



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

June 26, 2020

WARNING LETTER

VIA EMAIL TO contact.us@wwbinc.net

Whole World Botanicals
P.O. Box 322074
New York, New York 10032

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://wholeworldbotanicals.com/> on June 22, 2020. We have also reviewed your social media postings on Facebook (<https://www.facebook.com/WholeWorldBotanicals/>), where you direct consumers to your website <https://wholeworldbotanicals.com/>, where they can purchase various supplements. We have determined that you are unlawfully advertising that certain products prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims on your website include:

- In marketing materials titled “4 Things You Can Do at Home to Ease Coronavirus and Pneumonia Symptoms,” you claim, “If your lungs are healthy and your immune system is strong, you may reduce your risk of worsening symptoms – or you may even be able to ward off the virus entirely. My recommendation to support immune and respiratory health? Anti-viral and lung-supporting natural approaches from South America. Everybody, especially people who are over 60 years of age and/or have ongoing health challenges or a compromised immune system, can greatly increase their chances of staying out of the hospital and making a quicker recovery by adding the right botanicals and medicinal foods to their dietary intake.” Further:
 - In a section titled “FOUR STEPS TO INCREASE YOUR CHANCES OF STAYING WELL DURING A PANDEMIC,” you state: Step One— Prevention... Start taking daily “maintenance” doses of Peruvian rainforest botanicals, like 1/4 – 1/2 tsp or 2 – 3 caps of **Camu** **Camu** [<https://wholeworldbotanicals.com/royal-camu/>] twice daily (anti-viral and

high in natural Vitamin C) and 1/2 to 1 tsp of **Cat's Claw** [<https://wholeworldbotanicals.com/royal-cats-claw/>] or 1/2 to 1 cup of **Cat's Claw Tea** daily (immune system strengthener”);

- In a section titled “Step Two—If Infection Symptoms Appear,” you state that “[i]f you develop even a single symptom of an upper respiratory infection, or if you develop stomach distress or diarrhea, switch from a daily maintenance dose of immune-strengthening botanicals to a “high maintenance” dose, which means taking double the amount of a normal maintenance dose of the botanicals, every few hours. You must self-treat several times a day in order to get the full benefit. If you have any congestion in the chest and/or shortness of breath/difficulty breathing, begin to take 1/2 to 1 tsp or 3 – 4 caps of *Desmodium adscendens* or one cup of **Desmodium** [<https://wholeworldbotanicals.com/royal-desmodium/>] tea using 2 tsp of loose tea per cup several times daily”; and
- You present several purported consumer testimonials:
 - “A customer recently wrote to us about her sister-in-law who contracted the coronavirus and how *Desmodium adscendens* greatly improved her breathing and helped ease her coughing: *My sister-in-law, Maria, had the coronavirus for 3 weeks. At age 63, she was high risk and she has several serious medical conditions. She had previously used Royal Desmodium™* [<https://wholeworldbotanicals.com/royal-desmodium/>], *with great success, to help with her allergies and recurrent pneumonia. When she contracted the coronavirus, she started using the Desmodium to help with her breathing, coughing and further development of more serious lung issues caused by the virus. I truly believe this product was instrumental in saving her life. I am so grateful to Whole World Botanicals for bringing this potent product to the U.S., especially in this time of crisis. I have purchased more for my other family members to have on hand, so they also can be prepared. Maria has said, ‘These drops really do work!’”*
 - “Another customer told us about her nephew and his wife – both frontliners in a New York City hospital – who also became infected with COVID-19. They both began taking **Camu Camu**, **Cat's Claw**, and **Desmodium** and within three days, they were feeling much better. *My nephew, an Operating Room Assistant, and his wife, Myra, an NYC Critical Care RN, were both diagnosed with COVID-19.... At one point my nephew's breathing started to deteriorate, and his X-rays came back with signs of pneumonia. He was prescribed antibiotics but was warned antibiotics would not treat the COVID-19. Having had my own great experiences with Whole World Botanicals products, I suggested they start taking Royal Camu®* [<https://wholeworldbotanicals.com/royal-camu/>], *Royal Cat's Claw™* [<https://wholeworldbotanicals.com/royal-cats-claw/>] and *Royal Desmodium™* [<https://wholeworldbotanicals.com/royal-desmodium/>] *immediately, which they did. They also took the Peruvian*

anti-viral tonic as well as Tylenol for their headaches. Three days later their fevers were gone and their oxygen levels were almost back to normal!”

- In marketing materials titled “Staying Healthy in the Face of Coronavirus: Is Social Isolation the Complete Answer?”, you claim that, “[d]octors are in the process of testing existing antiviral medications and developing new ones for the treatment of the coronavirus, but the process takes time and such medications are very expensive – especially if you live in the United States and don’t have health insurance.... Botanicals with antiviral properties, on the other hand, are inexpensive, don’t require a prescription, and are meant to be taken as part of your daily health regimen. You don’t have to wait until you get sick in order to benefit from taking them. In fact, they are most beneficial when taken on a regular basis when you are well or on an urgent schedule when you first become aware that you may be coming down with something.”

You then claim:

- “Dietary supplements made from the Camu Camu* [<https://wholeworldbotanicals.com/royal-camu/>] fruit (*Myrciaria dubia*) and the bark of the Cat’s Claw [<https://wholeworldbotanicals.com/royal-cats-claw/>] *vine (*Uncaria tomentosa*) are widely used in naturopathic (natural medicine) circles for their antiviral and immune system-supporting properties”;
- “Desmodium* [<https://wholeworldbotanicals.com/royal-desmodium/>] (*Desmodium adscendens*) is another wonderful botanical that, while not known for its antiviral properties, supports healthy lung function, relieves congestion, and promotes easy breathing – a major issue in both bacterial and viral pneumonia and a host of other upper and lower respiratory illnesses”;
- “**For daily use when exposed to people with viral and bacterial illnesses:**

Camu Camu [<https://wholeworldbotanicals.com/royal-camu/>]– ½ t- 1 tsp (3 – 5 caps) twice daily away from food

Cat’s Claw [<https://wholeworldbotanicals.com/royal-cats-claw/>] liquid extract, 1:1 strength: ½ tsp three times daily away from food

Desmodium a.[<https://wholeworldbotanicals.com/royal-desmodium/>] liquid extract, 1:1 strength: 4 – 5 squirts (80 – 100) drops as needed away from food”;
- “**For immediate and urgent use if you think you might be getting sick:**

Camu Camu [<https://wholeworldbotanicals.com/royal-camu/>] – 1 tsp (5 caps) every 1 or 2 hours away from food

Cat’s Claw [<https://wholeworldbotanicals.com/royal-cats-claw/>] liquid extract,

1:1 strength – ½ tsp 5 – 6 times daily away from food

Desmodium a. [<https://wholeworldbotanicals.com/royal-desmodium/>] liquid extract, 1:1 strength: 4 – 5 squirts (80 – 100) drops as needed away from food”; and

- “Making **Cat’s Claw** and **Camu Camu** a part of your daily health regimen is an excellent way to strengthen your immune system and stay well, along with avoiding crowds when you are surrounded by people who may be sick.”
- In marketing materials titled “Vitamin C: A New Weapon Hospitals are Using to Combat Coronavirus,” you claim that “the same Vitamin C that we are urged to take in order to ward off colds and flu – as well as a host of other ills – is being used to help treat COVID-19.... a pulmonologist and critical-care specialist who works at two of Long Island’s Northwell Health hospitals, told the New York Post that he has been giving his intensive-care patients who have been infected with the coronavirus 1500mg of intravenous Vitamin C several times a day,” and that “Camu-Camu [<https://wholeworldbotanicals.com/royal-camu/>] (*Myrciaria dubia*) is the single most potent form of natural Vitamin C in the world. Its large grape-sized fruit contains more than 50 times the amount of Vitamin C in an orange and . . . studies suggest that it produces superior therapeutic effects* as compared to synthetically produced ascorbic acid, it can provide a practical, affordable alternative to expensive, hard to find, intravenous Vitamin C treatments.... Your safest bet of getting through the COVID-19 pandemic unscathed is to do the following: . . . (3) if you have no symptoms, take high maintenance doses of some form of Vitamin C. . . . (5) If you do have this virus, or any other virus for that matter, you can also increase the dosage of the form of Vitamin C you choose and take it multiple times a day.”

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 claims regarding such products 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 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