

Richard A. Quaresima Acting Associate Director Division of Advertising Practices United States of America FEDERAL TRADE COMMISSION Washington, D.C. 20580

May 26, 2020

WARNING LETTER

VIA EMAIL TO tulsachiropracticrehab@gmail.com Tulsa Chiropractic Rehab 8252 S. Harvard Ave Suite 155 Tulsa, Oklahoma 74137

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 <u>https://tulsachiropracticrehab.com/</u> in May 2020. We have also reviewed your social media website at <u>https://www.facebook.com/pg/TulsaChiropracticRehab/</u> where you promote your injectable therapies and supplements, including IV Vitamin C and Vitamin D injections. We have determined that you are unlawfully advertising that certain products treat or prevent Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or cure claims on your websites include:

- On your social website media website at https://www.facebook.com/pg/TulsaChiropracticRehab/:
 - In a post on March 12, you state: "Particular vitamins and minerals are proving effective in the fight against coronavirus COVID-19. Vitamin D, Vitamin C, and zinc are of the most interest. If you are looking to improve your immune health and decreasing your risks, we would be happy to help. Our facilities are set up for IV therapy, injectable nutraceuticals, and we are stocked with supplements."
 - In a post on March 25, you state: "Certain vitamins and supplements are proving effective in the fight against coronavirus: particularly vitamin D, vitamin C, and Zinc!"
 - In a post on April 21, you post a video titled, "Vitamin C and treating coronavirus" available at

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> https://www.fox5atlanta.com/video/670244?fbclid=IwAR3aa7w8m1FRcuBG 3nt9X0niBmgXTpdDIpY5ogE21Nvrh8TIOuKc0rn3Uz0, and state: "We are offering Megadoses of vitamin[] C IV. Also subdermal injections of Vitamin C and IM of Vitamin D! Call us for more information[.]" The video states, "critical care doctors in New York are now using high doses of Vitamin C to help patients with COVID-19. There's a lot of promising data in regards to this...It's decreasing hospital stays, it's improving lung function, it's also decreasing the [] that someone will go into what's called acute respiratory distress syndrome."

- In a post on April 30, you post a link to an article titled, "Hospital turns to high-dose vitamin c to fight coronavirus" available at https://www.nutraingredients.com/Article/2020/03/25/Hospital-turns-to-high-dose-vitamin-C-to-fight-coronavirus?fbclid=IwAR0ExsfSxVJ8nxwXng4_4OwFq6nZ9-iHANUraIJI-6-Cbhpp876RVFXLEA#,">https://www.nutraingredients.com/Article/2020/03/25/Hospital-turns-to-high-dose-vitamin-C-to-fight-coronavirus?fbclid=IwAR0ExsfSxVJ8nxwXng4_4OwFq6nZ9-iHANUraIJI-6-Cbhpp876RVFXLEA#,">https://www.nutraingredients.com/Article/2020/03/25/Hospital-turns-to-high-dose-vitamin-C-to-fight-coronavirus?fbclid=IwAR0ExsfSxVJ8nxwXng4_4OwFq6nZ9-iHANUraIJI-6-Cbhpp876RVFXLEA#,">https://www.nutraingredients.com/Article/2020/03/25/Hospital-turns-to-high-dose-vitamin-C-to-fight-coronavirus?fbclid=IwAR0ExsfSxVJ8nxwXng4_4OwFq6nZ9-iHANUraIJI-6-Cbhpp876RVFXLEA#,">https://www.nutraingredients.com/Article/2020/03/25/Hospital-turns-to-high-dose-vitamin-C-to-fight-coronavirus?fbclid=IwAR0ExsfSxVJ8nxwXng4_4OwFq6nZ9-iHANUraIJI-6-Cbhpp876RVFXLEA#,">https://www.nutraingredients.com/Article/2020/03/25/Hospital-turns-to-high-dose-vitamin-C-to-fight-coronavirus?fbclid=IwAR0ExsfSxVJ8nxwXng4_4OwFq6nZ9-iHANUraIJI-6-Cbhpp876RVFXLEA#,">https://www.nutraingredients.com/Article/2020/03/25/Hospital-turns-to-high-dose-vitaminC-to-fight-coronavirus?fbclid=IwAR0ExsfSxVJ8nxwXng4_4OwFq6nZ9-iHANUraIJI-6-Cbhpp876RVFXLEA#,">https://www.nutraingredients.com/Article/2020/03/25/Hospital-turns-to-high-hospital-turns-to-hight-coronavirus.We are recommending anyone experiencing symptoms receive one of these. We have our bags ready. Call to schedule an appointment[.]" The article states: "The [COVID-19] patients who received vitamin C...It helps a tremendous amount..."
- In a post on May 11, you post an article titled: "Coronavirus: Adults should take vitamin D, researchers say[,]" available at https://www.irishtimes.com/news/health/coronavirus-adults-should-take-vitamin-d-researchers-say-

 1.4250588?mode=amp&fbclid=IwAR0ASiGfIXC_jj00cK9QiV8sJyZLKC5ZCgd
 rYqLpKcMg5mss1Q2N5N-htJw, which states: "The Government should immediately change recommendations for vitamin D supplements as a matter of urgency by urging all adults to take them during the coronavirus pandemic...This follows evidence highlighting the association between vitamin D levels and mortality from Covid-19."
- On your website at https://tulsachiropracticrehab.com/, you display a banner at the top of the page that states: "In response to recent COVID-19 concerns, be assured we are open and are operating beyond recommended precautions...We also have Injectable Therapies and Supplements to improve immune health and help decrease risk of infection."

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

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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 Richard Cleland, Assistant Director via electronic mail at rcleland@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 Richard Cleland at 202-326-3088.

Very truly yours,

Richard A. Quaresima Acting Associate Director Division of Advertising Practices