



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

Serena Viswanathan
Associate Director
Division of Advertising Practices

July 22, 2021

CEASE AND DESIST DEMAND

VIA EMAIL TO angelicakokkalis@gmail.com

Dr. Angelica Kokkalis
The Han Institute
124 Westwood Dr.
West Lafayette, IN 47906

Re: Unsubstantiated claims for Coronavirus prevention and treatment

Dear Dr. Kokkalis:

This is to advise you that FTC staff has reviewed your websites at <https://angelicakokkalis.com/> and <https://www.han-institute.com/>, and your business listing at <https://www.beautynailhairsalons.com/US/West-Lafayette/275893399101020/The-Han-Institute--Dr.-Angelica-Kokkalis> in July 2021. We have also reviewed your social media websites at <https://www.youtube.com/channel/UCL-IYBVNJNTkHCnus-fhUJQ>, <https://www.facebook.com/TheHanInstitute>, <https://twitter.com/haninstitute>, and <https://www.instagram.com/haninstitute/>, where you direct consumers to contact you or Wei Labs, with whom you appear to have an affiliate or other financial relationship, to purchase products including Silver Flower capsules and Golden Flower herbal tea. We have determined that you are unlawfully advertising that certain products prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims on your websites and social media pages include:

- On your YouTube channel at <https://www.youtube.com/watch?v=rK50W2-Zxfg> you posted a video on April 9, 2021 titled, "Silver Flower and Golden Flower for Boosting the Immune System." The video description, which is nearly identical to your statements in the video, states:

"Hello, my name is Dr. Angelica Kokkalis and I'm a doctor of Chinese medicine. I have been practicing in the state of Indiana for over 25 years.

Today I would like to share with you some information on Silver Flower and Golden Flower for boosting the immune system.

Covid19 pandemic has caused an increase in hospitalizations for respiratory syndrome and multi-organ disease. Acute respiratory failure and acute respiratory distress syndrome can occur in the lungs which triggers severe lung inflammation and causes pneumonia. Blood clots are formed both in the artery branches that prevent blood from going to certain segments of the lungs and also blood clots are formed in the capillary-level vessels that prevent the transfer of oxygen to the blood. If you or a loved one is infected with Covid19, Wei Labs has the best, Chinese herbal medicine to offer.

The Silver Flower is in a capsule form and consists of the most rare and popular herbs for the treatment of pneumonia. It removes fluid pus and cellular debris from the lungs.

Another herbal formula that is great for boosting the immune system for the prevention of Covid19 is the Golden Flower Tea in powder and pill form.

Please call . . . to get more information and place an order. Mention code 1111 to get your order as soon as possible.”

[You made substantially similar statements in a Facebook post on May 18, 2021 and provided a link to your April 9, 2021 YouTube video (*see* <https://www.facebook.com/TheHanInstitute> and <https://www.beautynailhairsalons.com/US/West-Lafayette/275893399101020/The-Han-Institute---Dr.-Angelica-Kokkalis>). You also posted a link to your April 9, 2021 YouTube video on your Twitter page at <https://twitter.com/haninstitute/status/1380518590303109120>].

- In Facebook and Instagram posts at <https://www.facebook.com/TheHanInstitute> and https://www.instagram.com/p/CHyLE_InyXC/, posted on November 19, 2020, you state:

“COVID-19 cases are on the rise again, with At least 623 new coronavirus deaths and 135,187 new cases reported in the United States on Nov. 15. It’s so important to continue to follow CDC guidelines and stay safe!

One positive aspect of this situation is that Traditional Chinese Medicine can lend a helping hand to those struggling with the virus and recovery. According to Wei Labs, ‘Based on TCM theory, the SARS-CoV2 virus and its infection-induced immune reaction is viewed as [lung congestion]. Wei Labs Silver Flower Formula helps expel [lung congestion] in the respiratory tract, vascular system, and other organs of the body. Silver Flower also helps clear toxic Damp Heat resulting from the [lung congestion] and removes pro-inflammatory cytokines to reduce the cytokine storm and calm down the overactivated complement system.

Give us a call or send us a message for more information on the Silver Flower Formula.

#TCM #LungCongestion #WeiLabs #HanInstitute #Coronavirus #COVID19
#AngelicaKokkalis #HolisticHealth”

- On your YouTube channel at <https://www.youtube.com/watch?v=4TB6S7yvvmA> you posted a video on November 1, 2020 titled, “Silver Flower and Golden Flower for Boosting the Immune System - Jane Bro.” The video description, which is nearly identical to your statements in the video, states:

“Hello, my name is Dr. Angelica Kokkalis and I’m a doctor of Chinese medicine. I have been practicing in the state of indiana [sic] for over 25 years.

Today I would like to share with you some information on Silver Flower and Golden Flower for boosting the immune system. Covid19 pandemic has caused an increase in hospitalizations for respiratory syndrome and multi-organ disease. Acute respiratory failure and acute respiratory distress syndrome can occur in the lungs which triggers severe lung inflammation and causes pneumonia. Blood clots are formed both in the artery branches that prevent blood from going to certain segments of the lungs and also blood clots are formed in the capillary-level vessels that prevent the transfer of oxygen to the blood. If you or a loved one is infected with Covid19, Wei Labs has the best, Chinese herbal medicine to offer. The Silver Flower is in a capsule form and consists of the most rare and popular herbs for the treatment of pneumonia. It removes fluid pus and cellular debris from the lungs. Another herbal formula that is great for boosting the immune system for the prevention of Covid19 is the Golden Flower Tea in powder and pill form. Please call . . . Wei Labs at . . . to get more information and place an order. Mention code 1111 to get your order as soon as possible.”

[You made substantially similar statements in a Facebook post on November 2, 2020 and provided a link to your November 1, 2020 YouTube video (*see* <https://www.facebook.com/TheHanInstitute>).]

- On your YouTube channel at <https://www.youtube.com/watch?v=Hu2KE9OyhdA> you posted a video on April 4, 2020 titled, “An Urgent Message from Dr. Angelica Kokkalis.” The video description, which is nearly identical to your statements in the video, states:

“This is a rather urgent message to all of you regarding how to protect your body from this deadly, Coronavirus.

I am Dr. Angelica Kokkalis and I have been in private practice for over 25 years....

How can you boost your respiratory immune system to fight Coronavirus symptoms like fever, sore throat, cough, fatigue?

The National Administration of Traditional Chinese medicine developed 2 formulas to fight Coronavirus symptoms. Wei laboratory in California produced these formulas for the United States, anticipating that the virus will rapidly reach our country.

Golden Flower tea has 5 herbs and supports the body's respiratory immune system of the throat, respiratory tract, and heart. The Silver Flower herbal supplement has 20 herbs. It boosts the immune system's response to cough, phlegm, and sore throat. To order these products from Wei Labs please call . . . and mention promo code 11-11."

[The description accompanying this YouTube video also provides a link to your website at <https://angelicakokkalis.com/an-urgent-message-from-dr-angelica-kokkalis> which features the same video and text description.]

- In an April 4, 2020 post to your Facebook page at <https://www.facebook.com/TheHanInstitute/videos/465329150836371>, you provide the same video and text description that you posted to your YouTube channel on the same date (see <https://www.youtube.com/watch?v=Hu2KE9OyhdA>). You also posted a comment to this Facebook post in which you state: "For questions or to order Golden Tea or Silver Flower, call . . . and mention promo code 11-11."

It appears that you have a financial relationship with Wei Labs, the marketer of the Silver Flower capsules and Golden Flower herbal tea promoted in your videos and posts referenced above; therefore these videos and posts are subject to the federal laws that prohibit deceptive advertising.

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 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 and desist making all such claims, if you are being paid or otherwise receiving a benefit such as a discount or free products to promote the products at issue, including if you have a financial interest in the company marketing the product.

You are also advised to review all other claims for all products that you sell or are paid to promote, or in which you have a personal financial interest, and immediately cease and desist making claims that are not supported by competent and reliable scientific evidence.

Dr. Angelica Kokkalis
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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, via electronic mail at [rcleand@ftc.gov](mailto:rcleland@ftc.gov) certifying that you have ceased making unsubstantiated claims for the products 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 and Instagram *via email to* consumerpolicy@fb.com
Twitter *via email to* dc-help@twitter.com
YouTube *via email to* youtube-gov-support@google.com