



United States of America  
FEDERAL TRADE COMMISSION  
Southwest Region

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

June 2, 2020

**WARNING LETTER**

VIA EMAIL TO [joycepalmer1982@gmail.com](mailto:joycepalmer1982@gmail.com)

Joyce Palmer  
7739 East Broadway, Suite 205  
Tucson, Arizona 85710

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC staff reviewed your website at <http://www.vitalionedibleoxygen.com/> on May 25, 2020. We have determined that you are unlawfully advertising that your “Vital Ion Edible Oxygen” product treats or prevents Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus treatment or prevention claims on your website include the following on a page titled “Corona Virus Protocols,” that is available from your homepage by clicking on “Corona Virus Protocols Information” in your website navigation menu:

- Your “Vital Ion Edible Oxygen” product “will kill the Corona Virus that is plaguing the World . . . it will definitely kill the Corona Virus”;
- “Also you can gargle with the Vital Ion Edible Oxygen and hold it for 20 second’s [sic] and it will kill any flu virus’s [sic] such as the cold or common flu and the Corona Virus.”;
- “To protect the eye’s [sic] from the Corona Virus from entering the eye’s [sic], just take an eye dropper bottle and add the Vital Ion Edible Oxygen Daytime formula only and put seven consecutive drop’s [sic] into the eye’s [sic]. It will sting a little from the first drop but as you continue the stinging will subside. Repeat every day if you go out and think you may have the airborne virus in your eyes so when you get home do the eye drops again to prevent the Corona Virus from spreading in the body.”; and

- “For the nasal cavity, just snuffle the Vital Ion Edible Oxygen up into the nostril’s [sic] and suck up into the nose and it will drain down the throat. Repeat every time you go out into the public when you get home to insure that you won’t contact the Corona Virus. Repeat every day when leaving home.”

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](mailto: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](mailto:zkeller@ftc.gov).

Very truly yours,

Dama J. Brown  
Regional Director  
Southwest Region