



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

1999 Bryan St., Ste. 2150
Dallas, Texas 75201

May 18, 2020

WARNING LETTER

VIA EMAIL TO info@eastvalleynd.com

East Valley Naturopathic Doctors
5416 E. Southern Avenue Ste. 110
Mesa, Arizona 85206

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC staff has reviewed your website at <https://www.eastvalleynd.com/> on May 13, 2020. We have determined that you are unlawfully advertising that intravenous Vitamin C treats or prevents Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus treatment or prevention claims on your website include:

- In marketing materials titled “The role of Vitamin C in the treatment of COVID-19 and other viral infections,” you claim:
 - That a “careful review of Vitamin C and other antioxidants provide significant rationale for their immediate use in treatment of all viral infections and most importantly in the most challenging patients as found in ICU”;
 - That “[i]n high-dose intravenous vitamin C (IVC) therapy, vitamin C is thought to be a pro-oxidant in selective cell types, which allows it to kill specific cell types. . . Overall, vitamin C has a variety of effects (i.e. “pleotropic”) that are not duplicated by intracellular antioxidants. It supports intracellular antioxidants and is necessary as a specific co-factor in many critical biochemical reactions in many organs of the body”;

- That “[t]o treat pneumonia and hyper-inflammation caused by COVID-19, vitamin C has been given at high doses, both oral and IVC. Some IVC protocols have specified doses of 1000-3000 mg as necessary at intervals throughout the day. Other IVC protocols have specified doses as high as 10-20 grams daily for several days or weeks, and even as high as 50- 100 grams daily, when necessary for several days”; and
- That Vitamin C “has been proven to be effective in treating many different viral infections, including SARS pneumonia. With early and high dosing at regular intervals, vitamin C can effectively fight against sepsis, hyper-inflammation, and high virus titer to allow ICU patients to recover quickly. Combined with an overall integrative approach to health management, vitamin C, vitamin D, zinc, and other essential vitamins and minerals can effectively prevent and treat COVID-19.”

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 product identified above. Thus, any Coronavirus-related prevention or treatment claims regarding such product 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 James E. Elliott via electronic mail at jelliott@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 Zachary A. Keller at zkeller@ftc.gov.

Very truly yours,

Dama J. Brown
Regional Director
Southwest Region