



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

Richard Quaresima
Acting Associate Director
Division of Advertising Practices

June 19, 2020

WARNING LETTER

VIA EMAIL TO *info@NaturalHealthSupply.com*

NaturalHealthSupply.com
235 Camden Street, Suite 32-121
Rockland, ME 04841

Re: Unsubstantiated claims for Coronavirus treatment or prevention

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your websites at the URLs <https://www.naturalhealthsupply.com/>, <https://clarkzapper.com>, and <http://www.modernwife.com/> and your social media pages at <https://www.facebook.com/huldaclark> and <https://www.instagram.com/huldaclark/> in June 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 the following:

- **“We don’t need a COVID-19 vaccine.** Welcome to the 2020 media circus that is called the COVID-19 global pandemic. . . . The latest from ‘authorities’ is that this is the new normal until a vaccine is released for the entire planet’s population. . . . I’m not buying into their paradigm. . . . My household bases our health practices and lifestyle on the work of [Hulda Clark](http://huldaclark.com/) [link to <http://huldaclark.com/>]. . . . We set up our home and taught our kids healthy habits based on her recommendations. . . . Here are a few of them: 1. **Zap.** There are no studies performed on the novel coronavirus using the [Hulda Clark Zapper](http://clarkzapper.com/) [link to <http://clarkzapper.com/>] yet. Since hospitals stick to medical protocol, the only way we can learn if the Hulda Clark Zapper works is if people diagnosed with COVID-19 and are self-quarantined at home would use it and share their results. Hulda Clark stated, ‘Any positively offset *frequency kills all bacteria, viruses and parasites simultaneously* given sufficient voltage (5 to 10 volts), duration (seven minutes), and frequency (anything from 10 Hz to 500,000 Hz).’ In theory it should work. At the very least, the Hulda Clark Zapper can

eliminate all other microorganisms so that our body's immune system can focus on fighting the new virus in town." [from your webpage at <http://www.modernwife.com/covid-19/>]

- In a March 11, 2020 Facebook post, you state: "Your body is very good at killing bacteria and viruses. Your body kills them, faster than a wave of a magic wand.... HuldaClark.com." An individual left a comment on this post stating, "I'm zapping every day until we are months clear of coronavirus!" In response to this comment, two other individuals left comments stating, "what frequency are you using?," and "Yes we want to know what frequency n what zapper?" You then responded with a comment stating, "Hulda Clark published circuit designs for 2 frequencies: 30 kHz for basic zapping and 1 kHz for using with a north pole speaker to do things such as food zapping. Both frequencies are available in one unit at <http://ClarkZapper.com>."
- In response to a March 20, 2020 Facebook post about your Food Zappicator, an individual left a comment stating, "Hi. There have been quite a few cases of Corona virus in the US now. I believe the zapper can be an effective device to kill the virus. Has the zapper been tried on any Corona virus patient? And if yes, has it been found effective? I have made a zapper of my own and hence wondering whether it can be used on the Corona virus?" In response, you left a comment stating, "Yes, we are very interested to hear from anyone who has tested positive to COVID-19 and is pursuing a stay-at-home self-health approach."
- "Here's hoping the month of May gives us more hope. Have a good weekend. Take the time to zap. . . . #huldaclark #bacteria #viruses #health #huldaclarkzappers #clarkzapper #clarkzappers #frequency #frequencytherapy #electromedicina #electromedicine #electromedicinetherapy #curedisease #curediseases #curefordisease #diseasecure #huldaclarkzapper #covid19 #coronavirus #quarantine #quarantinelifelife" [from your May 1, 2020 Instagram post available at https://www.instagram.com/p/B_qcyGZBlkL]

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 identified above. Thus, any coronavirus-related treatment or prevention claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

We note that the Commission has previously filed federal court actions against companies who claimed their "Zapper" products could treat or cure human disease. In the

Commission's 2001 action against Western Dietary Products,¹ the defendant company and its owners settled the FTC's charges and agreed to a federal court order prohibiting them from making certain cancer treatment claims and requiring them to have competent and reliable scientific evidence to support any other health claims made in advertising. In the Commission's 2004 action against Dr. Clark Research Association,² the defendants similarly settled the FTC's charges and agreed to a court order requiring them to issue full refunds to U.S. consumers who purchased their Hulda Clark Zapper products.

In addition to the claims identified above, 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 Richard Cleland 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 Mr. Cleland at 202-326-3088.

Very truly yours,

Richard Quaresima
Acting Associate Director
Division of Advertising Practices

¹ See Press Release, *FTC Prohibits Marketers of Herbal Products and the "Zapper" from Making Unsubstantiated Claims* (Dec. 28, 2001), <https://www.ftc.gov/news-events/press-releases/2001/12/ftc-prohibits-marketers-herbal-products-and-zapper-making>.

² See Press Release, *Swiss Company to Provide Refund to U.S. Consumers* (Dec. 3, 2004), <https://www.ftc.gov/news-events/press-releases/2004/12/swiss-company-provide-refund-us-consumers>.