



Serena Viswanathan
Associate Director
Division of Advertising Practices

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

May 19, 2021

WARNING LETTER

VIA EMAIL TO drbarker.ipawc@gmail.com

Matthew Barker, D.O.
Integrative Pain and Wellness Center
1100 North Kimball Avenue Ste. 130
Southlake, TX 76092

Re: Unsubstantiated claims for Coronavirus prevention and treatment

Dear Dr. Barker:

This is to advise you that FTC staff has reviewed your website at <https://ipawc.com/> in May 2021. We have also reviewed your social media websites at <https://www.facebook.com/Integrativepainandwellnesscenter/>, <https://www.instagram.com/integrativepainandwellness/>, and <https://www.youtube.com/channel/UCfUILfxqOfiKcqlQmi-tQ> where you direct consumers to your website at <https://ipawc.com/> to schedule services including Osteopathic Manipulative Treatment and to purchase supplements including Silver Flower and Golden Flower herbal tea. We have determined that you are unlawfully advertising that certain products and services treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- In an April 15, 2020 Instagram post, you state: “Osteopathic Considerations for COVID-19 with Dr Matthew Barker[.] The Osteopathic approach is unique and can help to address the challenges we are facing with the current pandemic. Watch this video to see how Osteopathic Manipulative Treatment (OMT) helped improve outcomes and decrease mortality during the Spanish flu of 1918. Check our website www.ipawc.com to learn more or call the office for an appointment. 817-912-1436....#covid19 #coronavirus...#pandemic...”

This post includes a video in which you state: “Hi, Dr. Barker here with Integrative Pain and Wellness Center. The world has not seen a pandemic like COVID-19 since

the 1918 Spanish flu. And during that time, it actually showed the importance and benefit of Osteopathic Manipulative Treatment. They found that patients with the Spanish flu, who are treated by osteopathic physicians using osteopathic manipulative treatments, had a significantly lower death rate than the patients who were only treated with traditional allopathic methods at that time....”

[You also shared this video and made substantially similar statements in a Facebook post on the same date. This video is also available on your website at

<https://ipawc.com/osteopathic-considerations> and on your YouTube page at <https://www.youtube.com/watch?v=qR7tYiC0nZ0>.]

- In an April 1, 2020, Instagram post, you state: “COVID-19 Prevention. Check our [sic] this new herbal tea product from Wei Labs that helps boost your immune system and fights off germs in the respiratory tract and throat. Learn more at our website: www.ipawc.com/shop. Please reach out if you are interested in getting a tin for yourself.... #covid19 #preventcovid19 #coronavirus #coronavirusprevention...”

This post includes a video titled “COVID 19 Prevention” in which you state: “Good morning, Dr. Barker with Integrative Pain and Wellness Center, and I just got my order in for my Golden Flower Tea made by Wei Labs and it comes in this nice little box. Inside you’ll find your tin. It lists the ingredients here and there are six natural herbal ingredients that together help support your immune system and are supposed to help ward off any germs in the respiratory tract or in the throat. So in addition to the other things you’re doing to support your immune system during COVID-19, this is a great addition to your immune support.... So I’m getting ready to put in a new order if you’re interested in getting a carton of tea. One carton is enough for one person to have tea twice a day for about a month. Go ahead, reach out to us, call our office or if you have my work cell phone go ahead and call me or text me with how many you’d be interested in and I’ll put the order in. You can also read more about the tea, the ingredients on our website. If you go to www.ipawc.com. Check out the page that says shop and you can look at the Golden Flower Tea plus our other products that are on there. So please stay healthy and do what you can to prevent yourself and others from getting COVID-19....”

[You also shared this video and made substantially similar statements in a Facebook post on the same date. This video is also available on your website at

<https://ipawc.com/covid-19-prevention> and on your YouTube page at <https://www.youtube.com/watch?v=dFe-sfOJBiw>.]

- In a March 27, 2020, Instagram post, you state: “How to boost your immune system [.] Are you interested in boosting your immune system? Watch this video to learn about some simple things you can be doing to help stay healthy! If you would like a personalized recommendation, please call the office to schedule a telemedicine appointment. 817-912-1436 www.ipawc.com ...#covid19 #coronavirus...”

This post includes a video in which you state: “Hi, I’m Dr. Barker with Integrative Pain and Wellness Center and today I want to talk to you about our immune systems. Our immune system is responsible for protecting us when we come into contact with either viral or bacterial infections, and either warding those off so we never get sick, or helping us to get better if we do get sick and come down with something. So this is a very important topic right now with everything going on with COVID-19.... [T]here’s a lot of supplements out there that can be used to help boost your immune system. So if you want to set up an appointment, I am doing telemedicine appointments to discuss personalized immune function and to do an evaluation of either the current supplements you are taking or recommend a supplement regimen to boost your immune system in these times of COVID-19. So if you are interested in setting up an appointment you can do so by calling our office at 817-912-1436. I do also have some of the recommended supplements that I offer on my website at www.ipawc.com and you can read about those and the benefits of those supplements...”

[You also shared this video and made substantially similar statements in Facebook post on the same date.]

- In a March 13, 2020, Instagram post you state: “IPAWC COVID19 update. #covid19usa...#coronavirus.”

This post includes a video in which Dr. Melanie Gray states: “Hi, this is Dr. Gray, and on behalf of Dr. Barker and Integrative Pain and Wellness Center we wanted to give you our coronavirus update.... We also really value our osteopathic manipulative treatments. It’s the best way to help promote your body to heal itself. So maybe now before you get sick it would be great to have a lymphatic drainage or a respiratory treatment and get your body tuned up then after you get sick it will help promote healing and recovery as well...”

[You also shared this video in a Facebook post on the same date.]

- On your website at <http://shop-ipawc.com/product/golden-flower-herbal-tea/> you state: “How does Golden Flower Work? This all-natural herbal tea from Wei Labs may help prevent the Coronavirus from infecting individuals through immediate germ removal and immune support. The ingredients work together to remove germs from the throat, respiratory tract, and heart. At the same [sic], enhancing and supporting the immune system....”
- On your website at <http://shop-ipawc.com/product/silver-flower> you state:

“This formula addresses individuals who are symptomatic or diagnosed with the Coronavirus who are experiencing mild, moderate, and even severe symptoms.

How Does Silver Flower Work?

This herbal formula from Wei Labs contains 20 all-natural herbal ingredients that have been used in many clinical trials all over China, including, Wuhan.

These ingredients have shown symptom relief and negative test results from 214 coronary pneumonia patients with a success rate of 90%....

Silver Formula helps expel Cold Evil Qi in the respiratory tract. It can help alleviate respiratory symptoms caused by acute respiratory tract viral infection and inflammation due to the cold or flu as well as coronavirus disease (COVID-19).

The Silver Formula was developed based on the successful clinical results in China using 'Qingfei Paidu Decoction.' The National Administration of Traditional Chinese Medicine revealed on February 23, 2020 that this herbal formula had more than a 90% effective rate in the treatment of 214 patients who were diagnosed with pneumonia caused by coronavirus.... In the above mentioned trial, 'Qingfei Paidu Decoction' was used to treat 214 confirmed coronavirus cases in four pilot provinces including Shanxi, Hebei, Heilongjiang, and Shanxi [sic]. The patients' symptoms included fatigue, fever, cough, sore throat, anorexia, and changes in CT imaging. Statistic data from the trial showed that within 3 days of treatment (one treatment course) more than 60% of patients had symptom and/or CT imaging improvement. 30% of patients' symptoms become [sic] stabilized without further worsening....

Wei Laboratories' Silver Flower formula is made from the same herbal ingredients from the 'Qingfei Paidu Decoction.' However, the 'Qingfei Paidu Decoction' is a liquid formula, while the Silver Flower is in a capsule form...."

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 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 and services identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products and 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 and services and immediately cease making claims that are not supported by competent and reliable scientific evidence.

Violations of the FTC Act may result in legal action seeking a Federal District Court injunction. In addition, pursuant to the COVID-19 Consumer Protection Act, Section 1401, Division FF, of the Consolidated Appropriations Act, 2021, P.L. 116-260, marketers who make deceptive claims about the treatment, cure, prevention, or mitigation of COVID-19 are subject to a civil penalty of up to \$43,792 per violation and may be required to pay refunds to consumers or provide other relief pursuant to Section 19(b) of the FTC Act, 15 U.S.C. § 57b(b).

Dr. Matthew Barker

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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,

Serena Viswanathan
Associate Director
Division of Advertising Practices

cc: Facebook and Instagram *via email to* consumerpolicy@fb.com
Youtube *via email to* youtube-gov-support@google.com