



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 dallas@med-thrive.com and fortworth@med-thrive.com

Med-Thrive Dallas
7150 Greenville Ave.
Suite 310
Dallas, TX 75231

Med-Thrive Fort Worth
1307 8th Ave.
#608
Fort Worth, TX 76104

Re: Unsubstantiated claims for Coronavirus prevention and treatment

To Whom It May Concern:

This is to advise you that FTC staff reviewed your website at <https://med-thrive.com/> in February 2021. We have also reviewed your social media websites at <https://www.facebook.com/Med-Thrive-Dallas-340656063159464/>, <https://www.facebook.com/Med-Thrive-Fort-Worth-201920254089246/>, <https://www.instagram.com/medthrive214/>, and <https://www.instagram.com/medthrivefortworth/>, where you direct consumers to your website at <https://med-thrive.com/> to schedule services including intravenous therapy and vitamin injections. We have determined that you are unlawfully advertising that certain products or services treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- On your social media sites at <https://www.facebook.com/Med-Thrive-Dallas-340656063159464/> and <https://www.facebook.com/Med-Thrive-Fort-Worth-201920254089246/>:
 - In posts on November 25, 2020, you state: “A lack of vitamin D has been found in 80 per cent of COVID-19 patients. A new study found low levels of the sunshine vitamin have been recorded in a large number of people who tested positive for coronavirus. You can get Vitamin D added to ANY of your IV treatments with Med-Thrive.... Vitamin levels were measured in 216 COVID-19 patients using a serum test at the Hospital Universitario Marqu s [sic] in Spain. A deficiency in 80 per cent of COVID-19 positive patients was recorded by the researchers.... You can get Vitamin D added to ANY of your IV treatments with Med-Thrive.” This post also includes an image of an October 27, 2020 article headline that states: “Coronavirus: 80% of Covid-19 patients have a lack of Vitamin D, study finds.”
 - In posts on November 18, 2020, you state: “Did you know doctors are administering high does [sic] of Vitamin C intravenously (IV) to patients who are in intensive care battling Covid-19! The experimental treatment started in China where doses of vitamin C is reported to help patients with Covid-19. ‘The patients who received Vitamin C did significantly better than those who did not get Vitamin C.’
 - Do you consume enough vitamins to stay healthy during this difficult time?
 - We can help you boost your immune system!...
 - Check out our website Med-Thrive for more information!”
 - In posts on November 15, 2020, you state: “During this holidays [sic], you should try to comply with the latest government directives regarding COVID-19 prevention and treatment. However, you can also give yourself an advantage by taking steps to boost your immune system.... Med-Thrive offers a range of immune and health-boosting IV therapies that can help fortify your immune system. Our IV therapy contains several blends of vitamins and minerals that can help boost the body’s immune system. Visit [Med-Thrive.com](https://www.Med-Thrive.com) for more information.”
 - In posts on November 1, 2020, you state: “Vitamin C and Coronavirus[.] A new government clinical trial is looking into IV vitamin C’s ability to improve the prognosis of patients with 2019 new coronavirus (2019-nCoV) infected pneumonia, namely severe acute respiratory infection (SARI). Early feedback from China suggested low dose vitamin C (10-12 grams) given to COVID-19

patients with SARI had better outcomes, possibly due to reduced oxidative stress within lung tissues.”

- In posts on October 18, 2020, you state: “In these tough times it is important to take care of our bodies [sic] immune system. Let us help you with this task. We can help with keeping your immune system boosted or help your body heal from an extended illness. Call us at Med-Thrive to schedule for immune system support. Mention that you saw this post and save 10% on any purchase of an immune bag!!!” This post also includes several images, including: one displaying the text, “JUST IN TIME FOR THE SEASON Get ahead of minor colds, flu, & other immune challenges this season with this express drip” next to a graphic of a spherical object covered in spikes that is identifiable as a coronavirus; and another image that includes a graphic of a person with the lungs highlighted, who is surrounded by spherical objects covered in spikes that are identifiable as coronaviruses.
- In posts on October 12, 2020, you state: “Vitamin D is an essential vitamin for lung immunity... With our current health climate, there is a lot of fear and unknown considering ‘the bug’ has not directly impacted the health of many of us yet. There are a few precautionary lifestyle choices you can make that may optimize your results.... Lung Defenses in the Body: The lungs cells use Vitamin D in the lungs to synthesize ‘Cathelicidin’ an established antimicrobial peptide needed to attack viruses and bacteria. Vitamin D is also essential for activating immune cells like T-lymphocytes to keep surveillance over the lungs in case an ‘invader or virus’ were to enter. As you can see vitamin D is incredibly important for preventing infections and addressing infections in the lungs. Without adequate Vitamin D the immune system of the lungs suffers!... Vitamin D is a specific vitamin that is responsible for preventing infections....Come see us at Med-Thrive for your Vitamin D shots.”

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 and services identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products and 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.

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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, 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
Associate Director
Division of Advertising Practices

cc: Facebook and Instagram *via email*
consumerpolicy@fb.com