United States of America FEDERAL TRADE COMMISSION Washington, D.C. 20580

Serena Viswanathan Acting Associate Director Division of Advertising Practices David Boudreault November 16, 2020 Page 2

> living our best life and staying as healthy as possible is a peptide injection. Hate needles? Hear us out anyway. In less than five minutes, a peptide injection has the ability to boost your immunity all while helping you to feel stronger, better and ready to take on anything.... With an emphasis on active, immune boosting ingredient

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body to renter our new Covid19 world. #covid19 #coronavirus... #covid #coronatime."

In the accompanying video, Dr. David Boudreault states: "Yesterday we brought up immune-modulating treatments and the most exciting of those is thymosin alpha-1... Most of us have probably heard that the young person is probably resistant to serious infection with coronavirus. One theory would be that we have less of this thymosin alpha-1 to help our body fight this immune response or help fight this virus... By bringing thymosin alpha-1 into the body we are actually upregulating a lot of the signaling pathways, a lot of these cells that fight these infections... it's actually very specific to viral infections. Thymosin alpha-1 has been shown to decrease the viral replication rate... if you can decrease the amount of virus that replicates in the body, there is less virus around, it's less infectious, it's less contagious... Thymosin alpha-1 stimulates white blood cells... stimulates the dendritic cells.... and has a direct effect on viral replication.... [T]he mechanisms of actions that we discussed are really important in helping us fight and improve our immune function to help fight the coronavirus and other viral illnesses..."

 In a post on April 7, 2020, you state: "Not your average Covid19 update[.] Wellness, new website and immune boosting therapies coming your way! #thymosinalpha1 #ozonetherapy #highdosevitaminc #fastvitaminiv #glutathione #covid19 #coronavirus..."

In the accompanying video, Dr. David Boudreault states: "...We have been able to hear from and learn from some of the world thought leaders in these fields and come up with several immune boosting strategies that we are so excited to share with our patients. One of those in particular is Vitamin C... What I personally didn't know before this was how effective high-dose Vitamin C, now this is a dose that you can't even achieve orally, it's given IV. IV high-dose Vitamin C is David Boudreault November 16, 2020 Page 4

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product or service can prevent, treat, or cure human disease unless you possess competent and