



United States of America  
FEDERAL TRADE COMMISSION  
Southwest Region

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

April 29, 2020

**WARNING LETTER**

VIA EMAIL TO [zengeracupuncture@gmail.com](mailto:zengeracupuncture@gmail.com)

Inner Works Acupuncture  
811 NW 20<sup>th</sup> Avenue, Suite 203  
Portland, Oregon 97209

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://innerworksacupuncture.com/> on April 23, 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 “Chinese Herbal Medicine for COVID-19: An Informational Guide,” you state: “**Applications of Chinese Herbal Medicine in the USA to Fight COVID-19.** If you are concerned about contracting coronavirus, Chinese herbal medicine for COVID-19 is a great option for prevention, suspected exposure, early-stage and mild symptoms that can be treated at home.”
- In marketing materials titled “Chinese Herbal Medicine for COVID-19: An Informational Guide,” you claim that “starting an herbal formula early in treatment may help to keep your respiratory illness from progressing to a more severe stage. Herbal treatment could keep you from needing a hospital bed—a benefit both to you and to a healthcare system stressed to capacity.”
- In marketing materials titled “Chinese Herbal Medicine for COVID-19: An Informational Guide, you state: “**Prevention and Suspected Exposure:** Jade Windscreen (Yu Ping Feng San) is available as an OTC formula. A highly recommended enhanced version is Evergreen Herbs Immune Plus, available through your herbalist. It contains two immune-modulating mushroom herbs (Cordyceps and

Reishi), combined with Jade Windscreen. **Suspected Exposure and Mild Early Stage Symptoms** (sore throat, mild dry cough, chills, headache, muscle aches, low-grade fever): Gan Mao Ling, Zhong Gan Ling, and Yin Qiao San are all OTC options with antiviral effects. An enhanced, stronger option is Evergreen Herbs Lonicera Complex, available through your herbalist.... **Severe Early Stage Symptoms** (fever, chills, sore throat, weakness, dry unproductive cough with heavy chest congestion, muscle aches): at this stage, we recommend that you consult a Board-certified herbalist. None of the readily-available antiviral OTC formulas are sufficient to address one of the key symptoms, very thick phlegm in the lungs accompanied by a dry cough. A custom herbal formula may help prevent these symptoms from progressing to pneumonia or other complications which require medical attention....”

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 product identified above. Thus, any Coronavirus-related prevention or treatment claims regarding such product 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](mailto: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](mailto:zkeller@ftc.gov).

Very truly yours,

Dama J. Brown  
Regional Director  
Southwest Region