



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

April 29, 2020

WARNING LETTER

Cypress Natural Medicine
359 Middlefield Road
Palo Alto, California 94301

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://cnmhealth.com> on April 24, 2020. Based upon our review, 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 include:

- On a blog post on your website titled “IV Nutrient Therapy for Immunocompromised Patients,” you state: “At our office, we... support many types of medical conditions including heart disease, lung disease, cancer, autoimmune disease, and diabetes. These medical conditions can prevent a person’s immune system from functioning at its best, therefore putting them more at risk for contracting viral and bacterial infections. The most common question we get at the office is, what can people who have a weakened immune system do to keep their immune systems functioning well during this time? One of the therapies that can be done to support the immune system and prevent viral and bacterial infections is nutrient IV therapy.... There is a recent study that came out of China showing how vitamin C IVs can be a potential therapy for covid-19. This is excellent news and we are hoping that more research can be conducted to see the efficacy of this potential treatment.”
- On a blog post on your website titled “COVID-19 Pandemic Update 3/22/20,” you list under the subheading “**Important Antiviral Preventative Measures**” a

supplement called “**CNM Special Symptomatic Herbal Antiviral Tincture and/or Preventative Antiviral Tincture**,” which you describe as including ingredients such as:

- “*Andrographis paniculata*, which has been used in the current pandemic with good results in China”;
 - “Licorice (*Glycyrrhiza glabra*) is a potent antiviral herb. A study published in *Lancet*, 2003 showed glycyrrhizin was the most potent of 5 antiviral compounds tested in inhibiting replication of the SARS coronavirus”;
 - “Ban Lan Gen (*Isatis Root*)... Natural inhibitors against the SARS-Cov enzymes, such as the nsP13 helicase and 3CL protease, have been identified as well and include myricetin, scutellarein, and phenolic compounds from *Isatis Root*”; and
 - “Sweet Wormwood (*Artemisia annua*) has been shown in clinical trials to be effective against coronavirus. Compounds have been shown in research to effectively prevent the early stage of HCov-22E9 infection, including viral attachment and penetration.”
- In the same blog post described above, you include the following statements describing other purported “antiviral preventive measures” you offer for sale:
 - “**Oral Vitamin C**: Vitamin C reduces NLRP3, an important inflammatory mediator in the COVID-19 infection inflammatory cascade.”
 - “**Juice Plus Whole Food Concentrates**... the research shows improved immunity, lower inflammation and protection of our cardiovascular system. This is important because COVID-19 works on the ACE2 receptors and can potentially cause cardiac implications. Flavonoids have shown to be potent support to our immune system and to inhibit SARS-Cov virus.”
 - “**Intravenous Vitamin C**: According to Global Research, 3 clinical trials are currently underway studying IV Vitamin C for possible effect in patients with COVID-19. Doses range from 12,000 to 24,000 mg/ day by IV.”

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

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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