



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

Dama J. Brown, Regional Director
Federal Trade Commission – Southwest Region
1999 Bryan Street, Suite 2150
Dallas, Texas 75201

May 21, 2020

WARNING LETTER

Via U.S. Mail

Organic Hawaii, LLC
1024 Morris Lane
Honolulu, Hawaii 96817

Re: Unsubstantiated Claims for Coronavirus Prevention and Treatment

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your website at <https://organichawaii.org> on May 14, 2020. 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 website include the following representations made on a page titled “HOW TO PROTECT AGAINST CORONAVIRUS COVID-19 WITH SUPPLEMENTS, VITAMINS, HERBS, AND LIFESTYLE”:

- You claim:

“Good hygiene and social distancing are simple, commonsense approaches to protect from COVID-19 coronavirus, but it’s not enough. There’s a lot more we can do by strengthening our immune system to protect against COVID-19 and other pathogens. There are seven known strains of coronaviruses. COVID-19 is the newest one that mysteriously appeared in Wuhan, China at the end of 2019.

Certain natural vitamins, minerals, and supplements are known to make our immune system stronger. Our immune system is

designed to protect us from pathogens such as viruses, bacteria, yeasts, and other types of pathogenic infections.

However, daily stress, poor diet, bad lifestyle habits, chronic health conditions, and aging will deplete our immune system over time, making us more susceptible to infection. This is why it's crucial to boost immune function, especially during viral outbreaks, which often happen during the colder months i.e. flu season. But it's also wise to boost immune function regardless of pandemics since there's always something going around."

- Under the heading "**Best Natural Supplements, Vitamins, and Minerals to boost the immune system and help protect against COVID-19 coronavirus,**" you recommend "To help protect against COVID-19 coronavirus... taking the following vitamins and supplements daily": vitamin C, vitamin D, Zinc, Elderberry syrup, Resveratrol, and medicinal mushrooms "such as Reishi, Coriolus, Shitake, Chaga, and Lion's Mane."

- You further claim:

"As Dr. Kristen Coldes, ND suggested, people (especially the elderly and those with weak immune systems) should take 1000mg Vitamin C per day to build up their immune system and protect from COVID-19 coronavirus. I personally prefer taking Vitamin C [affiliate link to Amazon.com] by mouth at at least 1000 mg per day in divided doses or a single dose of liposomal Vitamin C [affiliate link to Amazon.com]....

For Vitamin D I prefer to get it from the good old Hawaiian sun, since our body produces this miracle vitamin after sun exposure. But when that's not enough it can be found in wild salmon [affiliate link to Amazon.com]... When that's not available, I take good quality vitamin D supplements [affiliate link to Amazon.com].

Zinc is super important in this age when vegetarian and vegan diets are promoted by the mainstream culture because Zinc is mostly found in animal foods. Highest sources of zinc in food are (from high to low): oysters, beef, chicken leg, firm tofu, pumpkin seeds [affiliate link to Amazon.com], and hemp seeds [affiliate link to Amazon.com]. For supplements I prefer raw zinc [affiliate link to Amazon.com].

I personally love mushrooms and regularly take medicinal mushrooms to strengthen my immune system. I really like Paul Stamets's line of medicinal mushrooms. Reishi [affiliate link to Amazon.com], Coriolus (Turkey Tail) [affiliate link to Amazon.com], Chaga [affiliate link to Amazon.com], and

Lion's Mane [affiliate link to Amazon.com] are almost always stocked in our health shelf at home.

Resveratrol [affiliate link to Amazon.com] is found in abundance in red wine, dark chocolate, and berries such as blueberries, raspberries, and bilberries. It's also available as a quality supplement [affiliate link to Amazon.com] if berries, dark chocolate or wine is not an option.

Elderberry syrup [affiliate link to Amazon.com] is also known as sambucus. It's available as an organic extract [affiliate link to Amazon.com] and we often give it to our 1 year-old if there are signs of sickness and take it ourselves to boost our own immune defenses.”

- Under the heading “**Colloidal silver**,” you claim:

“All viruses and pathogens have a weak spot

According to Dr. Gordon Pedersen PhD, ND as well as books written on the subject, nano sized silver particles (colloidal silver [affiliate link to Amazon.com]) have the ability to block viruses from attaching to human cells....

As Dr. Gordon Pedersen explains, colloidal silver effectively blocks the ability of a virus to attach to a living cell and reproduce. Ultimately, the inactive virus is naturally removed by our own immune system.

My family and I have been taking colloidal silver [affiliate link to Amazon.com] for many years to protect and boost our immune system. We rarely get sick....

In fact, the anti-pathogenic properties of silver have been known to humanity for a very long time.”

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.

Organic Hawaii

May 20, 2020

Page 4

You are also advised to review all other claims for your products or services and immediately cease making claims that are not supported by competent and reliable scientific evidence.

Within 48 hours, please send a message to Assistant Director Jim 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 Reid Tepfer at rtepfer@ftc.gov.

Very truly yours,

Dama J. Brown
Regional Director, Southwest Region
Federal Trade Commission