



UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WESTERN REGION

901 Market Street, Suite 570  
San Francisco, CA, 94103

Jeffrey Klurfeld  
Regional Director

Direct Dial  
(415) 356-5266

April 10, 2001

Mr. Troy Coppola  
Life's Vigor Health and Beauty  
P.O. Box 81264  
Bakersfield, CA 94134

RE: Life's Vigor  
File No.: 002 3297

Dear Mr. Coppola:

As you know, staff of the Western Regional Office of the Federal Trade Commission have conducted an investigation to determine whether your firm violated the Federal Trade Commission Act by making false or unsubstantiated claims regarding the safety and efficacy of herbal products on your web site containing chaparral. Among other things, staff investigated claims made via the Internet and by other means, in connection with the marketing of these products, that these products, taken internally, are effective in treating arthritis, act as a natural biotic, and cause no side effects.

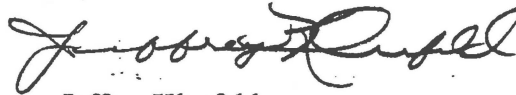
Based on this investigation, it appears to staff that the Life's Vigor Internet site contained the claims described above. Moreover, staff believes, based on the evidence gathered during the investigation, that these safety and efficacy claims were not substantiated by competent and reliable scientific evidence.

After careful review of this matter, however, it does not appear that further action by the Commission is necessary at this time. Among other reasons, you have indicated that you have ceased making the claims in question and will not make any such claims in the future unless, at the time the claims are made, you possess competent and reliable scientific evidence to

substantiate the claims.<sup>1</sup> In addition, you have indicated that sales of these products were *de minimis* during the period when these claims were made. Based on these and other considerations, the investigation has been closed.

This action is not to be construed as a determination that a violation has not occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take further action as the public interest may require.

Sincerely,



Jeffrey Klurfeld  
Regional Director

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<sup>1</sup> For further guidance on the FTC's advertising substantiation standard and how it applies to advertising claims for dietary supplements and other health-related products, see *Dietary Supplements: An Advertising Guide for Industry* (FTC, Bureau of Consumer Protection 1998), available at [www.ftc.gov](http://www.ftc.gov).