



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

Serena Viswanathan
Acting Associate Director
Division of Advertising Practices

July 7, 2020

WARNING LETTER

VIA EMAIL TO *eyedude92@icloud.com*

Fortify Vitamins, Inc. d/b/a
Fortifeye Vitamins
Attn: Michael Lange, OD
605 South Bayshore Blvd.
Safety Harbor, FL 34695

Re: Unsubstantiated claims for Coronavirus prevention or treatment

To Dr. Lange:

This is to advise you that FTC staff reviewed your websites at <https://www.fortifeye.com/> and <https://www.drmihaellange.com> on June 24, 2020. We also reviewed your social media websites at <https://www.facebook.com/Fortifeye/> and <https://www.youtube.com/user/OcularHealth>, where you direct consumers to contact you to purchase your Fortifeye Immune Boosting Bundle, Fortifeye Super Immune Wellness Bundle, Fortifeye Grass Fed Whey Isolate, Fortifeye Super Protein, Fortifeye Organic Blue Green Superfood, Fortifeye Focus, Fortifeye Probiotics, Fortifeye Super Omega-3, Fortifeye Super Omega-3 Max, and other products. 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 websites include:

- **“Dr Michael Lange and Fortifeye Vitamins have an incredible immune boosting supplement bundle they are now offering at a dramatic discount.** During the time of this viral pandemic it is extremely important to have a strong immune system. These four supplements [Fortifeye Grass Fed Whey Isolate or Super Protein, Fortifeye Organic Blue Green Superfood, Fortifeye Focus, and Fortifeye Probiotics] have amazing amounts of research supporting their immune boosting and total body wellness benefits. . . . Lactoferrin, another key immune boosting component of whey protein, is a globular glycoprotein that has many potential health benefits. New

research indicates that lactoferrin may have antiviral, antibacterial, antifungal and possibly anti carcinogenic effects. Lactoferrin can bind to a virus and prevent the virus from attaching to a host.” [from your webpage at

<http://fortifeye.com/products/fortifeye-immune-boosting-bundle/>]

- “New research indicates that lactoferrin may have antiviral, antibacterial, antifungal and possibly anti carcinogenic effects. Lactoferrin can bind to a virus and prevent the virus from attaching to a host. This new science is crucial during the time of viral pandemics. Dr Michael Lange recommends to his patients and his talk show listeners to consume a smoothie daily using a good grass fed whey protein to enhance their immune system . . . During the time of viral pandemics Dr Lange feels this is one proactive step people can do that may have some potential benefits. . . . Grass Fed Whey Proteins are also high in specific Immunoglobulins . . . all of which are responsible for a powerful immune system. Build a powerful immune system and fight against viral invasions. . . . Consuming a non denatured grass fed whey protein will help to enhance your immune system and strengthen your body to fight against viral attacks. Fortifeye makes both grass fed whey concentrate and isolate. . . . Dr Michael Lange also makes some other recommendations to help keep the immune system charged during the viral pandemic. . . . Dr Lange has created Fortifeye Organic Blue Green Superfood . . . you can order Fortifeye Probiotics online . . . Lange has developed Fortifeye Focus” [from your webpage at <http://fortifeye.com/articles/boosting-your-immune-system-naturally/>]
- “We’re going to talk a little bit today about some natural approaches to help fight against this viral invasion, alright. We talked about this earlier in the viral pandemic, but I think it’s a good time to address this, because there’s a lot of resurgence of this virus right now. . . . And omega-3 fish oil, yes, may be beneficial. There’s a new study Harvard and Thailand have been involved in that talks about the resolvins that are in omega-3. Resolvins may actually help to reduce the cytokine storm that’s produced by the COVID-19 and other viruses. So, it’s not a cure, alright, I didn’t say that. But I think taking your omega-3, our Fortifeye Super Omega, or better yet, our Fortifeye Super Omega-3 Max, two per day, is going to be a good idea. Because that does have resolvins and protectins in it and it will help reduce the cytokine storm. It’s the body’s natural stop signals for inflammation. So this cytokine storm when you have this virus attacks your lungs, your heart, your brain . . . you could die. So not only do we need to begin sunshine and vitamin D, getting a lot of vitamin C, maybe some zinc . . . but maybe taking your omega-3. . . . Currently, Fortifeye Super Omega and the one that’s 50 percent more potent, Fortifeye Super Omega-3 Max, is [sic] both at \$28, okay? So it’s a pretty good deal. So, once again, consider taking your omega-3 fish oil . . . Fortifeye, we make it in Norway . . . it is the purest, most potent triglyceride molecule omega-3 in the United States right now. . . . We have developed a product called Fortifeye Super Immune Wellness Bundle, it has all of this and it’s a pretty good price. Go to fortifeye.com, check out all the new bundles that we have, and look and see which one you like the best. But the big daddy, the king daddy has everything in it to stimulate your immune system for

total wellness of the body, anti-aging, would be the Fortifeye Super Immune Wellness bundle, and it's at fortifeye.com." [from your June 13, 2020 YouTube video "Dr. Michael Lange discussing how omega 3 may benefit the cytokine storm" at <https://www.youtube.com/watch?v=DpJcYb9YP8E>; also available in your June 13, 2020 post at <https://www.facebook.com/Fortifeye> and at <https://www.drmicroellange.com/ask-the-doctor-dr-michael-lange/>]

- "[T]here's a new study out that may suggest that omega-3 is beneficial. As a matter of fact, the manufacturers of a prescription fish oil that I don't like because our Fortifeye Super Omega[-3] Max is much more potent and pure, they're claiming that it is a treatment for the coronavirus, their high levels of omega-3. And you can go to Google and see why they claim this. But it does make a lot of sense." [from your June 6, 2020 YouTube video "Ask the Dr. LIVE with Dr. Michael Lange talks about a new mask for protecting against Covid-19" at <https://www.youtube.com/watch?v=OWHV9umRXA>; also available in your June 6, 2020 post at <https://www.facebook.com/Fortifeye> and at <https://www.drmicroellange.com/ask-the-doctor-dr-michael-lange/>]
- "Now, I do know, and I've talked about this in this program, everybody needs to be proactive at trying to stimulate their immune system, alright. So we need to be eating the right foods, plenty of fruits and vegetables. We need to be doing all sorts of things to stimulate our immune system. You know, I've created this immune boosting package on the Fortifeye website. It's \$99, it's usually \$140. I've taken four of our supplements that has [sic] a lot of science and evidence to produce a healthier immune system and all that science is posted on our website at fortifeye.com. . . . So we gotta be proactive to helping promote an overall healthy immune system so we can maybe potentially decrease the chance of you catching the virus and/or the symptomology once you do catch it." [from your April 18, 2020 YouTube video "Dr Michael Lange talks about Viral Pandemic" at <https://www.youtube.com/watch?v=3sYEOYNGH4M>; also available in your April 18, 2020 post at <https://www.facebook.com/Fortifeye> and at <https://www.drmicroellange.com/ask-the-doctor-dr-michael-lange/>]
- "Right now with this viral pandemic we have to stimulate a healthy immune system. We have to kick start our immune system. It's all fine and dandy – social distancing, all of this washing your hands is very important. But I think it's prudent to really educate the public on the importance of boosting your immune system. . . . But a lot of you don't realize . . . the power of proper supplementation. I mean proper vitamins, proper minerals. And most of the stuff you buy over the counter is not that good. It doesn't have very much antioxidant, doesn't have many minerals, it's not organically derived, it has a lot of binders and fillers, and a lot of stuff that's not that good for you. So, I've developed four supplements that are being used all over the world right now, put them all together in what we call Fortifeye Immune Boosting Bundle, alright. This is taking Organic Blue Green Superfood, taking our Fortifeye Probiotic bacteria, taking our Fortifeye Focus . . . and then either . . . Fortifeye vanilla or chocolate Super Protein . . . or our Grass Fed Whey Protein Isolate. . . . I call it quadruple whammy fighting against

outside invaders – virus, alright. Fungus, bacterial infections. . . . It works, like I said, I’ve got thousands of patients taking this right now Doctors all over the world are recommending it. . . . And it would be \$140 if you bought them individually, and right now we’re doing a deal, \$99. And you go on to the Fortifeye website, fortifeye.com, or call Fortifeye Vitamins. . . . So go to fortifeye.com, go to Immune Boosting Bundle. And I wrote a little article on it today, posted on there, so it tells you about the science of why I recommend it. . . . Right now in this viral pandemic, you know, I’m trying to do everything I can to help all of you.” [from your April 9, 2020 YouTube video “Dr Michael Lange launches Fortifeye Immune Boosting Bundle” at <https://www.youtube.com/watch?v=UOI3Pkut9Qg&t>; also available at <https://www.drmihaellange.com/ask-the-doctor-dr-michael-lange/>]

- “[ASK THE DR RADIO SHOW CALLER]: If you load up with antioxidants . . . would it help you fend off this virus or not?”

[DR. LANGE]: Well, there is a lot of proof, a lot of science, a lot of clinical evidence that actually talks about boosting your immune system with certain nutrients, okay? And that’s what that article is I just wrote, so when you get a chance, it goes into a lot of detail about boosting your immune system naturally, and it does mention some of our products, and it gives you a discount, but I give you alternatives, so it’s just not about pushing Fortifeye, okay? I’m giving everyone 25% off during this pandemic. I push Fortifeye because I know what’s in it, I developed it, I know it’s the best of the best. . . . So, a few supplements that I developed that I do recommend are the whey protein isolate that I developed or the new whey protein super protein concentrate. And there’s a lot of science behind why a whey protein stimulates your immune system and does fight against viruses. Now specifically the coronavirus, who knows, but we do know it fights against AIDS, HIV, influenza, alright? It fights against herpes zoster, it fights against lots of other types of viruses, so I can’t say with coronavirus, I’m sure there are some studies from the old coronavirus and whey protein. But remember whey protein not only enables you to build muscle strength and endurance, it’s going to help fight off viruses indirectly by building your immune system. So I like that. I like the Fortifeye Focus. Fortifeye Focus two per day during this viral season because two per day has been shown, the astaxanthin at two per day actually builds your immune system dramatically. . . . The Fortifeye Probiotics I recommend. . . . And then I do recommend something I created called Fortifeye Organic Blue Green Superfood Those are the four I call the quadruple whammy against the virus, building your immune system. . . . Those four things will build your immune system, it’ll make you healthier in general, it’ll make you feel better. And who knows, the whole key is to have a strong immune system so that you don’t catch this virus, and if you do catch this virus, it doesn’t kill you, okay?” [from your April 4, 2020 YouTube video “Dr. Michael Lange discussing how to stay safe during the pandemic at <https://www.youtube.com/watch?v=8C9Mwp6-72k>; also available in your April 4, 2020 posts at <https://www.facebook.com/Fortifeye> (including your post “Ask the Dr. LIVE with Dr. Michael Lange second part of discussion on

boosting immune system and decreasing chance of getting the corona virus”) and at <https://www.drmaichaelange.com/ask-the-doctor-dr-michael-lange/>

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 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,

Serena Viswanathan
Acting Associate Director
Division of Advertising Practices