



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

Serena Viswanathan  
Associate Director  
Division of Advertising Practices

September 22, 2021

**CEASE AND DESIST DEMAND**

*VIA EMAIL TO [DrMonicaSava@gmail.com](mailto:DrMonicaSava@gmail.com)*

Dr. Monica Sava  
Sava Holistic Health  
11 Flannery Row  
East Hampton CT 06424

Re: Unsubstantiated claims for Coronavirus prevention and treatment

Dear Dr. Sava:

This is to advise you that in September 2021, FTC staff reviewed your website at <https://www.savaholistichealth.com/>. We have also reviewed your social media websites at [www.facebook.com/drmonicasava](https://www.facebook.com/drmonicasava), and <https://www.instagram.com/savaholistichealth>, where you direct consumers to your websites at <https://www.savaholistichealth.com/> and <https://www.etsy.com/shop/SAVAHolisticHealth> to purchase supplements and tinctures. We have determined that you are unlawfully advertising that certain supplements and tinctures treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- In the “Tinctures” section of your website at <https://www.savaholistichealth.com/nutritional-and-herbal-products>, you state:  
  
**“Coronavirus: Complete Set of 4 Tinctures: \$500**  
Set of 3, 2oz tinctures. They are a modified version of Buhner’s formulas. They are very strong and should only be used if you have this virus...PLEASE CALL 203-482-6800 or email [drmonicasava@gmail.com](mailto:drmonicasava@gmail.com) to place an order.”
- In an August 28, 2021 Facebook post you state “Since everything is censored it’s hard to tell anyone about what I can do... but please note I have a set of tinctures that has worked

wonders on people with the lovely c v rus [sic]. There are four tinctures in this set and a ton of research went into their formulation. I make everything myself so I can tell you how powerful it is... trust me it's much easier to have this in the house versus calling me in a panic to overnight it to you. Your health should be a priority!" You provide a link to purchase "Viral Support 4 Tincture Set" at your Etsy store, at <https://etsy.me/3jqefy5>.

- In an August 23, 2021 Facebook post you state:

"We are entering another Viral season here in the US and regardless of how you feel about C\*\*V\*\*D [sic] it is here to stay for a while along with the tons of other viruses that are around so my advice is to be prepared.

So how does one prepare for Viral season... well it is all about strengthening your immune system. This goes for those that chose to be V-C-teded [sic] and those that did not....

I would take some supplemental insurance. What does that mean... I would add a good quality vitamin C, D, multi, zinc, probiotic, liposomal glutathione and omega 3 at a minimum. I DO NOT advise buying supplements from online sources or health food stores because I have no idea where they came from or how long they sat in a hot warehouse. I personally like fullscript and you can use my account to get access to a high-quality online pharmacy so that I feel better about the money you are spending.... You can get access to my recommendations here: <https://us.fullscript.com/welcome/msava> and my current KOVED [sic] Pro-Immunity Adult Protocol is listed in the protocol section so you will see exactly what I like.

Then you have the herbal tinctures I make.... For the fall I recommend medicinal mushrooms, an antiviral like viral smash.... or viral assassin.... and mitochondrial protector.....For those that were V\*\*C\*\*Nated [sic] I would add V\*\*C\*\*NE [sic] Detox to the regimen and go through a 2 oz tincture until its done.

You can also get a 4 tincture set for if/when you come in contact with the horrific C Virus. It was used a great deal in the last year with wonderful results.... Anyway, I hope this info is helpful. Please start to prepare now so you do not get sick." This post also includes a link to your online pharmacy at <https://us.fullscript.com/welcome/msava>.

- In an August 4, 2021 post on Facebook you state:

"I can't stress it enough that you should try your best to boost your immune system to prepare for the Fall viral season. I posted my suggestions in the last post. Viral season is serious for people with compromised immune systems. Now we have other issues like mutations/variants to deal with also. Based on the kind of things being used I also agree these mutations/variants have the potential to be quite strong. They seem to be affecting

all people regardless of whether you received the lovely shot. I can't post most things on FB or even online anymore because they will be taken down.

I do think we need to be ready for new strains of all viruses and the best way to do that is focus on your immune system. I'm also going to tell you to start things like Medicinal Mushrooms and Viral Smash now before you get a virus. The point is to keep you from getting it in the first place. Yes I have a 4 tincture package for those that get sick but again by the time you get tested and contact me.... then I have to overnight it.... trust me you should have things in your Arsenal at home....

So end result....stock up on what you need before viral season....”

- In an August 2, 2021 post on Facebook you state:

“People keep asking me how to get ready for Fall and viral season. There are few things you can do. First I suggest everyone be on the three tinctures I make. They are proven over time to be quite amazing. This includes kids over 50 pounds going back to school. The ones you do twice a day are: Medicinal Mushrooms, Viral Smash if you like garlic and Viral Assassin if you hate garlic. Plus I suggest a once a day does [sic] of Mitochondrial Protector. These are designed to help keep your immune system strong. The 2 oz should last you 3 months....

The fact we can't say many things right now or use many words makes it hard to describe the products we make....

Also I have designed a protocol for those they [sic] get the virus which has worked really well and for those that decide to get vaccinated so we can detox the bad stuff. You can also find this in the store but they have vague names... one is a 4 tincture viral package and to be use [sic] if you get sick or if people in your house are sick and the other is a detox but please ask if unsure [sic]. Again tons of people used this last year with great results.

I just want people to move past the fear now and be prepared. These things have worked amazing and I strongly encourage their use. They are organically grown and handmade here in CT by me. We will never be a big company because we choose to do thing the old way and focus on the people and animals we serve. We appreciate the trust and support. <https://etsy.me/2MRs2jp>”

- In a June 20, 2021 post on Facebook you state: “I have lots of CV related news and research with the team I have been working with aside from those I respect and follow.... We have been censored to a point where we can't post much and even this may get my page taken down.... I am constantly working on how to help people whether they choose to be jabbed or not. It's still your right to choose in my opinion always. But there is a

great deal of information and options to help you improve your health that exist now... including other things like vitamins, supplements, herbs and other pharmaceuticals. Viruses are not going away and optimizing your immune system will always be the best option so you can handle whatever you are exposed to. If you want to work with me then just make a free 20 min appt. Please note I can't legally give you any advice on that free consult... it's just a consult to see if we are a good fit for each other.... There are some basic nutrients you should be taking and you can find them on my fullscript site. I put together a CV protocol on fullscript. Other herbal options are on my Etsy store. The four tincture set for viruses is something I suggest everyone keeps in their house. To truly optimize your system I would need to customize a protocol for you.  
[https://us.fullscript.com/welcome/msava.](https://us.fullscript.com/welcome/msava)”

- In two identical June 11, 2021 posts on Facebook you state: “I have been doing research on COVID all year. Yes I have a very powerful tincture set that has now worked on a ton of people. And I do have a supplement protocol to boost your immune system. Aside from the fact that people taking my basic antiviral and medicinal Mushrooms have been healthy all year. When you take care of yourself you boost your immunity and you can withstand anything. We have so much research proving the power of food, herbs and supplements aside from basic lifestyle changes... not sure why anyone would not do this? You may get knocked down at time's [sic] but you rebound very fast... I'll post links to these again shortly. But just ask me if there is a specific thing you need me to help you with.”
- In a May 2, 2021 post on Facebook you state: “If anyone wants to get quality supplements at a discount from a pharmacy that I trust with excellent customer service... you can use the following link. You will also have access to three protocols that I recommend including optimal health, childrens [sic] basics and the C\*V\* [sic] protocol. People do not realize when they buy supplements from stores or normal online avenues that they could have been stored in hot warehouses and been just about anywhere. These places normally do not get temperature-controlled items or can even state how many suppliers it went through before it arrived.... it is very important that you purchase safe supplements. You can share this with family and friends. I also strongly suggest you work with a holistic nutritionist to optimize what you are purchasing so please schedule a consult if you are unsure about what is best for you or your family.  
[https://us.fullscript.com/welcome/msava.](https://us.fullscript.com/welcome/msava)”
- In a November 10, 2020 post on Facebook you state: “People always ask what I suggest for this time of year to help keep you from getting a virus. Remember we are in viral season now. If you get COVID or are exposed to it there is nothing I suggest other then [sic] my four COVID tinctures. People on here can tell you for themselves if they work. All viruses are nasty for people and especially ones with compromised immune systems. If you have not been exposed to COVID then I suggest medicinal mushrooms and a basic

antiviral like viral smash or viral assassin. Yes funny names 😊 Again these have been used by tons of people and school Kids to keep them from getting sick.”

- In a November 1, 2020 post on Facebook you post a graphic that states:

**“Coronavirus/COVID Herbal Protocol**

- All natural holistic (Medication-free) approach for COVID-19
- Shortens recovery time of those who have been exposed to or have tested positive for COVID-19
- Supports healthy or compromised immune systems with a simple and easy to use formula
- Research-based formula developed by a leading 30 year practitioner in the field

Your Source for Holistic Wellbeing  
1-203-482-6800  
SavaHolisticHealth.com[.]”

This graphic includes images of Dr. Monica Sava and bottles of Coronavirus/COVID Herbal Protocol.

- In an October 24, 2020 post on Facebook you state: “I’ll be making COVID tinctures, medicinal mushrooms and antivirals all weekend so either go to the website [www.savaholistichealth.com](http://www.savaholistichealth.com) or just send me a message if you want something....”

- In an August 29, 2020 Facebook Live video titled “Fall Ahead,” you state:

“...We are going to see an increase in COVID. We are going into viral season... and we are going to see an increase in viruses... and COVID is a virus... I am always focused on antivirals right now.... I would kind of try to prepare for viral season in general. What do I do for viral season?... I generally start to put people on medicinal mushrooms and antivirals right now. So I make two tinctures, one is medicinal mushrooms and one is antivirals.... That way if they do get a virus it’s not going to last very long.... even in COVID cases... I use Fullscript in terms of a dispensary for supplements and I have a little protocol built in there for COVID. I have a set of tinctures that I have built for COVID and instead of one, because a lot of times what I do is pretty strong... I make a set of tinctures for COVID. So there’s four because COVID’s nasty, COVID’s a nasty virus. So the stuff that I make for COVID deals with boosting someone’s immune system, killing the actual virus, and the symptoms that are involved with it, so that’s why there’s four. I don’t tell people to get the COVID tinctures and take them for preventative reasons, it’s too strong. I tell people to take them, put them in the house, and to use them if in fact they get exposed to COVID or someone in the family gets COVID, then they use it. Unfortunately I have had tons of people using my tinctures

over the last six months.... and everybody's done really well using the tinctures that I have given them.... To keep people from getting that in the first place.... Preventative, I take medicinal mushrooms and something I call Viral Smash.... My mushroom one is called Mushroom Madness and my virus one is called Viral Smash. There is a stronger viral one, and it kind of depends on where you are in your healing process, called Viral Assassin... But those are the kinds of things that I would use for preventative stuff. And then there is a protocol off of Fullscript that I built... it's like a multivitamin, Vitamin C, Vitamin D, Zinc, Quercetin, and Glutathione... and a lot of times I'll put oil of oregano also in there as an antiviral.... You can purchase anything that I make off of [www.pondbrookholistichealth.com](http://www.pondbrookholistichealth.com)... or you can contact me and ask me about specific things... ”

- In a June 23, 2020 post on Facebook you state: “I am doing my best to formulate as many COVID -19 tincture sets as I can for this fall. These contain 4 separate tinctures designed to shorten the lifespan of this horrific virus and strengthen your immune system. Remember the key to fighting any virus is having a great immune system. These have been used on relatively healthy people along with severely compromised people and they are all fine. My daughter was one of the first people to use this set of CV tinctures. Last time the virus hit hard I sold out of these sets very quickly and I was not able to make more until now. It takes three months for me to make these tinctures. Anyway they are ready and I decided to put them on sale for July 4th. These will last for several years in a dark cool place. If you are interested just order them off the website at [www.pondbrookholistichealth.com](http://www.pondbrookholistichealth.com) and use the coupon JULY4 to get the reduced price.”
- In a blog post dated May 7, 2020 and titled “Groundhog Day Meets COVID-19 Coronavirus” at <https://www.savaholistichealth.com/post/groundhog-day-meets-covid-19-coronavirus>, you state:

“First realize that COVID-19 is a virus and you have been exposed to viruses your entire life. Yes, this is a BEAST and has a very complex structure but it is still a virus. You can fight viruses just like you do every day of your life. The key with any virus is to support and strengthen your immune system while you do your best to knock down the infectious agent.... Aside from supplementation and the use of herbal and alternative medicine.... you have to keep your stress levels under control or you will wreak havoc on your immune system and your adrenals.

I have now helped many people get well with COVID-19 including family members like my own daughter. Tinctures, supplementation and diet are important factors for beating COVID-19...

Please check out the following herbs to help control stress: Skullcap, Hops, Oatstraw, Lavender, Chamomile, Valerian, Wild Lettuce, Kava Kava and California Poppy. Most of these are in my newest formulated tincture called the Stress Eraser. You can purchase

Stress Eraser off my website [www.pondbrookholistichealth.com](http://www.pondbrookholistichealth.com) [URL redirects to [www.savaholistichealth.com](http://www.savaholistichealth.com)] along with finding my newest COVID-19 package of tinctures. To avoid getting a virus in the first place I suggest using the two tinctures labeled Viral Smash and Mushroom Madness. Also you can see my latest prescription grade COVID-19 supplement suggestions by clicking here: <https://us.fullscript.com/welcome/msava....> #COVID19 #COVID-19 #coronavirus[.]”

You also provide a link to this blog post in a May 7, 2020 Facebook post.

- In an April 17, 2020 Facebook live video, you state: “...My herbal tinctures are actually doing really well... I was researching this virus a long time ago and trying to put together... an herbal formula that would actually work for COVID wasn’t the easiest thing to do and when I pulled together my tinctures... I was like do you want to offer this to the general public because it’s really strong. But then I decided because this is such a big deal and so many people are impacted by it that I would do that.... all I can tell you is that they’re working really well on all different kinds of people. People that have stronger immune systems, and then my population of people that I generally work with which are people that don’t have strong immune systems and have really weakened immune systems.... The tinctures that I developed are trying to strengthen someone’s immune system; wicked powerful antivirals that were put together... These things have been used on a lot of people and they have all gotten better.... If people want the COVID tinctures, go to my website which pondbrookholistichealth.com....”
- In a March 27, 2020 post on Facebook you state: “OK 12 positive CV people using my tinctures and all but one was seriously immune compromised... and they are all better. These are really great results! I am happy all my research is helping others!....You will just have to take my word for it.” On April 12, 2020, a user submitted a comment on this post that states, “How many more persons are you treating since March 27?...” You responded with a comment that states, “with COVID I think all together 19 so far. All did really well thank Goodness....”
- In a March 16, 2020 post on Facebook you state: “Well it’s nice to know that my coronavirus tinctures have been working well. They really helped one young woman over the weekend and she is doing much better now. She was immune compromised like most people I help so I am just very happy she is doing better. Remember I used one of my teachers 3 formulas (Buhner) and then Monica-ized them. I have some pretty strong research skills so I put them to use when making anything with herbs. I also had many teachers in my life so I try to use all of what I have learned. I am not sure how much longer I will be able to get supplies like bottles, organic moonshine and non-herb things but I am trying my best every weekend to make enough for family and friends. If you are interested in something just contact me....”



- In a March 13, 2020 post on Facebook you state: “I feel like I should be putting together a public announcement every day now. This is actually scary to me now for what it’s worth.... Anyway for my family and friends I want you to get a multivitamin, C, D, and zinc right now.... Oh if anyone wants access to the online practitioner pharmacy to get supplements please let me know and I’ll send you a link.... Aside from the fact I really don’t want people I love buying bad stuff from the stores or amazon. I have my suggestions for the supplements in the online pharmacy also. Just email me at [drmonicabruenn@gmail.com](mailto:drmonicabruenn@gmail.com) or message me and I will send you that link.... If you want any of the herbal tinctures I made for protection or [sic] the coronavirus just contact me also. I do think they will sell out fast and I may not be able to make more for a few weeks....”
- In a February 4, 2020 post on Facebook you state: “Well I have to say viruses in general are much more complex then [sic] most people realize and much smarter. I have been developing herbal formulations for many years to handle all kinds of viruses. Remember most antibiotics do not touch viruses. It’s really a combination of antivirals and getting the host stronger so they can handle anything that is thrown their way. This goes for all living things. So I have developed a tincture and a set of what I would call a CARE PACKAGE for the coronavirus. I sincerely hope I never have to test it. In the meantime I continue to track that lovely virus along with the general viral outbreaks all over during this time of year. I will be making the CARE PACKAGE available to other practitioners and people that sign a release for my products. I am a firm believer that people do not realize the power of natural medicine and that they should not just randomly buy things off the internet. They should be taught how to use something and understand how to use things in a safe manner. It is the responsible thing to do. You are welcome to sign up for my newsletter which will have details about this CARE PACKAGE in the next week.... Oh here is the website to sign up for the newsletter. [www.pondbrookholistichealth.com](http://www.pondbrookholistichealth.com)”

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 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 are also advised to review all other claims for your products and immediately cease and desist from making claims that are not supported by competent and reliable scientific evidence. You must immediately cease and desist making all such claims.

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



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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 unsubstantiated claims for the products identified above. 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: Etsy *via email to* [inquiries@etsy.com](mailto:inquiries@etsy.com)

cc: Facebook and Instagram *via email to* [consumerpolicy@fb.com](mailto:consumerpolicy@fb.com)