



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

Dama J. Brown, Regional Director
Federal Trade Commission – Southwest Region
1999 Bryan Street, Suite 2150
Dallas, Texas 75201

April 29, 2020

WARNING LETTER

Whole Health Chicago
2265 North Clybourn Avenue
Chicago, Illinois 60614

Re: Unsubstantiated Claims for Coronavirus Prevention and Treatment

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your website at <https://wholehealthchicago.com> on April 25, 2020. We also reviewed your social media account at <https://www.facebook.com/wholehealthchicago>, where you direct consumers to visit your website to schedule various treatments and to purchase supplements. Based upon our review, we have determined that you are unlawfully advertising that certain products or services prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims on your website and social media account include:

- On your website's landing page, in a pop-up notification with the caption "WholeHealth Chicago's Response to COVID-19," you state, "IV THERAPY: WholeHealth Chicago offers an Immune Boost IV with high-dose vitamin C. Read more about important developments in the role vitamin C plays in protection from COVID-19."
- The above statement includes a hyperlink to a webpage titled "IMPORTANT High Dose IV Vitamin C Now Available." On this webpage, you tell readers, "But please click to this article in the New York Post," where the text links to an article at <https://nypost.com/2020/03/24/new-york-hospitals-treating-coronavirus-patients-with-vitamin-c/>, titled "New York hospitals treating coronavirus patients with vitamin C." Further, you claim:

“Intravenous vitamin C in high doses is being used both in China and in intensive care units in New York because:

“–Patients already ill from Covid-19 do better when adding vitamin C to their treatments.

“–Patients who had been using vitamin C before they became ill had better outcomes than those who had not....

“The WholeHealth Chicago Immune Boost IV has 10,000 mg of vitamin C. We recommend two or three of these over time before switching to taking vitamin C by mouth. 2,000 mg a day would be fine. Call and schedule an Immune Boost IV before we run out of IV vitamin C.”

- On a webpage titled “Coronavirus Immune Superstar #1: Vitamin D,” you claim that “One of [Vitamin] D’s effects is to trigger your immune system into a high-alert, anti-viral state.... Low Vitamin D increases your susceptibility to viral infections, likely including Covid-19. Former CDC director Tom Frieden has publicly stated that vitamin D may protect us from Covid-19.... We recommend Thorne Vitamin D 5,000 IU [hyperlink to product purchase page at <https://store.wholehealthchicago.com/shop/vitamin-d-5000/>] because of its low price... Get one bottle for every member of your family.”
- In a March 30, 2020 Facebook post, you claim, “High Dose IV Vitamin C Available! ‘Intravenous vitamin C in high doses is being used both in #China and in intensive care units in New York because: --Patients already ill from #Covid-19 do better when adding vitamin C to their treatments. --Patients who had been using vitamin C before they became ill had better outcomes than those who had not.’”
- In an April 23, 2020 Facebook post, you claim, “Does Ozone Therapy Really Work for COVID-19? ... Ozone therapy is potentially effective for treating #COVID-19, based on its proven effectiveness against other viral infections. While ozone therapy is used for many diseases, scientists claim that ozone therapy is able to do the following against Coronavirus: 1. Block the virus’ ability to replicate by balancing the cellular redox state 2. Activates and modulates the immune system to prevent the virus from escaping immune control 3. Improves oxygenation to prevent scarring of the lungs and protect vital organs from viral damage. Interested in Ozone therapy? Click here to request an appointment...”

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

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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 or services and immediately cease making claims that are not supported by competent and reliable scientific evidence.

Within 48 hours, please send a message to Assistant Director Jim 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 Reid Tepfer at rtepfer@ftc.gov.

Very truly yours,

Dama J. Brown
Regional Director, Southwest Region
Federal Trade Commission