

United States of America
FEDERAL TRADE COMMISSION
Southwest Region

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

May 8, 2020

WARNING LETTER

VIA EMAIL TO support@in-goodhealth.com

Dr. Alan Christianson
9200 East Raintree Drive, Suite 100
Scottsdale, Arizona 85260

Re: Unsubstantiated Claims for Coronavirus Prevention or Treatment

To Whom It May Concern,

This is to advise you that FTC staff has reviewed your website at <https://www.drchristianson.com/> on May 5, 2020. We have determined that you are unlawfully advertising that certain products that can be purchased on your website treat or prevent Coronavirus Disease 2019 (COVID-19).

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

- x In marketing materials titled "Special Art: Coronavirus and What You Need to Know," in a section titled "Natural Solutions," you state, "Prior coronavirus outbreaks, like MERS and SARS, can give us some insight into some of the more natural treatments that we may consider pursuing." You then list the following:
 - o "Echinacea Echinacea is known as both antiviral and preventive. In addition, it has been shown as effective against the avian virus in animal studies. In the past, echinacea was thought to be a concern for autoimmune disease. That said, this concern has become less and less relevant. We know that it works through immune modulation, not simple immune stimulation. It is also known to be safe and effective for long-term use."
 - o "Astragalus In living animal and test-tube studies, this has been shown to kill other coronaviruses. This study, in particular, suggested that it has the potential to diminish disease progression in chickens and could be used to the control of coronaviruses."

- o “Andrographis This compound has been shown to make influenza viruses less able to cause pulmonary damage in the body. It also has antiviral and immunoregulatory properties.”
- o “Arabinogalactan The effects of glycans are both simple and complex and can play a profound role in metabolic, structural, and physical roles in biological systems. In knowing this we can learn more about their evolutionary role and what they tell us about biological complexity.”

It is unlawful under the FTC Act, 15 U.S.C. § 44 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 view 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 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,

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