



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

Richard A. Quaresima
Acting Associate Director
Division of Advertising Practices

May 27, 2020

WARNING LETTER

VIA EMAIL TO hello@thefeed.com

The Feed
1668 Valtec Lane, Unit H
Boulder, CO 80301

Re: Unsubstantiated claims for Coronavirus prevention and treatment

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your website at <https://thefeed.com/> in May 2020. We have also reviewed ads you sponsored on Facebook, where you promote the sale of your supplements, including Ortho Molecular D/K2 (Vitamin D) and Quicksilver Vitamin C. We have determined that you are unlawfully advertising that certain products treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- In a sponsored ad that began running on May 16 on Facebook at <https://www.facebook.com/ads/library/?id=168246287953645>, you state: “Vitamin D looks to play a major part in reducing your risk of a severe case from COVID, 86% of all cases among patients with normal vitamin D levels were mild, while 73% of cases among patients with vitamin D deficiency were severe or critical...Two new studies this week so [sic] a significant impact on reducing the risk of a severe COVID case by not being deficient in Vitamin D...Endurance Athletes (even with large sun exposure) often find themselves Vitamin D deficient and need supplementation to get to normal levels....We have researched the best Vitamin D supplements for Athletes and you can find out more at the link below.” The ad also contains a graph titled, “COVID-19 Percent Death Rate by Vitamin D Level,” which states: “98.9% death rate [had a Deficient Vitamin D Level]...4.1% death rate [had a Normal Vitamin D Level].” The ad then links to “Learn More” about “COVID & Athletic Performance” which directs consumers to <https://thefeed.com/products/immunity-packs>.

- When consumers click on the link to “Learn More” about “COVID & Athletic Performance,” at <https://thefeed.com/products/immunity-packs>, they are directed to a page promoting the “Athlete Immunity Pack,” which includes a Vitamin D Supplement, Ortho Molecular D/K2; a Vitamin C supplement, Quicksilver Vitamin C with RLA (liposomal); and a multivitamin, Thorne Multi-Vitamin Elite. On the same page is an article titled “Athletes are worried about how Covid might effect their long term performance. What our experts suggest athletes consider taking to reduce their risk of severe infection,” which states: “What can I do to be low-risk? Let’s be clear-there’s currently no medication or supplement that’s going to prevent you from getting the infection. Athletes are just as much at risk as anyone else. But there are a few low-risk things that are showing **strong evidence** that they can reduce my risk of more severe symptoms if I do contract COVID. **Here are the 3 things our experts suggest Athletes should strongly consider adding to their routine. The top of the list is Vitamin D...**The emerging data on Vitamin D is showing that if you are deficient your outcome after contracting COVID is significantly worse. In a Northwestern Study, 86% of all cases among patients with normal vitamin D levels were mild, while 73% of cases among patients with vitamin D deficiency were severe or critical...On the impact of improving Vitamin D deficiency [the lead of the Northwestern study stated], ‘Our analysis shows that it might be as high as cutting the mortality rate in half’...Next on the list is Vitamin C...I don’t believe it is a cure-all, but I do believe that it is a super low-risk supplement that is a great insurance policy right now...There is some data to suggest that Liposomal Vitamin C is the next most effective method of getting Vitamin C (next only to an IV). This is why I’m a big fan of Quicksilver’s Liposomal Vitamin C. The last piece is [sic] a puzzle is immune regulation and cellular health...The top Multi-Vitamin we sell for Athletes is Thorn Multi-Vitamin Elite.”
- In a sponsored ad that began running on May 16 on Facebook at <https://www.facebook.com/ads/library/?id=236916014394387>, you state: “Will Covid hurt my athletic performance? Will I still have the same aerobic capacity? I was worried so I asked the experts to see what they thought and found out there is something I can do to reduce my risk.” The ad then links to “Learn More” about “COVID & Athletic Performance” which directs consumers to the same website discussed above at <https://thefeed.com/products/immunity-packs>.

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 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,

Richard A. Quaresima
Acting Associate Director
Division of Advertising Practices