



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

Richard A. Quaresima
Acting Associate Director
Division of Advertising Practices

June 3, 2020

WARNING LETTER

VIA EMAIL TO help@huberpm.com
Huber Personalized Medicine, LLC
Attn: Gary Huber, DO
8170 Corporate Park Drive
Suite 150
Cincinnati, OH 45242

Re: Unsubstantiated claims for Coronavirus prevention or treatment

To Dr. Huber:

This is to advise you that FTC staff reviewed your website at <https://hippevosshop.com/> on May 26, 2020. We also reviewed your social media websites at <https://www.facebook.com/HuberPM/>, <https://www.instagram.com/hubersonalizedmedicine/>, and https://www.youtube.com/channel/UCV_D8RR9bt9sJJd9M9RrgKA/videos, where you direct consumers to contact you to purchase your “COVID Defense Bundle,” Viragraphis, Monolaurin, WholeMune, 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:

- **“COVID Defense Bundle** A well rounded defense against COVID or any infection start [sic] with a strong immune system. Argentyn is a silver preparation that when inhaled orally or nasally, lines the mucous membrane acting as the first line of defense. Viracid contains multiple active ingredients that elevate activity of your natural killer cells. Vitamin C reduce [sic] the ability of a virus to replicate or grow. Vitamin D stimulates your own innate immune systems [sic] antimicrobial peptides that find and destroy invaders. Combined this represents a significant defense against ever getting infection, or shortening its duration and intensity if one does occur.” [from your webpage at <http://hippevosshop.com/product/covid-defense-bundle/>]

- “COVID Defense. Don’t be a victim. Take 4 specific action steps to ignite your immune system defenses and reduce risk. Go online at HippEvoShop.com now and get 15% off this bundle of products that truly make a difference. It’s what I do every day. #COVIDdefense #antiviral #HippEvoShop.com.” [from your May 11, 2020 post on <https://www.instagram.com/huberpseudomedicine/>]
- “[Y]ou can build your barricade from within using . . . Argentyn, a silver antiviral. Put that in place, you’re going to the grocery store, great, squirt squirt, inhale it, you’ve got an antiviral in place as you mix amongst other people. . . . Viracid. It increases your killer cell activity. You want your immune system on guard and ready. Vitamin C reduces the virus’s ability to replicate if in fact you get it, and Vitamin D produces natural antimicrobials within your body. . . . So, don’t be a victim, go on the offensive, do something, and don’t feel like you’re just sitting home waiting to see if it gets through the front door. . . . Order all 4 of these products as a bundle, save 15%. Call my office, and ask them to send it to you. Just call it the COVID Defense Bundle . . . Or, if you go onto our online store, HippEvoShop.com, look for this little icon, the COVID Defense Bundle, and . . . get that for yourself, your family, and for your loved ones. These are the things that I’m doing myself and what I’m telling my patients to do to defend yourself against this virus.” [from your May 11, 2020 YouTube video “COVID – Defend Yourself” at <https://www.youtube.com/watch?v=K4EwcQmcuc>; link also available in your May 12, 2020 post at <https://www.facebook.com/HuberPM/>]
- “So, if you want to reduce your risk . . . I’m going to show you how you can protect your immune system, increase your immune competence, increase your killer cell activity, so that you’re less prone to getting the corona[virus], or the flu, or any virus for that matter. Vitamin C . . . we have a buffered Vitamin C . . . you can get that on . . . HippEvoShop.com. That is the materials that I use on my patients every day. Those are pharmaceutical grade, physician grade materials, that’s not the same stuff you’re gonna get at your local grocery store, if you can find it at your grocery store. Vitamin D . . . If you get an infection . . . it increases your antimicrobial peptides. . . . Vitamin C, by the way, decreases the virus’s ability to replicate, so it goes directly after the virus. Viragraphis . . . as a prevention, if you’re in a very hard-hit area and you want to be proactive, I would take Viragraphis It stimulates something in your body called natural killer cells . . . they kill bad things like viruses and bacteria, and even cancer cells. So, Viragraphis . . . is a good way of preventing the virus’s ability to enter you and even take root or replicate. If you get infected then I would increase the Viragraphis . . . that will dramatically reduce the intensity and the duration of the infection. And then WholeMune . . . stimulate your immune system’s natural killer cells to make you more resilient, you’re not going to be immunocompromised. So if you have autoimmune disease or . . . let’s say you’re diabetic and you’re trying to reduce your risk, those are the things that I would take. WholeMune one a day as prevention, if you get infected, two to

three a day. . . . Argentyn silver spray . . . it is amazing So these are simple, cost-effective, easy things you can do to take yourself out of the high-risk group or just give yourself a little extra protection.” [from your March 23, 2020 YouTube video “Coronavirus Update – Part 2” at <https://www.youtube.com/watch?v=BGKx6E7G7bc>; link also available in your March 23, 2020 post at <https://www.facebook.com/HuberPM/>]

- “[On screen text: “TREATMENT”] Stop living in fear of the coronavirus. Strengthen your immune system. Get strong, people. Quit living in fear. So, how do we keep our immune system strong? If you get symptoms, you get cold, cough, anything like that, any symptoms, immediately run for Vitamin D. . . . Doing a high dose of Vitamin D like this bolsters your immune system. What it actually is doing is increasing antimicrobial peptides. It’s activating your body’s natural antibiotics. Works really, really well. Vitamin C strengthens your immune system and it weakens viral replication, so the coronavirus can’t replicate. . . . You want something stronger, everybody should have this in reserve. You should have a pack of Viracid, right. It’s an herbal that stimulates your antimicrobial defenses. It bolsters your immune system . . . WholeMune is another product, similar. Bolsters my immune system. . . . Monolaurin is another antiviral. It’s been shown to be effective against most viruses on the planet. We carry that here. . . . And Argentyn. Love, love, love Argentyn. It’s a silver compound . . . if you get any kind of cough, sore throat, runny nose, sinus problem, taking Argentyn is an antiviral. It kills viruses. So very simple stuff. . . Look, we’ve got all this stuff in our pharmacy. Having some of it on hand makes a lot of sense. . . . But the paranoia and panic is not needed, you’re going to be just fine. Keeping a few of these things on hand will really help.” [from your March 3, 2020 YouTube video “Coronavirus Scare – Versus the Common Flu” at <https://www.youtube.com/watch?v=EaJIHMS8T2s&t>; link also available in your March 3, 2020 post at <https://www.facebook.com/HuberPM/>]

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.

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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,

Richard A. Quaresima
Acting Associate Director
Division of Advertising Practices