



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

Serena Viswanathan
Acting Associate Director
Division of Advertising Practices

September 21, 2020

WARNING LETTER

VIA EMAIL to craig@hwofc.com
Health and Wellness of Carmel
11900 N. Pennsylvania St.
Suite 200
Carmel, IN 46032

Re: Unsubstantiated claims for Coronavirus treatment

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your website at <https://www.hwofc.com>, and your social media websites at <https://www.facebook.com/hwofc>, <https://www.youtube.com/channel/UCWCr4hyGwSR82-4vqQ-sVMQ>, and <https://www.instagram.com/hwofc/>, where you promote products and services available at Health and Wellness of Carmel, including supplements, “IST-12” immunotherapy, and IV ozone therapy, in September 2020. 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:

- “Health and Wellness of Carmel is offering the first SARS-CoV-2 immunotherapy to protect individuals from developing COVID-19! This is using IST technique, which is extremely safe and does not have the potential dangers of traditional vaccines. On 3/23/2017 HWOFC was the first center in America to perform IST for cancer. We have experienced excellent IST results without any significant side effect in over 100 clients.” [from your webpage “IST-12,” <https://www.hwofc.com/ist-12>; see also “Covid-19 Update # 12,” <https://www.hwofc.com/covid-19-update-12>, “Covid-19 Update # 11,” <https://www.hwofc.com/covid-19-update-11>, and “Covid-19 Update # 10 – Mask Mandate and Why you Should Lobby for Health HWOFC offers first Immune Treatment to prevent COVID-19,” <https://www.hwofc.com/covid-19-update-10>; you also make substantially similar statements in posts dated August 5, 24 and 26 on your social media websites <https://www.facebook.com/hwofc> and <https://www.instagram.com/hwofc/>]

- “IST uses one’s own dendritic cells that are allowed to replicate in a lab and trained to attack the SARS-CoV-2. This procedure allows a natural immune response mimicking what normally happens when a person develops long-term immunity to a viral infection. The process utilizes 4 separate peptides that are known to induce a strong and safe immune response leading to antibody production. This procedure has demonstrated an 800% increase in IgG antibody production against SARS-CoV-2. Follow-up testing after 3 IV doses of primed dendritic cells given one week apart has demonstrated active memory plasma cells, IgG and IgM antibodies.” [from your webpage “IST-12,” <https://www.hwofc.com/ist-12>]
- In a Facebook post, you state, “Treating COVID-19 with IV Ozone therapy[.] Dr. Clifford Fetters, MD explains why IV Ozone therapy is one of the ideal treatments for COVID-19 (Coronavirus). Watch here!... Please call into our office to schedule your appointment today....” This post includes a link to a video on your YouTube channel [available at <https://www.youtube.com/watch?v=Z1xxoSiWbok>] titled “Treating COVID-19 with IV Ozone therapy” that includes the statements: “Hi, I’m Doctor Clifford Fetters, and I’d like to discuss with you why I feel that intravenous ozone is the ideal treatment for COVID-19 for most patients....So the beauty of ozone is, it allows you to introduce a large amount of oxidative stress short-term into your body to kill this virus without harming you.... Ozone is one of the ideal treatments for mild, moderate, even severe COVID-19.” [from your September 4, 2020 post at <https://www.facebook.com/pg/hwofc>]
- In a YouTube video titled “Immune Boosting Supplements,” you provide information on supplements including ImmuPro, K2 + D, GIH, Vitamin C/Ascorbic Acid, TCO, Microbinate, and ParaComp, including: “K2+D... Studies shown to protection [sic] against respiratory infections and prevent illnesses... GIH - High Quality Probiotic... Reduces susceptibility to infections... Vitamin C-Ascorbic Acid... Shown to reduce severity of infections/illnesses... Microbinate... Contains oregano and garlic – natural remedies to respiraotry [sic] complications...” The video description provides a link to your online store to purchase these supplements and includes the hashtags, “#coronavirus #corona #COVID19 #COVID.” [from your video at <https://www.youtube.com/watch?v=pZOAQVKEVnU>]

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.

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You are also advised to review all other claims for your products and services and immediately cease making claims if they are not supported by competent and reliable scientific evidence.

Within 48 hours, please send a message to Richard Cleland 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,

Serena Viswanathan
Acting Associate Director

