

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS

DIVISION

STATE OF ARKANSAS, *ex rel.*
LESLIE RUTLEDGE, ATTORNEY GENERAL

PLAINTIFF

v. CASE NO. _____

MORNINGSIDE CHURCH
PRODUCTIONS, INC. D/B/A
THE JIM BAKKER SHOW,
JIM BAKKER, AND
SHERRILL SELLMAN

DEFENDANTS

COMPLAINT

The State of Arkansas, *ex rel.* Leslie Rutledge, Attorney General (“the State”), for its Complaint against Morningside Church Productions, Inc. D/B/A The Jim Bakker Show, Jim Bakker, and Sherrill Sellman (“Defendants”), states:

I. INTRODUCTION

1. This is a consumer protection action brought to redress and restrain violations of the Arkansas Deceptive Trade Practices Act, Ark. Code Ann. § 4-88-101 through 115 (“ADTPA”).

2. The 2019 novel coronavirus (“COVID-19”) poses serious consequences to the public health, and Arkansas consumers are concerned as to how they can best protect themselves and their families. Defendants exploited Arkansans’ fears and

falsely told consumers that Defendants' colloidal silver products could cure, eliminate, kill, or deactivate COVID-19 when there is, in fact, no vaccine, pill, potion, or other product available to treat or cure the virus. Arkansas consumers purchased Defendants' colloidal silver products based on Defendants' false, misleading, and deceptive statements. Arkansas consumers may have been financially or physically harmed by Defendants' actions.

3. The State seeks restitution for affected consumers, an order imposing civil penalties, costs, and other injunctive relief against Defendants.

II. PARTIES

4. Plaintiff is the State of Arkansas, *ex rel.* Leslie Rutledge, Attorney General. Attorney General Rutledge is the chief legal officer of the State. Pursuant to Ark. Code Ann. § 4-88-104, 4-88-113, and 4-89-106, the State may seek civil enforcement of the ADTPA.

5. Defendant Morningside Church Productions, Inc. ("Morningside") is a for-profit Missouri corporation that is not registered with the Arkansas Secretary of State to do business in Arkansas. Morningside does business as "The Jim Bakker Show." Its principal place of business is 180 Grace Chapel Road, Blue Eye, Missouri 65611. Morningside's agent for service is Spenserv-Springfield, Inc., 2144 E. Republic Road, Suite B-300, Springfield, Missouri 65804.

6. Defendant Jim Bakker ("Baker") is an employee of Morningside and a resident of Missouri. He is the host of *The Jim Bakker Show*.

7. Defendant Sherrill Sellman (“Sellman”) is a resident of Oklahoma. Upon information and belief, she may have multiple residences. Defendant Sellman claims to be a naturopathic doctor with a degree from the Trinity College of Natural Health in Warsaw, Indiana and a psychotherapist. She conducts business online at www.drsherrillsellman.com, archive.aweber.com/whatwomenmust, and www.whatwomenmustknow.podbean.com. She also manages Facebook profiles located at www.facebook.com/drsherrillsellman and www.facebook.com/whatwomenmustknow. Defendant Sellman is a frequent guest speaker on *The Jim Bakker Show*.

III. JURISDICTION

8. This Court has jurisdiction over this matter pursuant to Ark. Code Ann. § 4-88-104 and the common law of the State of Arkansas.

9. This Court has jurisdiction over Defendants pursuant to Ark. Code Ann. § 16-4-101. At all times relevant to this lawsuit, Defendants systematically and continuously conducted business in the State of Arkansas and availed themselves of the privilege of conducting business activities within the State of Arkansas.

10. Venue is proper pursuant to Ark. Code Ann. §§ 4-88-104, 4-88-112, and the common law of the State of Arkansas.

IV. FACTUAL ALLEGATIONS

11. Defendant Morningside produces *The Jim Bakker Show*, which is a talk show hosted by Defendant Bakker and his wife.¹ The show is broadcast to Arkansas

¹ *The Jim Baker Show* (homepage). n.d. <https://jimbakershow.com/>. Accessed June 11, 2020.

consumers via satellite television and Morningside's 24-hour online streaming service.

12. On *The Jim Bakker Show*, Defendant Bakker promoted sales of colloidal silver products, referred to on the program as "Silver Solution," "Silver Sol," and "Optivida Silver Solution," for the prevention and treatment of COVID-19, among other illnesses.

13. Colloidal silver consists of tiny silver particles in a liquid.²

14. On February 12, 2020, on an episode³ of *The Jim Bakker Show* entitled "A Close Look at What's Not Being Said About the Coronavirus (Day 1)," the following conversation occurred between Defendants Bakker and Sellman, while an advertisement and toll free number to purchase the colloidal silver product was displayed on the screen:

Bakker: ...This is amazing...[Turning to Sellman] Would you recommend, as a doctor, people to have silver in their house for a pandemic?

Sellman: You never want to be without silver. Never. So many reasons. This is a staple. Staple. This is a staple for your family. And we can talk more about it...All I can say is that it has been proven by the government that it has the ability to kill every pathogen it has ever been tested on, including SARS and HIV – which you may or may not want to get into – as a part of this concern with this virus. And it can kill any of these known viruses like SARS. It has been tested on SARS. It has been tested

² National Center for Complementary and Integrative Health. *Colloidal Silver*. n.d. <https://nccih.nih.gov/health/collodialsilver>. Accessed June 11, 2020.

³ *The Jim Bakker Show. A Close Look at What's Not Being Said About the Coronavirus (Day 1)*. Show #3861, Aired on February 12, 2020. <https://jimbakkershow.com/watch/?guid=3861>. No longer accessible.

on the bird flu, the H5N1. And it is 99% kill within 12 hours of exposure to the silver. I mean, you get kill earlier but 99% kill within 12 hours. So we know that it has been able to deactivate this – these viruses successfully.

15. While Defendant Sellman was speaking, a scrolling list⁴ of health conditions with the heading “Silver Uses” was shown to consumers:



16. Defendant Sellman continued, “So what you want to know: it’s used for any age group. You can give it to babies. It has been tested. There are no side effects from it. And you can’t overdose on it. The body will use it efficiently and whatever it doesn’t need, it’s gone.”⁵

17. Defendant Bakker continued with the following discussion⁶ with Defendant Sellman:

Bakker: This influenza [sic] that is now circling the globe, you’re saying that silver solution would be effective.

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

Sellman: Well, let's say it hasn't been tested on this strain of the coronavirus, but it has been tested on other strains of the coronavirus and has been able to eliminate it within 12 hours.

Bakker: Yeah.

Sellman: Totally eliminate it, kills it. Deactivates it.

Bakker: Yeah.

Sellman: And it boosts your immune system so then you can support the recovery, 'cause when you kill the virus then the immune system comes into action to clear it out, so you want a vibrant immune system as well as an ability to deactivate these viruses....Silver Sol has been proven by the government that it has the ability to kill every pathogen it has ever been tested on including SARS and HIV.

18. Defendant Bakker then offered "Silver Solution" products for viewers should they offer donations to *The Jim Bakker Show* at levels of \$80.00 or \$125.00.⁷

19. Approximately 385 Arkansas consumers spent \$60,524.00 on Defendants' colloidal silver products between January 1 and March 9, 2020.⁸

20. Throughout Defendant Bakker's on-air conversation with Defendant Sellman, he referred to her as "Doctor." There is no evidence that Defendant Sellman is a medical doctor with training or experience in infectious diseases. Consumers viewing this interaction are likely to mistake Defendant Sellman for a medical doctor.

⁷ *Id.*

⁸ See the list of purchases made by Arkansas consumers, organized by the "Partner ID" assigned to the consumers by Morningside, order date, and transaction amount, which is attached as Exhibit A.

21. While the State of Arkansas does not recognize or license naturopathic doctors, over 20 states offer licenses to them according to the Association of Accredited Naturopathic Medical Colleges (“AANMC”).

22. JoAnn Yanez, the executive director of the AANMC, in an interview with *Newsweek*, stated that Defendant Sellman “has not met the educational standards that [AANMC] requires.” She clarified to *Newsweek* that Defendant Sellman “is neither a graduate of an accredited naturopathic medical program, nor has [she] obtained a doctoral level degree from a program recognized by the U.S. Department of Education.” She went on to state that Trinity School of Natural Health, the school from which Defendant Spellman graduated, “is not accredited and confers ‘degrees’ not recognized by any governmental institution. ‘Graduates’ of these programs are not considered licenseable [sic] medical practitioners.”⁹

23. On August 17, 1999, the U.S. Food and Drug Administration (“FDA”) issued the following final ruling concerning colloidal silver:

“...over-the-counter (OTC) drug products containing colloidal silver or silver salts for internal or external use are not generally recognized as safe and effective and are misbranded. FDA is issuing this final rule because many OTC drug products containing [silver] are being marketed for numerous serious disease conditions and the FDA is not aware of any substantial scientific evidence that supports the use of OTC [silver] for these disease conditions.”¹⁰

⁹ Moyler H. Televangelist sells \$125 ‘Silver Solution’ as Cure for Coronavirus. *Newsweek*. February 12, 2020. <https://newsweek.com/televangelist-show-guest-promotes-silver-solution-cure-coronavirus-1487069>. Accessed June 11, 2020.

¹⁰ *Over-the-Counter Drug Products Containing Colloidal Silver Ingredients or Silver Salts*, Fed. Reg. 64, 158 (August 17, 1999) (codified at 21 C.F.R. pt. 310).

24. According to the National Center for Complementary and Integrative Health (“NCCIH”), colloidal silver is both ineffective for any known health condition and dangerous to consumers. It can cause argyria, a usually permanent, bluish-gray discoloration of the skin, eyes, internal organs, nails, and gums. It can also cause decreased absorption of some drugs, including antibiotics and medications for thyroid conditions.¹¹

25. NCCIH guidance clearly states that “there are no legally marketed prescription or over-the-counter drugs containing colloidal silver that are taken by mouth” and that “scientific evidence doesn’t support the use of colloidal silver dietary supplements for any disease or condition.”¹²

26. A Mayo Clinic questions and answers post notes that “excessive doses of colloidal silver can cause possibly irreversible serious health problems, including kidney damage and neurological problems such as seizures.”¹³

27. On March 6, 2020, the FDA and the U.S. Federal Trade Commission (“FTC”) issued a warning letter to Defendant Bakker for selling unapproved coronavirus drugs. The warning letter advises that “there are currently no vaccines,

¹¹ National Center for Complementary and Integrative Health. *Colloidal Silver*. n.d. <https://nccih.nih.gov/health/collodialsilver>. Accessed June 11, 2020.

¹² *Id.*

¹³ Mayo Clinic. Healthy Lifestyle. “My dad takes colloidal silver for his health, but is it safe?” <https://www.mayoclinic.org/healthy-lifestyle/consumer-health/expert-answers/colloidal-silver/faq-20058061>. Accessed June 11, 2020.

potions, lotions, lozenges or other prescription or over-the-counter products available to treat or cure coronavirus disease 2019 (Covid-19).”¹⁴

28. On June 1, 2020, the FDA and FTC issued a warning letter to Defendant Sellman for selling silver products intended to mitigate, prevent, treat, diagnose, or cure COVID-19 in people.¹⁵

V. VIOLATIONS OF LAW

29. The ADTPA sets forth the State’s statutory program prohibiting deceptive and unconscionable trade practices.¹⁶

30. The business practices of Defendants constitute the sale of “goods” or “services.”¹⁷

31. The same business practices constitute business, commerce, or trade.¹⁸

32. It is unlawful to “knowingly make a false representation as to the characteristics, ingredients, uses, benefits, alterations, source, approval, or certification of goods or services.”¹⁹

¹⁴ See a copy of the warning letter issued to Jim Bakker by the FDA and FTC on March 6, 2020, which is attached as Exhibit B.

¹⁵ See a copy of the warning letter issued to Sherrill Sellman by the FDA and FTC on June 1, 2020, which is attached as Exhibit C.

¹⁶ Ark. Code Ann. §§ 4-88-101, *et seq.*

¹⁷ Ark. Code Ann. § 4-88-102(4) and (7).

¹⁸ Ark. Code Ann. § 4-88-107.

¹⁹ Ark. Code Ann. § 4-88-107(a)(1).

33. Defendants have engaged in prohibited conduct by making false representations that colloidal silver is safe and effective to treat or cure health conditions, including COVID-19.

34. Defendants have engaged in prohibited conduct by making false representations about colloidal silver's side effects.

35. Defendants have engaged in prohibited conduct by making unsubstantiated claims about the effectiveness of colloidal silver.

36. Defendants have engaged in prohibited conduct by referring to Defendant Sellman as "Doctor" and failing to clarify to consumers the nature and limits of Defendant Sellman's expertise.

37. Defendants have engaged in the unconscionable, false, or deceptive acts or practices in business, commerce, or trade in violation of the ADTPA.²⁰

38. It is unconscionable, false, or deceptive to advertise and sell colloidal silver marketed as a cure, treatment, prevention, or mitigation for COVID-19 or any other disease without approval from the FDA.

39. Defendants, in connection with the sale and advertisement of colloidal silver, engaged in the act, use, or employment of deception, fraud, or false pretenses in violation of the ADTPA.²¹

²⁰ Ark. Code Ann. § 4-88-107(a)(10).

²¹ Ark. Code Ann. § 4-88-108(1).

40. Defendants used deception, fraud, or false pretenses when referring to Defendant Sellman as “Doctor” and failing to clarify the nature and limits of her expertise.

41. Defendants used deception, fraud or false pretenses when implying that colloidal silver cured, treated, prevented, or mitigated COVID-19.

42. Defendants, in connection with the sale and advertisement of colloidal silver, utilized concealment, suppression, or omission of material facts with the intent that others rely upon the concealment, suppression, or omission, in violation of the ADTPA.²²

43. Defendants, with the intent that consumers rely upon them, concealed, suppressed, or omitted to tell consumers that Defendant Spellman lacked education and training to advise consumers regarding the treatment and prevention of infectious diseases such as COVID-19.

44. Defendants, with the intent that consumers rely upon them, concealed, suppressed, or omitted to tell consumers that there are currently no vaccines, potions, lotions, lozenges or other prescription or over-the-counter products available to treat or cure COVID-19.

VI. PRAYER FOR RELIEF

45. The Attorney General may bring a civil action to seek to prevent persons from engaging in the use or employment of prohibited practices under the ADTPA.²³

²² Ark. Code Ann. § 4-88-108(2).

²³ Ark. Code Ann. §§ 4-88-113(a).

46. Likewise, the Attorney General may bring a civil action to seek to restore to any purchaser who has suffered any ascertainable loss by reason of the use or employment of the prohibited practices any moneys or real or personal property which may have been acquired by means of any practices declared to be unlawful, together with other damages sustained.²⁴

47. The Attorney General may seek an injunction prohibiting any person from engaging in any deceptive or unlawful practice.²⁵

48. Any person who violates the provisions of the ADTPA may be assessed a civil penalty of up to \$10,000 per violation.²⁶

49. In addition, any person who violates the provisions of the ADTPA shall be liable to the Office of the Attorney General for all costs and fees, including but not limited to, expert witness fees and attorney's fees, incurred by the Office of the Attorney General in the prosecution of such actions.²⁷

50. A "person" is an individual, organization, group, association, partnership, corporation, or any combination thereof.²⁸

²⁴ Ark. Code Ann. § 4-88-113(a)(2)(A).

²⁵ Ark. Code Ann. §§ 4-88-104 and 4-88-113(a)(1).

²⁶ Ark. Code Ann. § 4-88-113(a)(3).

²⁷ Ark. Code Ann. § 4-88-113(e).

²⁸ Ark. Code Ann. § 4-88-102(5).

51. Defendants Morningside, Bakker, and Sellman are each a “person” who has engaged in an unconscionable, false, or deceptive act or practice in business, commerce, or trade.

52. Defendants are jointly and severally for any penalties assessed and any monetary judgments awarded.²⁹

53. The State will exercise its right to a trial by jury.

WHEREFORE, the above premises considered, the State of Arkansas, *ex rel.* Leslie Rutledge, Attorney General, respectfully requests that this Court:

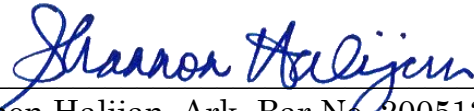
- a. Issue such orders, pursuant to Ark. Code Ann. §§ 4-88-104 and 4-88-113(a)(1), as may be necessary to prevent the use or employment by the Defendant of the practices described herein which are violations of the ADTPA;
- b. Issue a permanent injunction prohibiting Defendants from advertising or selling colloidal silver for the cure, treatment, prevention, or mitigation of COVID-19 or any other disease in Arkansas;
- c. Order the suspension or forfeiture of Defendants’ corporate charters, licenses, or permits or authorization to do business in this state;
- d. Issue an order, pursuant to Ark. Code Ann. § 4-88-113(a)(2)(A), requiring Defendants to pay restitution to those Arkansas consumers affected by the activities outlined herein;

²⁹ Ark. Code Ann. § 4-88-113(d)(1).

- e. Impose civil penalties pursuant to Ark. Code Ann. § 4-88-113(b), to be paid to the State by the Defendants in the amount of \$10,000.00 per each violation of the ADTPA proved at a trial of this matter, the full amount of which will exceed the amount necessary to establish federal diversity jurisdiction;
- f. Issue an order, pursuant to Ark. Code Ann. § 4-88-113(e), requiring Defendants to pay the State's costs in this investigation and litigation, including, but not limited to, attorneys' fees and costs; and
- g. For all other just and proper relief to which the State may be entitled.

Respectfully submitted,

LESLIE RUTLEDGE
ATTORNEY GENERAL

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partner_id	Order_Date	Detail_LineNetAmount
3048071	1/1/2020	\$40.00
260588	1/2/2020	\$80.00
567479	1/2/2020	\$80.00
3767795	1/2/2020	\$40.00
2556009	1/3/2020	\$40.00
3627395	1/3/2020	\$120.00
714774	1/4/2020	\$80.00
2429348	1/4/2020	\$80.00
1655828	1/5/2020	\$120.00
1559327	1/6/2020	\$80.00
2179778	1/6/2020	\$100.00
2571578	1/6/2020	\$55.00
3892882	1/6/2020	\$80.00
1286889	1/7/2020	\$80.00
13059	1/8/2020	\$80.00
1756899	1/9/2020	\$7.00
1598804	1/10/2020	\$80.00
3208311	1/10/2020	\$80.00
3331592	1/10/2020	\$80.00
526038	1/11/2020	\$155.00
2171601	1/11/2020	\$80.00
2492023	1/12/2020	\$21.00
3726148	1/12/2020	\$80.00
1426816	1/13/2020	\$40.00
3627395	1/13/2020	\$80.00
1625581	1/14/2020	\$100.00
208645	1/15/2020	\$200.00
1440858	1/15/2020	\$200.00
3331154	1/15/2020	\$80.00
923409	1/16/2020	\$40.00
2789063	1/16/2020	\$155.00
3401817	1/16/2020	\$120.00
1462712	1/20/2020	\$40.00
1869932	1/20/2020	\$55.00
2721462	1/20/2020	\$115.00
29814	1/21/2020	\$80.00
2459105	1/21/2020	\$585.00
3906856	1/23/2020	\$40.00
1517911	1/24/2020	\$310.00
1560275	1/25/2020	\$80.00
1798396	1/27/2020	\$65.00
2117133	1/27/2020	\$15.00
1756899	1/28/2020	\$79.00
2856235	1/28/2020	\$115.00

EXHIBIT A

3439239	1/28/2020	\$180.00
19713	1/29/2020	\$30.00
1756899	1/30/2020	\$18.00
2256386	1/30/2020	\$160.00
1085216	1/31/2020	\$125.00
2542280	1/31/2020	\$115.00
2960003	1/31/2020	\$80.00
3913704	1/31/2020	\$105.00
446112	2/3/2020	\$95.00
1386341	2/3/2020	\$165.00
3449162	2/3/2020	\$55.00
208645	2/5/2020	\$40.00
943183	2/5/2020	\$40.00
3691730	2/6/2020	\$100.00
46992	2/7/2020	\$250.00
1292390	2/7/2020	\$80.00
1598101	2/7/2020	\$125.00
2701167	2/7/2020	\$125.00
3331592	2/7/2020	\$125.00
3331592	2/7/2020	\$80.00
1286889	2/8/2020	\$115.00
1396605	2/9/2020	\$200.00
1655828	2/9/2020	\$125.00
2746915	2/10/2020	\$80.00
19468	2/12/2020	\$155.00
31145	2/12/2020	\$235.00
57198	2/12/2020	\$250.00
1110675	2/12/2020	\$125.00
2084861	2/12/2020	\$100.00
2148245	2/12/2020	\$1,730.00
2205219	2/12/2020	\$115.00
2996569	2/12/2020	\$200.00
3301850	2/12/2020	\$125.00
3326964	2/12/2020	\$125.00
3354842	2/12/2020	\$425.00
3379211	2/12/2020	\$225.00
3470291	2/12/2020	\$55.00
3580735	2/12/2020	\$100.00
3627395	2/12/2020	\$515.00
3922614	2/12/2020	\$125.00
3923729	2/12/2020	\$125.00
342709	2/13/2020	\$125.00
677559	2/13/2020	\$200.00
993998	2/13/2020	\$100.00
1264316	2/13/2020	\$300.00

1284983	2/13/2020	\$125.00
1298173	2/13/2020	\$115.00
1664689	2/13/2020	\$300.00
1756402	2/13/2020	\$300.00
2256386	2/13/2020	\$125.00
2266559	2/13/2020	\$115.00
2463172	2/13/2020	\$425.00
2733970	2/13/2020	\$115.00
3214533	2/13/2020	\$125.00
3379211	2/13/2020	\$240.00
3379211	2/13/2020	\$200.00
3420429	2/13/2020	\$125.00
3421070	2/13/2020	\$125.00
3470291	2/13/2020	\$300.00
3724564	2/13/2020	\$380.00
3740750	2/13/2020	\$715.00
3741691	2/13/2020	\$300.00
3888872	2/13/2020	\$125.00
3925062	2/13/2020	\$300.00
8810	2/14/2020	\$125.00
496299	2/14/2020	\$125.00
1153279	2/14/2020	\$80.00
1476134	2/14/2020	\$125.00
3228848	2/14/2020	\$425.00
3372133	2/14/2020	\$380.00
3656329	2/14/2020	\$125.00
3925567	2/14/2020	\$100.00
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3044740	2/15/2020	\$125.00
3196219	2/15/2020	\$300.00
3571080	2/15/2020	\$125.00
3762069	2/15/2020	\$125.00
918300	2/16/2020	\$125.00
2151710	2/16/2020	\$100.00
3048071	2/16/2020	\$15.00
3071321	2/16/2020	\$125.00
33400	2/17/2020	\$300.00
342709	2/17/2020	\$115.00
1427079	2/17/2020	\$380.00
1530005	2/17/2020	\$100.00
2433613	2/17/2020	\$115.00
2572931	2/17/2020	\$300.00
2960003	2/17/2020	\$125.00
3625837	2/17/2020	\$125.00
3647880	2/17/2020	\$125.00

3928025	2/17/2020	\$115.00
1025386	2/18/2020	\$100.00
1877760	2/18/2020	\$200.00
2179778	2/18/2020	\$300.00
2359669	2/18/2020	\$310.00
2815579	2/18/2020	\$205.00
3145166	2/18/2020	\$155.00
3145166	2/18/2020	\$155.00
3394657	2/18/2020	\$125.00
3726148	2/18/2020	\$455.00
3835204	2/18/2020	\$115.00
698175	2/19/2020	\$125.00
1085216	2/19/2020	\$250.00
2627198	2/19/2020	\$115.00
2841757	2/19/2020	\$125.00
3343852	2/19/2020	\$125.00
2320	2/20/2020	\$40.00
31145	2/20/2020	\$80.00
397315	2/20/2020	\$125.00
1798396	2/20/2020	\$65.00
1817857	2/20/2020	\$100.00
1869932	2/20/2020	\$55.00
1596337	2/21/2020	\$125.00
1720937	2/21/2020	\$125.00
2029403	2/21/2020	\$115.00
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3706041	2/21/2020	\$100.00
3932910	2/21/2020	\$125.00
31145	2/22/2020	\$155.00
3049285	2/22/2020	\$155.00
3011780	2/23/2020	\$300.00
3119344	2/23/2020	\$300.00
28951	2/24/2020	\$155.00
33400	2/24/2020	\$100.00
307132	2/24/2020	\$100.00
515999	2/24/2020	\$300.00
677559	2/24/2020	\$500.00
1756899	2/24/2020	\$46.00
2130003	2/24/2020	\$100.00
2463867	2/24/2020	\$300.00
2789063	2/24/2020	\$300.00

3149432	2/24/2020	\$200.00
3208311	2/24/2020	\$300.00
3724564	2/24/2020	\$300.00
3761608	2/24/2020	\$300.00
3935087	2/24/2020	\$200.00
19467	2/25/2020	\$300.00
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3249851	2/25/2020	\$125.00
3578192	2/25/2020	\$125.00
872135	2/26/2020	\$100.00
1081165	2/26/2020	\$125.00
1284983	2/26/2020	\$300.00
1478866	2/26/2020	\$115.00
1678887	2/26/2020	\$125.00
1756899	2/26/2020	\$225.00
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2029403	2/26/2020	\$80.00
2179778	2/26/2020	\$200.00
2503571	2/26/2020	\$300.00
2698363	2/26/2020	\$125.00
2935518	2/26/2020	\$100.00
3406550	2/26/2020	\$125.00
3520244	2/26/2020	\$125.00
3523180	2/26/2020	\$100.00
3937935	2/26/2020	\$500.00
19538	2/27/2020	\$125.00
23968	2/27/2020	\$125.00
35003	2/27/2020	\$115.00
1334390	2/27/2020	\$36.00
1339134	2/27/2020	\$80.00
1596113	2/27/2020	\$500.00
1889351	2/27/2020	\$125.00
2309375	2/27/2020	\$125.00
2433613	2/27/2020	\$380.00
2972842	2/27/2020	\$125.00
3104486	2/27/2020	\$300.00
3372802	2/27/2020	\$80.00
3675154	2/27/2020	\$115.00
3724564	2/27/2020	\$125.00

3776473	2/27/2020	\$115.00
3939360	2/27/2020	\$400.00
3939782	2/27/2020	\$125.00
3940186	2/27/2020	\$125.00
3941473	2/27/2020	\$125.00
3941549	2/27/2020	\$65.00
281709	2/28/2020	\$500.00
615187	2/28/2020	\$125.00
812941	2/28/2020	\$500.00
1598804	2/28/2020	\$125.00
2796100	2/28/2020	\$180.00
3288933	2/28/2020	\$125.00
3451861	2/28/2020	\$125.00
3942703	2/28/2020	\$125.00
26691	2/29/2020	\$115.00
1298173	2/29/2020	\$80.00
1501584	2/29/2020	\$125.00
3943818	2/29/2020	\$500.00
3944824	2/29/2020	\$125.00
1655828	3/1/2020	\$25.00
2556009	3/1/2020	\$125.00
3791621	3/1/2020	\$125.00
33400	3/2/2020	\$200.00
890178	3/2/2020	\$800.00
1292390	3/2/2020	\$300.00
1387810	3/2/2020	\$425.00
1756899	3/2/2020	\$32.00
1830579	3/2/2020	\$200.00
1858174	3/2/2020	\$300.00
2084861	3/2/2020	\$205.00
2229284	3/2/2020	\$300.00
2550689	3/2/2020	\$125.00
2579126	3/2/2020	\$205.00
2600427	3/2/2020	\$500.00
2809713	3/2/2020	\$115.00
2956175	3/2/2020	\$500.00
3149432	3/2/2020	\$300.00
3269396	3/2/2020	\$100.00
3331592	3/2/2020	\$300.00
3696085	3/2/2020	\$500.00
3870003	3/2/2020	\$125.00
3925567	3/2/2020	\$300.00
3945490	3/2/2020	\$155.00
886986	3/3/2020	\$125.00
1286889	3/3/2020	\$80.00

1339134	3/3/2020	\$100.00
1422799	3/3/2020	\$300.00
2829067	3/3/2020	\$500.00
3228848	3/3/2020	\$500.00
3358769	3/3/2020	\$115.00
31145	3/4/2020	\$155.00
526038	3/4/2020	\$200.00
526194	3/4/2020	\$115.00
593632	3/4/2020	\$700.00
844860	3/4/2020	\$300.00
1567700	3/4/2020	\$125.00
2458446	3/4/2020	\$125.00
3248150	3/4/2020	\$125.00
3627395	3/4/2020	\$1,000.00
3791621	3/4/2020	\$100.00
3949740	3/4/2020	\$80.00
567479	3/5/2020	\$125.00
1427079	3/5/2020	\$200.00
1763168	3/5/2020	\$125.00
1995802	3/5/2020	\$1,000.00
2463172	3/5/2020	\$500.00
2572931	3/5/2020	\$80.00
2856235	3/5/2020	\$40.00
2867307	3/5/2020	\$300.00
2962454	3/5/2020	\$500.00
3449162	3/5/2020	\$55.00
3470291	3/5/2020	\$55.00
3476413	3/5/2020	\$125.00
3714235	3/5/2020	\$200.00
3724564	3/5/2020	\$150.00
3940202	3/5/2020	\$40.00
141382	3/6/2020	\$500.00
659755	3/6/2020	\$380.00
1244052	3/6/2020	\$315.00
1984434	3/6/2020	\$125.00
2179778	3/6/2020	\$500.00
2359669	3/6/2020	\$300.00
2701647	3/6/2020	\$280.00
2927994	3/6/2020	\$115.00
2974772	3/6/2020	\$200.00
3208311	3/6/2020	\$200.00
3724564	3/6/2020	\$125.00
369975	3/7/2020	\$125.00
952887	3/7/2020	\$125.00
1462712	3/7/2020	\$300.00

1598101	3/7/2020	\$250.00
1911858	3/7/2020	\$155.00
2772275	3/7/2020	\$125.00
3857034	3/7/2020	\$115.00
590513	3/9/2020	\$200.00
2035087	3/9/2020	\$600.00
3523404	3/9/2020	\$300.00

WARNING LETTER**The Jim Bakker Show****MARCS-CMS 604820 – MARCH 06, 2020****Product:**

Drugs

Recipient:

The Jim Bakker Show
180 Grace Chapel Rd.
Blue Eye, MO 65611
United States

✉ partner.services@jimbakkershow.com (mailto:partner.services@jimbakkershow.com)

✉ website@jimbakkershow.com (mailto:website@jimbakkershow.com)

Issuing Office:

Center for Food Safety and Applied Nutrition (CFSAN)
United States

🏢 Federal Trade Commission (Federal Trade Commission)

WARNING LETTER

Date: March 6, 2020

TO: partner.services@jimbakkershow.com, website@jimbakkershow.com – James Bakker, The Jim Bakker Show

180 Grace Chapel Rd.
Blue Eye, MO 65611

**EXHIBIT
B**

RE: Unapproved and Misbranded Products Related to Coronavirus Disease 2019 (COVID-19)

This is to advise you that the United States Food and Drug Administration (FDA) and the Federal Trade Commission (FTC) reviewed your website at the Internet address www.jimbakkershow.com on February 21, 2020 and February 13, 2020, respectively. We have also reviewed your social media page at <https://www.facebook.com/jimbakkershow/>, where you provide a link to your website www.store.jimbakkershow.com to purchase your products. The FDA has determined that your website offers products labeled to contain silver, such as “Silver Sol Liquid,” for sale in the United States and that these products are intended to mitigate, prevent, treat, diagnose, or cure COVID-19¹ in people. FDA has determined that these products are unapproved new drugs sold in violation of the Federal Food, Drug, and Cosmetic Act

(FD&C Act), 21 U.S.C. § 355(a). Furthermore, these products are misbranded drugs under section 502 of the FD&C Act, 21 U.S.C. § 352. The introduction or delivery for introduction of these products into interstate commerce is prohibited under section 301(a) and (d) of the FD&C Act, 21 U.S.C. § 331(a) and (d).

The Secretary of Health and Human Services, under section 319 of the Public Health Service Act, 42 U.S.C. § 247d, has determined that a public health emergency exists nationwide as a result of confirmed cases of COVID-19. Therefore, FDA is taking urgent measures to protect consumers from certain products that, without approval or authorization by FDA, claim to mitigate, prevent, treat, diagnose or cure COVID 19 in people. We request that you take prompt action to cease the sale of such unapproved and unauthorized products for mitigation, prevention, treatment, diagnosis, or cure of COVID-19.

Some examples of the claims on your website that establish the intended use of your products and misleadingly represent them as safe and/or effective for the treatment or prevention of COVID-19 include:

- “But this influenza [sic] that is now circling the globe, you’re saying that Silver Solution would be effective? Well let’s say it hasn’t been tested on this strain of the coronavirus, but it’s been tested on other strains of the coronavirus, and has been able to eliminate it within 12 hours, totally eliminate it, kills it, deactivates it” [from your video entitled “A Close Look At What’s Not Being Said About the Coronavirus (Day 1)” at [44:48], <https://jimbakkershow.com/watch/?guid=3861>]
- “Silver Solution has been proven ... to kill every pathogen it has ever been tested on ... and it can kill any of these known viruses ...”
- “So the virus, like the coronavirus that we’re talking about ... affects the lung tissue so what you can do ... put it straight ... in a nebulizer which then creates a steam and you breathe it in and it will go directly into your lungs where that virus is and any other infection”

“You should take immediate action to correct the violations cited in this letter. The violations cited in this letter are not meant to be an all-inclusive list. It is your responsibility to ensure that the products you sell are in compliance with the FD&C Act and FDA's implementing regulations. We advise you to review your websites, product labels, and other labeling and promotional materials to ensure that you are not representing your products for a COVID-19 related use for which they have not been approved by FDA, and that you do not make claims that misbrand the products in violation of the FD&C Act. **Within 48 hours, please send an email to COVID-19-Task-Force-CFSAN@fda.hhs.gov (COVID-19-Task-Force-CFSAN@fda.hhs.gov)** describing the specific steps you have taken to correct these violations. Include an explanation of each step being taken to prevent the recurrence of violations, as well as copies of related documentation. Failure to immediately correct the violations cited in this letter may result in legal action, including, without limitation, seizure and injunction.

FDA is advising consumers not to purchase or use certain products that have not been approved, cleared, or authorized by FDA and that are being misleadingly represented as safe and/or effective for the treatment or prevention of COVID-19. Your firm will be added to a published list on FDA's website of firms and websites that have received warning letters from FDA concerning the sale or distribution of COVID-19 related products in violation of the FD&C Act. This list can be found at www.fda.gov/consumers/health-fraud-scams/fraudulent-coronavirus-disease-covid-19-products (www.fda.gov/consumers/health-fraud-scams/fraudulent-coronavirus-disease-covid-19-products). Once you have taken corrective actions and such actions have been confirmed by the FDA, the published list will be updated to indicate that your firm has taken appropriate corrective action.

If you cannot complete corrective action within 48 hours, state the reason for the delay and the time within which you will complete the corrections. If you believe that your products are not in violation of the FD&C Act, include your reasoning and any supporting information for our consideration.

If you are not located in the United States, please note that products that appear to be misbranded or unapproved new drugs are subject to detention and refusal of admission if they are offered for importation into the United States. We may advise the appropriate regulatory officials in the country from which you operate that FDA considers your product(s) listed above to be unapproved and misbranded products that cannot be legally sold to consumers in the United States. Please direct any inquiries to FDA at COVID-19-Task-Force-CFSAN@fda.hhs.gov (COVID-19-Task-Force-CFSAN@fda.hhs.gov).

In addition, 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. To make or exaggerate such claims, whether directly or indirectly, through the use of a product name, website name, metatags, or other means, without rigorous scientific evidence sufficient to substantiate the claims, violates the FTC Act.

There currently are no vaccines, pills, potions, lotions, lozenges or other prescription or over-the-counter products available to treat or cure coronavirus disease 2019 (COVID-19). Thus, the claims cited above are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims. In addition, you are advised to review all claims for your products and immediately cease making claims that are not supported by competent and reliable scientific evidence. Violations of the FTC Act may result in legal action seeking a Federal District Court injunction and an order may require that you pay back money to consumers. Within 48 hours, please send an email to Richard Cleland, Assistant Director of the FTC's Division of Advertising Practices, 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 Mr. Cleland at 202-326-3088.

Sincerely,

/S/

William A. Correll
Director
Office of Compliance
Center for Food Safety
and Applied Nutrition

Sincerely,

/S/

Richard A. Quaresima
Acting Associate Director Division of Advertising Practices
Federal Trade Commission

1 COVID-19 is the official name for the disease that is causing the 2019 novel coronavirus outbreak, first identified in Wuhan, China.

[➡ More Warning Letters \(/inspections-compliance-enforcement-and-criminal-investigations/compliance-actions-and-activities/warning-letters\)](/inspections-compliance-enforcement-and-criminal-investigations/compliance-actions-and-activities/warning-letters)

WARNING LETTER**Dr. Sherrill Sellman****MARCS-CMS 607964 – JUNE 01, 2020****Product:**

Food & Beverages

Recipient:

Dr. Sherrill Sellman
10 Corporate Dr STE 300
Burlington, MA 01803
United States

✉ drs@drsherrillsellman.com (mailto:drs@drsherrillsellman.com)

Issuing Office:

Center for Food Safety and Applied Nutrition (CFSAN)
United States

🏢 Federal Trade Commission (Federal Trade Commission)

WARNING LETTER**EXHIBIT
C**

Date: June 1, 2020

RE: Unapproved and Misbranded Products Related to Coronavirus Disease 2019 (COVID-19)

This is to advise you that the United States Food and Drug Administration (FDA) and the Federal Trade Commission (FTC) reviewed your websites at the Internet addresses www.drsherrillsellman.com, archive.aweber.com/whatwomenmust, and www.whatwomenmustknow.podbean.com on May 22, 2020, and May 27, 2020, respectively. We also reviewed your social media webpages at www.facebook.com/drsherrillsellman and www.facebook.com/whatwomenmustknow, which link to your website www.drsherrillsellman.com, where your products can be purchased. The FDA has observed that your website www.drsherrillsellman.com offers HealthMax Nano-Silver Liquid,¹ Silver Biotics Silver Lozenges with Vitamin C, and Silver Biotics Silver Gel Ultimate Skin & Body Care (collectively, “your silver products”) for sale in the United States and that these products are intended to mitigate, prevent, treat, diagnose, or cure COVID-19² in people. Based on our review, these products are unapproved new drugs sold in violation of section 505(a) of the Federal Food, Drug, and Cosmetic Act (FD&C Act), 21 U.S.C. § 355(a). Furthermore, these products are misbranded drugs under section 502 of the FD&C Act, 21 U.S.C. § 352. The introduction or delivery for introduction of these products into interstate commerce is prohibited under sections 301(a) and (d) of the FD&C Act, 21 U.S.C. § 331(a) and (d).

There is currently a global outbreak of respiratory disease caused by a novel coronavirus that has been named “severe acute respiratory syndrome coronavirus 2” (SARS-CoV-2). The disease caused by the virus has been named “Coronavirus Disease 2019” (COVID-19). On January 31, 2020, the Department of Health and Human Services (HHS) issued a declaration of a public health emergency related to COVID-19 and mobilized the Operating Divisions of HHS.³ In addition, on March 13, 2020, the President declared a national emergency in response to COVID-19.⁴ Therefore, FDA is taking urgent measures to protect consumers from certain products that, without approval or authorization by FDA, claim to mitigate, prevent, treat, diagnose, or cure COVID-19 in people. As described below, you sell products that are intended to mitigate, prevent, treat, diagnose, or cure COVID-19 in people. We request that you take immediate action to cease the sale of such unapproved and unauthorized products for the mitigation, prevention, treatment, diagnosis, or cure of COVID-19.

Some examples of the claims on your website and social media that establish the intended use of your products and misleadingly represent them as safe and/or effective for the treatment or prevention of COVID-19 include:

□ “In light of all the 24/7 news stories about the COVID19 situation, I wanted to share the most effective strategies that I personally recommend and use to support and enhance my immune system.

... I recommend that you incorporate this protocol into your personal program. ...Patented Nano- Silver SilverSol Technology®.

o Health Max Nano-Silver Liquid ...Recommended: Maintenance dose 1 tsp am and pm Therapeutic dose – 1 TBSP 2-4 x daily” [https://archive.aweber.com/whatwomenmust/PAT6p/h/Hi_My_Personal_Protocol.htm]

□ “Most relevant is the need to provide an enhanced immune defense in our throats where viruses colonize before moving on to our lungs, digestive track [sic] and spleen. The powerful duo of SilverSol® nano-silver and Vitamin C, found in the new Silver Biotics® Silver Lozenges, is the latest breakthrough formula by American Biotech Labs LLC. This unique product has the proven ability to help provide added immune protection as part of the Silverbiotics Protocol.” [from https://archive.aweber.com/whatwomenmust/PAT6p/h/Hi_My_Personal_Protocol.htm].

□ “I’m talking about the patented SilverSol Nano-Silver-Technology® range of products as a liquid, gel or lozenges! ... It has also been tested on various kinds of viruses including SARS with great success in deactivating all forms safely [from https://archive.aweber.com/whatwomenmust/KcCoJ/h/Hi_The_Ultimate_For.htm].

In addition, statements from your March 26, 2020 podcast titled, “What Women Must Know – The Best Flu Prevention Strategies with Keith Moeller” establish that your silver products are intended for the prevention and treatment of COVID-19 and misleadingly represent the products as safe and effective for that purpose. The podcast is posted on your website www.whatwomenmustknow.podbean.com, accompanied by links directing consumers to www.drsherrillsellman.com to purchase your silver products. The podcast begins with Dr. Sellman telling the audience that the podcast will discuss “how to virus-proof your body” because of the “big concern ... in the world with this new coronavirus” [at 1:03]. The following claims and recommendations for your silver products are made in that context.

□ “[M]ost viruses, you’re able to give them to other people two to three days before you show any symptoms. And ... it’s true with the new one, this coronavirus...what a lot of people do is use this silver prophylactically, meaning as a preventative....” [at 44:45]

□ “For a therapeutic, ...if you feel you’re coming down with something and you really want to hit it hard, you can do...three or four swigs [of your liquid silver product] a day....”[48:26]

□ “[P]eople are wearing these masks now to protect them from that transmission...let’s talk about how you can

use the silver liquid and the silver gel for barriers of protection....” [at 49:46]

□ “[T]ake that [silver] gel and dab it around your nostrils...because you breathe in these viruses, it gets transmitted that way...it’s another way to ... be more protected....”[53:11]

□ “Here you have something [silver] that’s been proven on everything it’s been tested.... It’s been tested on viruses It has no side effects, it’s totally safe ... there’s no amount that ever has shown to be toxic” [at 55:53]

□ “[E]veryone needs to have the Silver Biotics liquid and the silver gel in their medicine cabinet at home.... What we’re talking about today is how to protect yourself from these viruses...particularly this latest one that people are really concerned about, it’s one of the most effective ways to protect yourself and to also use it therapeutically....” [56:24]

You should take immediate action to correct the violations cited in this letter. This letter is not meant to be an all-inclusive list of violations that exist in connection with your products or operations. It is your responsibility to ensure that the products you sell are in compliance with the FD&C Act and FDA’s implementing regulations. We advise you to review your websites, product labels, and other labeling and promotional materials to ensure that you are not misleadingly representing your products as safe and effective for a COVID-19-related use for which they have not been approved by FDA and that you do not make claims that misbrand the products in violation of the FD&C Act. Within 48 hours, please send an email to COVID-19- Task-Force-CFSAN@fda.hhs.gov describing the specific steps you have taken to correct these violations. Include an explanation of each step being taken to prevent the recurrence of violations, as well as copies of related documentation. Failure to immediately correct the violations cited in this letter may result in legal action, including, without limitation, seizure and injunction.

FDA is advising consumers not to purchase or use certain products that have not been approved, cleared, or authorized by FDA and that are being misleadingly represented as safe and/or effective for the treatment or prevention of COVID-19. Your firm will be added to a published list on FDA’s website of firms and websites that have received warning letters from FDA concerning the sale or distribution of COVID-19 related products in violation of the FD&C Act. This list can be found at <http://www.fda.gov/consumers/health-fraud-scams/fraudulent-coronavirus-disease-covid-19-products>. Once you have taken corrective actions to cease the sale of your unapproved and unauthorized products for the mitigation, prevention, treatment, diagnosis, or cure of COVID-19, and such actions have been confirmed by the FDA, the published list will be updated to indicate that your firm has taken appropriate corrective action.

If you cannot complete corrective action within 48 hours, state the reason for the delay and the time within which you will complete the corrections. If you believe that your products are not in violation of the FD&C Act, include your reasoning and any supporting information for our consideration.

If you are not located in the United States, please note that products that appear to be misbranded or unapproved new drugs are subject to detention and refusal of admission if they are offered for importation into the United States. We may advise the appropriate regulatory officials in the country from which you operate that FDA considers your product(s) referenced above to be unapproved and misbranded products that cannot be legally sold to consumers in the United States.

Please direct any inquiries to FDA at COVID-19-Task-Force-CFSAN@fda.hhs.gov.

In addition, 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 product identified above. Thus, any coronavirus-related prevention or treatment claims regarding such product are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims. Violations of the FTC Act may result in legal action seeking a Federal District Court injunction and an order may require that you pay back money to consumers. Within 48 hours, please send an email to Richard Cleland, Assistant Director of the FTC's Division of Advertising Practices, 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 Mr. Cleland at 202-326-3088⁵.

Sincerely,

/S/

William A. Correll

Director

Office of Compliance

Center for Food Safety

and Applied Nutrition

Food and Drug Administration

Sincerely,


/S/

Richard A. Quaresima

Acting Associated Director

Division of Advertising Practices

Federal Trade Commission

¹ "HealthMax Nano-Silver Liquid" is the name used for your liquid silver product on your websites. According to the photo of the liquid silver product on www.drsherrillsellman.com, (<http://www.drsherrillsellman.com/>)  (<http://www.fda.gov/about-fda/website-policies/website-disclaimer>) however, it is labeled with the name "ASAP HCP HealthMax 10 Silver Supplement."

² As explained in the next paragraph, there is currently an outbreak of a respiratory disease named "Coronavirus Disease 2019" (COVID-19).

³ Secretary of Health and Human Services Alex M. Azar II, Determination that a Public Health Emergency Exists. Jan. 31, 2020. (Accessible at <https://www.phe.gov/emergency/news/healthactions/phe/Pages/2019-nCoV.aspx> (<https://www.phe.gov/emergency/news/healthactions/phe/Pages/2019-nCoV.aspx>)). The declaration was renewed for another 90 days on April 21, 2020. Secretary of Health and Human Services Alex M. Azar II, Renewal of Determination that a Public Health Emergency Exists. April 21, 2020. (Accessible at <https://www.phe.gov/emergency/news/healthactions/phe/Pages/covid19-21apr2020.aspx>). (<https://www.phe.gov/emergency/news/healthactions/phe/Pages/covid19-21apr2020.aspx>))

⁴ President Donald J. Trump, Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19). Mar. 13, 2020. (Accessible at <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>) declaring-national-emergency-concerning- (<https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>)

actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/)novel-coronavirus-disease-covid-19-outbreak/ (<https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>)).

➦ More Warning Letters (/inspections-compliance-enforcement-and-criminal-investigations/compliance-actions-and-activities/warning-letters)