



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

May 13, 2020

WARNING LETTER

VIA EMAIL TO info@drbrownstein.com

Dr. Brownstein's Holistic Medicine
Center for Holistic Medicine
6089 West Maple Road Suite 200
West Bloomfield, Michigan 48322

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC staff has reviewed your website at <https://www.drbrownstein.com/> on May 8, 2020. We have determined that you are unlawfully advertising that certain products or services that you sell online or in your clinic treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- In marketing materials titled "Coronavirus: What to Do," you claim that intravenous therapies you provide can treat or cure COVID-19: "Conventional medicine has little to offer to prevent or treat coronavirus infections... It is time for you to take the initiative and learn what other therapies are out there . . . My last recommendation is to work with a holistic doctor who can give you nutrient IVs when you become ill. Vitamin C, hydrogen peroxide, and ozone IVs can help anyone suffering from an infection. At my office, The Center for Holistic Medicine, we have seen the positive results a holistic approach to combatting viruses can provide."
- In marketing materials titled "Coronavirus: What to Do," you claim that iodine supplementation "**is essential to not only fighting off an infection it is necessary for proper immune system functioning. There is no bacteria, virus, parasite or fungus that is known to be resistant to iodine.** . . . I suggest taking 25 mg/day as a daily dose and more (sometimes 50-100 mg/day) at the first sign of an illness."

- In marketing materials titled “Coronavirus: What to Do,” you claim, “**First, it is important to maintain optimal levels of nutrients, particularly vitamins A, C, and D.** Most people have suboptimal vitamin A and C levels. Both of these nutrients have antiviral abilities and are able to support the immune system when it is under viral attack. If you are not ill, I suggest taking 3-5,000 mg/day of vitamin C. At the first sign of an illness, I would suggest taking 1,000 mg/hour until diarrhea develops, then back off for a time period. For vitamin A, I suggest using 5,000 Units/day if you are not sick and 100,000 Units/day for four days at the first sign of an illness... Also, vitamin D is very important for fighting infections. I suggest, at the onset of an illness, taking 50,000 IU of vitamin D3/day for four days.”

- In marketing materials titled “Coronavirus Part II,” you claim:

“At my office, we find great success with doing IV nutrient therapy when our patients are ill with a viral or bacterial infection. I received a note from a physician colleague of mine (a “Yoooper”) who, at my request, gave himself a hydrogen peroxide IV and recovered from the flu in a day. Intravenous vitamin C, glutathione and ozone are other therapies that also help with viral infections.

Holistically, there are a lot of things to do for a viral infection like coronavirus. Conventionally, there is little to offer. My best suggestion? Become a patient at the Center for Holistic Medicine. We have many safe and effective therapies to treat viral, bacterial, parasitic, and yeast infections.”

- In marketing materials titled “85 COVID Patients at The Center for Holistic Medicine: Zero Hospitalizations and No Deaths,” you claim that your “protocol of using vitamins A, C, D, and iodine” and “intravenous nutrient therapy” should be “the first-line treatment provided in any COVID patient.”
- In marketing materials titled “85 COVID Patients at The Center for Holistic Medicine: Zero Hospitalizations and No Deaths,” you claim that your vitamin-based protocol “was sufficient for the majority of our COVID patients. I (and my partners) have no doubt that the vast majority of COVID patients would avoid a deterioration of their symptoms if they started this protocol at the outset of symptoms.”
- In marketing materials titled “85 COVID Patients at The Center for Holistic Medicine: Zero Hospitalizations and No Deaths,” you claim that, “At my office, the Center for Holistic Medicine (CHM), we have had 85 COVID patients. At this time, no one has been hospitalized, no one has been diagnosed with pneumonia, and there have been no deaths.... I first reported to you about COVID on January 26, 2020. That was the first time I presented our *protocol of using vitamins A, C, D, and iodine not only to support the immune system but also to treat viral infections....* [A]fter witnessing the results our patients have experienced, I am more convinced than ever that a holistic approach like I presented above should be the first-line treatment provided to any COVID patient.”

- In marketing materials titled “85 COVID Patients at The Center for Holistic Medicine: Zero Hospitalizations and No Deaths” you claim that, “In my blogs, I encouraged people to take high doses of vitamins A, C, D, and iodine at the first sign of an illness. In our practice, this was sufficient for the majority of our COVID patients.... However, some became more ill or did not start the oral supplements early enough into their illness. Those patients needed additional holistic therapies. These included nebulizing hydrogen peroxide and iodine along with intravenous nutrient therapies. To protect our staff and healthy patients, we did **not** treat sick COVID patients inside my office. We were gowning up and meeting our patients at their automobile at the back of our building and administering IVs and ozone therapies. Some of these patients were very sick. So far, they all recovered.”

- In marketing materials titled “85 COVID Patients at The Center for Holistic Medicine: Zero Hospitalizations and No Deaths,” you claim of people sick with COVID-19:

“Having them increase the frequency of nebulizing hydrogen peroxide and iodine helped them all. Some of the sickest were advised to nebulize every hour or two for a short period. IV therapies and ozone treatments have helped many.

This therapy has worked for helping COVID patients. It is sad that hospitalized COVID patients are not given the proper nutritional support when they are admitted. In a perfect world, I would immediately start an IV of vitamin C and begin nebulizing any hospitalized COVID patient with hydrogen peroxide and iodine. I am sure that would markedly lower the need for mechanical ventilation.”

- In marketing materials titled “85 COVID Patients at The Center for Holistic Medicine: Zero Hospitalizations and No Deaths,” you claim that “[l]ike most holistic therapies, the earlier they are started in a disease process the better they perform. **AT THE FIRST SIGN OF A VIRAL ILLNESS I ENCOURAGE MY PATIENTS TO START MY VIRAL PROTOCOL OF TAKING VITAMINS A, C, D AND IODINE.** Due to the severity of COVID, I now recommend starting to nebulize hydrogen peroxide and iodine early into the illness as well.”
- In marketing materials titled “There Is Still Hope Out There- Christopher: ‘Four Days Ago I Felt Like I Was Staring At Inevitable Death,’” you present a video testimonial from a man named Christopher, represented to have been a patient of Dr. Ng at the Center for Holistic Medicine. You claim, “Dr Ng’s patient, Christopher, [] had tested positive for COVID-19. This is one of the worst cases we have seen at CHM. Christopher was sick for nearly 2 weeks, with a high fever, body aches, chills, nausea, and diarrhea.... Thankfully, Christopher is recovering after 4 days of a supplement protocol to strengthened [sic] his immune system administered by Dr Ng. *This pandemic is real, but so are the results of natural therapies.* Watch Christopher’s testimonial on how he recovered from COVID-19.”
- In marketing materials titled “There Is Still Hope Out There- Andre: ‘It was a remarkable recovery,’” you present a video testimonial from a man named Andre. You claim, “[M]y

long term patient, Andre from Boston, [] I diagnosed as COVID positive. Andre had a fever, severe diarrhea, and body aches that were painful to the touch. Watch Andre's emotional testimonial as he talks about his recovery by strengthening his immune system with high doses of vitamins A, C, D & iodine, nebulization, as well as at-home ozone therapy administered by his wife."

- In marketing materials titled "There Is Still Hope Out There-Miss Elizabeth: 'Now that I am nebulizing properly I feel 95% better!,'" you present a video testimonial from a woman named Miss Elizabeth. You claim, "Meet my patient Miss Elizabeth. She & her family had COVID-like symptoms to include severe headaches & extreme difficulty breathing. Elizabeth talks about her recovery through proper nebulizing with H2O2 solution and Lugol's 5% iodine. Watch her testimony to learn more."
- In marketing materials titled "There is Still Hope Out There- Brandon: 'I Didn't Really Break My 102 Fever for 4 or 5 Days,'" you present a video testimonial from a man named Brandon. You claim, "Check out my interview with COVID patient, Brandon, who is a paramedic. He experienced fatigue, body aches, high fever, followed by a shortness of breath. Watch Brandon's testimonial on his progress after administering to himself a Super C IV, followed by supplementation with high doses of vitamins A, C, D & iodine."

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 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