyl cysteine, glutathione, vitamin C and curcumin....” This article also provides a link to your website at

<https://www.prettyhealthynyc.com/>

[Article located at <https://thepuristonline.com/2020/07/inflammation-and-covid-19/>]

- On your website at <https://www.prettyhealthynyc.com/news>, you provide a link titled “MEDICAL LITERATURE... Clinical Trials for COVID-19 + Vitamin C.” This link leads to an article titled “A new clinical trial to test high-dose vitamin C in patients with COVID-19.”

[Article located at <https://ccforum.biomedcentral.com/articles/10.1186/s13054-020-02851-4>]

- On your website at <https://www.prettyhealthynyc.com/news> you provide a link titled “FEATURED ARTICLE... The Cuomos’ Corona Protocol, Week 3.” This link leads to an article that states:

“Cristina Cuomo Corona Protocol, Week 3[.] Just as my husband, Chris, began to finally kick this, I was stricken with the coronavirus. I spent a week in isolation battling COVID-19. Here’s what I learned—and my road to recovery....

On Tuesday, my sinus congestion was so painful that I called Dr. Roxanna Namavar from Pretty Healthy NYC, who suggested I do a vitamin drip. She also comes to your home, and does testing for COVID-19 and other viruses. Doctors suggested the drip because ‘New York hospitals and hospitals all over the world are using the vitamin C drip as part of their COVID-19 treatments (not a cure) since vitamin C may have anti-viral properties,’ says Dr. Namavar, who shows up in a hazmat outfit and 3M mask because I couldn’t leave the house. In March, Dr. Andrew Weber of Northwell Health services said of the Vitamin IVs hospitals have been administering to patients: ‘The patients who received vitamin C did significantly better than those who did not get vitamin C’ in this article on how a hospital turns to high-dose Vitamin C to fight coronavirus. Vitamin C is best known for its antioxidant properties, ‘being able to scavenge damaging reactive oxygen species, thus protecting the body’s cells and tissues from oxidative damage and dysfunction. However, the vitamin also has numerous other important functions within the body, many of which are known to support healthy immune function,’ the National Institutes of Health reported in its announcement that a new clinical trial to test high-dose vitamin C in patients with COVID-19 is underway in China. ‘Orally you can’t absorb the amount of vitamin C comfortably that is required for the anti-viral properties to combat this virus. The IV version is a safe alternative. You have to be really sick to go to a hospital, which may charge a fortune for a pharmaceutical treatment that might not be effective,’ says

Namavar. In my vitamin-packed drip: magnesium, NAC (a precursor to glutathione, said to be possibly helpful against COVID-19), vitamin C with lysine, proline, and B complex, folic acid, zinc, selenium, glutathione and caffeine (to combat severe sinus headaches). NAC is N-Acetyl-Cystine—an antioxidant amino acid (which is used for respiratory health; see here,) and replenished glutathione. NAC is also available in capsule form from [thorne.com](https://www.thorne.com). After two hours, this pricier investment paid off and my intense sinus pain was gone.”

[Article located at <https://thepuristonline.com/2020/04/cristina-cuomo-corona-protocol-week-3/>]

- On your website at <https://www.prettyhealthynyc.com/news/cuomo-protocol-quote> you state:

“Cristina Cuomo’s Corona Protocol (From Page Six)

Even though her CNN anchor husband, Chris — the brother of New York Gov. Andrew Cuomo — was universally panned for his melodramatic exit from COVID quarantine this week, it gets worse. ‘When my sinus congestion was painful, I enlisted Dr. Roxanna Namavar from Pretty Healthy NYC, who also does vitamin drips at home in the Hamptons,’ she wrote. ‘She shows up in her full hazmat outfit and 3M mask. I got magnesium, NAC (a precursor to glutathione, said to be very helpful against COVID-19), vitamin C with lysine, proline, and B complex, folic acid, zinc, selenium, glutathione and caffeine (to combat the headache).’”

- On your website at <https://www.prettyhealthynyc.com/glutathione> you state:

“Glutathione (GSH) was discovered in 1888 by French physician J. de Rey-Paihade. It is a naturally occurring antioxidant made by our livers and essential for life. Glutathione has multiple functions... Click here to read about the efficacy of glutathione in treating COVID-19. <https://nypost.com/2020/05/09/new-york-mom-with-coronavirus-saved-by-medical-student-son/>.”

- In an Instagram post dated February 18, 2021, you post an image of an article titled “A new clinical trial to test high-dose vitamin C in patients with COVID-19” that includes the text:

“With the 2019 novel coronavirus (2019-nCoV) outbreak now spreading across the world, people are seeking ways in which to potentially protect themselves from the virus or to alleviate its effects once caught. One such means that is being touted online and in the media is vitamin C....

During infection, vitamin C levels can become depleted and a person’s requirement for vitamin C increases with the severity of the infection. In severe cases, this may

require intravenous administration of gram doses in order to achieve high enough levels in the body to compensate for the enhanced turnover of the vitamin.”

In this post you state: “As of February 2020, the clinical characteristics of patients hospitalized with COVID-19-related pneumonia indicated that 26% were transferred to the ICU because of complications such as ARDS (Acute Respiratory Distress Syndrome) & shock. A recently published randomized controlled trial carried out of the US in 167 patients with sepsis-related ARDS indicated that administration of ~15 g/day of IV vitamin C for 4 days may decrease mortality in these patients. #vitaminC #healthy #covid_19 #ivtherapy...#ivdrip.”

- In an Instagram post dated February 11, 2021, you state “the POWER of vitamin D... Going live this week to talk about a vitamin many of us know, love & unfortunately... are deficient in.” This post includes video in which you make the following statements:

Dr. Roxanna Namavar: “So, Vitamin D has been a lot in the press around COVID but it it’s very important for a lot of other things.”

Dr. Leland Stillman: “...and of course we are using it a lot for people who want to make sure that they are immune and that they do well with COVID. There is abundant literature now that people who have adequate levels of Vitamin D in their blood have a better prognosis when they have any kind of infection.”

Dr. Roxanna Namavar: “So we offer a lot of Vitamin D shots, right, because most of my patients... tend to be Vitamin D deficient.... I rarely see a patient that comes in that has a healthy Vitamin D level, so we do offer Vitamin D shots, because let’s be honest – the commitment to taking supplements, myself included, is kind of hard...”

- In a July 12, 2020, Facebook post you share a link to a study titled “Endogenous Deficiency of Glutathione as the Most Likely Cause of Serious Manifestations and Death in COVID-19 Patients.”

[Study located at <https://pubs.acs.org/doi/10.1021/acsinfecdis.0c00288>]

- In another July 12, 2020 Facebook post you share a link to an article titled “The Right Immune Response.” This article states:

“Dr. Roxanna Namavar discusses the effective use of IV drips to deliver Vitamin C and Glutathione to combat the novel coronavirus....

An overactive immune response is the main life-threatening danger for patients with COVID-19. The medical community still has a lot to learn about coronavirus, but from what we now know, most deaths from the virus happen with the body’s own immune

response causes Acute Respiratory Distress Syndrome, or ARDS. This respiratory distress syndrome arises from immune overreaction that causes an immense buildup of fluid in the lungs. The fluid prevents oxygen from reaching the blood, starving the body's organs of this much needed fuel and eventually leading to death.

What can we do?

We need our immune systems to respond strongly to infection but there are ways to modulate that response so it remains helpful, not hurtful.

Vitamin C

Vitamin C, given at appropriate dosages, has strong antiviral and antibacterial effects. The presence of large amounts of Vitamin C in the blood causes viruses and bacteria to produce hydrogen peroxide, a substance that kills them. Right now, intravenous Vitamin C infusions are being used all over the world in the fight against coronavirus....

Mid-range dosages of 25-50 grams have been shown to have strong antiviral properties. Unfortunately, oral Vitamin C supplementation will never result in the blood concentrations necessary to see these effects. The most we can comfortably absorb is about 3 grams. IV infusion is necessary.

Glutathione

Glutathione is the body's most powerful and important antioxidant. Antioxidants work like the garbage truck of the body, effectively 'taking out the trash' by removing damaging oxidative radicals and thereby allowing a drop in the unhealthy inflammation that results from immune system overreaction.

As with Vitamin C, the efficacy and availability of glutathione increases exponentially when given in an intravenous infusion. Oral dosages are limited by our gastrointestinal tolerance and our ability to absorb nutrients. Studies also show that it takes an extended amount of time for oral glutathione supplements to show effects.

Right now, we don't have the luxury of time.

To help in the fight against coronavirus, my practice offers IV Vitamin C and Glutathione, along with a wide range of preventative and treatment-based infusion protocols, individually customized for each patient's needs. These IV treatments are offered in our office or in the patient's home." This article also provides a link to your website at <https://www.prettyhealthnyc.com/>.

[The article is available at <https://thepuristonline.com/2020/04/the-right-immune-response/>. You also link to this article from your website at

<https://www.prettyhealthynyc.com/news> and your Instagram Highlights include a post from @thepurist with an image of the beginning of this article, including the text: “The Right Immune Response[.] Dr. Roxanna Namavar discusses the effective use of IV drips to deliver Vitamin C and Glutathione to combat the novel coronavirus.”]

- In an Instagram post dated April 23, 2020, you share a carousel of two images. The first image includes the text: “On Tuesday and Wednesday, when my sinus congestion was painful, I enlisted Dr. Roxanna Namavar from Pretty Healthy NYC, who also does vitamin drips at home in the Hamptons. She shows up in her full hazmat outfit and 3M mask. I got magnesium, NAC (a precursor to glutathione, said to be very helpful against COVID-19), vitamin C with lysine, proline, and B complex, folic acid, zinc, selenium, glutathione and caffeine (to combat the headache).” The second image includes screenshots of an article from *Purist*, including the text: “The Cuomos’ Corona Protocol, Week 3[.] Just as my husband, Chris, began to finally kick this, I was stricken with the coronavirus. I spent a week in isolation battling COVID-19. Here’s what I learned – and what I did to push it out over the week.”

In this post you state: “Thank you for the shoutout @cristinacuomo! Still offering at-home visits to combat COVID-19. Please visit www.thepuristonline.com (LINK IN BIO) to learn more about Dr. Roxanna Namavar’s Covid and immune boosting protocols!”

- In an Instagram post dated April 15, 2020, you state: “Check out this article by Dr. Roxanna Namavar where she discusses the effective use of IV drips to deliver Vitamin C and Glutathione to combat the novel coronavirus.
[https://thepuristonline.com/2020/04/the-right-immune-response/...](https://thepuristonline.com/2020/04/the-right-immune-response/) #covid #corona #vitaminc #iv...#ivtherapy...”
- In an Instagram post dated April 9, 2020, you share an image of a quote attributed to the Center for Balanced Health that states: “Three U.S. hospitals use IVs of Vitamin C and other low-cost, readily available drugs to cut the death-rate of COVID-19 – without ventilators!” In this post you state: “Link in bio to learn more about our high-dosage Vitamin C infusions provided by PrettyHealthyNYC.com #wewillnotstopfighting #preventativehealth #vitaminc #intravenoustherapy.”
- In an Instagram post dated March 25, 2020, you state:

“See we weren’t kidding about the benefits of high dose Vitamin C... After doctors from China reported success with the Vitamin C administration to COVID-19 patients, doctors in America are following suit. The New York Post reported that NY Hospitals are now treating coronavirus patients with Vitamin C.

We have always preached the importance of Vitamin C at Pretty Healthy NYC and stressed the benefits it has for your immune system. Due to the severity of where the

disease is at now, we are offering high doses of Vitamin C in our custom antiviral infusions to give your body the strength and protection it needs....

Email appointment@prettyhealthynyc.com or call us at (646)-481-0156.... #vitaminc #covid_19 #covid19”

- In an Instagram post dated March 20, 2020, you state: “We are now offering at-home antiviral infusions in NYC and the Hamptons!”

A comment on this post states, “I would doubt this is FDA tested or safe for the treatment of coronavirus. @prettyhealthy.nyc what viruses are you treating for? In response to this comment you state: “We are boosting the immune system. Please note China is using high doses of Vitamin C to treat patients as are hospitals in NYC.”

In response to another comment on this post you state: “Until there is a vaccine, boosting immunity for our patients is helping people. Additionally, the virus is being treated in China with high dose infusions of vitamin C.”

- In an Instagram post dated March 19, 2020, you state: “...Remember Pretty Healthy NYC is offering telemedicine and in home visits to offer peptide therapy and antiviral infusion bags to our patients in a safe and secure manner. #stayhealthy #staystrong #corona #preventativemedicine #teletherapy #telemedicine #covid_19 #stopthespread.”
- In an Instagram post dated March 16, 2020, you state:

“In these trying times we could all use a bit more therapy... but we’re not just talking about psychotherapy. Peptide therapy with Thymosin Alpha 1 can strengthen your immune system, exhibiting antiviral properties.

Doctors around the world are looking to implement this antiviral treatment to help the fight against COVID-19. Thymosin is a peptide (small protein) with immense benefits to our autoimmune response. It is known to control inflammation associated with chronic diseases, treat chronic fatigue, lyme disease and it is currently being tested for its effectiveness in hepatitis B and C treatment. Thymosin Alpha 1 can alleviate infections, eradicate unhealthy cells, increase vaccine receptiveness, and suppress tumor and cancer cell growth.

Pretty Healthy NYC is offering Peptide Therapy with our intravenous infusions to help build up our patients [sic] immune systems during this fragile time. Call our office now to schedule an appointment....”

- In an Instagram post dated March 6, 2020, you share an image of a quote attributed Victoria Lampert from the *Daily Mail* that states: “Can VITAMIN C beat coronavirus? It boosts brains, combats sepsis and tackles colds... no wonder China’s

doctors are racing to test its effects on deadly outbreak.” In this post you state: “Orange you glad we’re talking about COVID-19? Vitamin C plays an integral role in helping our immune system fight off infectious diseases. That’s why we are encouraging our followers to make sure they are getting their daily dosage of Vitamin C. Come in today for you [sic] very own personalized vitamin bag and stay Pretty Healthy. Link in bio for the full Daily Mail article looking at Vitamin C’s role in fighting Coronavirus. #covid2019 #corona...”

- In an Instagram post dated March 5, 2020, you share an image titled “How Contagious Is Coronavirus?” and state: “Here’s some food for thought... I know with a new, unknown virus it is easy to become panicked. We are sharing this chart looking at ‘on average how many people a person with the illness can infect’ to put things in perspective a bit. The Coronavirus Disease is an infectious respiratory illness similar to the flu. As of March 4, 2020 the flu is showing much more impact on Americans than COVID-19. Learn more about how to take care of your mind and body as well as our preventative care methodologies at PrettyHealthyNYC.com. #corona #coronavirüs #health #flu #contagious...#ivtherapy.”
- In an Instagram post dated February 10, 2020, you state: “What can we do about the Coronavirus? High dosage Vitamin C has been shown to have an antiviral effect on multiple viruses including: HSV, influenza, HIV, Polio, Pneumonia and can even decrease the frequency of the common cold... At Pretty Healthy, we utilize our specialized antiviral formulas that include high quality intravenous Vitamins C at dosages much higher than orally available... #coronavirus #CDC #who #virus.”

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 or 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. 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 and may be required to pay back money to consumers.

Pretty Healthy NYC

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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

cc: Facebook and Instagram *via email to* consumerpolicy@fb.com