FEDERAL TRADE COMMISSION BUREAU OF CONSUMER PROTECTION WASHINGTON, DC 20580

VIA FEDERAL EXPRESS

TO: [Company]

DATE: January 11, 2018

RE: WARNING OF POTENTIALLY ILLEGAL MARKETING OF

PRODUCTS TO ALLEVIATE SYMPTOMS OF OPIATE WITHDRAWAL

AND/OR ASSIST WITH OVERCOMING OPIATE ADDICTION

Federal Trade Commission staff has reviewed marketing claims related to opiate withdrawal and/or opiate addiction for your [product name]. The FTC Act requires that health-related claims, such as claims that a product will treat or cure a disease or other health condition, must be supported by competent and reliable scientific evidence at the time the claims are made. In other words, it is against the law to make health claims, whether directly or indirectly, through advertising, the use of a product name, website name, or any other means, without adequate scientific support, or to exaggerate the benefits of products or services you are promoting. Violations of the FTC Act may result in legal action in the form of a Federal District Court Injunction or an Administrative Order and may require that you pay money back to consumers.

Given the claims you are making, you should be aware of two FTC law enforcement actions challenging unsupported claims for the treatment of opiate addiction and/or opiate withdrawal symptoms: FTC v. Sunrise Nutraceuticals, LLC, which involved the product Elimidrol, and FTC v. Catlin Enterprises, Inc., which involved the products Withdrawal Ease and Recovery Ease. The complaints and orders in those cases can be found at https://www.ftc.gov/enforcement/cases-proceedings/152-3208-x160006/sunrise-nutraceuticals-llc and https://www.ftc.gov/enforcement/cases-proceedings/1623204/catlin-enterprises-inc. The orders entered in both cases imposed monetary judgments and required the defendants to stop making deceptive claims.

FTC staff strongly urges you to review all health-related claims that you and any of your affiliates are making in any medium. Competent and reliable scientific evidence for a product claiming to treat opiate withdrawal symptoms or opiate addiction consists of randomized, controlled, human clinical testing of that product. If any of your claims are not supported by competent and reliable scientific evidence, you should delete or revise them immediately.

Please notify Mamie Kresses of the FTC via email at mkresses@ftc.gov within fifteen working days of receipt of this letter of the specific actions you have taken to address the FTC's concerns.