



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

Serena Viswanathan
Acting Associate Director
Division of Advertising Practices

December 10, 2020

WARNING LETTER

VIA EMAIL TO info@renewmedicalspsa.net

Theresa Fontenot
ReNew Integrated Medical Spa
3939 Texas Blvd.
Texarkana, TX 75503

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://renewmedicalspsa.net/> in November 2020. We have also reviewed your social media websites at <https://www.facebook.com/ReNewMedSpa/> and <https://www.instagram.com/renewintegratedmedspa/>, where you direct consumers to your website at <https://renewmedicalspsa.net/> to schedule appointments for services and telehealth visits, and to purchase supplements. We have determined that you are unlawfully advertising that certain products and services treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- In a July 21, 2020 Facebook post, you state: “Peptides are here! #renewtxk #peptides #functionalmedicine <http://ow.ly/yVQ050ADkJf> [link to a blog post on your website titled “OPTIMAL LIFE – PEPTIDES ARE HERE!,” available at <https://renewmedicalspsa.net/live-your-optimal-life-peptides-are-here/>”]

This Facebook post also includes a video, in which you state “Just a quick reminder, everyone take a look at our latest blog post. It’s all about peptides, an exciting new field of treatment for a variety of conditions. It does everything from helping improve the pain of arthritis, to improving muscle and mood, but also improves our resistance to such invaders as the recent corona virus that causes COVID... Peptides have been studied for more than 100 years and been proven to be very safe... This post provides information about the initial types of peptides that we are going to be offering here at ReNew to our patients so give the post a read and call our office for an appointment and let’s see how we can get peptides working for you.”

[July 21, 2020 Facebook post at <https://www.facebook.com/ReNewMedSpa/>; the same video and substantially similar text were published in a July 21, 2020 Instagram post at <https://www.instagram.com/renewintegratedmedspa/>]

- In an April 22, 2020 Facebook post, you state: “Renew On Texarkana Monthly. Check out our interview on COVID Conversations. #texarkanamonthly, #renewimmunity, #renewtxk, #texarkanafunctionalmedicine, #renewintegratedmedicalsapa, #immunity https://youtu.be/FTZ_vVXShEg. This link leads to an April 21, 2020 YouTube video [available at https://www.youtube.com/watch?v=FTZ_vVXShEg] titled “Renew Medical Spa ‘COVID’ Conversation with Texarkana Monthly.” In this video:
 - Theresa Fontenot states: “[The COVID Pandemic has] dramatically changed the business. My business both has an aesthetic component... but the other side of my business, this is actually bringing kind of at the forefront to where we can focus on it, which is functional medicine. Functional medicine is looking more at the root cause of issues. It is really allowing us to focus on supplementation and the things that we can do in our daily life that can help us fight this virus and maybe recover from it quicker if we do happen to be affected by it...”
 - Tammie Flanagan Luthringer states: “One of the things that we are going to be able to provide that a lot of people don’t know that we can provide is an opportunity to build your immune system...to be able to focus and all of our attention be placed on the health benefits of what we do and how we can help people not only build their immune system but maybe recover quicker from any virus or flu or that kind of thing, it kind of helps us be able to laser focus on what we can provide for people at this time.”
 - Theresa Fontenot states: “There is a national shortage of all these supplements just to help our immune system. We know that there is not really anything pharmaceutical wise that really is going to help prevent and there are some questions but we really don’t think there is anything on treatment yet. But what we do know is all these supplements, Vitamin C, D, all these sort of things really can make a difference and I have ordered literally hundreds so that I can keep this community healthy and that we as a team can really help Texarkana to fight

through this pandemic.... We are stocking them here and so what we are doing is, people can email us, they can phone call, give us a call, let us know what they are needing, we can answer some questions and we are compiling these products...we can drop them off at their house or they can come pick them up at the clinic...also we can mail them to people. We want to make this as easy on people as possible and offer education and then just offer the actual products that they need to boost their immune system and keep us as safe as possible...(903) 255-6398 and they can get ahold of us at info@renewmedicalspa.net.”

[April 22, 2020 Facebook post at <https://www.facebook.com/ReNewMedSpa/>]

- In an April 3, 2020 Facebook post you state: “Update – 4/3/20 – Important Information for You and Your Family about COVID-19 illness. Be Well. <http://ow.ly/CL9Q50z4Jyi> [link to a blog post on your website titled, “IMMUNOLOGY OF COVID-19,” available at <https://renewmedicalspa.net/immunology-of-covid-19>]”

This post includes a video in which you state: “Like most of you I am doing some work from home but I am here to introduce you to a blog post that we have that has some great information to answer two questions that a lot of us have, which first of all is how do we not get this virus, and second of all, is if we do get , how do we avoid serious illness or death from it. So I want you to click on the link in this video and it will give you some great information...”

The linked blog post on your website states: “On a good note, there are plenty of people who become infected and do not develop any symptoms or very mild symptoms. The patients who respond the best are those whose immune systems are the best fortified at all times to insure a robust response... The other important part about the immune response is ensuring that your body is not suffering chronic inflammation before you become infected... Vitamin D is necessary for your immune system and it is also anti-inflammatory. Vitamin C is a well studied antioxidant as well. We have made recommendations about Melatonin, which is detailed in its own blog. We have a [range of supplements](https://renew-medical-spa.myshopify.com/collections/bewell-supplementation) [link to your online store at <https://renew-medical-spa.myshopify.com/collections/bewell-supplementation>] you can take to support your immune system as well as that of your children and loved ones. However, this is not a short term protection. The future of life in the age of pandemics means we all need to change our focus to annual physical check ups and begin to monitor our health and that of our loved ones, especially the fortification of their immune systems, day to day and week to week. Having regular visits with our functional medicine practice will enable you to stay on top of your immune system to insure that the next wave of COVID-19 patients who need hospitalization does not include you.... Call us at [sic] today at 903-255-6398 to begin your telehealth visits and prepare your immune system for optimal health.”

[April 3, 2020 Facebook post at <https://www.facebook.com/ReNewMedSpa/>; the same video and substantially similar text were published in an April 3, 2020 Instagram post at <https://www.instagram.com/renewintegratedmedspa/>]

- In a March 30, 2020 Facebook post you state “Important COVID-19 information for You and Your Family. <http://ow.ly/1dKI50z0pVJ> [link to a blog post on your website titled “INFLAMMATION AND COVID-19,” available at <https://renewmedicalsapa.net/inflammation-and-covid-19/>]

This post includes a video in which you state: “Staying true to our promise of educating and empowering you, there’s a blog that I want to bring your attention to. You can click on a link in this post and it will take you there. There is some great information on COVID-19. We want to keep you abreast of all the important information and there will be some videos coming up to give you some further education so stay tuned.”

In the linked blog post, you state: “There are some simple steps you can and should take to protect yourself from viruses in general, including coronavirus, along with the well publicized CDC recommendations about hygiene and social distancing: If you contract any virus the most important thing is to try to minimize the risk of developing a ‘cytokine storm.’ I recommend the following supplements to boost your immune system and fortify your body’s natural defenses against viruses including COVID-19: ALL LINKS BELOW TAKE YOU DIRECTLY TO OUR STORE TO ORDER THE RECOMMENDED SUPPLEMENT

- Optimized curcumin
- High dose Vit C
- High dose melatonin...
- SPMs (specialized pro-resolving mediators which can help to stop the effects of uncontrolled inflammation once it has occurred.)
- Resveratrol
- Chinese mushroom extracts...
- You can pick up our Advanced Immunity-Acute Illness Pack here.”

[March 30, 2020 Facebook post at <https://www.facebook.com/ReNewMedSpa/>]

- In a March 28, 2020 Facebook post you state: “Advanced Immunity Support – Functional Medicine and You”.

This post contains a video, in which you state: “Today we are here to talk about some advanced protocols to improve your immunity. We are back to talk about education and empowerment, how to empower you to take control of this pandemic that’s occurring... Certainly we would ask that you continue with your basic immunity, that’s your vitamin D, vitamin C, zinc and a probiotic. In addition, there are some

great formulas out there. This one is probably my favorite and I was only able to get I think 40 of these and they are backordered through the whole nation until May. ImmuCore is a multidimensional immune support system that kind of gives you lots of different products. There is C in there, and D, and Niacin, and Zinc...but this also includes like some mushroom extracts and mushrooms are huge right now if you are looking into following anything on social media they are talking lots about these mushrooms and mushroom extracts that can really help....We also have something called TH1 support and I love TH1 support. When we think of our immunity, we call it TH1 which is innate, or our natural body's ability to fight infection....We want to increase TH1, our innate immunity, and this is how to do that. ...[W]hen we do increase our innate immunity sometimes we can start to create these things called cytokines. They are an inflammatory reaction to help fight so what we do know is as we are trying to improve our immunity we also want to kind of fight a little bit of that inflammatory effect...so we can do that...I often will add Meriva which is an optimized curcumin form to it. And another way to kind of help bring down some of that inflammation is by doing Inflanoids. This has curcumin in it. It also has quercetin and several other things that can kind of help bring down some of that inflammation. In the days to come we will talk about protocols if you happen to be getting ill. It doesn't have to be just from the Corona virus, it can be any cold or virus that is coming on and Essential Defense... is a way to do that. It is a combination of different Chinese herbal products that you actually take rapidly. I use it for a couple different protocols. One of them is when someone is starting to get sick... I will probably make a suggestion of combining that with something called Andrographis and that is a product that I have in the other room but we often do together. So what we know is that there is lots of information out there and there is probably a lot of questions. I have been researching the majority of it and again what I want to do is empower and educate, so give us a call and let's see if we can answer any of those questions. More importantly stop on by and tell us what you want and we can get that ready for you. Our number is (903) 255-6398 or email us at info@renewmedicalspsa.net.”

This post also includes a link to your website at www.renewmedicalspsa.net, where the products referenced in the video are available for purchase.

[March 28, 2020 Facebook post at <https://www.facebook.com/ReNewMedSpa/>]

- In a March 27, 2020 Facebook post you state: “Learn about basic immune support for kids from the functional medicine perspective.”

This post includes a video, in which you state: “Today we are talking about immunity for kids. Our kids' immunity does need to be brought up. Thankfully, those children are not getting sick quite as often. Well, they are getting sick – they are actually the biggest spreader of the virus, but they don't get dramatically ill. But you know you want to get them back to school so let's get their immunity up. The

things that we can do that is we have some probiotics for kids. Of course we have vitamin D and then vitamin C which is coming in, we have a chewable form... If you give us a call we can get these things ready for you. I've also got a multivitamin that is just for kids. I think it's actually called 'School Ready Multi' and that is so that we are sure we are ready to get them back to school and out of our house. So stay tuned. You can call us with any questions and email us and we would be happy to answer those. Our number is (903) 255-6398 or email us at info@renewmedicalspsa.net. Stay tuned, we have more to come."

[March 27, 2020 Facebook post at <https://www.facebook.com/ReNewMedSpa/>]

- In a March 24, 2020 Facebook post you state: "Our Commitment to You. Call us today!"

This post includes a video in which you state: "My goal through all of this is to empower and educate. I will be able to bring little updates on COVID-19. Part of the reason I have not posted anything in a couple days is I have been very busy listening to some webinars and things that come from some of the U.S.' best immunologists so I can bring some concise and quick information. But the thing I want to really do is calm everybody's nerves. We have the ability through functional medicine to give you some information to make you feel more empowered that you can take some control over some immunity, how can we boost our immunity and there is some good information on how we can decrease symptoms of viruses, and this being a virus that we know at this point has no way to really treat it, then what we need to do is really work on our immunity. And I have been, what I would honestly say is day trading on supplements over the past few days, it has been insane. You will find out since there is not much that is available at this time through the pharmaceutical industry, people are depending more on our innate, or our own immunity so I have done plenty of research on both basic and advanced protocols for your immunity and we are going to be here to offer that to you and do it in a very safe way."

[March 24, 2020 Facebook post at <https://www.facebook.com/ReNewMedSpa/>]

- In a March 19, 2020 Facebook post you state: "A message from our fearless leader on Covid 19!"

This post includes a video in which you state: "...We want to be a resource to empower and educate the community on what we can do to boost our immunity, and to make it through this difficult time that is going on. Pharmaceuticals, unfortunately, there is really nothing available at this time, but in functional medicine we really can help you boost your immunity to not only prevent it, but if you were to get a virus, any sort of virus, we can help to diminish the amount of time that it requires to recover from it.... So come on over and we are here to support you."

[March 19, 2020 Facebook post at <https://www.facebook.com/ReNewMedSpa/>; the same video and substantially similar text were published in a March 19, 2020 Instagram post at <https://www.instagram.com/renewintegratedmedspa/>]

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, 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