

Dr Stewart

From: Dr Stewart
Sent: Thursday, June 4, 2020 6:04 PM
To: jelliott@ftc.gov
Cc: Loudoun Holistic Health Partners
Subject: FTC Warning letter to Loudoun Holistic Health Partners (LHHP)

Mr. Elliot,

In compliance with the instructions in the warning letter we received on June 2, 2020 at 1725 PM EDT I am notifying you of the specific actions LHHP has taken to address the FTC's concerns.

I have removed from our website any, and all, mentions of COVID-19. This includes the following, as noted in the FTC letter:

- * "COVID-19 Guidance" removed from navigation menu.
- * Rotating banner on homepage mentioning "LHHP COVID-19 Guidance Statements" removed.
- * Any, and all, mention of supplements, IV infusions, or any other treatment to prevent or treat COVID-19 have been removed.
- * Downloadable COVID-19 Guidance Statements have been removed and are not accessible.
- * All documents alluding to "#CrushCorona Updates" have been removed.

Having taken the aforementioned actions, I am satisfied that we have complied with the instructions outlined in the FTC Warning letter dated June 2, 2020.

In my professional opinion, actions like this by the FTC do nothing more than limit law abiding Americans from exercising their right to choose what actions they take to maintain, or restore, their health. The letter references that every claim must be "supported by competent and reliable scientific evidence" is prejudicial against individuals who choose not to consume pharmaceutical agents to prevent or treat disease. The standard "competent and reliable evidence" can only be satisfied after determining who decides which evidence is adequate. That is a subjective determination open to bias which, in most cases, serves the already financially lucrative interests of the pharmaceutical industry. In fact, most of what is practiced in medicine does not meet the standard set forth by the FTC Act. Off-label uses of FDA-approved medications generate tremendous revenues for pharmaceutical companies and completely violate the spirit of the FTC Act. However, marketing of off-label uses for medications is done off the record by direct to physician presentations from pharmaceutical sales representatives and by industry-compensated clinical "experts" who contribute to practice guidelines. Neither of those marketing outlets receives the ire of the FTC.

However, as it stands, the law is what the FTC Act states and LHHP will comply. Thank you for allowing us to correct our non-compliance in advance of any further FTC actions.

Please notify me if more action is necessary on the part of LHHP.

Best,

David W. Stewart, MD

President
Loudoun Holistic Health Partners, PLLC