



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

Serena Viswanathan
Associate Director
Division of Advertising Practices

December 4, 2021

CEASE AND DESIST DEMAND

VIA EMAIL TO info@navage.com and support@navage.com
Mr. Martin R. Hoke, President and Founder
RhinoSystems, Inc.
1 American Road, Suite 1100
Brooklyn, Ohio 44144

Re: Unsubstantiated claims for Coronavirus prevention and treatment

Dear Mr. Hoke

This is to advise you that FTC staff has reviewed your website <https://www.navage.com> in December 2021. We also reviewed your social media websites <https://www.facebook.com/Navage4Life> and <https://www.youtube.com/user/NavageRocks>, where you direct consumers to your website <https://www.navage.com> to purchase Naväge nasal irrigation products. We have determined that you are unlawfully advertising that Naväge products treat or prevent Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims include:

- x In an email sent to consumers on September 17, 2021 with the subject "Clinical Trial Preprint: Covid and Twice Daily NASAL IRRIGATION," you state

“SUMMARY: A clinical study using nasal irrigation was recently published on [MedRXiv.com](https://www.medrxiv.org/) [link to <https://www.medrxiv.org/>], a non peer-reviewed site for new medical research that is overseen by Yale University and the British Journal of Medicine. The primary result is that individuals who tested positive for Covid and immediately began using nasal irrigation twice a day were 8.4 times less likely to be hospitalized or die than those who did not...

Mr. Martin Hoke
RhinoSystems, Inc.
December 4, 2021
Page2

Please note that a preprint has yet to be evaluated by the scientific community through the peer review process, and it may undergo future alterations.

In July, 2020, RhinoSystems, the maker of Naväge, was asked to support a clinical trial designed to test the theory that people who get Covid will have better outcomes if they immediately begin using nasal irrigation twice-a-day, compared to those who don't. The primary measured outcomes were hospital admissions and death. The results, and they are so very encouraging.

In short, Covid-positive individuals who immediately began using nasal irrigation twice-a-day were

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Mr. Martin Hoke
RhinoSystems, Inc.
December 4, 2021
Page3

[national dataset link to
https://www.medrxiv.org/content/10.1101/2021.08.16.21262044v2](https://www.medrxiv.org/content/10.1101/2021.08.16.21262044v2)

PRIMARY RESULT: Clinical trial participants were 8.4 times less likely to be hospitalized or die than non-participants.

The significant, 8-fold reduction in hospitalization rates by participants who used nasal irrigation is an exceptionally positive result. To put this in context, consider [antheiral drug by Regeneron link to https://www.fda.gov/news-events/press-announcements/coronavirus-covid-19-update-fda-authorizes-mono-clonal-antibodies-treatment-covid-19](https://www.fda.gov/news-events/press-announcements/coronavirus-covid-19-update-fda-authorizes-mono-clonal-antibodies-treatment-covid-19) received FDA Emergency Use Approval last November for only a 3-fold reduction in hospitalization rates

I'm sharing this good news with you in the hope that if you do not already, you will give serious consideration to becoming a twice-a-day Naväge user yourself. I can think of very few things you could do for yourself or those you love that are as simple and healthy.

On a more personal and purely anecdotal note, namely the experience of two, twice-a-day Naväge users: Throughout the pandemic, RhinoSystems has been up, running, and manufacturing Naväge Nose Cleaners and SaltPods, and during that time neither my wife, Maria, nor I have missed a day of work due to illness. Thanks be to God and knock on wood!

Best regards,
Martin ...
Martin R. Hoke
President and Founder..."

x In an email sent to consumers on September 20, 2021, the subject line "Just in case you missed it: Twice-A-Day NASAL IRRIGATION, a Covid Clinical Trial Preprint," you repeated all of the claims described above.

x In a July 21, 2021 video titled "Naväge 2021 Commercial - So Many Good Things," available at <https://www.youtube.com/watch?v=G5zmTLuTQ8s>, you state:

"The pandemic'N8 108 5y6Themip4 paiNa 2021

Mr. Martin Hoke
RhinoSystems, Inc.
December 4, 2021 Dc -0.001 3..001 b l