



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

May 1, 2020

WARNING LETTER

VIA EMAIL TO dr@drkristinereese.com

LotusRain Naturopathic Clinic
5210 Balboa Avenue, Suite F
San Diego, California 92117

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://lotusrainclinic.com/>, and your social media postings on Facebook at <https://www.facebook.com/LotusRainClinic/>, on April 28, 2020. We have determined that you are unlawfully advertising that certain products treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- In marketing materials titled “COVID-19 Corona Virus Information and Precautionary Suggestions,” claiming to offer consumers “In-Clinic Preventative Options” for preventing COVID-19 that include “High Dose Vitamin C IV’s,” “Hydrogen Peroxide IV’s,” “Infared Sauna,” “The AVACEN – Advanced Vascular Circulation Enhancement,” and “B12 Injections.”
- In marketing materials titled “COVID-19 Corona Virus Information and Precautionary Suggestions,” claiming that your “IV Vitamin C therapy can significantly improve even some of the most acute conditions in a matter of hours” and that your “AVACEN – Advanced Vascular Circulation Enhancement” product has the “potential ability to prevent or treat the Corona (COVID-19).”
- Promoting your website <https://lotusrainclinic.com/> that makes the representations described above in your Facebook account by providing links to the website <https://lotusrainclinic.com/> alongside promotional images.

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 products 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 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