

United States of America FEDERAL TRADE COMMISSION Southwest Region

Dama J. Brown, Regional Director Federal Trade Commission – Southwest Region 1999 Bryan Street, Suite 2150 Dallas, Texas 75201

April 28, 2020

WARNING LETTER

Riordan Clinic 3100 North Hillside Street Wichita, Kansas 67219

Re: Unsubstantiated Claims for Coronavirus Prevention and Treatment

To Whom It May Concern:

This is to advise you that FTC staff has reviewed your website at https://riordanclinic.org on April 21, 2020. We also reviewed your social media website at https://www.facebook.com/riordanclinic, where you direct consumers to visit your website to schedule IV treatments of high dose vitamin C and other supplements. We have determined that you are unlawfully advertising that certain products or services prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims on your website include:

- On a page on your website titled "COVID-19: News & Updates" you state: "Vitamin C has been at the center of the mission of the Riordan Clinic for almost 45 years. This page will serve as a resource center for all things related to COVID-19 as well as resources on using IV Vitamin C and other nutrients to not only boost your immune system but help actively treat the respiratory distress that goes along with the COVID-19 virus."
- On a page on your website titled "Riordan Clinic and COVID 19, A Letter From Our Chief Medical Officer" you state: "The COVID 19 pandemic represents one of the greatest global health challenges to face mankind in modern times... The three Riordan Clinic sites... will remain open to our chronically ill patients (with no fever) who can benefit from the *preventive* power of IVC. Our priority is to protect these patients from an otherwise potentially devastating exposure to COVID 19."

- "This video (click link to watch video) describes the work of five critical care specialists who are treating coronavirus patients at academic centers and other major hospitals across the United States. Through their current work, past research, and studying the findings of the Shanghai expert protocols, they have concluded that a combination of corticosteroids, high dose intravenous ascorbic acid (vitamin C), and anticoagulants, given early in the ER or hospital, can prevent the progression of the disease and reduce the need for mechanical ventilators. Their findings have not yet been widely adopted in the U.S. and they want to get the word out to save lives now.' Also included: List of doctors in the U.S. who are actively using IV Vitamin C to treat COVID-19...." (From an April 20, 2020 post on your Facebook page.)
- "Seven leading critical care specialists, who together have formed the Front Line COVID-19 Critial Care Consortium, have released a protocol for treating patients who arrive in hospitals with COVID-19. 'People are dying needlessly. This protocol will save lives.' – Dr. Paul Marick. The protocol calls for the intravenous administration of ascorbic acid and corticosteroids starting in the Emergency Room and every 6 hours thereafter while in the hospital. The mortality rate of this disease and the need for mechanical ventilators will likely be greatly reduced. Based on early experiences with this more aggressive approach, they predict that early adoption of the protocol will reduce ICU admissions, obviate the need for mechanical ventilators, and most importantly, save many lives. 'This is not the time for randomized controlled trials. We need to treat these patients NOW.' – Front Line COVID-19 Critical Care Consortium #COVID19 #Coronavirus #AscorbicAcid #Methylprednisolone #Heparin #Hydroxychloroquine #COVI19treatmentprotocol #COVID19CriticalCareConsortium #PaulMarikMD #IntegrativeMedicine #FunctionalMedicine Share this post with your friends and family. To find out more about using vitamin C with COVID-19, please visit riordanclinic.org/COVID19" (From an April 10, 2020 post on your Facebook page.)

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 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 or services identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products or services 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 or services and immediately cease making claims that are not supported by competent and reliable scientific evidence.

Within 48 hours, please send a message to Assistant Director Jim Elliott via electronic mail at jelliott@ftc.gov describing the specific actions you have taken to address the FTC's

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concerns. If you have any questions regarding compliance with the FTC Act, please contact Reid Tepfer at rtepfer@ftc.gov.

Very truly yours,

Dama J. Brown Regional Director, Southwest Region Federal Trade Commission