



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@provitahealthstore.com
Provita Health Store

Re: Unsubstantiated claims for Coronavirus treatment or prevention

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your website at the URL <https://www.provitahealthstore.com/> and your social media pages at <https://www.facebook.com/provitahealthstore/> and <https://www.instagram.com/provitahealthstore/> 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:

- “**Coronavirus** is a family of viruses that can cause respiratory diseases in humans. However, this family of viruses can circulate between animals including camels, cattle, cats and bats. The most recently discovered coronavirus is one that causes the disease globally known as **COVID-19**. . . . **VariZapper to remove viruses**. Dr. **Hulda Clark**, seeing the need to wipe out all kinds of pathogens, created **VariZapper**, an electronic device designed to eliminate all kinds of microorganisms including viruses. **VariZapper** works by sending frequencies that match the frequencies of pathogenic microorganisms and in the same way that a crystal can burst at a certain frequency, viruses die when attacked using their own frequency. . . . Human frequency ranges from 1520 to 9460 kHz, while frequencies of pathogens, viruses, parasites, bacteria, etc., range from 77 to 500 Khz. The currents emitted by the Zapper are low intensity so it does not affect the cells of the body, it does not produce effects on blood pressure, memory or body temperature. It only impacts pathogenic microorganisms without affecting us and without causing any side effects. We recommend using the VariZapper before 9PM, because that is when the organs change polarity from north to south to enter the recovery phase, and the

device will work at its maximum before that time. VariZapper is a totally safe and safe device even for pets and babies.” [from your webpage <https://www.provitahealthstore.com/en/human-viruses-diseases-they-cause/>]

- “**VariZapper 2.0** . . . [i]s a frequency generator invented by Dr. Hulda Clark with the purpose of destroying our body’s pathogens through resonance. . . . The zapper generates 30 KHz square waves of positive offset in order to destroy virus [sic], parasites, bacteria and mold in just a few minutes. It transforms a continuous current into a pulsed current with a really low voltage, but with a really high frequency which is enough to kill microorganisms in any place where the current may find them. When these invasive pathogens are treated inside the organism with the corresponding frequency according to their spectrum, they die quickly and are eliminated by white blood cells. . . . By cleansing our circulatory and lymphatic systems from all the pathogen microorganisms they might have, our white blood cells reactivate and energize, this re-polarizes our organism to north and favors our immune system.” [from your webpage <https://www.provitahealthstore.com/en/product/varizapper/>]
- “VariZapper 2.0 an electronic device designed to eliminate microorganisms. When your body is healthy or functioning properly, it is able to remove #microorganisms [sic] as #viruses #parasites or #bacteria in its initial phases by its own. But unfortunately very few people, if perhaps any, can say that their body is totally healthy and free of pathogens. This is mainly due to the toxics that accumulate in our body over the years through the food we eat, the water we drink, the air we breathe, etc. Dr. Clark created #VariZapper2.0, a device that allows us to get rid of toxins and pathogenic microorganisms lodged in the body. Using electrical frequencies, it destroys: #virus, parasites, fungi and #bacterias that represent a threat to our well being.” [from your May 18th Facebook post]
- “Dr. Hulda Regehr Clark invented the technique of selectively electrocuting #microorganisms by understanding that they emit specific radio waves and frequencies. She developed a device known as the #VariZapper o [sic] #Zapper. This is a #frequencygenerator device that removes #pathogens from the body. It emits an electric current of 9 volts, at a frequency of 32,000 Hz, that frequency ends with virtually any type of pathogen including #virus, #parasites, #bacterias, #fungi Activates the #immunesystem by energizing white blood cells so they can go after the ‘invaders’ and destroy them. #Varizapper2.0 is Zapper’s latest model, manufactured by the Clark Center, founded by the #DraHuldaClark. It also offers micro-chips with pre-recorded frequencies to attack specific microorganisms depending on the disease they cause or the organ they affect.” [from your March 24th Instagram post at <https://www.instagram.com/p/B-IYg5LjpiG/>]
- “#DrClark discovered that an internal organ can be scanned by using radiofrequency based electronics. She was able to detect #virus, #bacteria, #parasites, contaminants and #toxins using an accessible, simple technique that did not cause #sideeffects. Several

interesting concepts could be analyzed from this discovery. In order to use it for the benefit of her patients, Dr. Clark devised a portable and easy-to-use device that we now know as #Varizapper which generates square waves of positive offset at 30 KHZ to destroy viruses, parasites, bacteria and #mold in just a few minutes. . . . #virus #coronavirus.” [from your February 17th Instagram post at <https://www.instagram.com/p/B8rsi3jAVSN/>]

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.

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>.

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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
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