



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

May 7, 2020

WARNING LETTER

VIA EMAIL TO amy@nesh.com

Naturopathic Health Care
115 Elm Street, Suite 210
Enfield, Connecticut 06082

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.nhcmcd.com/> on May 2, 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 “COVID-19 Thoughts and Recommendations: April 1, 2020,” you claim that “Zinc 15 mg/day and 1-2 Zinc or Zinc/elderberry or Zinc/Echinacea lozenge for kids and adults. Zinc raises immune function through your blood but also kills on contact. This coronavirus, like the one that causes regular colds, starts out in the nose & the naso-pharynx. But for those who become quite ill, it drops to the chest. By ‘killing’ in the nasopharynx you can help prevent that worsening.”
- In marketing materials titled “COVID-19 Thoughts and Recommendations: April 1, 2020,” you claim that “Echinacea, an anti-inflammatory, immune modulating herb activates white blood cells to fight infection and may also be used for prevention.”
- In marketing materials titled “COVID-19 Thoughts and Recommendations: April 1, 2020,” you claim, “There are MANY things I would prescribe as preventive—both with regard to diet, supplements, botanicals and homeopathy, which would be individualized to the patient, depending on their personal health history and any relevant risk factors. Paul and I have treated or consulted on 140 patients with

COVID-19 at this point—all people with mild disease (i.e., not hospitalized) and none have gone on to severe disease.”

- In marketing materials titled “COVID-19 Thoughts and Recommendations: April 1, 2020,” you claim, “Many of you have asked, what’s the best homeopathic remedy to take to prevent getting COVID-19 or what remedy to take if you fall ill. The thing about homeopathy is that it is individualized to the person, it is the original personalized precision medicine. What works for one person may not work for another. We often treat people constitutionally, giving a remedy for the whole person to optimize health, mood and energy.

“We recommend working with a trained homeopath and request a dose of your constitutional remedy at this time. Paul has created an algorithm for homeopaths which is in beta-testing at this time, to help streamline the case-taking and analysis, because the way many patients with COVID-19 present, there are symptoms of many homeopathic remedies.”

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