



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

Serena Viswanathan  
Associate Director  
Division of Advertising Practices

May 27, 2021

**CEASE AND DESIST LETTER**

*VIA EMAIL TO [info@drtracygapin.com](mailto:info@drtracygapin.com)*  
The Gapin Institute  
Dr. Tracy Gapin  
1 S. School Ave. #200  
Sarasota, FL 34237

Re: Unsubstantiated claims for Coronavirus prevention and/or treatment

To Whom It May Concern:

This is to advise you that in May 2021, FTC staff reviewed your website at <https://drtracygapin.com>, and your social media websites at <https://www.instagram.com/drtracygapin/> and <https://www.linkedin.com/today/author/tracygapin>, where you promote products and services available at The Gapin Institute, including Thymosin Alpha 1. We have determined that you are unlawfully advertising that certain products and/or services treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- “Boost Your Immune System with Peptides

...

Can Peptide Therapy Help You?

The benefits of peptides in areas like immune system function have been widely known for many years. Peptides can play a vital role when it comes to building immunity and strengthening the immune system’s response.

...

[Image of man sneezing into a tissue surrounded by oversized depictions of round spiky objects typically used to illustrate coronaviruses]

With the current Coronavirus pandemic affecting the world, today we'll focus on peptides that have the greatest effect on immune function.

LL-37

...

Antimicrobial peptides (AMPs)... can possibly regulate bacteria/virus invasion and may control infection.... LL-37 plays an important role in the first line of defense against infection and systemic invasion of pathogens at sites of inflammation and wounds.

...

SELANK

...

...Selank was reported to stimulate the release of interferons, which are anti-viral molecules. Selank has also been proposed to potentially protect cells against some viral infections.

...

If you're interested in radically upgrading your health, you'll want to keep a close eye on the power of peptides and consider adding these therapies to your immune boosting regimen.

...

Dr. Tracy Gapin is currently accepting new clients for peptide therapy to boost immunity and improve other aspects of men's health. Schedule your consultation right now by calling 941-444-1441 or clicking this link."

[From your webpage "Boost Your Immune System With Peptides,"  
[https://drtracygapin.com/boost-your-immune-system-with-peptides/.](https://drtracygapin.com/boost-your-immune-system-with-peptides/)]

- "Coronavirus: What Men Need to Know

...

Listen to my story.

[Embedded video titled “Dr. Tracy Gapin – Battling COVID-19 and Winning with Precision Health, also available at <https://www.youtube.com/watch?v=3dT2wsHYV1g>, and further described below.]

Read my story [here](#) [link to article titled “Coronavirus Recovery: An MD’s Personal Story,” available at <https://www.linkedin.com/pulse/coronavirus-recovery-mds-personal-story-tracy-gapin-md>, and further described below.]

...

Today, in the world of optimal health & peak performance peptides are one of the latest in scientific advancements. Peptide therapy can not only boost your immune system, but can help with fat loss, tissue repair, and reduction of inflammation – the major contributor to chronic diseases. They can even extend your life! Discover what these power-packed peptides could do for YOU.”

[From your webpage “Coronavirus: What Men Need to Know,” <https://drtracygapin.com/coronavirus-what-men-need-to-know/>.]

- “Coronavirus Recovery: An MD’s Personal Story

...

So a lot of people have asked me what I did to recover.... One of the first things I did when I developed symptoms that Friday night was to start immune-boosting peptides.... And there are specific peptides that optimize and upregulate immune function. So that Friday night, I immediately started several immune peptides. I’ll never know for sure, but I believe those peptides likely contributed to my fairly quick recovery.”

[From your article, “Coronavirus Recovery: An MD’s Personal Story,” <https://www.linkedin.com/pulse/coronavirus-recovery-mds-personal-story-tracy-gapin-md>.]

- In a podcast episode titled “COVID-19: From the Front Lines with Dr. Tracy Gapin”:

“But I think that this is a really key time to focus on what you just mentioned, that is, optimizing our health. We have control over that. And I truly believe that some of the things that I did before getting sick – as well as the peptides that I started immediately when I did get sick – I think those may have saved my life.”

[Podcast episode, “COVID-19: From the Front Lines with Dr. Tracy Gapin,”  
<https://drtracygapin.com/podcasts.>]

- In a video podcast episode titled “Dr. Tracy Gapin – Battling COVID-19 and Winning with Precision Health”:

“Now I also use peptides.... I had already purchased some peptides for myself, and I was prepared for this to happen. And so that Friday night when this happened I had peptides that I started on. And I truly believe that my approach to health leading up to this certainly helped, but I believe those peptides probably saved my life. And being able to get them quickly from the beginning there, by boosting my immune system, boosting my immune response, I believe that’s a big reason why my acute symptoms resolved so quickly.... For example, Thymosin Alpha is an amazing one that upregulates your immune function through T-cells and Reg T-Cells. That is a great one for boosting prior to getting sick, so if you’re asking what can you do to boost your immunity before you get infected, that would be a great one that I have suggested to my clients. LL-37 is another great one for if you were to get infected.”

[Podcast episode, “Dr. Tracy Gapin – Battling COVID-19 and Winning with Precision Health,” <https://drtracygapin.com/podcasts>, also available at <https://www.youtube.com/watch?v=3dT2wsHYV1g>.]

- “PEPTIDE THERAPY WITH THYMOSIN ALPHA 1 TO REDUCE SEVERE COVID-19 SYMPTOMS

With the COVID-19 pandemic in full force, we’re all looking for ways to protect ourselves. One of the best ways to do that is to do everything we can to optimize our immune systems. Thymosin alpha 1 (TA1) is one of the most powerful peptides to enhance immunity.

...

#peptidetherapy #peptide #covid19 #covid\_19 #covid—19 #covid\_19[masked emoji] #immunesupport”

[From your post dated July 21, 2020 on your social media website at <https://www.instagram.com/drtracygapin/>.]

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 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, 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.

Violations of the FTC Act may result in legal action seeking a Federal District Court injunction. 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 and may be required to pay refunds to consumers or provide other relief pursuant to Section 19(b) of the FTC Act, 15 U.S.C. § 57b(b).

Within 48 hours, please send a message to Richard Cleland via electronic mail at [rcleland@ftc.gov](mailto: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  
Associate Director  
Division of Advertising Practices

cc: Instagram *via email to* [consumerpolicy@fb.com](mailto:consumerpolicy@fb.com)  
LinkedIn *via email to* [Lera\\_us@Linkedin.com](mailto:Lera_us@Linkedin.com)  
YouTube *via email to* [youtube-gov-support@google.com](mailto:youtube-gov-support@google.com)