



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

Dama J. Brown, Regional Director
Federal Trade Commission – Southwest Region
1999 Bryan Street, Suite 2150
Dallas, Texas 75201

May 1, 2020

WARNING LETTER

Via email to info@aspireregenerativehealth.com
Aspire Regenerative Health
4510 Executive Drive, Suite 111
San Diego, California 92121

Re: Unsubstantiated Claims for Coronavirus Prevention and Treatment

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your website at <https://aspireregenerativehealth.com> on April 27, 2020. We also reviewed your social media page at <https://www.facebook.com/AspireRegen>, where you direct consumers to call to schedule IV therapy. We have determined that you are unlawfully advertising that certain products or services prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims on your website and social media page include:

- On a webpage titled “How Can IV Therapy Help With The Coronavirus?” you claim: “You may find the relationship between IV therapy and the coronavirus surprising, but this powerful therapy has been used to boost the immune system for quite some time.... With the current spread of coronavirus COVID-19 becoming an increasing concern amongst our patients, we decided to share the benefits of IV therapy and break down how this treatment can help you stay healthy and/or recover faster from an array of illnesses.”
- On this same webpage, under a heading titled, “How Can IV Therapy Help with Viruses Like the Coronavirus?,” you claim: “At this point, you may be asking yourself, ‘how can IV therapy help with viruses we know so little about?’ The answer lies in what we do know about the body’s immune system. Everything from sleep and exercise to hydration and diet affect our immune system function. If you

are falling behind in even one of these areas, your immune system may not be able to do its job. In turn, you are more likely to become sick if you do come in contact with a virus....While IV therapy cannot prevent you from coming in contact with COVID-19, it can help strengthen your immune system's ability to fight it off."

- You claim in an April 10 Facebook post: "IV Therapy can help strengthen your immune [sic], which can be vital in helping to prevent the possibility of coming into contact with viruses like Covid-19."
- You claim in an April 9 Facebook post: "While IV therapy cannot prevent you from coming in contact with COVID-19, it can help strengthen your immune system's ability to fight it off."

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 or services and immediately cease making claims that are not supported by competent and reliable scientific evidence.

Within 48 hours, please send a message to Assistant Director Jim Elliott via electronic mail at jelliott@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 Reid Tepfer at rtepfer@ftc.gov.

Very truly yours,

Dama J. Brown
Regional Director, Southwest Region
Federal Trade Commission