

Richard A. Quaresima Acting Associate Director Division of Advertising Practices United States of America FEDERAL TRADE COMMISSION Washington, D.C. 20580

April 27, 2020

## WARNING LETTER

VIA EMAIL TO info@holistiquehealth.com Holistique Naturopathic Medical Center Holistique IV Lounge 1200 116<sup>th</sup> Ave. NE, Ste. C Bellevue, WA 98004

Re: Unsubstantiated claims for Coronavirus prevention and treatment

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your websites at <u>https://www.holistiquehealth.com</u> and <u>https://holistiqueivlounge.com/</u> in April 2020. We also reviewed your social media websites at <u>https://www.facebook.com/pg/HolistiqueMedicine/</u>, <u>https://www.facebook.com/pg/holistiqueivlounge/</u>,

https://www.instagram.com/holistiqueivlounge/, and

https://www.instagram.com/holistiquenaturopathic/, where you are promoting products that you offer through your websites, including IV Vitamin C, Immune Booster IV, and Oxygen and Ozone Therapy. We have determined that you are unlawfully advertising that certain products treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- On your social media website at <a href="https://www.facebook.com/pg/HolistiqueMedicine/">https://www.facebook.com/pg/HolistiqueMedicine/</a>:
  - In a post on March 3, you post a video titled: "Daughter's Story: family saved from COVID-19 virus with vitamin[] C in Wuhan," and state: "Just an example of the power of intravenous vitamin C in helping heal patients with viral infections. Call us to schedule a high dose Vitamin C drip at Holistique IV Lounge."
  - In a post on March 21, you post a video titled: "Hospital treatment of COVID-19 with high-dose Vit C," and state: "More updates on Shanghai doctors treating COVID-19 with intravenous vitamin C, safely and effectively without

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any deaths reported. We offer corn-free IV vitamin C at dosages discussed in the video below along with many other preventative treatments at #Holistique and Holistique IV Lounge.... #covid19 #coronavirus..."

- In a post on April 13, you post a link to a blog post from a doctor at Holistique titled: "Ozone: An Out-of-the-Box Potential Treatment for COVID-19" and state: "Dr. Darvish explores the use of ozone vs oxygen therapy as a sole or adjunctive treatment option for COVID-19. Read her blog to learn more about the science behind these therapies."
- In a post on April 15, you state: "A comprehensive individualized treatment plan is what we each need to prevent and to shift the COVID-19 pandemic. H[ere] are some basics to consider and discuss with your #Holistique #naturopathicdoctor...#Oxygenate your cellular engine...#hyperbaric oxygen...Reduce oxidative stress -> IV vitamin C...ask your #holistique doctor... Keeping up with the current research on COVID-19 for prevention and treatment options... Vitamin Therapies: vitamin C...."
- On your social media website at <a href="https://www.facebook.com/pg/holistiqueivlounge/">https://www.facebook.com/pg/holistiqueivlounge/</a>:
  - In a post on February 27, you state: "Chinese medical researchers are calling physicians to immediately start using intravenous vitamin C to help patients with Coronavirus. Three Chinese studies are approved to study high dose intravenous vitamin C as a possible treatment!...Our #Holistique doctors are ahead of the research and got you covered. #dropinforadrip of vitamin C if you are traveling or fighting a cold."
  - In a post on March 2, you state: "We all want to stop the spread of #coronavirus. Holistique has implemented a protocol to keep all of us, patients and staff from catching this virus...Drop in for a vitamin c drip for immune support."
  - In a post on March 21, you state: "More case reports from the Chinese on benefits of intravenous Vitamin C therapy during this #pandemic of #coronavirus. Let's learn from each other. It's simple, inexpensive, safe, and appears to be beneficial [with video from an individual discussing the use of vitamin C use in COVID patients]."
- On your social media website at <a href="https://www.instagram.com/holistiqueivlounge/">https://www.instagram.com/holistiqueivlounge/</a>:
  - In a post on March 12, you state: "#covid fight with #ivvitamintherapy. Now is the time to get an Energizer IV, 10g of vitamin C IV or Immune Booster IV. Get your immune system strong."
  - In a post on March 17, you state: "Get a Vitamin C IV or an Immune Booster IV and receive a vitamin D shot at no charge. One of the best ways to reduce your risk for COVID-19 is to keep your immune system strong...Our physician-custom-formulated Immune Booster IV along with our Vitamin C

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IV provide you with the most important nutrients your body needs for a healthy immune system... #corona #covid\_19..."

• On your social media website at <a href="https://www.instagram.com/holistiquenaturopathic/">https://www.instagram.com/holistiquenaturopathic/</a>, in a post on March 12, you state: "Did you know that one of the best ways to reduce your risks for catching COVID-19 and other viruses is to keep your immune system strong by receiving IV vitamin therapy? Especially vitamin C therapy. If you are not an established patient of Holistique Medical Center, you can still drop by to @holistiqueivlounge for a drip."

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 product identified above. Thus, any coronavirus-related prevention or treatment claims regarding such product 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 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,

Richard A. Quaresima Acting Associate Director Division of Advertising Practices