



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 27, 2020

WARNING LETTER

Via U.S. Mail

Hot Springs Biofeedback
Phillip Burbutes
3417 New Boston Road
Texarkana, Texas 75501

Re: Unsubstantiated Claims for Coronavirus Prevention and Treatment

Mr. Burbutes:

This is to advise you that FTC staff has reviewed your website at <https://www.hotspringsbiofeedback.com> on May 13, 2020. 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 website include the following representations concerning silver:

- You claim: “**Diagnosed with COVID-19? I’ve got the answer! I’m in total recovery! See below...**”

- Directly beneath the above, you further claim:

“**SILVER! Silver kills viruses....** silver nanoparticles kill HIV-1 and virtually any other viruses.... Silver employs a unique mechanism of action to kill viruses:

- Silver binds to the membrane of the virus, limiting its oxygen supply and suffocating it.
- Silver also binds to the DNA of the virus-cell, preventing it from multiplying.

- Silver is also able to prevent the transfer of the virus from one person to another by blocking the ability of the virus to find a host cell to feed on. All viruses need host cells to survive....

Bacteria and viruses cannot develop resistance to silver as they can with many other treatments. Silver disables a vital enzyme and mechanism in pathogens, so they cannot survive. This applies to all viruses!

Silver available now!”

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 or 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