



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Richard A. Quaresima  
Acting Associate Director  
Division of Advertising Practices

June 16, 2020

**WARNING LETTER**

VIA EMAIL TO [hello@uwellshop.com](mailto:hello@uwellshop.com)  
UWell Life, Inc.  
8902 Vestavia Ave.  
Buena Park, CA 90621

Re: Unsubstantiated claims for Coronavirus prevention or treatment

To Whom It May Concern:

This is to advise you that FTC staff reviewed your website at <https://uwellshop.com> on June 10, 2020. We also reviewed your social media website at [www.instagram.com/theuwellshop/](http://www.instagram.com/theuwellshop/), where you direct consumers to your website <https://uwellshop.com>, where they can purchase dietary supplements and skin treatments, including Primocyn branded products. We have determined that you are unlawfully advertising that certain products prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims include:

- “Prevent Corona Virus with Primocyn” [This text appears over a photograph that displays six bottles of various Primocyn branded products. Clicking this image links to a page offering Primocyn branded products for sale, <https://uwellshop.com/product-category/primocyn/>.]

[Advertisement appears on a rotating banner at <https://uwellshop.com>; also see Instagram post dated April 21, 2020 at [www.instagram.com/p/B\\_Q5URwhsko/](http://www.instagram.com/p/B_Q5URwhsko/)]

- On a web page offering Primocyn Skin Solution 118 ml for sale at a price of \$79.99, you include text in Korean that translates to English as:

“**Primocyn Eau Divine** Is a super-oxidizing disinfectant for treating multiple skin conditions. It is non-toxic, manufactured in the United States, pH neutral, and purified by the FDA as a purified aqueous solution.... Recent advances in wound

care have shown that eradication of solutions from MRSA, VRE, and other dangerous pathogens quickly emerged with 99.97% killing within 30 seconds, but is safe for use around the eyes, ears, and mouth....

Strong antibacterial

Time Kill Study: Removal of HOCl in pathogens in vitro

- More than 99% reduction in killing 23 different microorganisms including *S. aureus* and *S. aureus*-MRSA
- Time to kill 30 seconds”

This text is accompanied by an “infographic” which states, in part:

“CORONAVIRUS: CoV INFOGRAPHISC [sic]  
SYMPTOMS  
PREVENTIONS  
RISK FACTORS”

[See <https://uwellshop.com/product/primocyn-skin-solution-118ml>]; see also the same or similar claims at <https://uwellshop.com/product/primocyn-skin-solution-236ml>; <https://uwellshop.com/product/primocyn-skin-solution-500ml>; <https://uwellshop.com/product/primocyn-new-regular-mist-set-w-236ml-skin-solution>; <https://uwellshop.com/product/primocyn-new-regular-mist-set-w-500ml-skin-solution>; <https://uwellshop.com/product/primocyn-new-regular-nano-mister>.]

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 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 Richard Cleland, Assistant Director via electronic mail at [rcleland@ftc.gov](mailto:rcleland@ftc.gov) describing the specific actions you have taken to address the

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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