



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

June 1, 2020

WARNING LETTER

VIA EMAIL TO info@imcwc.com

Integrative Medicine Center of Western Colorado
2470 Patterson Road, #8
Grand Junction, Colorado 81505

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://imcwc.com/> on May 26, 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 “Coronavirus Disease 2019 (COVID-19) Treatments,” you claim:
 - In a section titled “In Office Treatments,” that: “**Stem Cells** given intravenously have been shown to be highly successful in the most severe cases, in Chinese research just published in the Aging and Disease journal”; “**Vitamin C infusions** are currently being tested in several studies in China; **Ozone therapy** may also help with viral infections by stimulating the immune system”; and “**Nebulized glutathione** (inhaled) can markedly reduce lung inflammation. We routinely provide all of these therapies in our office.”
 - In a section titled “**Supplements**” that includes a photo of several bottles of supplements with a caption stating “Anti Viral Supplements used in our office,” you list a number of supplements, including: **Vitamin C** (“I suggest taking 1000mg every 2-3 hrs, up to 10,000mg daily”); **N-acetylcysteine (NAC)** (“I recommend 500mg 3-4x/day when congested with a cold”); **Thymic Protein A (TPA)** (“I prefer a TPA product called ProBoost® given 3x/day”); **Astragalus (A. membranaceus)** root extract; **Andrographis (A.**

paniculata whole plant extract 12:1); **ambucus nigra** (“also called black elderberry, has been shown to have antiviral properties and is commonly used to treat colds or flu”); **AHCC** (“derived from mushrooms and stimulates the immune system attack against viral infections”); **Transfer Factor Multi Immune** (“another great product for stimulating a robust immune response to infection”); **Biotic Silver** (“mixed studies with some showing benefit in viral infection”); and **Vitamin D** (“Supplement using vitamin D3, with as much as necessary to get blood levels into the 80-100 ng/ml range, or, taking 2,000 to 5,000 units daily is a reasonable guess for most adults”).

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