



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

April 28, 2020

WARNING LETTER

VIA U.S. Mail and Email to: kia@pacificacupuncture.net

Pacific Acupuncture
800 Manhattan Beach Blvd.
Manhattan Beach, California 90266

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://pacificacupuncture.net> on April 24, 2020. Based upon our review, we have determined that you are unlawfully advertising that certain products or services prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims on your website include:

- On a page on your website titled “COVID19 Treatment & Prevention Strategy,” you state that “I am recommending the following products as essential immune support for the prevention of COVID 19” followed by a list of products including Myco-Immune, Vitamin C with flavanoids, Phytogen, and Quercetin. This statement is accompanied by a link to purchase these products. Additionally, you provide information concerning herbal medications “for the treatment of Covid19” and state that “I have made *proprietary blends of Classical Chinese herbal formulas* that will strengthen your immune system, as well as address acute, mild, moderate, severe, and recovery stages of the virus. The goal is to prevent and in the event of infection... effectively treat the virus and its symptoms.” You instruct consumers to “*Contact me directly for details and orders for these proprietary blends, which are only available through my office.*”

- On the home page of your website you state, “COVID-19 Offering Antiviral Treatments & Formulas,” followed by a large button labeled “See Covid-19 products.” Consumers who click on the button are taken to a page selling products including “Immunity Booster” supplement (“to prevent strong viral infections”), “Immune Defense” essential oil (“to prevent strong viral infections”), “Immune Defense Kit Antiviral + Immune Support,” and “Immune Defense Antiviral” (with different options available for “mild respiratory/viral symptoms” and “more severe respiratory/viral symptoms”).

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 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