



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

Serena Viswanathan
Acting Associate Director
Division of Advertising Practices

November 5, 2020

WARNING LETTER

VIA EMAIL TO KLMD@rmm.com; VEMD@rmm.com

Dr. Vassily Eliopoulos, MD
Dr. Khoshal Latifzai, MD
Rocky Mountain Regenerative Medicine
2260 Baseline Road, Suite 102
Boulder, CO 80302

Re: Unsubstantiated claims for Coronavirus prevention and treatment

To Whom It May Concern:

This is to advise you that FTC staff reviewed your website <https://rmm.com> in October 2020. We also reviewed your social media websites at https://www.youtube.com/channel/UCpqQBAwb_CmuMPPHSzEI-pw, <https://www.facebook.com/RMRMBoulder/>, and <https://www.instagram.com/rmrmboulder/>, where you direct consumers to your website <https://rmm.com> to purchase supplements and make appointments for treatments including peptide therapy, ozone therapy, and stem cell therapy. We have determined that you are unlawfully advertising that certain products or services treat or prevent Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or cure claims on your websites include:

- On your website at <https://rmm.com/covid-19-natural-treatments/>, a page that is accessible by selecting “COVID-19” from the website navigation menu, you state:

“COVID-19 NATURAL IMMUNE SYSTEM SUPPORT

RMRM IS OPEN DURING THE QUARANTINE PERIOD. WE CAN HELP WITH PREVENTION AND COVID-19 NATURAL MANAGEMENT.

COVID-19 NATURAL PREVENTION:

CAN I DO ANYTHING TO PREVENT SEVERE COVID-19 REACTIONS?

There are no current cures or approved COVID-19 natural treatments, although there are many natural interventions you can make. These strengthen your body's immune system improving its reaction to an encounter with any virus, including coronavirus.

Click on the below videos to find out more about each action or treatment:...

- Supplementation
- Peptide Therapy

...

SUPPLEMENTATION:

[Embedded YouTube Video, "Vitamin Supplements for Coronavirus," also available at https://www.youtube.com/watch?v=7Ggyy2o4_pE]

Taking the right supplements can help your immune system function and there are specific supplements that have been shown to prevent or minimize the possible complications of COVID-19.

Check out Dr. Vass' video on what to supplement and why.

PEPTIDE THERAPY:

[Embedded YouTube video, "Why Thymosin alpha 1 may (ube)-8674-2.6 (2vo5 >>BD-9.7 (

OXIDATIVE THERAPY:

[Embedded YouTube video, “Shorter version of new COVID Therapy,” also available at <https://www.youtube.com/watch?v=-GTRIUY2Fns>]

Oxidative Therapy – Oxidative therapy is being used in Italy to help people with active COVID-19 [sic] infection. The Italians have not published their data yet but the verbal reports from the physicians there using it give hope.

Watch Dr. Vass talking about oxidative therapy for COVID-19.

STEM CELL THERAPY:

[Embedded video hosted on rmm.com, file name Stem-Cell-Therapy-COVID-19.mov]

Stem Cells have been demonstrated in a Chinese study (<http://www.aginganddisease.org/EN/10.14336/AD.2020.0228>) to be successful in reversing severe and critical COVID-19 infection. This, in our opinion, is the most powerful study to date that demonstrates a solution for severe and critical COVID-19 infection.

Dr. Vass explains the important aspects & how it could be done in the USA.

[From the video:

“This Chinese study for COVID-19 which shows that IV stem cells appear to be an effective therapy for COVID-19 infection. I think this is really important because I don’t hear anybody talking about this, but this is the most powerful study that demonstrates a solution for severe and critical COVID-19 infection.”

DURING THE COVID-19 QUARANTINE PERIOD WE ARE OFFERING SPECIAL DISCOUNTS:...

RMRM COVID-19 Vitamin Supplementation regimens run in the \$100-200 range.

RMRM Peptide Therapy regimens usually cost around \$300 but can vary depending on individual recommendations.

Ketamine starts at \$500.00 per infusion and goes up based upon the dosages required.

Oxidative Therapy costs \$200-\$500 depending on the modality.

Stem Cell Therapies are in the thousands of dollars.

WE ARE AVAILBLE FOR TELEMEDICINE CONSULTATIONS AND CAN SEE YOU NO MATTER WHERE IN THE WORLD YOU ARE LOCATED. WE CAN HELP YOU COME UP WITH AN ACTION PLAN FOR PREVENTION AND MANAGEMENT OF COVID-19.”

- In a video dated March 21, 2020 on your YouTube Channel at https://www.youtube.com/watch?v=7Ggyy2o4_pE and titled, “Vitamin Supplements for Coronavirus,” you state:

“Ok so here I’m talking about evidence-based supplementation for coronavirus.... A lot of these supplements have become difficult to get locally... We have a formulary... it’s invite only. They have most of this available currently so it’s not too late if you’re having trouble getting a supplement you’re going to have to email us, let me know, and we’ll figure out a way if we can fold you into the formulary... This is not a complete list. If you want the complete list, you’ll have to email us.... The first vitamin that I think is a no-brainer is vitamin C. Vitamin C has been studied for the SARS coronavirus.... The second one is zinc. Zinc has been shown directly in vitro to suppress the replication of coronavirus. Now this is not the COVID-19 or the novel coronavirus, these are other common cold causing coronaviruses, but these are all relatives in the same family.... [Zinc] is something I’m personally taking on a daily basis, and so should you.... The third one I’m going to mention is vitamin D...”

[This video was also shared in a March 21, 2020 Facebook post at <https://www.facebook.com/RMRMBoulder>, in which you also state, “Supplements in the time of Corona. Dr. Vass discusses evidence based vitamin supplementation. #covid #coronavirus... #prevention...”]

- In a video dated April 3, 2020 on your YouTube Channel at <https://www.youtube.com/watch?v=ADLoWZUvMsg> and titled “Why Thymosin alpha 1 may be the best peptide for Coronavirus,” you state:

“There’s a peptide that’s been approved for use for both hepatitis B and C, so there’s a lot of safety data behind it. It was used in 2003 as a preventative for the SARS coronavirus. So it’s not a big leap to be used as an off-label medication for COVID-19. It has multiple different mechanisms of action: one is that it’s directly antiviral, and two, perhaps most importantly, it can prevent cytokine storm.... I’m going to get more in depth into the scientific evidence for thymosin alpha-1.... It’s the same mechanism by which it defends you from COVID is the same mechanism by which it helps prevent cancer formation.... [T]here’s multiple different ways that thymosin alpha-1 can be efficacious in COVID-19.... Although there’s no direct evidence that I can give you for COVID-19, we’re extrapolating from its success with the SARS coronavirus, which again is a different virus but from the same family as COVID-19. And the fact that this can help prevent the cytokine storm, which is the thing that directly leads to mortality in COVID-19 infection.... And one of the beauties of this is it’s relatively cheap, you’re looking at two to three hundred dollars for a month’s worth of therapy. It can be used as a preventative, and potentially as a treatment.... If you’re interested, send us an email. We can set up a telemedicine evaluation no matter where you are in the country, and we can get this compounded and sent to you.”

[This video is also embedded on your website at <https://rmm.com/covid-19-natural-treatments/>, and an excerpt of this video is shared in April 5, 2020 Facebook and Instagram posts at <https://www.facebook.com/RMRMBoulder/> and [https://www.instagram.com/rmrboulder.](https://www.instagram.com/rmrboulder/)]

- In a video dated April 15, 2020 on your YouTube channel at <https://www.youtube.com/watch?v=-GTRIUY2Fns> and titled, “Shorter version of new COVID Therapy,” you state:

“Today I want to talk to you about oxidative therapy, also known as ozone therapy. Ozone is the antimicrobial par excellence. It not only directly kills viruses, but is antibacterial, antifungal, and antiparasitic. It’s a very safe therapy, and now there’s evidence coming out of Italy where it’s being used in 17 hospitals that it has /-9.7 5 (r7-8.6 (t)-3)-0.8

ARE THERE ANY NATURAL COVID-19 TREATMENTS AVAILABLE? There are many natural COVID-19 treatments and options you can take to vastly improve your body's recovery with a coronavirus encounter.

Visit our website to get more information.

<https://rmm.com/covid-19-natural-treatments/>”

[April 15, 2020 posts at <https://www.facebook.com/RMRMBoulder/> and <https://www.instagram.com/rmrboulder/>]

- In March 21, 2020 posts on Facebook and Instagram, you state: “The four things you should be doing to prepare your body for corona virus! #coronavirus...” These posts include a video in which you state: “There are four things you should do if you’re healthy and you’re worried about the coronavirus. Number one is proper supplementation. Number two is oxidative therapy... Number four is peptide therapy. All of these have scientific backing...” c 2020 postse

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You are also advised to review all other claims for your products and services and immediately cease making claims that are not supported by competent and reliable scientific evidence.

Within 48 hours, please send a message to Richard Cleland Assistant Director, via electronic mail at rcleland@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