



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

1999 Bryan St., Ste. 2150
Dallas, Texas 75201

June 19, 2020

WARNING LETTER

VIA EMAIL TO support@bulletproofexec.com

Dave Asprey
c/o Bulletproof 360, Inc.
1012 1st Avenue, Suite 400
Seattle, Washington 98104

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC staff reviewed your website at <https://daveasprey.com/> on June 15, 2020. We have determined that you are unlawfully advertising that certain products prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims on your website include:

- In a blog post titled “What I Do to Protect Myself From Coronavirus, and How I Plan to Kick It if I Get It,” you state, “This post is about how to hack coronavirus.... One of the things that it does is damage people’s hearts, not just lungs. It seems to do this through increasing inflammation beyond what would be normal, what we call a cytokine storm.... Researchers... provide the name of the inflammatory cytokine that seems to rise, that’s causing the problem, which is interleukin-6, commonly known as IL-6.... So, I came up with a list of things I’m going to do to inhibit IL-6 before or even during an infection.... if you want to stop a cytokine storm, this is your list of big guns”:
 - “**ANDROGRAPHIS** This is something that I actually take when I fly, especially during cold and flu season, whether or not I’m staring down the barrel of a coronavirus epidemic. Andrographis [<https://amzn.to/3a1FpnR>] is an herb, and out of dozens and dozens of plants that have been tested, this is something that inhibits IL-6 very potently, in fact, more than some prescription drugs”;

- “Sage, oregano, and bay leaves all decrease IL-6. You can pick up alcohol-based sage [<https://amzn.to/33shw6p>], oregano [<https://amzn.to/2Wr0PXw>], and bay leaf [<https://amzn.to/2IYPypi>] extracts”;
- “**FEED YOUR GUT BACTERIA**... So far, it’s looking like coronavirus starts by touching funk then touching your face, but his point holds true anyway. When you have a strong gut, your immune system more efficiently fights off disease. . . . Resistant starch is ‘food’ for your friendly gut bacteria. If you treat them well, they’ll love you back by fighting off the bad guys and regulating IL-6. The blend I developed for Bulletproof [<https://amzn.to/39WM8zn>] is the one I take every day. It contains acacia gum, larch arabinogalactan, and it also contains hydrolyzed guar gum, because there were studies that showed that those things break down to feed the good guys in your gut. . . . Probiotics are friendly microbe strains that researchers have identified to help your digest your food and boost your body’s natural defenses. Look for strains like . . . Saccharomyces boulardii [<https://amzn.to/3daaSpU>] (a beneficial yeast) . . .”;
- “Vitamin D3, zinc, and magnesium are all on the list of top five supplements you should be taking every day anyway. They all have research behind them showing they reduce IL-6. **Get D3** [<https://amzn.to/3a7EwdC>], **zinc** [<https://amzn.to/33usRD0>], and **magnesium** [<https://amzn.to/2QssVxH>] **here**”;
- “**COQ10 and PQQ**[.] Almost anything that increases mitochondrial function is going to help you with IL-6. One of my favorite mitochondrial boosters is one that I helped to put on the market, called PQQ, is in my Unfair Advantage formula [<https://amzn.to/2IZezAK>] that’s been around for around seven years now. PQQ is shown, in a study, to reduce IL-6. It also contains coenzyme Q10 (CoQ10) which strengthens and protects your heart”;
- “**OMEGA 3 FATTY ACIDS**[.] Even the medical community is on board with the idea that omega 3 fatty acids reduce inflammation, and doctors almost universally recommend supplementing omega 3’s to their patients, especially to their heart patients. I developed a high-potency formula [<https://amzn.to/3dabyLY>] for Bulletproof that I take every day”;
- “Black cumin seed oil [<https://amzn.to/3aZbRHA>] is picking up steam in popularity for its effect. It has research behind it for its ability to reduce IL-6 and other inflammatory proteins. It’s also good for people who have excess histamine”;
- “Hydroxytyrosol [<https://amzn.to/2ITldbM>] is one of my favorite but little-known antibacterial and antiviral compounds that comes from olive oil. You can take olive oil to get it, but you’ll get more of the good stuff if you take capsules of hydroxytyrosol. I’m talking hundreds of times more of this precious antioxidant than olive oil does. I’d do both”;

- “Broccoli sprouts, or sulforaphane [<https://amzn.to/2IZfyRs>], is shown to inhibit IL-6, which is something I wrote about in Head Strong. You can also get sulforaphane in capsules”; and
- “If I was very, very ill and working on fighting things, I would be on a serious L-glutamine [<https://amzn.to/33uJizd>] regimen. L-glutamine can reduce IL-6 directly, at least in mice, and probably does it in humans. It makes you feel better really fast.”

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

Within 48 hours, please send a message to James E. 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 Zachary A. Keller at zkeller@ftc.gov.

Very truly yours,

Dama J. Brown
Regional Director
Southwest Region