



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

Serena Viswanathan
Acting Associate Director
Division of Advertising Practices

November 5, 2020

WARNING LETTER

VIA EMAIL TO conciierge@transformyou.com

Dr. Robb Bird
Transform You LLC
4025 S. McClintock Dr. #210
Tempe, AZ 85282

Re: Unsubstantiated claims for Coronavirus prevention or treatment

Dear Dr. Bird:

This is to advise you that FTC staff has reviewed your website at <https://www.transformyou.com> in November 2020. We also reviewed your social media websites at <https://www.facebook.com/TransformYou>, <https://twitter.com/transformyouaz>, and <https://www.instagram.com/transformyouaz/> where you promote products and services available at Transformyou, including Thymosin Alpha 1, Thymosin Beta 4, LL-37, and Pentosan Polysulfate peptide therapies. We have determined that you are unlawfully advertising that certain products or services prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims include:

- On a page on your website titled “BOOSTING YOUR IMMUNE SYSTEM AGAINST COVID-19,” that includes an image of the profile of a person’s nose and mouth next to large luminous spiky cells floating in the air, you state:

“Symptom treatment and immune-boosting support is the only treatment available for COVID-19 right now. As of now, there is no antiviral medicine or a vaccine for this virus, but these are currently being worked on. Because of this, prevention is extremely important. . . . [W]e want to share with you a few of the peptides we work with that can potentially help strengthen your immune system as an extra precautionary step. These include:

Thymosin Alpha 1

Thymosin alpha 1 (T α 1) is a peptide produced naturally by the thymus gland. T cell production and action within the body is important for adaptive immunity. This is the mode by which immune cells are able to recognize and kill foreign invaders. Specifically, Thymosin alpha 1 has been shown to enhance the function of certain immune cells called T and dendritic cells. These white blood cells play huge roles in the body's defense process for anyone with a depressed immune system or suffering from an infection.

LL-37

LL-37 is an antimicrobial peptide with antiviral and immunomodulatory effects. In response to infection, neutrophils, macrophages, and bronchial epithelial cells all produce LL-37.... Besides its antimicrobial and antiviral activity, it stimulates responses in many types of cells to microbial compounds. LL37 is a multifunctional host defense peptide that disrupts and defends against localized bacterial and viral invasion.

Pentosan Polysulfate

Pentosan Polysulfate is a highly potent and selective inhibitor of the in vitro replication of HIV and other enveloped viruses such as the coronavirus. The anti-viral activity of polysulfates works because they help block certain sites on the viral envelope. This action prevents the virus from entering the cells and allows for our immune system to clear it.

Are you interested in learning more about immune-boosting peptides and how they can help you? Schedule a consultation today!"

[\[https://www.transformyou.com/blog/boosting-your-immune-system-against-covid-19\]](https://www.transformyou.com/blog/boosting-your-immune-system-against-covid-19)

- In Twitter and Facebook posts on April 7, 2020 you state: "Are you looking to boost your immune system against #coronavirus or any other sickness that's floating around? We've got just the thing." The posts include an image of illuminated spiky cells and a link to a page on your website at <https://www.transformyou.com/thymosin-alpha-1>, which prominently features a banner at the top stating, "Telemedicine Appointments Available." The Twitter post also includes the hashtags "#health #immuneboosters."

[April 7, 2020 posts at <https://twitter.com/transformyouaz> and <https://www.facebook.com/TransformYou>]

- In Twitter and Instagram posts on March 20, 2020 you state: “Are you looking to supercharge your immune system? We recommend trying Thymosin Alpha 1! It enhances immune cells, is effective against infections, has #antibacterial, #antiviral and antifungal properties, and more. . . . #covid19 #coronavirus.” The posts include an image of a dial showing “immunity level” at “maximum” and a link to a page on your website at <https://www.transformyou.com/thymosin-alpha-1> that prominently features a banner at the top stating, “Telemedicine Appointments Available.”

A Facebook post on March 20, 2020 includes the same image, a link to the same page on your website, and substantially similar text.

[March 20, 2020 posts at <https://twitter.com/transformyouaz>, <https://www.instagram.com/transformyouaz/>, and <https://www.facebook.com/TransformYou>]

- In Twitter and Facebook posts on March 12, 2020 you state: “Learn how to boost your immune system against coronavirus with these tips (and add immune-boosting peptides to the list while you’re at it!).” The posts include a link to an *Alexandria Living Magazine* article titled “How to Boost Your Immune System to Help Avoid Coronavirus COVID-19. The Twitter post includes the hashtags “#covid19 #immuneboosting #health #wellness.”

[March 12, 2020 posts at <https://twitter.com/transformyouaz> and <https://www.facebook.com/TransformYou>]

- In a Twitter post on March 6, 2020, which includes an image of a profile of a person’s nose and mouth next to large luminous spiky cells floating in the air, you state: “Are you worried about the recent spread of the #Coronavirus? Learn more about how you can work to prevent it and boost your immune system against it. You have options! #health #covid19 #immunesupport #peptides.” The post includes a link to <https://www.transformyou.com/blog/boosting-your-immune-system-against-covid-19>, which is described above.

A Facebook post on March 6, 2020 includes the same image, a link to the same page on your website, and substantially similar text.

[March 6, 2020 posts at at <https://twitter.com/transformyouaz> and <https://www.facebook.com/TransformYou>]

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,

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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 services 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,

Serena Viswanathan
Acting Associate Director
Division of Advertising Practices