



UNITED STATES OF AMERICA  
**Federal Trade Commission**  
WASHINGTON, D.C. 20580

Office of the Secretary

After carefully considering your comment, along with others received in this matter, the Commission has determined that the public interest is best served by issuing the Decision and Order in final form without modification. A copy of the final Decision and Order, and other relevant materials, are available from the Commission's website at [www.ftc.gov](http://www.ftc.gov)

Thank you again for your comment. The Commission is aided in its analysis by hearing from a variety of sources, and we appreciate your interest in this matter.

By direction of the Commission.

April J. Tabor  
Acting Secretary



heart failure, myocardial infarction, multiple sclerosis, diabetes, fibromyalgia, or neurodegenerative disorders; and (2) consumers should talk to their doctor or healthcare provider before stopping any treatment they have ~~scrie~~ prescribed.

The Commission considers a number of factors in determining appropriate relief in each case, including the scope of harm, the benefits to consumers of obtaining a quick resolution to stop the deceptive conduct, and the best use of the Commission's scarce resources. In this matter, we carefully considered the facts of this case (including ~~public~~ public facts), and determined that the conduct relief obtained by the order appropriately remedies the alleged violations of the FTC Act. In addition, the o



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February 13, 2019

Ms. Amy Crittenden  
State of Ohio

Re: In the Matter of A & O Enterprises Inc., a corporation, doing business as iV Bars Incorporated and iV Bars, and Aaron K. Roberts, also known as Aaron Keith, individually and as owner and operating manager of A & O Enterprises Inc. File No. 172 3016; Docket No. C-4670

Dear Ms. Crittenden:

Thank you for your comment of October 2, 2018, regarding the proposed consent

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February 13, 2019

Ms. Elizabeth de Laperouse  
State of Missouri

Re: In the Matter of A & O Enterprises Inc., a corporation, doing business as iV Bars Incorporated and iV Bars, and Aaron K. Roberts, also known as Aaron Keith, individually and as owner and operating manager of A & O Enterprises Inc. File No. 172 3016; Docket No. C-4670

Dear Ms. de Laperouse:

Thank you for your comment of September 24, 2018, regarding the proposed consent agreement accepted by the Federal Trade Commission for public comment in the above-captioned matter. The Commission has placed your comment on the public record pursuant to Commission Rule 4.9(b), 16 C.F.R. § 4.9(b), and has given it serious consideration in connection with its decision to grant final approval to the proposed Decision and Order.

Your comment is generally supportive of the proposed consent agreement and states, “Any facility claiming to help disease should be held at a basic level of proof that the therapy works.” In the instant case, the Commission’s proposed complaint alleges that respondents’ disease claims were false, misleading, or unsubstantiated, and violated Section 5(a) of the FTC Act, 15 U.S.C. § 45(a). The proposed Decision and Order prohibits express or implied health benefit, efficacy, safety, or side effects claims for proposed respondents’ intravenous therapies, unless the representation is non-misleading. In addition, the proposed Decision and Order requires that at the time the representation is made, proposed respondents must possess and rely upon competent and reliable scientific evidence that is sufficient in quality and quantity to support the claim, based on standards generally accepted by experts in the area. The proposed Order further provides that such substantiation must include a randomized, double-blind, and placebo-controlled human clinical trial, when experts generally require such human clinical testing to substantiate the representation.

The Commission has determined that the conduct relief obtained by the proposed Decision and Order will serve to remedy these alleged violations and deter future violations. Proposed respondents will be subject to the Commission’s final Order for 20 years and be liable for civil penalties of up to \$41,484 per violation should they violate that Order, pursuant to Section 5(l) of the FTC Act, 15 U.S.C. § 45(l). This action also sends a clear message to the burgeoning iV therapy industry and sellers of all iV therapy products, that health claims must be supported by competent and reliable scientific evidence.

After carefully considering your comment, along with others received in this matter, the Commission has determined that the public interest is best served by issuing the Decision and Order in final form without modification. A copy of the final Decision and Order, and other relevant materials, are available from the Commission's website at [www.ftc.gov](http://www.ftc.gov)

Thank you again for your comment. The Commission is aided in its analysis by hearing from a variety of sources, and we appreciate your interest in this matter.

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April J. Tabor  
Acting Secretary





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February 13, 2019

Ms. Carol Mathews  
State of California

Re:



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Office of the Secretary

February 13, 2019

Mr. Max Parker  
State of California

Re: In the Matter of A & O Enterprises Inc., a corporation, doing business as iV Bars

The Commission has determined that the conduct relief obtained by the proposed Decision and Order will serve to remedy the alleged violations of the FTC Act by proposed respondents and deter future violations. It is important to note that proposed respondents will be subject to the Commission's final Order for 20 years and be liable for civil penalties of up to \$41,484 per violation should they violate that Order, pursuant to Section 5(l) of the FTC Act, 15 U.S.C. § 45(l).

After carefully considering your comment, along with others received in this matter, the Commission has determined that the public interest is best served by the Decision and Order in final form without modification. A copy of the final Decision and Order, and other relevant materials, are available from the Commission's website at [www.ftc.gov](http://www.ftc.gov)

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