

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

May 27, 2020

WARNING LETTER

VIA EMAIL TO wellness@enliventx.com
Enliven
3800 E. 42nd St. Suite 205
Odessa, TX 79762

Re: Unsubstantiated claims for Coronavirus prevention and treatment

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your website at https://www.enliventx.com/ in May 2020. We have also reviewed your social media websites at https://www.facebook.com/pg/ENLIVENTX/ and https://www.instagram.com/enlivenmenow/ where you promote your IV vitamin therapy. We have determined that you are unlawfully advertising that certain products or services treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- On your social media website at https://www.facebook.com/pg/ENLIVENTX/:
 - O In a post on March 3, you post an article titled, "Coronavirus: Is High-Dose Vitamin C the Answer?" available at https://innovationcompounding.com/coronavirus/?fbclid=IwAR3ZhR6A8cC1PTZcyjEVpdrwNrROqt723VufYwPgh6zcuS6JQVdDqiYtUXU and state: "Vitamin C is significant to the human body and plays a role in reducing inflammatory response and also helps boost the immune system when you are ill with the cold or the flu. Mega C Available at Enliven[.]" The article states: "Insufficient vitamin C intake is a global problem that can be addressed with proper nutrition and supplementation. With even modest amounts of supplemental vitamin C, deaths will decrease. In a study, modest amounts of supplemental vitamin C (200 mg of vitamin C per day) resulted in an 80% decrease in deaths among severely ill, hospitalized respiratory disease patients."

- o In a post on April 29, you post a link to a commercial for your vitamin IV treatments titled, "Vitamin IV Drips Strengthen Your Immune System[,]" available at https://www.youtube.com/watch?v=R912pnRH-WE&feature=share&fbclid=IwAR1_GhwPQG3env2pRnIzAhPybitpuMmzBhnq0_EIa-IcbjuByGQhfOPO8pU. The commercial states: "What can stand between you and a visit to the ER during these crucial times? Enliven's IV drips, which are packed with multivitamins to help strengthen your immune system. Enliven's IV drips are absorbed more efficiently than regular vitamins taken orally and will immediately boost your immune system to help guard against the cold, flu, and even COVID-19."
- On your social media websites at https://www.instagram.com/enlivenmenow/:
 - o In posts on March 11, you post an article titled, "WHO Declares Coronavirus a Pandemic, US Areas Take 'Dramatic Action' as 1,000 infected[,]" and state: "Preparation is key. Support your body's defense. IV Cure or IV Vitamin C[.]"
 - o In posts on March 19, you post an article titled, "CORONAVIRUS IN WEST TEXAS[.] First confirmed case of coronavirus in the Permian Basin reported in Crane County[,]" and state: "Preparation is key. Support your body's defense. IV Cure or IV Vitamin C[.]"
 - o In a post to Facebook on March 29 and a post to Instagram on March 30, you state: "Vitamin C plays a significant role to the human body...Helps to boost the immune system from a Cold, Flu or CoVID-19[.]"
 - o In posts on March 30, you post an image of a "High Dose Vitamin C" IV bag and state: "Immune BOOST FOR COLD, FLU, & COVID-19[.]"

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, 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 product or service identified above. Thus, any coronavirus-related prevention or treatment claims regarding such product or service 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.

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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,

Richard A. Quaresima Acting Associate Director Division of Advertising Practices