



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

1999 Bryan St., Ste. 2150
Dallas, Texas 75201

June 3, 2020

WARNING LETTER

VIA EMAIL TO info@joywellnesspartners.com

Joy Wellness Partners
838 W G Street Suite 201
San Diego, California 92101

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC

graphic is displayed which includes the following as part of a “PREVENTION ROUTINE”: “Daily Supplements: a. 6x 500mg (3 g) Quercetin[;] b. 1x Iodine+ (*or 1 immunity IV/wk*)[;] c. 2x 1,000 mg (2 g) Vitamin C (*or 1 Immunity IV/wk*)[;] d. ADK10/day (*or 1 Vit D shot/wk*)[.] Weekly Immunity IV = High Dose IV[,] Vitamin C + Zinc + B Vitamins.”

- In marketing materials titled “Zinc and your immune system; what the grocery store hoarders don’t know,” you claim that “Zinc is vital for protecting your bodies against viruses. Simply put, your immune system uses zinc specifically when repairing damaged cells and growing new ones. When you are exposed to a new virus, your body must essentially grow a new ‘army’ of attack cells specifically tailored to beating that virus to a pulp. No zinc, no new army. Make sense?”
- In marketing materials titled “Virus prevention and cure readily available?”, you:
 - Claim that “[m]edical orthodoxy obsessively focuses on searching for a vaccine and/or drug for coronavirus COVID-19). While they are looking for what would be fabulously profitable approaches, we have with vitamin C an existing, plausible, clinically

consider what happens next as our adaptive immunity is called into action. T3 is an essential thyroid hormone in promoting the maturation of our adaptive immune cells. These cells, once mature, promote pro-inflammatory cytokines, including IL-6, IL-12, and TGFβ1. This adaptive response favors the development of cytotoxic T cells, which further modulates our immune system's response to targeting and killing viruses.”

“Support your immune system by utilizing these BioTE recommended nutraceuticals in stock at JWP – shipping available!

BioTE® IODINE+ Zinc—one of the ingredients in IODINE+—has been shown to reduce the severity of respiratory illness. Zinc may improve the integrity of respiratory cells by protecting them from inflammation and infection.

BioTE® ADK 5 &10 Vitamin D is essential in maintaining the innate and adaptive immune responses. (ncbi.nlm.nih.gov) Deficiency in vitamin D increases susceptibility to infection. Although the mechanism is not clearly established, vitamin D is known to have anti-viral effects. In 2017, a large prospective trial showed taking vitamin D can reduce the odds of developing respiratory infections by approximately 42%....

BioTE® PROBIOTICS Our gastrointestinal tract is important to our overall immune system health. Probiotics are recommended in the BioTE Method to help improve health by up-regulating immune function. There are clinical trials that have shown probiotics reducing acute respiratory infections—many of which are caused by viruses.”

- In marketing materials titled “6 Tips for avoiding the Coronavirus,” you claim that:

“Vitamin C. Our Cold & Flu IV Infusion
[\https://joywellnesspartners.

- In marketing materials titled “Quercetin: Clinical trials begin... high doses of Quercetin for antiviral activity,” you state that a doctor “believes we have nothing to lose by using it [Quercetin] now. In theory, it works as an antiviral by diminishing the entry of the virus into the cell.”

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any Coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

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

Within 48 hours, please send a message to James E. Elliott via electronic mail at jelliott@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 contact Zachary A. Keller at zkeller@ftc.gov.

Very truly yours,

Dama J. Brown
Regional Director
Southwest Region