



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

May 14, 2020

WARNING LETTER

VIA EMAIL TO dayna@tcmclinic.org

Traditional Chinese Medical Clinic
700 W Mountain Avenue
Fort Collins, Colorado 80521

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.tcmclinic.org/> on May 10, 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:

- Material on your website represents in a blog post titled “The Benefits of Chinese medicine and the coronavirus... *In silico* screening of Chinese herbal medicines with the potential to directly inhibit 2019 novel coronavirus” that “[o]f the natural compounds screened, 13 that exist in traditional Chinese medicines were found to have potential anti-2019-nCoV activity. Further, 125 Chinese herbs were found to contain 2 or more of these 13 compounds. Of these 125 herbs, 26 are classically catalogued as treating viral respiratory infections.”
- In materials entitled “Resources for combined Chinese & Western medical treatment of CRsouOVID-19 [sic],” accessible via a “COVID-19 Resources” option in your website’s navigation menu, you present materials relating to the use of “Traditional Chinese Medicine in the prevention and treatment of COVID-19” with various titles and descriptions, that collectively represent that the treatments discussed are effective in the treatment or prevention of COVID-19, including:
 - “Prevention and treatment of viral respiratory infections by traditional Chinese herbs”;

- “Vitamin C and its Application to the Treatment of nCoV Coronavirus”;
 - “Coronavirus: 85 percent of patients in China benefiting from traditional chinese [sic] medicine, officials claim”;
 - “Clinic characteristics and therapeutic procedures for four for case [sic] with 2019 novel coronavirus pneumonia receiving combined Chinese and Western medicine treatment”;
 - “Coronavirus: Is Chinese medicine useful for fighting the disease? . . . ‘This time at the front of the battlefield against the new coronavirus, Chinese medicine must not be absent”;
 - “18 recover from virus after treatment with TCM [traditional Chinese medicine]”;
 - “Early Large Dose Intravenous Vitamin C is the Treatment Choice of 2019-nCov”; and
 - “Handbook of COVID-19 Prevention . . . See page 18: Personalized, collaborative, multidisciplinary Management. Traditional Chinese Medicine is integrated as a vital part of the multidisciplinary treatment team.”
- In marketing materials titled “A Perspective from Oliver Pijoan DOM on COVID-19,” you claim:

“It is a well known fact that the SARS epidemic in China was more successfully treated with Chinese herbs than with allopathic drugs, something not publicized in the West. It may be no different with COVID-19. Isolation, hand washing, social distancing and other protocols suggested by the CDC are effective and I also highly recommend the services of skilled qualified TCM herbalists for preventative and treatment measures with this virus. The Traditional Chinese Medical Clinic in Fort Collins, Colorado is an excellent resource for this care. Dr.'s Dayna and Monique Larson have had extensive training and their clinic has one of the most complete herbal pharmacies in Colorado.”

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