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

November 3, 2020

**WARNING LETTER**

VIA EMAIL TO [info@tribeca-wellness.com](mailto:info@tribeca-wellness.com)

Tribeca Wellness Collective  
116 Chambers Street  
3<sup>rd</sup> Floor  
New York, NY 10007

Re: Unsubstantiated claims for Coronavirus prevention and treatment

To Whom It May Concern:

This is to advise you that FTC staff reviewed your website at <https://www.tribeca-wellness.com/>, and your social media website at <https://www.instagram.com/tribecawellness/>, where you promote products and services available at Tribeca Wellness Collective, including Thymosin Alpha 1 peptide therapy, Endolaser IV therapy, high dose vitamin C IV therapy, ozone IV therapy, vitamin B12 injections, and supplements, in October 2020. 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:

- In a May 14, 2020 post on your Instagram page, you state:

“PSA from Dr. Trutt!

Supporting your immune system may be the best way to stay healthy in the next 12-18 months

Curos Immunity Pack is an easy way to get all of his recommended supplements in one daily packet

Green tea extract, Vitamin C, Quercetin, NAC, and other compounds may be the best options we have while we keep learning more and more about COVID prevention, treatment, and spread.

...

#vitaminc #zinc #vitc #covid19news #drtrutt #tribecawellness #covid\_19 #highdosevitaminc #covid19 #covid #coronasymptoms #immunesupport #immunehealth #immunityboost..."

In the video shared in this post, you state: "I found out recently that the FDA has shut down a couple of medical offices for saying that ozone or vitamin C cures COVID, so let me make very clear I am not saying that anything cures COVID, but if you want to support your immune system, those are two good options. And I also have all my patients still taking zinc, quercetin, green tea, NAC, and vitamin C, and I have all those put together in a Curoso immunity pack if you're having trouble finding them online."

[From your post dated May 14, 2020 on your social media website at <https://www.instagram.com/tribecawellness/>. This post is also included in your Instagram Stories Highlight titled "COVID" with the text "COVID UPDATE," "FACT CHECKING: Wellness Treatments vs. Treatments That Can CURE COVID."]

- In an April 15, 2020 post on your Instagram page you state:

"COVID-19 came on our radar this past winter, and Dr. Trutt has followed the data out of China very closely for weeks and has been communicating with doctors across the U.S. as well. Based on this collaboration it seems that Zinc Ionophores such as Green Tea Extract and Quercetin (or Doxycycline in sicker patients) is a crucial weapon in supporting your immune cells in the fight against COVID-19. With many supplements out of stock, he created the @curoso "Immunity Pack" as an easy way to access all of these recommendations for his patients in convenient, daily packets. (link in bio)..."

...

#curoso... #immunebooster... #immunesupport #immunehealth #immunityboost #immunitybooster #covid19 #covid #covid\_19 #nutritionfacts #coronavirusnyc

[From your post dated April 15, 2020 on your social media website at <https://www.instagram.com/tribecawellness/>.]

- In an April 15, 2020 post on your Instagram page, you state:

"Treating Covid-19

Dr. Trutt discusses how he has been treating his COVID patients, and why he thinks they are doing well!

...

#vitaminc #zinc #vitc #covid19news #drtrutt #highdosevitaminc #covid19 #covid #covid\_19 #nutritionfacts #tribecawellness #coronasymptoms #coronapandemic #immunesupport #immunehealth #immunityboost #immuneboost #fightcoronavirustogether”

In the video shared in this post, you state: “I want to mention a couple of the things that I’ve been doing with my COVID patients that have been working.... Zinc thankfully is getting widespread acceptance – I think right now the whole country should be taking zinc every day. The reason being, it shuts down the replication of the virus. It inhibits the enzyme RNA dependent RNA polymerase, which is what the enzyme uses to replicate its genome inside our cells. So shutting that down is crucial. Zinc can do that. But zinc has trouble getting into our cells because it’s a positively charged ion. So you need something to usher zinc in. Doxycycline can usher zinc in. Two other things that do a good job ushering zinc in are quercetin and green tea. So I use quercetin, not always this brand, whatever brand they can get, and EGCG, one of the ingredients in green tea, along with the zinc.... In February, the Oak Ridge National Laboratories scientists turned on their supercomputer and asked it to screen 57,000 compounds and figure out which ones might be able to inhibit COVID from binding to our cells... [O]ut of 57,000 compounds, quercetin was number five on the list. So I have all of my patients taking green tea, quercetin, and zinc every day. I think that really sets them up for success.... Those things have been kind of sold out, people are having difficulty finding them. I did put them together in a pack, which maybe we’ll put a link that people can grab if they can’t find them elsewhere. I hope that helps, I think a lot more people should be doing things like this preventatively, and we can keep a lot more patients out of the hospital.”

[From your post dated April 15, 2020 on your social media website at <https://www.instagram.com/tribecawellness/>. This post is also included in your Instagram Stories Highlight titled “COVID” with the text “WHAT’S BEEN WORKING,” “TREATING COVID-19.”]

- In an April 3, 2020 post on your Instagram page, you share an image of an article headline from the *New York Post* that reads “New York hospitals treating coronavirus patients with vitamin C” and you state:

“Most clouds do have a silver lining. For COVID, it is gratifying to see the world’s most established mainstream hospitals showing a willingness to try orthomolecular approaches such as intravenous Vitamin C and Zinc. We hope and believe that this merging of Integrative & Allopathic techniques will continue to expand in the years to come...

#vitaminc #zinc #vitc #covid19news #highdosevitaminc #covid19 #covid #covid\_19 #nutritionfacts #coronavirusnyc”

[From your post dated April 3, 2020 on your social media website at <https://www.instagram.com/tribecawellness/>. This post is also included in your Instagram Stories Highlight titled “COVID.”]

- In a March 23, 2020 post on your Instagram page, you state:

“It’s all about COMBO therapy! Ozone MAH before the Endolaser, using both red & blue wavelengths to help stimulate immune cells and directly kill any foreign invaders [collision emoji] [right-facing fist emoji] [microbe emoji, resembling a coronavirus] #ledlighttherapy

...

#endolaser #laseriv #ozonetherapy #ivtherapy #infrared #covid\_19...#redlighttherapy #immunity... #flattenthecurve #immunesystem #stayhealthy... #coronavirusoutbreak”

In the video shared in this post, you state: “So the reason that we use the IV Endolaser is because specifically the red light helps to support your body's natural immune system. So it supports natural killer cells, T helper cells, and T suppressor cells, which are all cells that your immune system uses to keep you healthy, recognize foreign invaders, as well as kill them, and alert your body that you're being invaded, and the appropriate response to that. So that is why I'm sitting here on our red laser.

So now I’m on the blue light. And one of the things that the blue light does is, similar to the blue LED that we use on the face to kill the bacteria that causes acne, the blue light kills viruses, bacteria, and parasites. So this is a great option if you're feeling under the weather.”

[From your post dated March 23, 2020 on your social media website at <https://www.instagram.com/tribecawellness/>. This post is also included in your Instagram Stories Highlight titled “COVID” with the text “Combining RED & BLUE endolaser wavelengths to help stimulate immune cells and directly kill any foreign invaders.”]

- In a March 20, 2020 post on your Instagram page you state:

“**FACT 1:** Thymosin Alpha-1 is a major component of Thymosin Fraction 5 found in the thymus (the gland responsible for regulating the immune system).

**FACT 2:** Thymosin Alpha-1 augments the body’s T-cell function (part of your adaptive immune system) which fights off infection.

**SUMMARY:** Thymosin Alpha-1 optimizes the performance of your immune health and supports you [sic] body's general wellness by preventing infections like the cold and flu.

#thymosin #tribecawellness #alpha1 #parkaveskin #covid\_19 #immuneboosting... #coronavirus... #immuneboost”

[From your post dated March 23, 2020 on your social media website at <https://www.instagram.com/tribecawellness/>.]

- In a March 18, 2020 post on your Instagram page, you state:

“Ozone therapy of MAH (Major AutoHemotherapy) is a therapy we use at Tribeca Wellness to help boost the immune response. It's a very powerful therapy that has been around for many years in Europe and now being more widely accepted in the US....

#ivozone #immunesupport #covid\_19 #immunesystem #corona”

In the video shared in this post, you state: “Ozone therapy is a therapy we use to help boost the immune response. What we do is we take out a small amount of blood. And we expose that fraction of blood to ozone gas.... It also can kill any viruses or bacteria in that blood sample, chop it up into little pieces, and then when we introduce it back in your body it creates kind of a mini-vaccine reaction. And then it also stimulates the immune response in general, helps stimulate natural killer cells and your immune-fighting cells. So it's a really great immune booster...”

[From your post dated March 18, 2020 on your social media website at <https://www.instagram.com/tribecawellness/>.]

- In a March 15, 2020 post on your Instagram page, you state:

“Thymosin Alpha-1 is a major component of Thymosin Fraction 5 found in the thymus – The thymus is responsible for regulating the immune system – Thymosin Alpha-1 is prescribed to optimize the performance of your immune health and improve general wellness by preventing infections such as the common cold or flu – It acts to augment T-cell function; T cells are a part of the adaptive immune system which fights off infection. We are using Thymosin alpha in conjunction with healthy diet, good hygiene, and active distressing techniques to keep our immune system in tip top shape! #Thymosin...#covid\_19 #corona...#covid #covid19”

[From your post dated March 15, 2020 on your social media website at <https://www.instagram.com/tribecawellness/>. This post is also included in your Instagram Stories Highlight titled “COVID.”]

- In a March 12, 2020 post on your Instagram page, you state:

“How to be proactively preventative #corona

We at Tribeca Wellness believe in being proactively preventative. In that vein, we offer many immune boosting IV therapies to help stimulate a more effective immune response. While none of these therapies have been proven specifically effective against Covid they have been studied to be anti-viral generally and boost the immune system broadly.

These include:

1-Ozone

2-Endo Laser

3-High Dose Intravenous Vitamin C

If you are an existing patient and would like to book an IV consult call the front desk and learn more.

#coronavirus #covid #covid19 #endolaser #ozone #ivtherapy #ivdrip...#cdc #corona #covid2019”

In the embedded video with this post, you state: “So with all the Covid craziness that’s going around, people are wanting to know what they can do specifically to boost their immune system. And luckily there are a lot of things we can do here at Tribeca Wellness to help our patients boost the immune response. Specifically, certain IV therapies. One IV therapy that we offer here is called ozone therapy, where we take out a small amount of blood and introduce ozone gas and then put it back in to the body. This is anti-inflammatory, helps to stimulate the immune response and kills any viruses in that sample to create a kind of a mini vaccine for the immune system. We also offer high dose vitamin C, which is being studied in China and Korea as a treatment specifically for Covid. And we also offer the new endolaser, which we’re the only ones in the city currently offering it. Where we introduce a fiber optic cable into your veins that shines different spectrum of light, laser light, into the blood, kind of filtering it for different effects: the red laser specifically is boosting the immune response and natural killer cells, and blue laser actually kills viruses on contact. So, we offer all of these here for our patients, they’re very exciting, they’re very new, and if you’re interested you can call the front desk and learn more.”

[From your post dated March 12, 2020 on your social media website at <https://www.instagram.com/tribecawellness/>. This post is also included in your Instagram Stories Highlight titled “COVID.”]

- In a March 8, 2020 post on your Instagram page, you state:

“With so many conflicting reports surrounding Coronavirus, it’s hard not to feel the tension in the air. We’ve received quite a few questions about this: here are some answers!

...

Corona-fighting supplements:

At Tribeca Wellness and Park Avenue Skin Solutions, we are using nutraceuticals (via a recent review paper on encapsulated viruses) that seem to both help prevent and treat Coronavirus. After multiple requests, we have created a supplement prescription that is easy to use. If you would like more information, please reach out, and we are happy to send the recommendation your way!”

[From your post dated March 8, 2020 on your social media website at <https://www.instagram.com/tribecawellness/>. This post is also included in your Instagram Stories Highlight titled “COVID.”]

- In your Instagram Stories Highlight titled “COVID,” you state:

...

“Keeping our patients healthy this season with complimentary B12 shots with any procedure. Ask us about our Intravenous and anti-viral boosters.

...

What can we do to boost our immune systems during the #coronavirus pandemic!?

#ozoneiv  
#endolaser...

...

Intravenous ozone therapy plus red Endaser [sic] treatments at @tribecawellness to help boost the immune response

...

thymosin alpha-1

fact #1:

thymosin alpha-1 is a major component of thymosin fraction 5 found in the thymus (the gland responsible for regulating the immune system).

fact #2:

thymosin alpha-1 augments the body's t-cell function (part of your adaptive immune system) which fights off infection.

fact #3:

thymosin alpha-1 optimizes the performance of your immune health and supports you [sic] body's general wellness by preventing infections like the cold and flu.

[From the "COVID-19" Stories Highlight on your social media website at <https://www.instagram.com/stories/highlights/17932899031361428/>]

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 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 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 via electronic mail at [rcleland@ftc.gov](mailto: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 contact Mr. Cleland at 202-326-3088.

Very truly yours,

Serena Viswanathan  
Acting Associate Director