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Division of Advertising Practices

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

December 20, 2021

CEASE AND DESIST DEMAND

VIA EMAIL TO info@terramunehealth.com

TerraMune Health, LLC
345 Heritage Ave, #324
Portsmouth, NH 03801

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://www.terramunehealth.com/> in December 2021. We also reviewed your social media website at <https://www.facebook.com/TerraMuneHealth>, where you direct consumers to your website <https://www.terramunehealth.com/>, to purchase ViralHalt supplement. We have determined that you are unlawfully advertising that ViralHalt treats or prevents Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims include:

- On the homepage of your website at <https://www.terramunehealth.com/>, you state:

“ViralHalt™

Peace of Mind for Every Household

‘COVID-19 is the newest member of the coronavirus family. I concur with NIH laboratory findings that ViralHalt’s proprietary blend is safe and features broad spectrum antiviral properties. Science reveals that ViralHalt is nature’s prescription to help fight viruses.’ - Dr. Douglas Nelson, Medical Director

ViralHalt™ is our proprietary Humic Acid blend of natural active colloidal minerals. ViralHalt™ has a stronger affinity to healthy cell membranes than that of viruses. This means that ViralHalt™ will bind to healthy cell membranes first, deterring viruses from invading, destroying the cell and stealing the cell’s DNA to replicate

and infect other healthy cells. ViralHalt™ then binds to the unsuccessful virus and eliminates it from the body.

✓ SAFE BROAD SPECTRUM ANTIVIRAL PROTECTION - NIH SUPPORTED

✓ 20+ YEARS OF SAFE AND EFFECTIVE USE IN CLINICS...”

- On the homepage of your website at <https://www.terramunehealth.com/>, you display a carousel of purported consumer testimonials, including the following:
 - “For years I have used zinc and vitamin C to help boost my immune system. I added ViralHalt several months ago for its well documented antiviral properties and immune support. I feel great! I also feel better protected heading into flu season, especially since there is no safe and proven vaccine available yet for Covid-19. RC, Saratoga Springs, NY.”
 - “Just a quick note to thank you for ViralHalt. After some time of using it, I realized I haven’t had so much as a sniffle over the past month, even though I historically get at least a couple of miserable colds each year at this time. I was also exposed to COVID for about 5+ hours a short while ago and fully expected to get it. However, no symptoms and a negative test a week later confirmed that I did not have it. While I do not know with any certainty that the ViralHalt stopped it, at the time I had not received any immunizations, so it certainly could not have hurt and in all likelihood, helped. I intend to keep using it for the foreseeable future. Thanks again. Preston B., Florida.”
 - “I am a 78-year-old male and my girlfriend is 76. We both chose not to get vaccinated as we consider ourselves in good health. We have been taking ViralHalt for over a year now. We both got covid and experienced moderate upper respiratory issues, no fever, no significant bodily pain, and no need for hospitalization. We are so thankful to have been on ViralHalt which we believe helped our bodies minimize our symptoms! Doug S. & Arda M., Indiana.”
- On your website at <https://www.terramunehealth.com/clinical>, you state:

“Emergency Health Alert: Blood Clot Prevention

Our offices have received an overwhelming number of requests for guidance from people who are gravely concerned about the potential for **blood clots** or **excessive bleeding** resulting from COVID19 infections and the vaccines currently being administered due to the pandemic.

Fortunately, there is something you can do to greatly diminish these risks. **ViralHalt** is a proprietary compound including humic acid and fulvic acid, which have been clinically proven to address the most serious aspects of these threats to your health....

Humate – Nature’s EPA for the Human Body

Earth’s Colloidal Minerals Activate the Body’s Innate Ability to Protect and Heal

What is Humate?

Humate, or Humic Substance is highly composted natural material from ancient plant deposits, which contains vital organic compounds. Humic substance is ‘Bivalent’ which means it attracts BOTH Positive ions and Negative ions. Why is this important for Humans? The ability to attract positive or negative ions means that substances beneficial to the body, like Calcium and Vitamin D, can be better absorbed, while substances dangerous to the body, like viruses or heavy metals, can be better eliminated.

Our Proprietary Blend of Humic Substance composed of Humic Acid (HA) and Fulvic Acid (FA) and containing 72 trace minerals, including zinc, is the very foundation of all our supplements....

Our Proprietary Blend of Humic substance (Humic and Fulvic acids) exhibits excellent health benefits in many spectra, including broad-spectrum antiviral activity against a large group of viruses ranging from common colds and flus, to HPV, hepatitis and West Nile Virus.

Our all-natural dietary supplement ViralHalt™ has several characteristics that make it well suited for the disruptive processes typical of the family of Corona and Rhino Viruses. Humic Acid acts to block virus reproduction, which lowers overall viral loading. Additionally, HA works to make simple sugars more complex within the body to form glycoproteins, and thus replenishing those destroyed by the virus. This process greatly reduces potential crashes of the immune system, as well as acts to regulate it....”

- On your website at <https://www.terramunehealth.com/shopproducts>, you state:

“COVID-19 is the newest member of the coronavirus family. I concur with NIH laboratory findings that ViralHalt’s proprietary blend is safe and features broad spectrum antiviral properties. Science reveals that ViralHalt is nature’s prescription to help fight viruses.’ - Dr. Douglas Nelson, Medical Director.”

- On your website at <https://www.terramunehealth.com/blog/natural-covid-19-vaccine-alternative>, you state:

“A Natural Covid-19 Vaccine Alternative

2020 has been a year to forget for many of us. The uncertainty of the pandemic has had an irreversible effect on life as we know it - lives lost, small businesses forced to close, and many now living without income.

As we begin to navigate year 2 of the COVID-19 pandemic, there appears to be light at the end of the tunnel in the form of rapidly developed vaccines, authorized for emergency use.

For many Americans, these EUA vaccines are welcome - one or two shots that may or may not prevent Covid-19.

But for others, there is a sense of doubt. According to Monmouth University, 1 in 4 people are unwilling to get the new COVID-19 EUA vaccines....

‘We know about the short term, but can we truly know about the long term side effects in a rushed vaccine?’

‘Is 12 months long enough to develop a trusted vaccine?’

‘Will the COVID-19 Vaccine Affect My Pregnancy?’

It’s okay to be skeptical, doubtful or even scared. After all, these are valid questions to ask yourself. But COVID-19 has the potential to be serious, so it’s in your best interest to protect yourself and your loved ones. TerraMune Health is here to help you do just that.

Our Natural COVID-19 Vaccine Alternative

Our team has over 20 years of experience researching and developing our proprietary blend of Earth’s natural minerals. Our flagship product - ViralHalt demonstrates broad-spectrum antiviral properties, which have been laboratory tested and confirmed by the NIH (National Institutes of Health)....

Statements from our Medical Director, Dr. Douglas Nelson:

‘Specifically regarding Covid-19, this is the newest member of the coronavirus family. I concur with the NIH laboratory findings that ViralHalt’s proprietary blend is safe and features broad-spectrum antiviral properties. Science reveals that ViralHalt is nature’s prescription to eliminate and prevent viral illness.’

How Does ViralHalt Work

ViralHalt is an all-natural dietary supplement that provides viral protection by having a stronger affinity to healthy cells than that of viruses. The humic substances in ViralHalt are mainly split into humic acid & fulvic acid. The humic acid is responsible for transferring natural nutrients where it can benefit the body while fulvic acid is responsible for chelating healthy minerals while passing toxic minerals out of the body.

In simpler terms, ViralHalt will bind to healthy cell walls, deterring any viruses that enter your system. ViralHalt will then bind to the virus and eliminate it from the body.

To read more about the science behind ViralHalt, visit our [Clinical page](https://www.terramunehealth.com/clinical) [link to <https://www.terramunehealth.com/clinical>].”

- In a November 19, 2020 Facebook post at <https://www.facebook.com/TerraMuneHealth/>, you shared an image of a bottle of ViralHalt supplement and an image of radio talk-show host Howie Carr holding a bottle of ViralHalt. In this post you stated:

“Our 1st radio advertisement on the Howie Carr Show was a BIG success! Thanks Howie for helping us get the word out! Until a vaccine is available, or if you're waiting a while to take a vaccine, ViralHalt offers a sound alternative.”

In response to this post, one Facebook user posted a comment asking, “what is it for.” You responded by stating: “Thanks for asking! ViralHalt is an all natural antiviral that has shown effectiveness against a broad spectrum of viruses, including cold, flu, and others in the coronavirus family. ViralHalt helps block viruses from getting into healthy cells. ViralHalt also helps good nutrients, like Vitamin C, Vitamin D, and Zinc permeate healthy cells which then boosts your immune system. ViralHalt makes a great all natural choice for protection this virus season! Best Regards, The TerraMune Health Team.”

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 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 product identified above. Thus, any coronavirus-related prevention or treatment claims regarding such product are not supported by competent and reliable scientific evidence. You must immediately cease and desist making all such claims.

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

TerraMune Health, LLC

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Violations of the FTC Act may result in legal action seeking a Federal District Court injunction. In addition, pursuant to the COVID-19 Consumer Protection Act, Section 1401, Division FF, of the Consolidated Appropriations Act, 2021, P.L. 116-260, marketers who make deceptive claims about the treatment, cure, prevention, or mitigation of COVID-19 are subject to a civil penalty of up to \$43,792 per violation and may be required to pay refunds to consumers or provide other relief pursuant to Section 19(b) of the FTC Act, 15 U.S.C. § 57b(b).

Within 48 hours, please send a message to Richard Cleland, Assistant Director, Division of Advertising Practices, via electronic mail at rcleland@ftc.gov certifying that you have ceased making unsubstantiated claims for the product identified above. If you have any questions regarding compliance with the FTC Act, please contact Mr. Cleland at 202-326-3088.

Very truly yours,

Serena Viswanathan
Associate Director
Division of Advertising Practices

cc: Facebook *via email* to consumerpolicy@fb.com