



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

Serena Viswanathan
Associate Director
Division of Advertising Practices

April 1, 2021

WARNING LETTER

VIA EMAIL TO ffmc2514@yahoo.com

Dr. Alison Garza, MD
Family First Medical Center
2046 S McColl Rd
Edinburg, TX 78539

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://www.dralisongarza.net/> in March 2021. We also reviewed your social media website at <https://www.facebook.com/Family-First-Medical-Center-Dr-Alison-Garza-114664368592233/>, where you direct consumers to your website <https://www.dralisongarza.net/> and encourage consumers to visit your clinic to obtain medical prescriptions and other services. We have determined that you are unlawfully advertising that Ivermectin treats or prevents Coronavirus Disease 2019 (COVID-19).

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

- In a December 2, 2020 Facebook post, you state: “The Eastern Virginia Medical School guidelines (EVMS) clearly stated in their updated version on October 30 that IVERMECTIN should be used in ALL phases of COVID-19 infection including prophylaxis to prevent everyone from even getting Covid. AT THE RISK OF BEING CENSORED AGAIN TONIGHT, I am going to say it again: GO GET ON IVERMECTIN WEEKLY. Go see your doctor and ask for it.”
- In another December 2, 2020 Facebook post, you state: “My last post is being censored. About the I word dosing, pics, etc. Take snapshots before it is gone! Share and spread the word. Look at the EVMS guidelines below. They were updated on 10/30/2020. The I word is the bottom green line and is recommended for ALL phases of the c word and for prophylaxis.”

This post includes an image of a table labeled “Table 1. Pharmacological therapy for COVID by stage of illness: What has worked and what has failed*.” The bottom row of the table is labeled “Ivermectin.”

- In a December 4, 2020 Facebook post, you state: “Just saw this study pop up about the Ivermectin. ‘Ivermectin is effective for COVID-19, a meta-analysis of 21 studies.’ Conclusion of the study = Ivermectin is 100% positive across all stages of illness and prophylaxis. The I word is published again! GET ON THE I WORD AND STAY ON THE I WORD WEEKLY UNTIL 1-2 MONTHS AFTER YOU ARE VACCINIATED!!...”

This post includes a link to the website <https://ivmmeta.com/> that is titled “Ivermectin is effective for COVID-19....”

- In a December 7, 2020 Facebook post, you state: “Many of you posted last night when I could not post anything on Facebook that you shared the information that I have given you to doctors across the nation who have agreed to use the I word. yay! Keep sharing. Tell everyone you know. Everyone get on it that can and get on it NOW. I will post throughout the day today as I prepare to set up a drive-through in the evenings so that I can legally prescribe the I word to those of you who need it.”
- In another December 7, 2020 Facebook post, you state: “I was not able to get the drive-thru lanes going for new patients that want prophylaxis with ivermectin today. For now, until we catch up (or slow down which is probably not going to happen) enough in the office to do that, if you would like to make an appointment, we can do the same thing using our existing appointment EMR system. If you are an EXISTING patient, we can telemedicine your appointment. If you are a NEW patient, I feel we must see you in the clinic first to establish a relationship. From a medical/legal standpoint, this is the safest for both of us. I am a conservative and cautious doctor and this is my professional opinion for new patients.”
- In a December 8, 2020 Facebook post, you state: “I HAVE ALL OF MY PAPERWORK READY FOR THE DRIVE THRU ‘I WORD PROPHYLAXIS CLINIC,[]’ I HAVE VOLUNTEERS FROM OUR FACEBOOK PAGE READY TO HELP WITH DIRECTING TRAFFIC AND THE PAPERWORK. WE WILL GET THIS DONE! Stay tuned! I think it will be this weekend on Saturday for sure. Probably \$40 cash for the outside office visit. Will finalize the times on Friday and will post here. PLEASE DO NOT CALL MY OFFICE, the front does NOT even know about this.”
- In a December 11, 2020 Facebook post, you state:

“IMPORTANT NEWS:

We are having the Drive-thru clinic tomorrow from 10 am -3 pm.!!

All of my providers will be there to see you in line in your cars. And the rest of my staff will be there as well. Thank you to all who volunteered to help, but my FFMC staff is on board! I will keep your names on my list for the future, volunteers.

We are all very excited to do this for our community tomorrow.

You do not need to be an existing patient to come to the Drive-thru.

This is how it will work:

1. You will be directed into one of 3 lanes on the south side of my building. Stay parked and in your cars.
2. An employee will approach your vehicle and give you 2 pieces of paper and a ziploc baggy. One paper is for you to fill out front and back. It is your demo and medical information. You will need to **BRING YOUR OWN PEN** and fill out **BOTH** sides of the paper marked with pink lines. You also need to bring **ALL OF YOUR CURRENT MEDICATIONS WITH YOU** in their original bottles and any vitamins or herbal supplements you are taking as well.

The second piece of paper marked with yellow is for you to take home with you. It has the list of medications **NOT** to take with the I word, possible side effects, and instructions on how to take the I word.
3. You will also be given a ziploc baggy to put your \$40 cash in for your Drive-thru office visit. No checks or credit cards accepted. No change will be given. **CASH ONLY.**
4. My providers and I will come to your car, review your medical history and medications and decide if you can take the I word. We will then write you a prescription based on your weight and you are done!
5. Take your script to a pharmacy and start your weekly dose as soon as you get the medication....

This Drive-thru is **NOT** to answer questions about the different forms of the med, which is better, etc. This Drive-thru is for patients wanting to start the I word for prophylaxis with a prescription from a doctor. And only that....

If you have further questions after you are seen tomorrow, you will need to call the office after 10 am Monday morning and schedule an appointment for a provider to answer your questions. All of the information you need will be on the 2 page sheet

that you take home and/or can be found by looking back thru my posts over the last week.”

- In a December 12, 2020 Facebook post, you state: “We are open for the Drive-Thru line and have finished the first bunch of cars! Only 2 cars in line right now! Come now!! We are here to educate the public and evaluate you for a prescription for being proactive against the C word!”
- In a December 18, 2020 Facebook post, you state: “DRIVE THRU CLINIC TOMORROW MORNING FROM 8 am - 12 noon for the Secret Sauce prescriptions! Remember to bring your own pen and \$40 cash. No change will be made. We will have 4 providers working 3 lanes tomorrow morning, so this will be quick and easy!”

In response to this post, one person posted a comment that asked, “What prescriptions are you giving Dr. G.” You responded, “can’t say on here bcuz my page keeps being shut down. We call one the I word. Read back a few days to see the meds.”

- In a December 20, 2020 Facebook post, you state: “If you missed the last two Saturdays we worked to get you prophylaxis prescriptions with the ‘neigh neigh pills’ (previously known as the I word coined by a follower of our fb page), come anytime when the clinic is open to the drive thru lane. Use the second lane from the building and use the code word Flamingo so we know what you are in line for! No appointment needed. Please don’t call the office phone number about this project as the front staff knows nothing about this. This is all driven from my provider’s hearts for you and your families.”
- In a December 21, 2020 Facebook post, you state: “Our drive thru line for the neigh neigh pills worked well all day today. Quick and easy. We will be open tomorrow from 9 am - 6 pm for the same. Come to the second lane marked by orange cones next to our building on the north side of the building and use the code word FLAMINGO so we know exactly why you are in line!”
- In a January 18, 2021 Facebook post, you state:

“Tonight I wanted to address some questions that I have been asked over the past two weeks...

Should I keep taking the I word after I am vaccinated? We have two choices here:

1. Continue that I word until three weeks after your second Covid vaccine. That ensures that the maximum number of antibodies have been produced against Covid

from the vaccine in your body. But remember, the vaccine is not 100% effective. So, for that reason option number two may be for you.

2. Continue taking the I word weekly for prophylaxis. The way I look at this is it's kind of like using the birth control pill and a condom at the same time. You have double the protection. So vaccination plus the I word equals double protection. This is the option I am going to follow. I am going to continue taking the I word weekly. I have very high exposure to Covid positive patients every day. Those of you that have low risk and low exposure, can probably follow option one. Your choice."

- In a January 19, 2021 Facebook post, you state:

"ATTENTION!

We are seeing many new patients that are very, very sick with Covid that are showing up to our office 5 to 7 days after diagnosis. If you see your own PCP for testing and diagnosis and they do not offer anything to you other than to go home with your Covid, come see us ASAP. Early treatment is imperative!!

We have noticed quite a few people are coming through the prophylaxis lane to get a prescription for the I word and then while talking to them and reviewing their medical history, they tell us they just tested positive or they have a test result that is pending.

The treatment with the I word for a Covid infection is different than weekly prophylaxis with the I word. We give you the I word daily for 3-5 days in a row if you are COVID positive. We give you the I word once a week for prophylaxis!

So it is perfectly fine for you to come through the prophylaxis lane if you have tested positive for Covid somewhere else and want a prescription for the I word! We would rather have you come early in your infection than late."

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 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 product identified above. Thus, any coronavirus-related prevention or treatment claims regarding such product 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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Family First Medical Center
April 1, 2021
Page 6

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: Facebook *via email*
consumerpolicy@fb.com