



United States of America  
FEDERAL TRADE COMMISSION  
Southwest Region

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

May 13, 2020

**WARNING LETTER**

VIA EMAIL TO [info@flatironfunctionalmedicine.com](mailto:info@flatironfunctionalmedicine.com)

Dr. Jill Carnahan  
400 S. McCaslin Boulevard, Suite 210  
Louisville, Colorado 80027

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC staff has reviewed your website at <https://www.jillcarnahan.com/>, which directs consumers to your online store located at <https://www.drjillhealth.com/>, on May 6, 2020. We have determined that you are unlawfully advertising that certain products you sell in your online store treat or prevent Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus treatment or prevention claims on your website <https://www.jillcarnahan.com/> include:

- In marketing materials titled “Worried About Coronavirus? What You Need to Know to Protect Yourself,” you state, “How Can You Protect Yourself From Coronavirus? When it comes to defending yourself against coronavirus, it’s best to take a two-pronged approach: avoiding potential contact with the virus and bolstering your natural ability to fight infection. Here’s what I recommend:... Supplements are one of the most potent ways to give your body a boost and drastically improve its ability to fight off infection. Here are some of the most powerful immune-boosting supplements that I recommend taking...” Then you list eight supplements—including N-Acetyl Cysteine, Liposomal Glutathione, Vitamin D3, and probiotics—and provide hyperlinks to purchase each of them in your online store at <https://www.drjillhealth.com/>.” Further, you state, “You can find all of these recommended supplements at my online health store [hyperlink to online store]. You can even get 10% off your first order by signing up right here [hyperlink to Dr. Jills’ Specials page at online store].”

- In marketing materials titled “Worried About Coronavirus? What You Need to Know to Protect Yourself,” you state, “What Is the Treatment for Coronavirus?... [M]ore and more research is finding that treatment with something called *nutraceutical measures*, may be the answer to beating coronavirus. The focus of nutraceutical treatment is to flood the body with compounds that support and enhance the body’s natural immune response. Studies are also finding that high doses of antioxidants – in particular, vitamin C – can help not only prevent, but also treat coronavirus by:
  - “Stopping the excessive inflammatory response in the lungs[;]
  - “Suppressing the reproduction and spread of the virus within the body[; and]
  - “Boosting the function of the immune system.”

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 or treatment 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](mailto: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](mailto:zkeller@ftc.gov).

Very truly yours,

Dama J. Brown  
Regional Director  
Southwest Region