

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

July 7, 2020

WARNING LETTER

VIA EMAIL TO store@gesundheitnutrition.com Gesundheit! Nutrition Center 2855 19th Ave. Ste. N Bozeman, MT

Re: Unsubstantiated claims for Coronavirus prevention and treatment

To Whom It May Concern:

This is to advise you that FTC staff reviewed your website at https://gesundheitnutrition.com/ in June 2020. We have also reviewed your social media websites at https://www.facebook.com/pg/gesundheitnutritioncenter/ where you promote products you sell in your physical and online stores, such as vitamin supplements, including Astragalus, Vitamin C, Vitamin D, and Cat's Claw; and essential oils, including Eucalyptus oil. 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 website at https://gesundheitnutrition.com/health-articles/what-to-do-about-coronavirus-health-pearl-858/, in an article dated February 5, 2020, you state: "WHAT TO DO ABOUT CORONAVIRUS?...The big health news right now is this CoronaVirus...I don't have a crystal ball and therefore cannot predict what will happen and how many people will be affected. What I can tell you is there are things you can do to protect yourself from becoming infected by this CoronaVirus or any other virus for that matter. In the supplement industry, there are wonderful well-known antivirus nutrients. First off, I recommend everyone to get adequate Vitamin D-3...Other supplements with proven anti-viral properties are Oil of Oregano, Olive Leave Extract, Elderberry, Sovereign Silver, Garlic, Astragalus, and Cat's Claw. Don't let the CoronaVirus scare you, but be diligent in your own preventative measures."

- On your website at https://gesundheitnutrition.com/health-articles/how-much-of-a-supplement-to-take-for-different-uses/, in an article dated February 16, 2020, you state: "Last week I explained the immune-enhancing and viral fighting power of Vitamin C. I also suggested how to find out how much Vitamin C your body can handle. The main reason for that is we often do not take enough supplements for the condition we are dealing with. For many vitamins and herbs it's ok to take one or two capsules daily. However, if you are suffering from a specific condition; or if you prepare for a potential vital attack, such as the Coronavirus, it is suggested (almost essential!) to double, triple, or quadruple your daily intake of these for a short period of time, such as a week or two. After that you can continue with you regular recommended dose."
- On your website at https://gesundheitnutrition.com/health-articles/using-essential-oils-at-night/, in an article dated March 29, 2020, you state: "One of the big worries about COVID-19 is the attack on the lungs, especially extreme shortness of breath.... One suggestion I have is using pure essential oils at night while going to sleep. Of course you can use them also during the day! If you have a humidifier, or an oil diffuser: add drops of pure eucalyptus oil and let it run next to your bed when going to sleep. Eucalyptus has many benefits for our lungs and respiratory system because of its anti-viral, anti-bacterial, and anti-fungal properties. A wonderful option for the elderly who suffer from, or worry about, COVID-19."
- On your website at https://gesundheitnutrition.com/health-articles/covid-19-and-vitamin-d-3-deficiency/, in an article dated May 27, 2020, you state: "COVID-19 AND VITAMIN D-3 DEFICIENCY...The other day I was shown an article published on yahoo!life. It stated: https://multiple.studies.one-sible link between vitamin-D deficiency and COVID-19. []... <a href="https://covid-19.covid-19.didn't start because of a vitamin D3 deficiency. However, D3 has shown to build immunity and could therefore help build a buffer against the virus...D3 supplementation is inexpensive, even at high dosages. However, not all vitamin D3 is packaged the same way. If you know what's good for you, come-in and get the best, and best variety, of D3 on the market."
- In a Facebook Live video that was streamed on March 21, 2020 on your social media website at https://www.facebook.com/pg/gesundheitnutritioncenter/, and that is also shared on your website under the title "IMMUNITY PRESENTATION" at https://gesundheitnutrition.com/highlights/immunity-presentation-video/, you state: "Tonic herbs...[or]...adaptogenic herbs or Adaptogens...don't go after one thing specifically...They by definition they help you to adapt to multiple different stressors in the body... Within that category of adaptogenic herbs or tonic herbs, there are many different specialties...[One is] Astragalus mangolokus...it makes you stronger...it has an affinity for the lungs, which is really nice with this current virus because we know that one of the primary or the big thing is that it goes into the lungs and causes pneumonia... it specifically strengthens the immune system in your lungs...It's an immune enhancer...It is specifically antiviral...it can activate your immune system and can also calm down an overactive immune system. And, it's good to use it to support the body to

Gesundheit! Nutrition Center July 7, 2020 Page 3

fight all viruses. Do we know, am I saying that this is active against the current Coronavirus or any one specifically? Well, first of all, nobody knows that. This virus is new...we're talking about supporting the body's immune system. The innate immunity, what we're born with until the body can adapt and use the adaptive part of the immune system."

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 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 releland@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 Acting Associate Director Division of Advertising Practices