



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 officemanager@gordonmedical.com

Gordon Medical
361 Third Street, Suite J
San Rafael, California 94901

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.gordonmedical.com/>, where you advertise products and services you offer at your office, including intravenous therapy and nebulized therapy, on May 11, 2020. We have determined that you are unlawfully advertising that certain products or services treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- In marketing materials titled “Nebulized Hydrogen Peroxide (H₂O₂) as a Preventative and Treatment for Covid-19,” you claim:

“Our doctors have been impressed with the potential for nebulized hydrogen peroxide (H₂O₂) to protect against, and possibly treat the Covid-19 infection. This is a treatment that you can do at home if you have a nebulizer. Gordon Medical also has a number of nebulizers on hand that we purchased from our suppliers, if patients need to get one and can’t find it due to everything being out of stock. Patients can contact us via the Patient Portal [<https://gordonmedical.md-hq.com/>] to request a nebulizer.... See Dr. Mercola’s description of the rationale for the use of H₂O₂ in Covid-19, and how to use it. [link to page titled ‘Could Hydrogen Peroxide Treat Coronavirus?’, located at <https://articles.mercola.com/sites/articles/archive/2020/04/09/hydrogen-peroxide-therapy.aspx>, which states, ‘Can an inexpensive and easy to administer at-home treatment treat the novel coronavirus, SARS-CoV-2? According to Dr. Thomas Levy, the answer is yes. The remedy in question is hydrogen peroxide, aerosolized in any standard

nebulizer.'].”

- In marketing materials titled “FDA: Approve High Dose IV Vitamin C for Coronavirus Patients!”, you claim that “There have been emerging reports favoring Vitamin C administered intravenously (IV) alone or in combination with hydroxychloroquine/chloroquine as a very effective treatment for Coronavirus COVID-19 patients in China and U.S. Unfortunately, IV Vitamin C’s has not yet been recognized or explored by the FDA, CDC, or HHS.... U.S. board certified anti-aging physician, Dr. Richard Cheng, MD,Ph.D [stated that]... ‘High-dose intravenous VC [Vitamin C] has also been successfully used in the treatment of 50 moderate to severe COVID-19 patients in China. The doses used varied between 2 g and 10 g per day, given over a period of 8–10 h. Additional VC bolus may be required among patients in critical conditions. The oxygenation index was improving in real time and all the patients eventually cured and were discharged.’”
- In marketing materials titled “Support your immune system to protect against a COVID-19 infection,” you claim, “Since our patients are at high risk for severe symptoms of this virus, we suggest treating everyone prophylactically with an individualized protocol of herbs, supplements, and medications when appropriate. We are evaluating existing patients who are experiencing COVID-19 like symptoms and are using herbs and nutrient therapies to support their immune system and to also decrease viral attachment and replication. We have seen rapid turn around in early symptoms and slower but eventual turnaround in more severe symptoms.”
- In marketing materials titled “Support your immune system to protect against a COVID-19 infection,” you claim to provide “information on herbs and medications we recommend for treatment for viral symptoms, even at first onset of symptoms. **We strongly recommend prevention of severe symptoms of any virus before they begin!** Further down you can read our herbal antiviral recommendations.”
- In marketing materials titled “Support your immune system to protect against a COVID-19 infection,” you recommend a variety of supplements for consumers to take before and while experiencing symptoms of COVID-19, including “***Nebulized Hydrogen Peroxide, 3% Food Grade Only!*** Before trying this, you must speak with your GMA doctor first to determine if this is appropriate for you, and to discuss instructions. This can be used as a prophylactic to help diminish the likelihood of viral replication in the nose and sinuses, where the virus [sic] Good to use after coming back home from being in public. If you do not have a nebulizer that can be used for nasal nebulization, GMA has some available for patients to purchase. See our next post on preparing hydrogen peroxide for nebulization.”

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product or service 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 or services identified above. Thus, any Coronavirus-related prevention or treatment claims regarding such products or services

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.

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