



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

Serena Viswanathan
Associate Director
Division of Advertising Practices

January 15, 2021

WARNING LETTER

VIA EMAIL TO info@infinitumhealth.com

Kevin Engholdt
Founder and Manager
Infinitum Health, LLC
3820 W. Happy Valley Rd. Suite 141 No. 419
Glendale, AZ 85310

Re: Unsubstantiated claims for Coronavirus prevention or treatment

Dear Mr. Engholdt:

This is to advise you that FTC staff reviewed your website at <https://www.infinitumhealth.com> in December 2020. We also reviewed your social media websites at <https://www.facebook.com/infinitumhealth> and <https://twitter.com/infinitumhealth> where you promote supplements you sell on your website at <https://www.infinitumhealth.com>, including Infinimin® Immunity Multivitamin. We have determined that you are unlawfully advertising that certain products or services prevent or treat Coronavirus Disease 2019 (COVID-19).

Some examples of Coronavirus prevention or treatment claims include:

- On a page on your website titled “Cordycepin: a metabolite of Cordyceps mushroom - a viral inhibitor with potential against COVID-19,” you state:

“Another incredible step forward for COVID-19 research, this time, using mushroom research on inhibition, highlighting one of our newcomer extracts - **cordycepin**. This is found in *Cordyceps* species of mushroom, already found our product, **Infinimin**®.

As in previous articles (‘**Seaweed Inhibits COVID-19**’ [link to <https://www.infinitumhealth.com/post/seaweed-extract-effective-inhibits-covid-19-in-vitro-study-finds>], ‘**Seaweeds to the Rescue**’ [link to

<https://www.infinitumhealth.com/post/the-covid-19-novel-coronavirus-pandemic-2020-seaweeds-to-the-rescue>] and ‘**Seaweed compounds inhibit COVID-19, further research shows**’ [link to <https://www.infinitumhealth.com/post/seaweed-compounds-inhibit-binding-of-covid-19-further-research-shows>]), research is really starting to take off in this area but originally started with **fucoïdan** and seaweed species. Now, some interesting light is shed on a new compound, **cordycepin**, interacting with the virus in an entirely different way than the **fucoïdan** compound, potentially giving us a dual approach to combat this virus!!! . . .

This research is the first study of its kind that highlights the therapeutic potential of cordycepin against COVID-19....

In summary, based on the strong molecular interactions of cordycepin with SARS-CoV-2 spike protein and main proteases in addition to reported polyadenylation inhibition; suggesting a higher potential of cordycepin to inhibit virus entry and replication into the host body. It is, therefore, suggested that world community should undertake repurposing clinical studies to test efficacy and safety in the treatment of COVID19 which is an urgent need of the hour....

Well, our dietary supplement, **Infinimin®** is already on the market and most notably already has compounds like cordycepin and fucoïdan that may help support the need for COVID-19 efforts.” (emphasis in original)

[<https://www.infinitumhealth.com/post/cordycepin-a-metabolite-of-cordyceps-mushroom-a-viral-inhibitor-with-potential-against-covid-19>]

- On a page on your website titled “Seaweed compounds inhibit binding of COVID-19, further research shows” you state:

“Another remarkable study, continuing the effort around COVID-19 and seaweed research on inhibition, highlighting once again, one of our favorite extracts - **fucoïdan**. This is found in **Laminaria japonica (aka Saccharina japonica)** included in our product, **Infinimin®** . . .

As with the previous studies, they have been consistent in using fucoïdan from the same seaweed species, found in **Laminaria japonica (aka Saccharina japonica)** included in our **Infinimin®** brand! . . .

*We know that **Saccharina japonica (AKA Laminaria Japonica)** stops the binding of the COVID19 virus...*

It is a good thing, **Infinimin®, has not only **Saccharina japonica (AKA Laminaria Japonica)** but also **Undaria pinnatifida** and **Fucus Vesiculosus** to assist us....**

This current study showed that a seaweed species, has a compound, that appears to show stronger binding to specific enveloped viruses. FACT. More research is needed of course, but the researchers put together a pretty good evidence packet. Our product, also has this exact species of seaweed(s). FACT.

More specifically, this research showed that the sulfated galactofucan and glucuronomannan from the seaweed species, *Saccharina japonica (AKA Laminaria Japonica)*, showed strong binding ability to SARS-CoV-2 (COVID-19), suggesting that these polysaccharides might be good candidates for preventing and/or treating SARS-CoV-2 (COVID-19).” (emphasis in original)

[<https://www.infinitumhealth.com/post/seaweed-compounds-inhibit-binding-of-covid-19-further-research-shows>]

- On a page on your website titled “Seaweed extract effectively inhibits COVID-19 in vitro, study finds” you state:

“Another remarkable study in the prestigious journal, **Cell Discovery**, highlights one of our favorite extracts - **fucoïdan**. This is found in **Laminaria japonica (aka Saccharina japonica)** included in our **Infinimin®** brand! In a test of antiviral effectiveness against the virus that causes the novel coronavirus (COVID-19), an **extract from edible seaweeds, fucoïdan, substantially outperformed remdesivir, the current standard antiviral used to combat the disease, according to new research published in the journal Cell Discovery. . . .**” (emphasis in original)

[<https://www.infinitumhealth.com/post/seaweed-extract-effective-inhibits-covid-19-in-vitro-study-finds>]

- On a page on your website titled “Fucoïdan (from seaweed) as potential inhibitor of Corona, HIV-1, Herpes, and other envelope viruses?” you state:

“Dramatic research showing broad spectrum antiviral properties, yet again, with the power of seaweed and its key extract, fucoïdan, already available in our **Infinimin® Multivitamin**.

More research is needed, but numerous studies speak about the incredibly deadly **Human Immuno-deficiency Virus (HIV-1), Herpes Simplex Virus (HSV), Coronavirus**, and other ‘enveloped’ and ‘non enveloped’ viruses being prohibited from binding to a host - i.e. **PREVENTION from viruses!!!**

They speak to fucoïdan's ability to inhibit the actual binding of enveloped viruses, specifically, HIV-1, HSV, and Coronavirus. According to the research, ‘ ... all natural fucoïdians can be considered as potential anti-HIV agents, like having a detergent for your body ... ’.

Even more amazing, these studies speak of a few of our key seaweed species in our **Infinimin® Multivitamin**, *saccharina japonica* (also know[n] as laminaria japonica), *undaria pinnatifida* (also known as wakame), and *fucus vesiculosus* (also known as bladderwrack, having the most potent broad spectrum antiviral activity!...

Finally, **‘broad pandemic level viruses such as Avian Flu, SARs, and Coronavirus could be completely prevented if more seaweed supplementation occurred in populations lacking these key nutritional compounds like Fucoidan[.]’** (emphasis in original)

[<https://www.infinitemhealth.com/post/2015/07/23/fucoidan-from-seaweed-as-potential-inhibitor-of-hiv1>]

- In Facebook and Twitter posts on December 6, 2020 you state: “Excellent new research on cordycepin, a compound already available in our Infinimin® brand and its support against COVID-19!!” The posts include an image of dried mushrooms on a plate and a link to a page on your website at <https://www.infinitemhealth.com/post/cordycepin-a-metabolite-of-cordyceps-mushroom-a-viral-inhibitor-with-potential-against-covid-19> described above. The Twitter post also includes the hashtag #covid19research.

[December 6, 2020 posts at <https://www.facebook.com/infinitemhealth> and <https://twitter.com/InfinitemHealth>]

- In a Facebook post on November 12, 2020 you state: “Further research on seaweed compounds and COVID-19 binding inhibition!!!!” The post includes an image of a coronavirus next to an image of supplement capsules and an herb and links to a page on your website at <https://www.infinitemhealth.com/post/seaweed-compounds-inhibit-binding-of-covid-19-further-research-shows> described above.

[November 12, 2020 Facebook post at <https://www.facebook.com/infinitemhealth>]

- In a Twitter post on September 15, 2020 you state:

“SEAWEED EXTRACT INHIBITS COVID19 IN VITRO STUDY FINDS!!

Fantastic research on an extract already available in our Infinimin® brand and its antiviral ability on COVID!! #covid19research”

The post includes an image of seaweed floating in the ocean and links to a page on your website at <https://www.infinitemhealth.com/post/seaweed-extract-effective-inhibits-covid-19-in-vitro-study-finds> described above. Two separate Facebook posts on September 10, 2020 include the same image, link to the same page on your website, and substantially similar text.

[September 15, 2020 Twitter post at <https://twitter.com/infinitemhealth>; September 10, 2020 Facebook posts at <https://www.facebook.com/infinitemhealth>]

- In a Facebook post dated March 8, 2020, which includes an image of a coronavirus next to an image of supplement capsules and an herb, you state: “Infinimin® Multivitamin supporting prevention to Coronavirus!!” The post includes a link to <https://www.infinitemhealth.com/post/2015/07/23/fucoidan-from-seaweed-as-potential-inhibitor-of-hiv1> which is described above. A separate Facebook post on March 8, 2020 includes the same image, a link to the same page on your website, and substantially similar text.

[March 8, 2020 Facebook posts at <https://www.facebook.com/infinitemhealth>]

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, 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 review all other claims for your products and immediately cease making 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 and an order may require that you pay back money to consumers. In addition, pursuant to the COVID-19 Consumer Protection Act, H.R. 133, 116th Cong., Div. FF, Title XIV (2020) (enacted), 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.

Within 48 hours, please send a message to Richard Cleland, Assistant Director via electronic mail at 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 Richard Cleland at 202-326-3088.

Very truly yours,

Serena Viswanathan
Associate Director
Division of Advertising Practices