

⁹ *P. . .*, 81 F.T.C. 23, 62–64 (1972).

¹⁰ *Complaint, v. . .*, No. 2:14-cv-00015-NVW (D. Ariz. Jan. 7, 2014) (stipulated judgment) (challenging weight-loss claims for purported homeopathic products); *Complaint, v. . .*, No. 10-CV-587 (W.D.N.Y. July 14, 2010) (stipulated judgment) (challenging claims that purported allergy-relieving product was homeopathic and effective); *Complaint, v. . .*, No. C-3926, 2000 FTC LEXIS 24 (Feb. 10, 2000) (consent order) (challenging cold treatment and pemaathic and

³ Federal Trade Commission Act, 15 U.S.C. 45(a)(2).

⁴ Federal Trade Commission Act, 15 U.S.C. 52.

⁵ *Advertising Substantiation Policy Statement*, appended to *104 F.T.C. 648, 839 (1984)*, 791 F.2d 189 (D.C. Cir. 1986) (“Advertising Substantiation Policy Statement”).

⁶ FTC Staff Report on the Homeopathic Medicine & Advertising Workshop (Nov. 2016).

⁷ See CPG Sec. 400.400 Conditions Under Which Homeopathic Drugs May be Marketed (revised Mar. 1995), *:// . . . / . . . /*

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⁸ “[A] product that contemporary technology does not understand must establish that this ‘magic’ actually works. Proof is what separates an effect new to science from a swindle . . . [I]f a condition responds to treatment, then selling a placebo as if it had therapeutic effect directly injures the consumer.” *v. . .*, 512 F.3d 858, 862–63 (7th Cir. 2008).

¹ A self-limiting disease condition is one that resolves spontaneously with or without specific treatment.

² This Policy Statement does not apply to the practice of medicine.

