



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

Serena Viswanathan
Acting Associate Director
Division of Advertising Practices

October 1, 2020

WARNING LETTER

VIA EMAIL TO dr@dranamarca.com and info@dranamarca.com

Integrative Health Carolinas
2132 Lombardy Circle
Charlotte, NC 28203

Re: Unsubstantiated claims for Coronavirus prevention and/or treatment

To Whom It May Concern:

This is to advise you that FTC staff reviewed your websites at <https://www.familywellnesstips.com>, <https://www.integrativehealthcarolinas.com>, and <https://www.dranamarca.com>, as well as your social media website at <https://www.youtube.com/channel/UChlrBGRcBXhz0Tqm2gDm3NQ>, where you promote products and services available at Integrative Health Carolinas, including supplements, in September 2020. We have determined that you are unlawfully advertising that certain products treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- "☺ My Positive Covid Test Story

Last month, Kelley tested positive for Covid. These supplements helped her recovery and helped protect her family from getting Covid.

Watch Kelley's Story

[Images of four products, including "LIQUID Vitamin D3 with K2," "SBI Protect Powder," "Buffered Lemon C Powder," and "Zinc liquid 15 mg"]

Start Shopping [link to "Ana-Maria Temple's Dispensary" at <https://us.fullscript.com/welcome/atemple>]

If you are local and would like to pick up your supplements at our office,

Click Here [link to send email to info@ihcclt.com with subject line “Supplements”]

[From your September 10, 2020 email newsletter, sent from dr@dranamaria.com with the subject line “😊 My Positive Covid Test Story”]

- Clicking on “Watch Kelley’s Story” in the September 10, 2020 email links to a video on your YouTube channel [available at <https://www.youtube.com/watch?v=cmAEuw8aiyU>] titled “What Protected Kelley from COVID Video” that includes the statements: “Hi guys, I’m Kelley Gilbert, and I’m the Director for Health and Wellness for Dr. Ana-Maria Temple at Integrative Health Carolinas. And I had COVID.... So what I did is I took 4 supplements that we recommend really for any virus. These aren’t proven to cure you from COVID for any stretch of the mind, but they are antiviral, and you know COVID is a virus so by taking these it can certainly help prevent you from getting it. So what I did was I myself took 4 dropperfuls of zinc, of the 15mg that we sell on FullScript, every day, and I gave my children 2 dropperfuls, and my husband had the same dosing I had. I went ahead and got some of the buffered vitamin C powder as well, and I took a full scoop of that, and gave my children about a fourth to a half of a scoop of that. And then I went ahead and used the SBI Protect powder. Now this is different and people usually wouldn’t think to do this unless you’re into functional medicine. And SBI Protect powder helps protect your gut lining, and what we know is 80% of our immune system takes place in our gut so we really want to make sure we’re doing something for our gut so the virus can’t, you know, your body is not inhabitable for the virus. So I took one scoop of this every single day and gave my kids a half of a scoop. And then the last thing that we did is we took our D3 with K2 every single day. And my children never got it.... Their tests were negative. We also got the antibody test that tells you if you’ve ever had it and their test for that was negative as well.... And my husband never got it. So, obviously not saying this is 100% you’ll never get COVID if you do this, but it definitely helped in my situation and my family. My entire extended family now is doing the same protocol whenever they feel like they’ve been exposed.... So if you’re interested, we have all these supplements on FullScript, and obviously because of the success I had with my family I would definitely recommend them.”
- In a blog post dated August 5, 2020, and titled “COVID Protocol For You And Your Family,” you state: “With positive COVID tests increasing and some schools starting back soon, we wanted to go over some frequently asked questions as well as the supplements we recommend to keep you and your family safe and healthy.

...

Q: What supplements should I be taking so that I do not get COVID?

...

Supplements

- **use the upper dosage for treatment.**
- **use the lower dosage for prevention**

Vitamin C

Vitamin C Dosages:...

- 1-5 years: 125-250 mg daily
- 6-12 years: 250-500 mg daily
- 13-18 years: 500-1000 mg daily
- 19+ years: 500-1000+ mg daily

Dr. Temple -Approved Vitamin C Supplements:

- Seeking Health Liposomal Vitamin C
- Quicksilver Scientific Liposomal Vitamin C
- Orthomolecular Buffered C Powder

[Dosages and “Dr. Temple-Approved” supplements also provided for Zinc, Vitamin D, Fish Oils, Probiotics, and Immunoglobulins]

PURCHASE HERE [link to Ana-Maria Temple’s Dispensary at <https://us.fullscript.com/welcome/atemple>]

[Blog post located at <https://www.familywellnesstips.com/blog/2020/8/5/covid-protocol-for-you-and-your-family>]

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.

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You are also advised to review all other claims for your products and immediately cease making claims if that 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