



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

Richard A. Quaresima  
Acting Associate Director  
Division of Advertising Practices

April 27, 2020

**WARNING LETTER**

VIA EMAIL TO *info@COEM.com, drlieberman@coem.com*  
Center for Occupational & Environmental Medicine  
Attn: Dr. Allan D. Lieberman  
7510 North Forest Drive  
North Charleston, SC 29420

Re: Unsubstantiated claims for Coronavirus prevention, treatment, or cure

Dear Dr. Lieberman:

This is to advise you that FTC staff has reviewed your website at <https://coem.com> on April 21, 2020. We also reviewed your email to consumers dated April 2, 2020 with the subject line "TML Courting as potential CoVID Cure," where you directed consumers to your website, [www.coem.com/store](http://www.coem.com/store), to purchase TML drops and a "Coronavirus kit" containing dietary supplements labeled as Monolaurin, Interferon Alpha Bovine, and Vitamin D3 50,000. We have determined that you are unlawfully advertising that certain products prevent, treat or cure Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention, treatment, or cure claims on your website and in your email include:

- In your email dated April 2, 2020 with the subject line "TML Courting as potential CoVID Cure," you wrote, "We are getting feedback from patients who developed Corona Virus disease and have used products from the kits we put together.

In about 20 cases using only the TML drops all responded. In the very sick patients they are without fever and pretty much asymptomatic in 10-24 hrs. In some who have used the drops within minutes to a few hours they report aborting the disease within 1-4 hours. Speed is the critical factor to abort. So at the first sign of getting sick, start the TML with a loading dose of 1 dropper full and then 2 drops every 2 hours until bedtime. Continue the next day until well.

I hope you are taking Monolaurin 2 caps twice a day for prevention and if symptomatic 3 caps 3x a day. I just spoke to Dr. Joseph Cummins, an expert and pioneer on the use of Interferon. He felt 1 squirt to the back of the throat once a day up to 3 days may be enough to protect you.

The Russians, in 1969, during the Hong Kong influenza epidemic using only 1 dose of interferon up the nose reduced the incidence of the flu in 54-69% of 14,000 children and adults. Spraying in the back of your throat may be even more effective. Please email us back your experience with the kit.”

- On the webpage <https://coem.com/store/CVK-p187127903>, you offer for sale at the price of \$139.00 a “Coronavirus kit” that includes dietary supplements labeled as Monolaurin, Interferon Alpha Bovine, and Vitamin D3 50,000. The dosing instructions state, “**Monolaurin** – 3 capsules daily for **prevention** – 3 capsules, 3 times a day, beginning at the first sign of any infectious disease or until no longer symptomatic. **Interferon Alpha Bovine Drops** – Take 1cc and squirt into the back of the throat and swish it around the mouth for 2 minutes before swallowing. Do this 3x/day. (1 bottle = 3 day use). **Vitamin D3 50,000 IU capsules** are to be used only when showing symptoms. Does is 1,000 IU per pound, once a day for 3-5 days. (100 pounds = 100,000 IU = 2 capsules).” [Bolding and underlining in original]
- On the webpage <https://coem.com/covid-video>, in a video featuring individuals identified as Dr. Lieberman and Dr. Caroline Duncan, you state, “We have prepared this video in order to explain to you the use of the materials that we have sent you in the Coronavirus kit. ... In order for you to be successful in turning off this disease, we must stop replication, we must stop an overabundance of the cytokine messengers that induces the inflammation. And you must somehow turn off the inflammation. ... It’s important that you be disciplined and you stay on the Monolaurin in particular because we must get back to work. In order for you to be in the workplace and be attached to somebody who may be sick, the Monolaurin is going to prevent you from the contagion of the virus. The Interferon that we are giving you, along with the TML, is going to kill the virus. So these are things that, I think, will allow you to go back into the workplace, be with people, and still protect you. ...”
- On the webpage <https://coem.com/covid-video>, in a video featuring individuals identified as Dr. Lieberman and Dr. Caroline Duncan, Dr. Duncan states, “...I’ll just go through the four components of the COVID-19, Coronavirus kit and explain briefly how each one works and how you take it. This is the Monolaurin that Dr. Lieberman would like for you to be on for prevention and for if you are going to have to go back to work and you know someone who’s been exposed and you don’t want to catch the virus from them. We want you to take two capsules twice daily for adults; half that dose or a fourth of a dose for children and smaller children. If you do become symptomatic and/or you do have a confirmed case of the COVID one nine, COVID-19, Coronavirus, you’re going to go ahead and begin high dosing this. High dosing looks like three capsules, three times daily, until the symptoms subside.

This is really safe, you can stay on this long after you feel like you have symptoms or you can stop when your symptoms end as well. But any time that you feel you may be exposed to somebody else ... we'll use the Monolaurin for prevention.

"...Vitamin D3 50,000 ... is for down-regulating the cytokine storm that occurs in the body. ... You'll take one capsule, one 50,000 capsule, per 50 pounds of body weight ... And you will only use this one while you are symptomatic. This is not for prevention and this is not for long-term use. It's for acutely turning off cytokine storm once you've developed viral illness and become achy and symptomatic.

"Next we'll talk about the TML ... It's a signal that tells our DNA to go ahead and be on guard and know that there's an intruder in our body and to fight the virus. ... That is why the TML has been successful over the years in treating both DNA and RNA viruses, because it is a DNA signal. The way you will use this one is the rush protocol and that will be outlined to you in your instructions when you receive your kit.

"The Interferon Alpha Bovine ... so all of this is going to be very good for Coronavirus [waves hand at other products already discussed], but this one has data in terms of this specific family of really being what makes the most difference. ... It's going to stop the replication of the virus so that it doesn't take over your cell, develop a cytokine storm, cause inflammation beyond repair and symptoms become much worse and the presentation becomes worse, even some deaths that we have seen. ... Also not for prevention, this is for treatment. If you develop the symptoms of Coronavirus or if you become a confirmed case with a test kit, you're going to start using your Interferon Alpha Bovine three times daily ... until your symptoms stop.

"We believe that these four things in combination can turn off the Coronavirus."

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product 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 identified above. Thus, any coronavirus-related prevention, treatment, or cure claims regarding such products 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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Within 48 hours, please send a message to Richard Cleland, Assistant Director via electronic mail at [rcleland@ftc.gov](mailto: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,

Richard A. Quaresima  
Acting Associate Director  
Division of Advertising Practices