



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

Serena Viswanathan
Acting Associate Director
Division of Advertising Practices

November 3, 2020

WARNING LETTER

VIA EMAIL TO info@revive4colorado.com

Michael Wall
Revive Colorado
2312 Central Park Blvd.
Denver, CO 80238

Re: Unsubstantiated claims for Coronavirus prevention and treatment

To Whom It May Concern:

This is to advise you that FTC staff reviewed your website at www.revive4colorado.com/ in October 2020. We have also reviewed your social media websites at <https://www.facebook.com/revivecolorado/> and <https://twitter.com/revivecolorado>, where you direct consumers to your website at <http://www.revive4colorado.com/> to purchase and schedule services including Vitamindrip IV therapy and Thymosin Alpha-1 peptide therapy. We have determined that you are unlawfully advertising that certain products or services treat or prevent Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or cure claims on your websites include:

- In a blog post dated March 23, 2020 and titled “PEPTIDES: HOW TO PROTECT YOURSELF FROM VIRAL INFECTIONS,” you state:

“We are in the midst of the ‘new norm,’ one resulting in a worldwide disruption by an unseen invader... **What can be done to reclaim our power and shield ourselves from illness?** I have two suggestions, and I recommend that you do both... **Path One: High-Dose Vitamin C**... If you want the full effects, go for High-Dose Vitamin C via an IV... **Path Two: Thymosin Alpha 1-Peptide**... Thymosin Alpha 1 in particular, restores immune function and has been found to enhance cell-mediated immunity. It also:...

 - Improves host protection by its effect on T cells and B cells — the white blood cells that fight off bad things.

- Increases mitogen response (ability of the cell to divide) of lymphocytes and increases their ability to regenerate. Lymphocytes are very important in the battle against viruses. Vitamin C affects the neutrophils even more. So the combination of both is proving to be very effective.
- Improves antioxidant and glutathione production, both of which help the body fight the big battles....

Your particular dose of High-Dose Vitamin C and the amount of Thymosin Alpha 1 directly correlates with your age and risk levels. Call us to discuss your needs and concerns. We'll determine what's best, line you up with a prescription and get you covered... Now is the time that we protect ourselves and each other. Together, we can beat this!"

[Blog post at <https://revive4colorado.com/2020/03/23/how-to-protect-yourself-from-covid-19-and-other-viruses/>]

- On your website at <https://revive4colorado.com/peptides/> you state:
"There's a lot you don't know about peptides...."

COVID-19 PROTECTION Thymosin ALPHA-1

- Exhibits antibacterial, antiviral and antifungal properties
- Increases vaccine effectiveness
- Suppresses tumor growth
- Enhances function of certain immune cells
- Helps eradicate unhealthy cells
- Stops infection or cancer growth
- Strengthen your immune system
- Improve symptoms associated with chronic fatigue

Click [here](#) for patient information sheet." [link to <https://revive4colorado.com/wp-content/uploads/2020/04/Revive-Thymosin-Alpha.pdf>, which states in part:
"THYMOSIN ALPHA-1 COVID-19 PROTECTION... It acts to augment T-cell function; T cells are a part of the adaptive immune system, which fights off infection... T-cells come in two forms: killer and helper cells. Killer T-cells are responsible for hunting down and destroying our body's own cells that are cancerous or infected with bacteria or viruses. TA1 is thought to modulate the immune system by augmenting T-cell function.... **Yes, it's FDA approved**[,] TA1 is also known as Zadaxin® and is FDA approved."]

- On your social media site at <https://www.facebook.com/revivecolorado/>:

- In a post on March 30, 2020, you post an image with the text, “WE’RE ALL WORRIED. HERE’S SOME HOPE. THE PROMISE OF PEPTIDES,” and state, “We’re now offering Thymosin Alpha 1 (Zadaxin™), a peptide with great hope of COVID-19 protection. We can order and have it delivered directly to you, and it can be self-administered. Read Dr. Steve’s blog here. <http://ow.ly/DhBG50yZPJ4>” [link leads to a March 23, 2020 blog post at <https://revive4colorado.com/2020/03/23/how-to-protect-yourself-from-covid-19-and-other-viruses/> referenced above]

[The same image and substantially similar text (including a link to the same blog post) were published on your Twitter account on March 30, 2020]

- In a post on March 14, 2020, you post a picture of the Coronavirus and a link to an email message titled “How we are keeping you safe while you are keeping yourself well,” available at <https://myemail.constantcontact.com/How-we-are-keeping-you-safe-while-you-are-keeping-yourself-well.html?soid=1129916583093&aid=lwqxVg6ZENk>.

In this email, you state: “**COVID-19 (CORONAVIRUS) WHAT WE’RE DOING FOR YOU... SCHEDULE AN IV OR SERIES OF BOOSTER SHOTS[.]** The powerful combination of ingredients in our **Vitamindrip® IV** [link to <https://revive4colorado.com/vitamindrip-iv-therapy/>] Infusions may help shorten the duration of a virus attack and help you feel better faster. This treatment generally takes 45 and 60 [sic] minutes. We can also include anti-inflammatory or anti-nausea medication for fast relief from your symptoms. **Take 20% Off All Vitamindrip® IV Therapies – at our place or yours.** Providers are limited. Call 303.292.3016 to schedule at our new place in Stapleton or at your home or office.”

[A substantially similar post, including a link to the same email, was also published on your Twitter account on March 14, 2020]

- In a post on March 9, 2020, you post an image that states: “COVID-19 HAS HIT COLORADO[,] DON’T LET IT HIT YOU,” and a link to an email titled “The theme of the day seems to be PANIC. Don’t,” available at <https://myemail.constantcontact.com/The-theme-of-the-day-seems-to-be-PANIC-Don-t.html?soid=1129916583093&aid=vd3GdFPt4bQ>.

In this email you state: “**Prevent the Panic[.]** Step one. Know the symptoms and how to prevent them... Step two. Stay hydrated... The powerful combination of ingredients in our **Vitamindrip® IV** [link to <https://revive4colorado.com/vitamindrip-iv-therapy/>] Infusions may help shorten the duration of a virus attack and help you feel better faster. This treatment generally takes 45 and 60 [sic] minutes. We can also include anti-inflammatory

or anti-nausea medication for fast relief from your symptoms. **Take 20% Off All Vitamindrip® IV Therapies** – AND we can come to you. Providers are limited. Call 303.292.3016 to schedule at our new place in Stapleton or at your home or office.”

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 and services 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, Assistant Director 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 Richard Cleland at 202-326-3088.

Very truly yours,

Serena Viswanathan
Acting Associate Director
Division of Advertising Practices