



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

May 14, 2020

WARNING LETTER

VIA EMAIL TO rosalee@herbswithrosalee.com

Rosalee de la Foret, LLC
P.O. Box 322
Carlton, Washington 98814

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.herbalremediesadvice.org/> on May 7, 2020. On your website, you make an “Affiliate Disclaimer” where you state that you receive a commission when consumers use affiliate links on your website to purchase items from the websites of several retailers, including from Mountain Rose Herbs. When you receive compensation from a retailer to promote its products, including as through the use of affiliate links, the claims you make about such products are subject to federal laws that prohibit deceptive advertising. Accordingly, 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 “Herbs for Immunity: Herbs to Consider for Coronavirus,” you state:

“The following are my best recommendations for using herbs for immunity as well as the particular symptoms being reported with Covid-19. I want to be clear that I am recommending common sense herbal approaches. Time and time again I’ve seen that foundational strategies work! They may not be as sexy as the latest exotic ‘anti-viral’ miracle herb, but they are more likely to succeed.

I also want to be clear that I am not claiming that any single herb is effective at stopping the Coronavirus. Instead it’s by working with your own immune system and using supporting and nourishing practices that you will have the best chances at seeing

beneficial results from using herbs.

It may surprise some people that herbs not only have a long history of successful use but they are also studied extensively.”

- In marketing materials titled “Herbs for Immunity: Herbs to Consider for Coronavirus,” you state in a section titled “Addressing Symptoms of Covid-19” that “Herbs for immunity excel at addressing the symptoms of upper respiratory viruses. I see them working best when they are used in a way that supports your own amazing and powerful immune system. Herbs aren’t there to magically erase symptoms; instead they are partners, something able to give you a helping hand as your body dances with the pathogens.”
- In marketing materials titled “Herbs for Immunity: Herbs to Consider for Coronavirus,” you promote a variety of products as “Herbs for Immunity and Preventing Illness,” including:

- “Astragalus root [<https://www.mountainroseherbs.com/products/astragalus-root-slices/profile>] is originally from China and is now used extensively by western herbalists. For many years astragalus has been my favorite herb for building and modulating the immune system. I regularly take it during the winter months.

This Chinese herb is used in many formulas for upper respiratory viruses including Jade Screen Formula (used as a preventive). I often combine it with other herbs in chai spiced teas. Despite astragalus’ popularity and extensive history of use there aren’t a lot of studies on the whole root. From limited human clinical trials and from in-vitro studies, we know that astragalus increases the white blood cell count, decreases viral replication, and stimulates the production of T killer cells.”

- “Codonopsis root [<https://www.mountainroseherbs.com/products/codonopsis-root/profile>] is another Chinese herb. It’s commonly used as a substitute for ginseng due to its lower price. Codonopsis can stimulate the immune system, strengthen the lungs and has moistening qualities (which seems important for Covid-19; see below). I recommend 15-30 grams per day. Lately I’ve been combining it with astragalus in my daily chai spiced teas. Like astragalus, this is something to take regularly over a period of time.”
- “Elderberry [<https://www.mountainroseherbs.com/products/elder-berries/profile>] is a very popular herb and is currently used extensively for the prevention of upper respiratory infections... I’ve seen elderberry work too many times to now brush it aside because of a hypothesized risk.... Lots of studies have been done showing elderberry benefits for preventing

and reducing the symptoms of upper respiratory viruses.”

- “Mushrooms. Many mushrooms can help to build your immune system. I take reishi [<https://www.mountainroseherbs.com/products/reishi-mushroom-slices/profile>] frequently simply for general health. Reishi has many immune system benefits.”

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