



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

Richard A. Quaresima
Acting Associate Director
Division of Advertising Practices

May 4, 2020

WARNING LETTER

VIA EMAIL TO info@holgistic.com
Holgistic Personalized Healthcare / Natural Care Institute
Attn: Dr. Jill Skurnowicz
720 E. 11 Mile Rd.
Royal Oak, MI 48067

Re: Unsubstantiated claims for Coronavirus treatment or prevention

Dear Dr. Skurnowicz:

This is to advise you that FTC staff has reviewed your websites at <https://holgistic.com> and www.naturalcareinstitute.com on April 28, 2020. We also reviewed your social media websites at <https://www.facebook.com/Holgistic/> and <https://www.facebook.com/NaturalCareInstitute/>, where you direct consumers to your website <https://holgistic.com>, to purchase Vitamin C infusion therapy and supplements, teas, and herbal remedies, including Holgistic's Anti-Viral Organic Tea Blend. We have determined that you are unlawfully advertising that certain products treat or prevent Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus treatment or prevention claims on your social media websites include:

- On a Facebook post, posted to <https://www.facebook.com/Holgistic/> on March 28, 2020 at 9:30 a.m., you state: "With news of Detroit Police Chief James Craig and so many officers from Detroit testing Positive for COVID-19 we would like to extend an offer to all law enforcement of 10% off Vitamin C infusion therapy ~

"Appointments available by teleconference with one of our Naturopathic Physicians on ways to build your immune system and stay healthy!! Ask about our 30 minute consultations! ~

"... Treating the root, not just your symptoms ~

“Call us today 248-733-5700 – let us help you become a Healthy Warrior!!”

- On a Facebook post, posted to <https://www.facebook.com/Holgistic/> on March 27, 2020 at 10:54 a.m., you state: “Offering vitamin C infusions to all healthcare workers, police officers and first responders at 10% discount. Get in now while supplies last!!!”

This text appears above a link to an article titled, “Can early and high intravenous dose of vitamin C prevent and treat coronavirus disease 2019 (COVID-19)?” This article, published in *Medicine in Drug Discovery* in March 2020, states, “The COVID-19 (SARS-2-Cov) pandemic, first reported in Wuhan, China, is now spreading to many continents and countries, causing a severe public health burden. Currently, there is no vaccine or specific antiviral drug for this deadly disease. A quick, deployable and accessible, effective and safe treatment is urgently needed to save lives and curtail the spreading.... Early use of large dose antioxidants, such as vitamin C (VC) may become an effective treatment for these patients. Clinical studies also show that high-dose oral VC provides certain protection against viral infection. Neither intravenous nor oral administration of high-dose VC is associated with significant side effect. Therefore, this regimen should be included in the treatment of COVID-19 and used as a preventative measure for susceptible populations such as healthcare workers with higher exposure risks.”

[https://www.sciencedirect.com/science/article/pii/S2590098620300154?fbclid=IwAR0AcCRd4zxaW_TLrGTvErMKRx4UYT5yw5pWNzpa7yJ0sH5a-BCKYegIVZU]

- On a Facebook post, posted to <https://www.facebook.com/Holgistic/> on March 16, 2020 at 10:15 a.m., you state:

“***Law Enforcement, Healthcare Workers, First Responders receive 10% discount on all Vitamin C infusions!!***

Fight Against COVID-19 (CORONA VIRUS) WITH HIGH DOSE INFUSION
VITAMIN C

Now is The Time

BUILD YOUR IMMUNE SYSTEM”

- On a Facebook post, posted to <https://www.facebook.com/Holgistic/> on March 12, 2020 at 9:52 a.m., you state: “FYI – Prices for Vitamin C infusions are rising, call us today to book your infusion to lock in current pricing. Build your immune system now – don’t wait until its [sic] too late.”

This text appears above a link to an article titled, “Chinese Medical Team Report Successful Treatment of Coronavirus Patients with High-Dose Vitamin C.” This article, published on *GreenMedinfo* on March 11, 2020, states, “A medical team from the Second Affiliated Hospital of Xi’an Jiaotong University in China has reported the successful treatment of coronavirus patients with vitamin C. In a press release posted

on the hospital website, the team describes how patients suffering from severe coronary pneumonia, a potentially fatal complication of the new coronavirus COVID-19, have recovered after being treated with high doses of the vitamin.... Significantly, the press release acknowledges that early application of vitamin C can have a strong antioxidant effect, reduce inflammatory responses, and improve endothelial function.... The medical team say their past experience shows that high-dose vitamin C can not only improve antiviral levels, but more importantly can prevent and treat acute lung injury and acute respiratory distress.”

[https://www.greenmedinfo.com/blog/chinese-medical-team-report-successful-treatment-coronavirus-patients-high-dose-v0?utm_campaign=Daily+Newsletter%3A+Chinese+Medical+Team+Report+Successful+Treatment+of+Coronavirus+Patients+with+High-Dose+Vitamin+C+%28HijVQh%29&utm_medium=email&utm_source=Daily+Newsletter&_ke=eyJrbF9lbWFpbCI6ICJvZmZpY2VAaG9sZ2lzdGljLmNvbSIsICJrbF9jb21wYW55X2lkIjogIksydHBeSJ9&fbclid=IwAR1EyKiFX4-BTJqcvII3tfl7M4yARFu3dYx5CHXvPIw7JvkYCOcQneXaVjU]

- On a Facebook post, posted to <https://www.facebook.com/NaturalCareInstitute/> on March 3, 2020 at 9:43 a.m., you state: “At Holgistic, with proper testing, we give IV vitamin C for a variety of conditions. Call Holgistic and let us help you with immune support.”

This text appears above a link to an article titled, “More Vitamin C Studies Approved in China to Fight Coronavirus: Therapy Censored in U.S.”

[<https://vaccineimpact.com/2020/more-vitamin-c-studies-approved-in-china-to-fight-coronavirus-therapy-censored-in-u-s/?fbclid=IwAR37zag-w6HZhiHpkyEhYiEermxsSugrAqt343OZShB0GJi1YMYuixk8JHIw>]

- On a Facebook post, posted to <https://www.facebook.com/NaturalCareInstitute/> on March 18, 2020 at 2:24 p.m., you state: “A research article about therapeutic targets for treating Coronavirus and what natural botanicals can be used.... the antiviral blend of Organic herbs I made for Holgistic has many of them in it! It’s a great antiviral tea. Call Holgistic to get yours today.”

This text appears above a link to an article titled, “Analysis of therapeutic targets for SARS-CoV-2 and discovery of potential drugs by computational methods,” published in Acta Pharmaceutica Sinica B on February 27, 2020.

[<https://www.sciencedirect.com/science/article/pii/S2211383520302999>]

- On a YouTube video posted on March 18, 2020, you state: “... There are other things like ... this is an anti-viral organic tea [holds up a bag of Holgistic brand tea leaves labeled ‘Anti-Viral Organic Tea Blend’] that I had made for my office. It’s an anti-viral tea blend with lemon balm, rosemary, thyme, skullcap, basil, echinacea, and stevia. And skullcap and rosmarinic acid have been shown in the research to be effective at fighting

Coronavirus. It targets a receptor. So those two things are really great.” [See video available at www.youtube.com/watch?v=hqxxF4KWGXc&feature=youtu.be&fbclid, starting at 15:25; also see Facebook post, posted to <https://www.facebook.com/Holgistic/> on March 18, 2020 at 8:17 p.m. and Facebook post, posted to <https://www.facebook.com/NaturalCareInstitute/> on March 18, 2020 at 8:14 p.m., both of which link to the YouTube video]

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 products or services identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products or 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.

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