



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

Dama J. Brown, Regional Director
Federal Trade Commission – Southwest Region
1999 Bryan Street, Suite 2150
Dallas, Texas 75201

May 22, 2020

WARNING LETTER

Via U.S. Mail

Hawaii Naturopathic Retreat
239 Haili Street
Hilo, Hawaii 96720

Re: Unsubstantiated Claims for Coronavirus Prevention and Treatment

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your website at <https://www.hawaiinaturopathicretreat.com> on May 13, 2020. We have determined that you are unlawfully advertising that certain products or services prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims on your website include the following representations on a page titled “COVID-19 Testing and Prevention”:

- You claim: “We’ve created several immune boosting packages to help you protect yourself against the coronavirus.... Reverse or prevent chronic illness and strengthen your immune system at your naturopathic clinic in Hilo.”
- Under the heading “Immune Strengthening Treatments for Coronavirus Protection,” you claim: “Strengthen your immune system and build up your defenses for the future, not only to prevent coronavirus but to help you cope better if you do get contaminated with the virus.... **To take your immune support one step further, you can take specific measures like vit D injections, vit C intravenous infusions, and by taking supplements like vit D, zinc and vit C at therapeutic doses for boosting your immune system.** If you are concerned about how you will cope if you get the virus, we encourage everyone to come in to strengthen their immunity. We

are offering several treatments and packages to help you do that.” You then promote several specific products and services, including “Immune Boosting and Antiviral Supplements Drop Shipped Directly to You” [Vitamin D3, Zinc, and Vitamin C with bioflavonoids], “A La Carte Immune Support Services” [including Vitamin D injections, intravenous Vitamin C, and various supplements], and “Viral Immune Boosting Packages” [with components including intravenous Vitamin C, Vitamin D injections, infrared sauna, and colonics with probiotics], and provide a telephone number for consumers to call to “place your order” or “set up your appointment.”

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 Assistant Director Jim 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 Reid Tepfer at rtepfer@ftc.gov.

Very truly yours,

Dama J. Brown
Regional Director, Southwest Region
Federal Trade Commission