



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

Serena Viswanathan
Associate Director
Division of Advertising Practices

April 14, 2021

WARNING LETTER

VIA EMAIL TO info@thrivedripspa.com
I Thrive Drip Holdings, LLC dba ThrIVe Drip Spa
1014 Wirt Rd. Suite 210
Houston, Texas 77055

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://thrivedripspa.com/> in March 2021. We also reviewed your social media websites at <https://www.facebook.com/thrivedripspa> and <https://www.instagram.com/thrivedripspa/>, where you direct consumers to your website <https://thrivedripspa.com/> to book appointments for services including intravenous therapy. We have determined that you are unlawfully advertising that intravenous vitamin drips and boosters treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- In a November 20, 2020 blog post titled “Worried About Coronavirus? Keep Your Immune System At Peak Function!” on your website at <https://thrivedripspa.com/worried-coronavirus-keep-immune-system-peak-function-2/>, you state:

“With the Coronavirus taking the world at such an alarming pace, staying on top of your wellness and maintaining a strong immune system has never been more important....

How can ThrIVe Drip Spa help maintain a strong immune system, or strengthen a compromised one? Read further on what the benefits of staying hydrated are, and how receiving components such as Zinc, Vitamin C and Glutathione can do to boost the immune system....

How does staying hydrated promote a healthy immune system?...

Without being hydrated, not only does your body work less efficiently and effectively, but it can't deal with blood flow, causes premature cell death, high blood pressure, weakened immune system, diminishes memory and many more detrimental effects on the body. With IV hydration at ThrIVe Drip Spa, we are able to help you avoid the risks of being dehydrated in as little as 30 minutes....

Beyond hydration, you are able to boost your results by adding in components, which will further benefit the immune system, starting with Vitamin C. Our Myers Cocktail and High C Drip are two favorable drips when it comes to boosting the immune system. Vitamin C is also offered as an add-on and you are able to add in about 10,000mg, or 10g, of Vitamin C into your bag.

What is Vitamin C good for when concerning the immune system?

- Stimulates both production and function of white blood cells
- Helps body produce antibodies
- Essential for healthy immune system response...

Another popular add-on is Zinc. Zinc is a trace mineral and helps stimulate the activity of at least 100 enzymes. It is an important aspect of nutrition and deficiency can occur if there is not high enough consumption in your diet. We offer a max dosage of Zinc at 1mL.

What is Zinc good for when concerning the immune system?

- Controlling and regulating immune responses
- Attacking infected or cancerous cells...
- Prevents cellular damage
- Prevents and treats pneumonia...

Lastly, our next most beneficial component is a strong antioxidant, Glutathione. Glutathione works by acting as a cellular defense that allows the body to fight and prevent infections and disease. Our white blood cells are cells that help fight off disease and to do this, they need an abundant supply of Glutathione to be able to effectively protect us from viruses. Our max dosage of Glutathione is 10mL.

What is Glutathione good for when concerning the immune system?

- Boosts white cell production to fight infections
- Protects us from viruses...
- Help those with suppressed immunity

Again, staying on top of your wellness and maintaining a strong immune system has never been more important and we hope you have a better understanding after reading this article. For any other questions or concerns you may have, please feel free to contact us at either of our following locations...”

You posted substantially similar information in a March 11, 2020 blog post at <https://thrivedripspa.com/worried-coronavirus-keep-immune-system-peak-function/>.

- In a December 30, 2020 Instagram post, you state: “Continue to build up your immune system with IV Therapy offered at ThrIVE. IV Therapy has continually satisfied our clients when they need it the most - feeling sick... Here you can see our Nurse infusing b12 into our most popular drip: The Myers Cocktail. With the New Year rolling in, it’s time to focus on your wellness and give your body what it needs!... #covid19... #COVID #COVID-19.”
- In a November 14, 2020 Instagram post, you state: “Reasons why we love Zinc... Boosts the immune system... Boost your IV with Zinc, you deserve it... #covid19.”
- In an August 24, 2020 Instagram post, you state: “Have you heard of one of our most popular boosters, Glutathione? Glutathione has many important functions, including:... supporting immune function... #covid19.”
- In a March 21, 2020 Instagram post, you state: “Just a reminder to everyone Thrive Drip Spa is OPEN and will remain OPEN to meet the needs of the people of Houston! The best defense against COVID-19 exposure is a strong immune system. Hi dose vitamin C infusions have been found to successfully treat infected patients in 3 studies in China. We offer immune system support with our Immuno Drips. We even delivered such treatment to the Director of Emergency Services to the City of Houston.”
- In a large number of your Instagram posts in which you promote the health benefits of your products and services, you use hashtags referencing the coronavirus pandemic, such as “#covid19.”

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 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 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.

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Violations of the FTC Act may result in legal action seeking a Federal District Court injunction and an order may require that you pay back money to consumers. 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.

Within 48 hours, please send a message to Richard Cleland 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 Mr. Cleland at 202-326-3088.

Very truly yours,

Serena Viswanathan
Associate Director

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