



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

June 2, 2020

WARNING LETTER

VIA EMAIL TO info@loudounholistic.com

Loudoun Holistic Health Partners
209 Old Waterford Road, NW
Leesburg, Virginia 20176

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC staff reviewed your website at <https://loudounholistichealthpartners.com/> on May 24, 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 treatment or prevention claims on your website include:

- In marketing materials accessible on your website by selecting “COVID-19 Guidance” in the navigation menu or by clicking on a rotating banner on the homepage that states, “#CrushCorona – LHHP COVID-19 Guidance Statements...”, you claim:
 - In your “Updated COVID-19 Guidance” dated March 12, 2020, you state that you “recommend[] the following supplements for general immune support to possibly enhance your body’s protection from, and recovery from, the COVID-19 virus:
 - **“Vitamin C: Intravenous vitamin C infusions** have been used to treat COVID-19 in China. LHHP is still offering IV Vitamin C infusions up to 25,000mg for our members. Supplies of this crucial vitamin are being rationed so supplies are limited. **Oral vitamin C**, at high doses, can also be helpful. We recommend the following products (some products sold at LHHP, while supplies last): **Amla-C** (Pure Planet) – take 1 to 3 tablets up to 3 times per day. **Potent C Guard** (Perque) – start with ½ tsp once a day (in 4 ounces of water).”

- **“Stephen Buhner Coronavirus Protocol:** Mr. Buhner is a highly respected herbalist with experience successfully treating infectious diseases, including previous coronavirus outbreaks, including SARS. He has put together a protocol for COVID-19 based on the science of how the virus attacks our cells and immune systems. **LHHP has ordered a limited number of kits that may be used for post-exposure prevention and COVID-19 treatment. Please contact the office for more details.**”

[available at https://loudounholistichealthpartners.com/wp-content/uploads/2020/03/COVID-19-Statement-03_12_2020.pdf]

- In your “Coronavirus Update” dated March 20, 2020, you state that “Intravenous Vitamin C infusion continues to show efficacy in prevention/treatment.”

[available at https://loudounholistichealthpartners.com/wp-content/uploads/2020/03/COVID-19-Statement-03_20_2020.pdf.]

- In your “#CrushCoronaUpdate” dated March 26, 2020, you state in a section titled “Prevention/Treatment via micronutrient and herbal agents: (LHHP carries many of these products – call (703-779-2801) or email (info@loudounholistic.com for pricing/availability.)”:

- “Studies, and anecdotal reports, are showing that the following are especially beneficial to preventing, and reducing the severity of, COVID-19 illness: • Vitamin C • Zinc • Ashwagandha • Licorice • Houttuynia • Elderberry/Elder Leaf • Echinacea • Japanese Knotweed • Astragalus • Boneset • Vitamin D/Vitamin A • Melatonin • Cordyceps • Olive Leaf”;
- **“Vitamin C** – Hands down the most effective, scientifically validated natural prevention/treatment for COVID-19. • **Prevention:** IV 25,000mg [link to send email to info@loudounholistic.com with subject line “Schedule IV Vitamin C”] at least once per week AND Potent C Guard Powder (Perque) [link to online store] – up to 1 tbsp twice per day (PLEASE START LOW AND INCREASE GRADUALLY) • **Treatment:** IV 25,000mg [link to send email to info@loudounholistic.com with subject line “Schedule IV Vitamin C”] daily until symptoms resolve OR continue Potent C Guard at maximum tolerated dosage”;
- **“Stephen Buhner’s COVID-19 Protocol** – This kit contains many every herb known to limit the impact of Coronavirus illnesses. Therefore, it takes the place of many of the following herbals. Check with LHHP if you plan to start the Buhner Protocol. Please contact us for pricing and availability (703-779-2801 or info@loudounholistic.com)”;
- **“Zinc** – IV Myers’ Cocktail [link to send email to info@loudounholistic.com with subject line “Schedule Myers’ Cocktail”] OR Zinc lozenge [link to online store] (delivers the zinc to the upper

respiratory tract where the virus attacks first) OR [oral capsule](#) [link to online store]. • **Prevention:** [IV Myers' Cocktail](#) [link to send email to info@loudounholistic.com with subject line "Schedule Myers' Cocktail"] weekly AND [Zinc lozenge](#) [link to online store] twice per day OR [oral Zinc](#) [link to online store] 50 to 100mg per day. • **Treatment:** [IV Myers' Cocktail](#) [link to send email to info@loudounholistic.com with subject line "Schedule Myers' Cocktail"] daily OR [Zinc lozenge](#) [link to online store] four times per day OR [oral Zinc](#) [link to online store] 50 to 100mg per day”;

- “**Houttuynia (Nutramedix)** [link to online store] – Is virucidal against many Coronaviruses. • **Prevention:** 15 drops twice per day. • **Treatment:** 30 drops twice per day”;
- “**Anandamide (Sun Potion)** [link to https://www.sunpotion.com/products/anandamide-bliss-alchemy?_pos=41&_sid=552c46fea&_ss=r] – A yummy (per Dr. Dave anyway) cacao-based powder containing COVID-19 preventing herbs – Ashwagandha, Astragalus, and Love! • Mix 1 tbsp with boiling water then add oat milk for a coffee/tea substitute”;
- “**Astragalus Complex (MediHerb)** [link to <https://www.standardprocess.com/Products/MediHerb/Astragalus-Complex#.Xs7ggjpKhPa>] – Contains Licorice, Echinacea, and Eleuthero. (Warning: Licorice can raise blood pressure.) • **Prevention:** 1 tablet twice per day • **Treatment:** 2 tablets twice per day”;
- “**HerbaVital (MediHerb)** [link to <https://www.standardprocess.com/Products/MediHerb/HerbaVital#.Xn0g24hKhPY>]– Contains Japanese Knotweed. • **Prevention:** 1 tablet twice per day • **Treatment:** 1 tablet 4 times per day”;
- “**Bio-ADEK-Mulsion (Biotics Research)** [link to online store] — Vitamins D/ A/ E/K – Essential for immune protection against viral infections and reducing inflammation to prevent the cytokine storm from COVID-19. • **Prevention:** 10 drops twice per day • **Treatment:** 20 drops twice per day”;
- “**Melatonin Liquid (Pure Encapsulations)** [link to online store] – Micro-dose melatonin each morning can boost immunity against viruses. • **Prevention/Treatment:** 1 to 3 drops each morning.”

[available at https://loudounholistichealthpartners.com/wp-content/uploads/2020/03/COVID-19-Statement-03_26_2020.pdf.]

- In your “#CrushCorona – Coronavirus Update” dated March 31, 2020, you state that you are “**NOW PROVIDING IV VITAMIN C TO NON-MEMBERS** for help with reducing the impact of COVID-19 illness (#CrushCorona). . . . A growing body of information supports the use of IV Vitamin C [link to <https://www.naturalhealth365.com/vitamin-c-covid-19-infection-3349.html>] early in COVID-19 illness to prevent worsening AND in moderate to severe hospitalized patients. We recommend combining with IV Myers’ Cocktail for the added benefit of zinc given the positive research on this micronutrient with past coronaviruses [link to <https://pubmed.ncbi.nlm.nih.gov/21079686/>].”

[available at https://loudounholistichealthpartners.com/wp-content/uploads/2020/03/COVID-19-Statement-03_31_2020.pdf]

- In your “#CrushCorona – COVID-19 Update” dated April 6, 2020, you state that you “CONTINUE[] TO PROVIDE IV VITAMIN C TO EVERYONE for help with reducing the impact of COVID-19 illness (#CrushCorona). . . . We recommend combining with IV Myers’ Cocktail for the added benefit of zinc given the positive research on the micronutrient with past coronaviruses.”

[available at https://loudounholistichealthpartners.com/wp-content/uploads/2020/04/COVID-19-Statement-04_06_2020.pdf.]

- In your “#CrushCorona – COVID-19 Update” dated April 13, 2020, you market a “**Buhner Coronavirus Protocol – want all your herbal COVID-19 immune support in one place?** (Micronutrient support is still recommended with Vitamin C, Zinc, Vitamin D, etc.) The Buhner Protocol combines herbal extracts known to interfere with the various ways coronaviruses attacks our cells.* These potent tinctures may be effective for COVID-19 risk reduction and treatment.* Please read Stephen Buhner’s detailed explanation [link to <https://www.stephenharrodbuhner.com/wp-content/uploads/2020/03/coronavirus.txt.pdf>] of how his protocol works.* This may be especially helpful for teens/children who cannot swallow/tolerate pills. Also, as supplies of the other supplements we are recommending dwindle, the Buhner tinctures will become essential.* As these are alcohol-based tinctures, their shelf-life is exceptionally long. The kits may be kept and used for future coronavirus outbreaks.* After tremendous demand from our members, we continue to stock a small number of the kits.”

[available at https://loudounholistichealthpartners.com/wp-content/uploads/2020/04/COVID-19-Statement-04_13_2020.pdf.]

- On a rotating banner on your website homepage, you claim, “LHHP Is Your Source for IV Vitamin C! High-dose IV Vitamin C therapy is a proven treatment for many infections and medical conditions. There is evidence that it can reduce the severity of COVID-19 illness. Click to Learn More.” Consumers who click on the “Click to Learn More” button are taken to <https://loudounholistichealthpartners.com/iv-infusion-services-at-lhhp/>,

where you state, “In our effort to support the #CrushCorona fight, LHHP is now offering IV Vitamin C to non-members.”

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.

You are also advised to review all other claims for your products and services 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