



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

May 13, 2020

WARNING LETTER

VIA EMAIL TO info@mulberryleafacu.com

Mulberry Leaf Acupuncture and Herbs
11650 Riverside Drive #5
Studio City, California 91602

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://mulberryleafacu.com/> on May 6, 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:

- On your website's homepage, you market your business as providing treatment for COVID-19, stating, for example:

“At Mulberry Leaf Acupuncture and Herbs we are undergoing continuous education of diagnosis and treatment of COVID-19 with Traditional Chinese Medicine. As of today we have completed over 15 hours of COVID-19 dedicated lectures from top doctors that worked on coronavirus cases in China. We are ready, willing and able to answer any questions you may have and assist you in the prevention and treatment of your cold, flu or COVID-19 symptoms may you present them. We highly recommend setting up a consultation within hours of developing the symptoms, as this time is crucial to slow down the progression of the disease.”

- In marketing materials titled “Chinese Medicine to help defeat COVID-19,” you claim, “[M]ost Traditional Chinese Herbologists aka Licensed Acupuncturists in the State of California are well-trained to diagnose and treat any viral disease. Coronavirus is a new virus but the same principles of diagnosis and treatment are still applied and proven to be effective. As a matter of fact, many formulas that are used to treat SARS and H1N1 influenza can successfully address certain coronavirus

symptoms.” Further, you state:

“In order to be successful in the treatment of COVID-19 we should implement 4 rules:

- 1. Strengthen the immune system.** It means you need to eliminate all sugar and alcohol intake as well as dairy as it promotes phlegm formation.
- 2. Act quickly.** Optimally, we need to treat the patient with herbal medicine within two hours of learning of their diagnosis. That is why testing is so important. This time in Wuhan, the number of people infected with this novel coronavirus resulted in a sudden escalation of pneumonia cases. Therefore, the treatment strategy employed must be efficient to address symptoms rapidly and avoid the pathogen penetrating deeper into the body and causing pneumonia, or to swiftly clear any pneumonia that has set in.
- 3. Utilize a powerful/potent treatment.** It means that the form of medication and the dosage has to be the highest to eradicate the virus before it replicated.
- 4. Be preemptive.** We must understand a typical disease progression (such as this virus’s tendency to enter the lungs and cause pneumonia), to anticipate and prevent advancement of the virus, which is one of the major strengths of Traditional Chinese Medicine. Depending on the stage we choose formulas that have antiviral properties, suppress hyper inflammatory response a.k.a. cytokine storm.

The goal of incorporating Traditional Chinese Medicine to treat COVID-19 is to slow down the disease progression into a more severe phase, minimize the symptoms, shorten the duration of the disease, ensure faster rehabilitation and complete recovery without chronic complications.

Coronavirus might be new, but it is here to stay. There is a good chance that as much as 70% of the population will eventually get infected. The only real method to prevent it from happening is a vaccine that according to Dr. Anthony Fauci won’t be developed for at least another year and a half. There is no better time than now to seek holistic care that has proven through thousands of years as well as these past few months to be safe and effective in treatment of chronic and preexisting conditions, weak immune system, early stages of infection and a recovery phase.”

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.

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