



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

Serena Viswanathan  
Associate Director  
Division of Advertising Practices

July 22, 2021

**CEASE AND DESIST DEMAND**

VIA EMAIL TO [wei@weilab.com](mailto:wei@weilab.com)

Wei Laboratories, Inc.  
3002 Scott Blvd.  
Santa Clara, CA 95054

Re: Unsubstantiated claims for Coronavirus prevention and treatment

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your websites at [www.weilab.com](http://www.weilab.com) and [www.famousdoctor.org](http://www.famousdoctor.org) in July 2021, and has reviewed promotional emails distributed via your [information@weilab.com](mailto:information@weilab.com) email address. We have also reviewed third-party websites operated by your business partners or affiliates at [www.ocproactivehealth.com](http://www.ocproactivehealth.com), <https://xceedwellness.com>, <https://health-truth.com>, <http://shop-ipawc.com>, <http://weifasttpatchhawaii.com>, and [www.angelicakokkalis.com](http://www.angelicakokkalis.com), where your business partners or affiliates have sold Wei Labs products, including Silver Flower capsules and Golden Flower herbal tea, using promotional information and materials provided by Wei Labs. 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:

- On your website at [www.weilab.com/weilab\\_condition\\_month.php?condition\\_id=271915547](http://www.weilab.com/weilab_condition_month.php?condition_id=271915547) you promote a "COVID-19 Protocol" for the "Condition of the Month – August 2020," in which you state:

"The coronavirus disease 2019 (COVID-19) pandemic has caused a sudden and significant increase in hospitalizations for respiratory syndrome with multiorgan disease. COVID-19 is caused by the novel severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2). SARS-CoV-2 is a large, enveloped, positive-sense single-stranded RNA virus and belongs to the same Coronaviridae family with other viruses like SARS and Middle East respiratory syndrome...."

You further instruct website users to, “Login as practitioner to view Wellness Recommendation.”

- It appears that your “COVID-19 Protocol” has been published on your business partners’ or affiliates’ third-party websites, including <https://xceedwellness.com>. Your “COVID-19 Protocol” states:

#### **“COVID-19 and FLU Recommended Wellness Protocol**

Wellness Recommendation Based on TCM [Traditional Chinese Medicine] theory, the SARS-CoV2 virus and its infection-induced immune reaction is viewed as Cold Evil Qi. The wellness recommendation for COVID-19 includes Silver Flower. Silver Flower Formula helps expel Cold Evil Qi in the respiratory tract, vascular system, and other organs of the body. It helps alleviate respiratory symptoms caused by acute respiratory tract viral infection and inflammation due to the cold or flu as well as coronavirus (COVID19). Silver Flower also helps clear toxic Damp Heat resulting from the Cold Evil Qi and removes pro-inflammatory cytokines to reduce the cytokine storm and calm down the overactivated complement system. Silver Flower helps clear symptoms of fever, cough, sore throat, nausea, breathing difficulties, diarrhea, and fatigue. Silver Flower formula exhibits a dual function in immune regulations. While calming down the overwhelming immune system and avoiding the damage to the epithelial cells, it also helps to enhance the cellular immunity to maintain healthy levels of T cells to help the body eradicate the viral infection. It also helps improve blood circulation to support the anticoagulation function and dissolve the blood clots as well as helps repair the epithelial damage....

The use of Silver Flower does not require a full diagnosis of a SARS-CoV2 infection. It is recommended as long as patients are experiencing any flu or cold symptoms such as a cough, itchy or sore throat, fever, fatigue, shortness of breath, or diarrhea.... [I]f the symptoms persist, are partially reduced, or the symptoms are caused by influenza or COVID-19, it is recommended to continue taking the formula for a total of 2 weeks.

In order to boost the immune system for those who have not become infected/do not have symptoms, Golden Flower is recommended.... It is recommended to keep Golden Flower on hand during COVID-19 pandemic as well as the flu season and to take it as needed....

[The protocol then recommends numerous other Wei Lab products – including Bitter, Brown, Qi Booster, LC Balancer, CL, Jade, Woad, KS, Soup A, Soup B, Nova, Resurgen, Surgenin, Sona, Myogen, CV, B-2, Pacekeeping, Anginen, King and Xcel – to treat lung viral complications, vascular viral complications, heart viral complications, and kidney viral complications arising from COVID-19 infection.]

#### **Additional Complications**

The SARS-CoV2 virus can cause multiorgan damage. Patients may develop one or more complication described in this protocol as well as other complications which may require treatment that is not covered in the above wellness recommendations.

For additional formulas required, please contact the Wei Lab's professional support team.



Wei Laboratories, Inc.”

- In emails sent from your email address [information@weilab.com](mailto:information@weilab.com) dated Monday, July 27, 2020 and Monday, August 3, 2020, with the subject, “COVID Update - Wei Labs,” you state:

“

**-Coronavirus Update-**

With the number of COVID cases across the US climbing, it's important to know all the options available to you and your patients.

While the virus itself is damaging to the body, the complications it can cause can be even more life-threatening. Many of these complications may be caused by a condition known as cytokine release syndrome or a cytokine storm. This is when an infection triggers your immune system to flood your bloodstream with inflammatory proteins called cytokines. They can kill tissue and damage organs, including the lungs, heart, and kidneys. Acute respiratory failure, liver injury, kidney injury, septic shock, and cardiac injury are just some of the identified complications that can occur.

Silver Flower and Golden Flower herbal formulas have shown great results in patients diagnosed with COVID-19. It's important to keep these formulas on hand for yourself, loved ones, and patients during this time. Taking these formulas early enough can help to reduce symptoms as well as help to avoid the complications that can occur.

If you or your patients are feeling symptomatic, it is recommended to take Silver Flower for two weeks. It helps alleviate respiratory symptoms caused by acute respiratory tract viral infection and inflammation due to the cold or flu as well as coronavirus. After two weeks, it's recommended to take Golden Flower (available in herbal tea and capsules) to help settle the cytokine release and boost the immune system's function.

Please call or respond to this email if you have any questions regarding Golden Flower or Silver Flower.”

- On your business partner's or affiliate's third-party website, <http://weifasttpatchhawaii.com>, a Wei Labs branded fact sheet on Silver Flower states:

“



**Wei Laboratories, Inc.**

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*(408) 970-8700*

*Email: [wei@weilab.com](mailto:wei@weilab.com)*

*[www.weilab.com](http://www.weilab.com)*

3-19-20

### **Silver Flower**

Silver Formula helps expel Cold Evil Qi in the respiratory tract. It helps 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 on February 23, 2020 revealed that this herbal formula has more than a 90% effective rate in the treatment of 214 patients who were diagnosed with coronavirus pneumonia.... This report revealed that '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 on February 5th 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 formulas [sic] 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.... The use of Silver Flower does not require a full diagnosis of a viral infection. It is recommended as long as patients are experiencing any flu or cold symptoms such as a cough, itchy or sore throat, fever, fatigue, shortness of breath, or diarrhea.... [I]f the symptom persists, it is recommended to continue taking the formula for a total of 2 weeks....

### **Lung Viral Complications**

If patients still experience difficulty breathing or are experiencing die off symptoms due to poor excretion of toxins, it is recommended to include Bitter, Brown, Qi Booster, LC Balancer, CL, Jade and Woad. Bitter "Cools down the Blood" and helps clear excessive

pro-inflammatory cytokines from the blood to address the cytokine storm caused by the viral infections....

If patients develop lung scarring or fibrosis due to the viral infection; Soup A, Soup B, and LC Balancer is recommended....

**Suggested Dosage:** 3 capsules, 3 times a day....”

[Statements promoting Silver Flower that are nearly identical to the language in the first two paragraphs quoted above appeared on your business partner’s or affiliate’s third-party website, <http://shop-ipawc.com>.]

- In addition, we have seen the following identical claims for Golden Flower and Silver Flower on multiple third-party websites selling Golden Flower and Silver Flower, including [www.ocproactivehealth.com](http://www.ocproactivehealth.com), <https://xceedwellness.com>, <https://health-truth.com>, <http://shop-ipawc.com>, and <http://weifasttpatchhawaii.com>. We believe Wei Labs has distributed these claims to its business partners or affiliates for the promotion of Golden Flower and Silver Flower to consumers for the prevention and treatment of COVID-19:

- “WEI LABS - PREVENTION: Golden Flower - Herbal Tea

This all-natural herbal tea from Wei Labs helps 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.”

- “WEI LABS - TREATMENT [or “SYMPTOMATIC”]: Silver Flower formula

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%.”

- Furthermore, we have seen the following “case studies” promoting Golden Flower and Silver Flower for the treatment of COVID-19 on multiple third-party websites selling Golden Flower and Silver Flower, including <https://xceedwellness.com>, <https://health-truth.com>, and <http://weifasttpatchhawaii.com>, sometimes published under the heading,

“Practitioner COVID-19 Case Studies.” We believe Wei Labs distributed these “case studies” to its business partners or affiliates for the promotion of Golden Flower and Silver Flower to consumers for the prevention and treatment of COVID-19. We further believe that the health care practitioners to whom these case studies are attributed are business partners of Wei Labs through its FamousDoctor.org practitioner partnership program:

- **“Complete Symptom Resolution in Positive Coronavirus Patient...**

A 25-year-old female patient who was a very active restaurant worker, started experiencing flu-like symptoms on March 15th, 2020. The patient had lost her sense of smell and taste. She was tested on the 24th for COVID-19 and was confirmed positive on the 27th.... She was experiencing difficulty and painful breathing, headache, dry cough, congestion, and difficulty speaking.... The patient started taking Silver Flower (three capsules, three times daily) and Golden Flower (one teaspoon, two times daily) from Wei Labs. Within two days, her body aches had improved by 50%. By the third morning, she started to expel chest congestion and after day three, the patient’s body aches/pains and congestion were almost completely gone. All symptoms were resolved by day six however, the patient is finishing their two week course of Silver Flower and will continue taking Golden Flower for further support.” [Statement attributed to Dr. Anish Bajaj (March 2020)]

- **“Overall Wellness Improvement in Suspected Coronavirus Patient...**

A 67-year-old male patient was experiencing a cough for two-three weeks.... The patient had congestion, dry cough, shortness of breath, and brain fog. He was presumed to be diagnosed with COVID19 by his physician.... On March 27th, 2020, the patient started taking Silver Flower (three capsules, three times daily) and Golden Flower (one teaspoon, two times daily) from Wei Labs. By March 30th (4th day of treatment), the patient could hold a six-minute conversation without coughing. His sleep was even better than before the illness. His overall wellness improved by 70%. By April 1st (6th day of treatment) the patient felt well enough to return to work. However, he was advised to stay home for the safety of himself and others until he tests negative. The patient is finishing their two-week course of Silver Flower and will continue taking Golden Flower for further support.” [Statement attributed to Dr. Anish Bajaj (March 2020)]

- **“Positive Coronavirus Patient Cleared 8 Days After Silver Flower Usage...**

A 69-year-old male in Seattle Washington who has high blood pressure, type II diabetes, high cholesterol, and a history of arthritis returned from Panama on March 15th. On the 19th, he started to notice a cough, fatigue, and loss of appetite. The patient started to get concerned on the 23rd when he developed a 101-degree fever with severe chills and mild body aches.... The patient was bed

ridden. On the 30th of March, he tested positive for COVID-19. On the 6th of April, he started taking Silver Flower from Wei Laboratories, 3 cap 3x/day. Within the first five days of starting Silver Flower, the patient's symptoms incrementally improved by 50%. The patient was able to get out of bed to walk around the house as well as eat solid food. He was cleared by his primary doctor eight days later." [Statement attributed to Dr. Anish Bajaj (April 2020)]

- **“Coronavirus and flu patient case studies. #1...** A 22-year-old female non-smoker, medical assistant in my office, presented with an acute sore throat, painful to swallow, cough, fatigue, lymphoid aggregates of posterior oropharynx & thin mucous exudate of tonsillar pillars x 2-day duration. It did not look toxic. On the 2nd day, she had to go home from work due to fatigue although she appeared well enough to work. On the 4th day, there was no improvement and Azithromycin began. After 3 days of antibiotics, there was no change in energy, sore throat, or cough.

On day 8-9, Silver Flower from Wei Labs was substituted for the antibiotics. On day 11-12, the patient was back to work, remarking about the rapid turn-around 2-½ days after beginning Silver Flower.... #coronavirus #covid19” [Statement attributed to Tom Yarema, MD, CA (March 2020)]

- Dr. Angelica Kokkalis, a business partner of Wei Labs through its FamousDoctor.org practitioner partnership program, has also promoted Golden Flower and Silver Flower to consumers for the prevention and treatment of COVID-19, and has directed consumers to contact Wei Labs directly to place an order for the products. For example, in a video posted to [www.youtube.com/watch?v=rK50W2-Zxfg](https://www.youtube.com/watch?v=rK50W2-Zxfg) (April 9, 2021), [www.beautynailhairsalons.com/US/West-Lafayette/275893399101020/The-Han-Institute---Dr.-Angelica-Kokkalis](https://www.beautynailhairsalons.com/US/West-Lafayette/275893399101020/The-Han-Institute---Dr.-Angelica-Kokkalis), [www.facebook.com/TheHanInstitute](https://www.facebook.com/TheHanInstitute), and <https://twitter.com/haninstitute/status/1380518590303109120>, Dr. Kokkalis states:

“Hello, my name is Dr. Angelica Kokkalis and I’m a doctor of Chinese medicine. I have been practicing in the state of Indiana for over 25 years.

Today I would like to share with you some information on Silver Flower and Golden Flower for boosting the immune system.

Covid19 pandemic has caused an increase in hospitalizations for respiratory syndrome and multi-organ disease. Acute respiratory failure and acute respiratory distress syndrome can occur in the lungs which triggers severe lung inflammation and causes pneumonia. Blood clots are formed both in the artery branches that prevent blood from going to certain segments of the lungs and also blood clots are formed in the capillary-level vessels that prevent the transfer of oxygen to the blood. If you or a loved one is infected with Covid19, Wei Labs has the best, Chinese herbal medicine to offer.

The Silver Flower is in a capsule form and consists of the most rare and popular herbs for the treatment of pneumonia. It removes fluid pus and cellular debris from the lungs.

Another herbal formula that is great for boosting the immune system for the prevention of Covid19 is the Golden Flower Tea in powder and pill form.

Please call . . . to get more information and place an order. Mention code 1111 to get your order as soon as possible.”

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 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 and desist making all such claims. You must also immediately cease and desist distributing to your business partners or affiliates any information and materials promoting these products for the prevention and treatment of COVID-19, including but not limited to, the COVID-19 Protocol / Wellness Recommendation, the Silver Flower fact sheet, and the Practitioner COVID-19 Case Studies, cited above. You must also contact all third-party sellers, distributors, and healthcare practitioners to whom you have provided promotional materials for these products related to COVID-19 prevention or treatment and tell them to stop distributing these materials and making promotional claims based on the materials.

You are also advised to review all other claims for your products and immediately cease and desist making claims that are not supported by competent and reliable scientific evidence. It also appears you may have a financial connection with the health care practitioners who have supplied the case studies used in your marketing materials. If this is the case, both you and they would need to disclose this financial connection in any promotional materials for your products.

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).

Within 48 hours, please send a message to Richard Cleland, Assistant Director, via electronic mail at [rcleland@ftc.gov](mailto:rcleland@ftc.gov) certifying that you have ceased making and distributing unsubstantiated claims for the products identified above, and that you have contacted your business partners and affiliates and have advised them to cease making unsubstantiated claims for those products.

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If you have any questions regarding compliance with the FTC Act, please contact Mr. Cleland at 202-326-3088.

Very truly yours,

Serena Viswanathan  
Associate Director  
Division of Advertising Practices