



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20548

Division of Advertising Practices

July 27, 2017

Merin Zwerling  
Deputy Director  
National Advertising Division  
112 Madison Avenue, 3rd Fl.  
New York, NY 10017

Re: Advertising for Aqua Health LLC, Inc. & PhyOriginal Group, Inc.

Dear Mr. Zwerling:

A few months ago, the National Advertising Division conducted an NAD compliance investigation of Aqua Health LLC, Inc. and PhyOriginal Group, Inc. The products in question provide various health benefits, including reducing cholesterol. Your letter indicated that Aqua Health LLC, Inc. and PhyOriginal Group, Inc. participated in NAD's solicited review process. This matter is being referred to the FTC for our review.

After we contacted Aqua Health LLC, Inc. regarding the NAD referral, the company agreed to cooperate with the NAD's inquiry. We understand from the NAD attorney handling this matter that Aqua Health LLC, Inc. and PhyOriginal Group, Inc. are currently cooperating with the NAD's inquiry.

Accordingly, it appears no additional FTC action is warranted at this time. Our decision is not to be construed as a determination that a violation has not occurred. The Commission reserves the right to take such further action as the public interest may require. This decision supports the NAD's solicited review process and provides an opportunity to continue to assist in supporting NAD.

Very truly yours,

Devin W. Domond  
Chief of Staff for Advertising Practices