



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

May 18, 2020

WARNING LETTER

VIA EMAIL TO info@iwholehealth.com

Renaissance Health Centre
3455 Cliff Shadows Suite 110
Las Vegas, Nevada 89129

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://www.iwholehealth.com/>, where you advertise products and services you offer at your clinic, including homeopathy and intravenous hydrogen peroxide and ozone therapies, on May 13, 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:

- In marketing materials titled “The Coronavirus: Effective Alternative Therapies,” you claim:
 - That “[t]he world is in high alert due to the new Coronavirus, but homeopaths are not nearly as concerned about it...and for good reasons. Homeopathic treatment has had a long history of success in treating various viruses. . . . Homeopathic vaccines have been used for over 200 years and have an excellent track record”;
 - That “homeopaths [in China] report that the symptoms of people who get the Coronavirus point towards Gelsemium (first choice) and Bryonia or Eupatorium Perf. (as second choices).... And don’t forget homeopathic Thymulin 9C (Thymulin is the hormone that helps the body create T-cells which are known to help fight viral infections)”;
 - That “[i]n addition to homeopathy, intravenous H2O2 (hydrogen peroxide) [<https://www.iwholehealth.com/intravenous-hydrogen-peroxide-therapy/>] and O 3

(ozone) is also very effective in killing viruses of all kinds.”

- In marketing materials titled “How to increase your odds of surviving COVID-19 and other respiratory viruses Part I,” you claim that “Vitamin C upregulates Natural Killer cell activity and helps boost our immune system . . . Ascorbic acid (Vit C) inhibits NLRP3 in a dose-dependent fashion and also decreases IL-1 β secretion. Ascorbic acid also protects mitochondria against oxidative damage caused by the N-protein of COVID-19. At Renaissance Health Centre we are providing high Dose IV vitamin C plus Myers vitamin/mineral combination at a significant discount for those wanting to boost their immune system.”

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