

## United States of America FEDERAL TRADE COMMISSION Southwest Region

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

May 1, 2020

## WARNING LETTER

VIA EMAIL TO holistic@vivahealthylife.com

Viva Healthy Life – the Center for Holistic Medicine a/k/a Philadelphia Holistic Clinic and Philadelphia Homeopathic Clinic c/o Victor Tsan 2200 Michener Street, Unit 12, Suite A Philadelphia, Pennsylvania 19115

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC staff has reviewed your websites at <a href="https://philaholisticclinic.com/">https://philaholisticclinic.com/</a> and <a href="https://www.philahomeopathy.com/">https://www.philahomeopathy.com/</a>, as well as your social media postings on Facebook (<a href="https://www.facebook.com/PhiladelphiaHolisticClinic/">https://www.facebook.com/PhiladelphiaHolisticClinic/</a>) on April 27-29, 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 on your website <a href="https://www.philahomeopathy.com/">https://www.philahomeopathy.com/</a> titled "Natural and home remedies for coronavirus," stating that, "In homeopathy, it is easier than in western medicine to create a 'vaccine' or a remedy for Coronavirus treatment," and claiming to offer a "Homeopathic Coronavirus vaccine" (emphasis in original) that uses "original materials and potentializing them using the rules of Homeopathic Pharmacopeia until the physical quantities of the virus become equal to zero. That's why homeopathic remedies are safe and homeopathic 'vaccines' do not cause even a light reaction."
- In marketing materials on your website <a href="https://www.philahomeopathy.com/">https://www.philahomeopathy.com/</a> titled "Natural and home remedies for coronavirus," claiming to "recommend[] the use of homeopathic remedies as an effective and safe, scientifically proven medical approach for <a href="Coronavirus prevention">Coronavirus prevention</a> and <a href="treatment for coronavirus 2020">treatment for coronavirus 2020</a>"

(emphasis in original).

- In marketing materials on your website <a href="https://www.philahomeopathy.com/">https://www.philahomeopathy.com/</a> titled "Natural and home remedies for coronavirus," claiming to offer "Chinese Herbal Remedies" that are "Scientifically Proved natural remedies for coronavirus. . . . The following herbs are suggested for prevention or treatment for Coronavirus 2020. Fructus forsythia[,] Lonicerae Japonicae Flos[,] Rhizoma Atractylodis Macrocephalae . . . "
- In marketing materials on your website <a href="https://philaholisticclinic.com/">https://philaholisticclinic.com/</a> titled "Natural remedies for coronavirus Demand and Supply," claiming that consumers can "Prevent COVID-19 using Natural remedies for coronavirus" and that "Homeopathy can help you in Natural remedies for coronavirus."
- In marketing materials on your website <a href="https://philaholisticclinic.com/">https://philaholisticclinic.com/</a> titled "Natural remedies for coronavirus Demand and Supply," claiming that "homeopathic pharmaceutical company Professional Formulas developed a protocol that decreasing [sic] the chance of Coronavirus contamination by 90%. The protocol includes... 1. Homeopathic vaccine... 2. Homeopathic remedies that stimulating [sic] the immune system" and that you sell "a stock of Professional Formulas anti-Coronavirus remedies."
- In marketing materials on your website <a href="https://philaholisticclinic.com/">https://philaholisticclinic.com/</a> titled "Natural remedies for coronavirus Demand and Supply," claiming that "[a]t the Philadelphia Holistic Clinic we have a supply of Natural remedies for coronavirus medicinal herbs and homeopathic remedies that may benefit Coronavirus prevention, but much more important, we have the knowledge and clinical experience of using these natural remedies."
- In marketing materials on your website <a href="https://philaholisticclinic.com/">https://philaholisticclinic.com/</a> titled "Coronavirus outbreak Natural Prevention and Palliative Treatment," promoting "natural remedies" including specific herbs, supplements, and homeopathic remedies, that you claim "will help with prevention of farther Coronavirus outbreak" and that "can be used for Coronavirus prevention."
- Promoting your website <a href="https://philaholisticclinic.com/">https://philaholisticclinic.com/</a> that makes the representations described above in your Facebook account by providing links to the website <a href="https://philaholisticclinic.com/">https://philaholisticclinic.com/</a> alongside promotional images.

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 <u>jelliott@ftc.gov</u> 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