



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

April 28, 2020

WARNING LETTER

VIA EMAIL TO fb@holtorfmed.com

Holtorf Medical Group
2232 E. Maple Ave.
El Segundo, California 90245

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC staff has reviewed your websites at <https://holtorfmed.com/> and <https://www.holtraceuticals.com/> on April 26, 2020. We have determined that you are unlawfully advertising that certain products treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- In marketing materials titled “What You Need to Know to Protect Yourself from Coronavirus (COVID-19),” under a heading titled “How to Proactively Combat COVID-19,” claiming that “Despite there not yet being a cure for COVID-19, there is still much you can do to protect yourself from it and limit its symptoms. Supplementation and peptide therapies have been shown to notably improve immune function and support the body’s ability to eliminate viral infections similar to COVID-19.”
- Claiming that certain supplements “may also aid in the resolution of respiratory viruses such as COVID-19,” including: ImmunoStim, which is “most beneficial to individuals who have a higher risk of illness or wish to take preventative measures against potential sickness; Virunex, which contains licorice root extract, a substance that has “successfully treated” “many viruses that share qualities with COVID-19”; and colloidal silver, which “may ease symptoms and encourage the resolution of COVID-19.”

- Claiming that the peptide therapies you market “may even support prevention and treatment of COVID-19.”
- Claiming that “You can... combat COVID-19 by appropriately supplementing with immune-boosting substances and utilizing powerful peptide therapies. Protect yourself and others by being proactive in the prevention of coronavirus.”

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 product identified above. Thus, any Coronavirus-related prevention or treatment claims regarding such product 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