



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

Serena Viswanathan  
Associate Director  
Division of Advertising Practices

December 29, 2021

**CEASE AND DESIST DEMAND**

VIA EMAIL TO [Health@TheDrsWolfson.com](mailto:Health@TheDrsWolfson.com) and [health@naturalheartdoctor.com](mailto:health@naturalheartdoctor.com)

Dr. Jack Wolfson, D.O.  
Dr. Heather Wolfson, D.C.  
The Drs. Wolfson, LLC  
10585 N. Tatum Blvd, Suite D-135  
Paradise Valley, AZ 85253

Re: Unsubstantiated claims for Coronavirus prevention and treatment

Dear Drs. Wolfson:

This is to advise you that FTC staff has reviewed your websites at <https://thedrswolfson.com/> and <https://naturalheartdoctor.com/> in December 2021. We also reviewed your social media websites at <https://www.instagram.com/thedrswolfson/>, [https://www.instagram.com/natural\\_heart\\_doctor/](https://www.instagram.com/natural_heart_doctor/), <https://www.facebook.com/TheDrsWolfson>, <https://www.youtube.com/user/TheDrsWolfson>, where you direct consumers to your websites <https://thedrswolfson.com/> and <https://naturalheartdoctor.com/> to purchase products, including supplements. We have determined that you are unlawfully advertising that certain products treat or prevent Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims include:

- In an email sent to consumers on August 27, 2021 with the subject line, “**3 Strategies Besides Ivermectin,**” you state:

“We are getting tons of emails about ivermectin. Does it work? Is it safe? What other options exist?”

First, it appears ivermectin works and is safe for most people.

But if you know me, I really don’t like taking out my prescription pad.

So here are 3 things YOU can do without a script to accomplish the same things as ivermectin.

1. Eat plenty of wild seafood and pasture-raised meat. We love this source [affiliate link to <https://www.vitalchoice.com/>] for the best seafood and meat in the world. Also, get the chemicals out of your food by eating only organic.
2. Get sunshine and get sleep. Sunshine creates vitamin D and THIS may be the single best strategy for immune support. Sleep allows your body to recover. Make sure you get 8 hours.
3. Natural supplements will help do the same thing as ivermectin. Glutathione, zinc, vitamin A, C and D are all anti-viral and help support our body against the daily onslaught of environmental toxins.

We have a package called Immune Basics [link to <https://shop.thedrswolfson.com/products/immune-basics-bundle>, where the Immune Basics Bundle, including Super C, Super D, Zinc, Liquid A, and N-Acetyl-Cysteine, is available for purchase] that contains all the above. And with every purchase, you get a FREE bottle of Quercetin by Pure Encapsulations. Quercetin may be the silver bullet in the recent pandemic according to this research paper [link to <https://journal-inflammation.biomedcentral.com/articles/10.1186/s12950-021-00268-6>, an article titled “Anti-inflammatory potential of Quercetin in COVID-19 treatment” from *Journal of Inflammation*].

Get your Immune Basics bundle here [link to <https://shop.thedrswolfson.com/products/immune-basics-bundle>].

In Health,

Jack Wolfson D.O., FACC  
The Natural Heart Doctor.”

- On your website at <https://thedrswolfson.com/a-note-on-ivermectin/>, you state:

“**A Note on Ivermectin...**  
Updated: August 25, 2021...

We get a ton of questions about ivermectin for the prevention and treatment of COVID. Many people ask for a prescription for this pharmaceutical....

### **Does Ivermectin Work for COVID?**

A July 2021 review in the American Journal of Therapeutics was very favorable on the use of ivermectin for the prevention and treatment of COVID.

This table demonstrates an 86% reduction in COVID infection among those who received ivermectin versus placebo....

The authors of the above review conclude, ‘The findings indicate with moderate certainty that ivermectin treatment in COVID-19 provides a significant survival benefit.’...

**Conclusion:**

Personally, I do not take ivermectin. If I still worked in a hospital or area with rampant sickness, I may change my tune. But I think natural immune support is always the answer. Ivermectin is still pharma. I trust nature.

To that end, I take my NAC every day. You can buy the best brand [link to <https://shop.thedrswolfson.com/products/nac>] here. 1 cap 1-2x per day is the standard dose. I suggest stocking up on NAC [link to <https://shop.thedrswolfson.com/products/nac>] as the above FDA may limit its use.

I also suggest our Viral Protection Kit [link to <https://shop.thedrswolfson.com/products/viral-protection-kit>, where the Viral Protection Kit and Protocol, including Multi Multivitamin, Omega DHA, Daily Defense, and Gut Flora 30 Billion, is available for purchase] and take the components every day. There are many, many benefits to this protection kit for overall health and wellness....”

- On your website at <https://thedrswolfson.com/nac-and-your-heart/>, you state:

“**NAC and Your Heart...**  
Updated: May 18, 2021...

**What is NAC?**

Cysteine is an amino acid essential for the production of many proteins. It is also a major component of glutathione, the main antioxidant of the body....

NAC may also help with COVID prevention and treatment in people with COVID.

NAC appears to fight other viruses too.

**Ways to Benefits from NAC (and glutathione)...**

Whey protein as a supplement is an excellent source of glutathione building blocks. That is why I included New Zealand grass-fed whey in our Daily Defense [link to <https://shop.thedrswolfson.com/products/daily-defense-grass-fed-whey-protein->

[shake](#)]. I think Daily Defense is our single best source of heart, lung and total body protection. [You can read more here](#) [link to <https://shop.thedrswolfson.com/products/daily-defense-grass-fed-whey-protein-shake>].

N-acetyl cysteine supplements are a proven strategy. We have an [excellent source for you](#) [link to <https://shop.thedrswolfson.com/products/n-acetyl-cysteine-nac-this-item-is-in-stock>]. High dose, one cap by mouth per day.

You can nebulize glutathione too. BUT ONLY [THIS BRAND](#) goes in the nebulizer [link to <https://shop.thedrswolfson.com/products/l-glutathione-plus>].

Our [Detoxicore](#) [link to <https://shop.thedrswolfson.com/products/detoxicore>] also contains NAC and many other nutrients to support body health and wellness. Excellent for immune and detox support....”

- On your website at <https://thedrswolfson.com/can-beetroot-powder-protect-you-from-coronavirus/>, you state:

### “Can Beetroot Powder Protect You from Coronavirus?”

Dr. Jack Wolfson...  
Updated: March 19, 2020...

Who would have thought that beetroot can protect you from a virus? Actually, it is the end-product, nitric oxide, made from nitrates from food like beets that are antiviral.

A couple of studies seem to point to nitric oxide as protective against certain viruses. Corona is one of them....

### How NO Works to Fight Viruses

One study that you can find here discovered the following:

1. Nitric oxide or its derivatives can reduce viral spike protein which affects the fusion of the virus and its receptor, angiotensin converting enzyme 2. ([T]his receptor appears to be increased in users of ACE inhibitors, who are at a 300% higher risk of viral pneumonia death or intubation.[])
2. Nitric oxide or its derivatives cause a reduction in viral RNA production in the early steps of viral replication.

The same authors published another article on the topic as well. You can read more here. Here is a 3rd study you can review about nitric oxide and virus control.

### **Boost Nitric Oxide Naturally...**

Nitrate-rich foods- Nitrates (NO<sub>3</sub>) from foods like beets and green leafy vegetables are converted to nitrite (NO<sub>2</sub>) by oral bacteria and then to NO by stomach acid. Two problems here: People have low levels of good oral bacteria AND have decreased amounts of stomach acid. This is why we need probiotics and digestive enzymes. (Read on for my product recommendations for both of those.) Aside from eating the beets and greens, I suggest organic beetroot powder and an organic greens powder. (Read on for my product recommendations for both of those.)...

### **Crank Up Your NO for Viral Protection and More**

Eat beets and leafy greens. Consume protein rich foods like liver and seafood for amino acids. Get sunshine whenever possible. Everyone should follow these steps.

But you can also supplement with food-based nutrients and here is my plan for viral protection, heart health and SO much more.

1. Heart Beet [link to <https://shop.thedrswolfson.com/products/beetroot-powder>] – 1 heaping teaspoon daily
2. Daily Greens [link to <https://shop.thedrswolfson.com/products/daily-greens-drink>] – 1 heaping teaspoon daily
3. Vessel Support [link to <https://shop.thedrswolfson.com/products/vessel-support>] – 1 level teaspoon daily. Vessel Support is arginine, citrulline and taurine plus grapeseed extract to prevent the breakdown of nitric oxide
4. Heart Helpers [link to <https://shop.thedrswolfson.com/products/heart-helpers-probiotic>] is a top quality probiotic. Take one capsule daily.
5. Digest [link to <https://shop.thedrswolfson.com/products/digest>] is our digestive enzymes. Most people need more than 35 digestive enzymes for immune system health and Digest delivers. Take two caps daily.

I take the powdered drinks and mix them in 8-12 ounces of water or add them to a smoothie.

I have packaged these 5 products together in our Nitric Oxide Viral Protection Kit. You save 20% when you buy them as a kit. Ordering information and more details here [link to <https://shop.thedrswolfson.com/products/nitric-oxide-viral-protection-kit>]....”

- On your website at <https://naturalheartdoctor.com/nac-for-afib/>, you state:

“NAC for AFIB?...”

October 19, 2021...

## **What is NAC?**

Cysteine is an amino acid essential for the production of many proteins. It is also a major component of glutathione, the main antioxidant of the body.

NAC is the standard version of cysteine used in supplements and the version used in 100s of medical and scientific studies....

NAC may also help with COVID prevention and treatment in people with COVID.

NAC appears to fight other viruses too.

FDA threatens to ban NAC.

The product appears to be so effective, they want to control its distribution.

Better secure your supply quickly.

We love this NAC product [link to <https://shop.thedrswolfson.com/products/nac-120-caps-please-call-for-pricing-480-535-6844-1>], where NAC 120 Caps are available for purchase]. You will too.

Again, make sure you take the best. Buy your NAC here [link to <https://shop.thedrswolfson.com/products/nac-120-caps-please-call-for-pricing-480-535-6844-1>].”

- On your website at <https://naturalheartdoctor.com/covid-and-vitamin-d/>, you state:

### **“COVID and Vitamin D**

Dr. Jack Wolfson DO, FACC  
September 6, 2021...

### **Vitamin D Deficiency and COVID**

Vitamin D deficiency is a worldwide pandemic....

Vitamin D deficiency markedly increases our risk of viral, bacterial, fungal, and parasitic infections.

Vitamin D deficiency and COVID lead to:

1. More hospitalizations
2. More cytokine storm, higher CRP, and higher D-dimer

3. More ICU admissions
4. More deaths- 3x more

### **Vitamin D Works (Science Alert)**

#### Vitamin D:

1. Is a key regulator of the renin-angiotensin system that is exploited by SARS-CoV-2 for entry into the host cells.
2. Modulates multiple mechanisms of the immune system to contain the virus that includes dampening the entry and replication of SARS-CoV-2
3. Reduces concentration of pro-inflammatory cytokines and increases levels of anti-inflammatory cytokines,
4. Enhances the production of natural antimicrobial peptides and activates defensive cells such as macrophages that could destroy SARS-CoV-2.

#### **How to prevent vitamin D deficiency...**

1. Get sunshine – smart sunshine while avoiding sunburn is the key here. The more time outside, the better.
2. Eat seafood and meat- vitamin D only comes from animal sources. Check out [this page for more information](#) [affiliate link to <https://www.vitalchoice.com/>].
3. Get a lamp- Yes, a vitamin D producing lamp is very beneficial. [Check out this product here](#) [affiliate link to <https://www.sperti.com/>].
4. Take supplements- During the winter months, load up on vitamin D from food, your lamp, and from a bottle. Our patients get the best with our [Super D liquid](#) [link to <https://naturalheartdoctor.com/product/super-d/>, where Super D is available for purchase].

5-10 drops per day in the winter usually suffices. Get your levels checked and stay above 40. Take Super D with a [quality multivitamin](#) [link to <https://naturalheartdoctor.com/product/cardio-multi/>] loaded with K2 as well. [See our MULTI](#) [link to <https://naturalheartdoctor.com/product/cardio-multi/>].”

- On your website at <https://naturalheartdoctor.com/japanese-natto-will-this-nutrient-dense-food-help-with-covid/>, you state:

#### **“Japanese Natto: Will This Nutrient Dense Food Help with Covid?”**

Dr. Jack Wolfson DO, FACC and Ali Richmond, FNTF  
August 17, 2021...

Are you concerned about contracting viruses such as covid? Do you have loved ones who have had the J & J, AstraZeneca or really, any of the so-called ‘shots’?

Read on to find out how you can help yourself and your loved ones, and share this information on a simple Japanese food/common supplement....

### **What is Natto?**

Natto is a traditional Japanese fermented soybean which has proven to be beneficial for health. The texture is slimy, sticky and stringy, but don't let that deter you as it's benefits far outweigh any opposition to eating it. Fortunately, we can also just take it in pill form. It is rich in nutrients including manganese, magnesium, potassium, zinc and more....

### **Natto and Covid**

Scientists discovered Natto breaks down spike proteins on the surface of the Covid virus which prevents the virus from spreading within the body. It can also limit infections from other viruses.

In those who contract covid, elevated blood viscosity is the primary cause of thrombotic complications of Covid-19. Survivors of covid are at an increased risk for blood clots so using Nattokinase or our product called FLOW [link to <https://naturalheartdoctor.com/product/flow/>] is a perfect way to include some powerful protection by keeping blood flowing well.

Keep in mind that the J & J, AstraZeneca and the other gene therapy ‘solutions’ to covid also produce harmful thrombotic reactions. Why? Because these jabs don't stay locally at the injection site. Instead, the components including the spike proteins (which are the toxin) make their way to the blood and build up primarily within your blood vessels (also in your organs). This equates to a very high risk for blood clots, strokes and pulmonary embolisms to name a few. If you know anyone who has gotten one of these, please share this information.

Nattokinase (FLOW) supports healthy blood flow by acting as an anticoagulant and breaking up fibrous clots. It is also anti-atherosclerotic and protective of your blood vessels. Ideal dosing is 1-2 caps per day, depending on need (and if you've had a jab)....”

- On your website at <https://naturalheartdoctor.com/are-you-in-imminent-danger-covid-19-and-cardiovascular-conditions/>, you state:

**“Are You in Imminent Danger? Covid 19 and Cardiovascular Conditions**



Dr. Jack Wolfson DO, FACC  
May 5, 2021...

[Graphic of a large red round object with spikes, identifiable as a coronavirus, with the text: "COVID-19 CoronaVirus"]

Fear can make you sick; a virus will not if you keep your body in the best of shape. The fear that has been perpetuated over the last year will only serve to undermine your immune system. I want to help you Bulletproof Your Immune System....

Did you know that humans host 300,000,000,000 viral particles. You heard that right. We have coexisted with viruses since the beginning of time. So why are people so afraid? And what can we do?

The answer is simple, maintain a healthy immune system in order to keep ALL the viruses and other co-inhabitants in your body balanced....

I want you to know that your body is your hero. It is fully capable of fighting a virus when equipped to do so. Stop fearing a virus and know that you can be invincible. Will we get sick from time to time? Sure! And we will recover. Let's make sure we prepare ourselves every day to keep viruses, bacteria and everything else in check.

### **Boost Your Immune System to Annihilate Fear!...**

Sadly, even the best diets are deficient in nutrients. The soil is lacking, the air is polluted and the water is poisonous. This is why we recommend support from supplements in addition to taking the above steps.

1. Protection Kit to support your body on a daily basis. For this kit purchase: Heart Defense [link to <https://naturalheartdoctor.com/product/heart-defense/>], Cardio Multi [link to <https://naturalheartdoctor.com/product/cardio-multi/>], CardiOmega [link to <https://naturalheartdoctor.com/product/cardiomega/>], and Heart Helpers [link to <https://naturalheartdoctor.com/product/heart-helpers-probiotic/>]
2. Emergency Kit to provide maximum benefit in a time of need. For this kit purchase: Super C [link to <https://naturalheartdoctor.com/product/super-c/>], Argentyn [link to <https://naturalheartdoctor.com/product/argentyn-silver-hydrosol/>], Berber [link to <https://naturalheartdoctor.com/product/berbe-berberine/>], Lauricidin [link to <https://naturalheartdoctor.com/product/lauricidin-the-natural-heart-doctor/>], and Liquid A [link to <https://naturalheartdoctor.com/product/liquid-a/>]."

Drs. Jack and Heather Wolfson  
The Drs. Wolfson, LLC  
December 29, 2021  
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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 for such products 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 products and services and immediately cease and desist claims that are not supported by competent and reliable scientific evidence.

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 Mr. Richard Cleland via electronic mail at [rcleland@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