

United States of America FEDERAL TRADE COMMISSION Southwest Region

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

May 4, 2020

WARNING LETTER

VIA EMAIL TO lisa@plumdragonherbs.com

Plum Dragon Herbs 102 Chester Village Chester, Maryland 21619

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://plumdragonherbs.com/ on April 30, 2020. 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 website include:

- In marketing materials titled "Chinese Herbs to Maintain Healthy Immune System During Cold-Damp Phase of Corona Virus (COVID-19)," you market a product called "Shanghan Lun Defense Formulas for Fighting COVID-19."
- In marketing materials titled "Chinese Herbs to Maintain Healthy Immune System During Cold-Damp Phase of Corona Virus (COVID-19)," you claim that your products "Wen Bing Defense formula, Huang Qin Extract and Wildcrafted Osha Root Extract may continue to provide beneficial support against COVID-19 [before the disease progresses]."
- In marketing materials titled "Chinese Herbs to Maintain Healthy Immune System During Cold-Damp Phase of Corona Virus (COVID-19)," you claim to have created "2 new formulas" based on recent COVID-19 research, including a "Shanghan Lun Defense liquid extract . . . intended for use for those who become exposed or infected to support immunity and overall health only as needed for more acute situations."

- In marketing materials titled "COVID-19 Bacterial Genus Revealed? Is this Bacteria Increasing the Virulence of COVID-19?", you claim:
 - o That "Reducing *Prevotella* Bacteria Load May Help to Decrease Virulence of COVID-19 Infection";
 - o That several of your products, such as "Huang Qin, Huang Lian, Huang Bai and Zhi Zi decrease *Prevotella* and help suppress inflammatory response"; and
 - o That "it might be a good idea to make the diet, supplementation and lifestyle changes you can that will keep your *Prevotella* levels from increasing beyond a healthy level, as this might expose you to a greater risk of experiencing a more virulent case of 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 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 James E. Elliott via electronic mail at <u>jelliott@ftc.gov</u> 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