



EXECUTIVE OFFICES  
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August 18, 2021

Richard Cleland, Assistant Director  
Division of Advertising Practices  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
*by email to rcleland@ftc.gov*

Dear Assistant Director Cleland:

On behalf of the Center for Inquiry, Inc., its members, and the millions of consumers directly impacted by pandemic-related financial crimes, I write to alert you to potential violations of the COVID-19 Consumer Protection Act and request an urgent investigation regarding the advertising and sale of “homeopathic vaccine detoxification” products.

### **Introduction**

When Congress enacted the COVID-19 Consumer Protection Act,<sup>1</sup> the intent was clear: to provide the Federal Trade Commission (FTC) a strong tool necessary for the protection of consumers during the ongoing pandemic. Fully empowered to do so, the FTC must hold bad actors accountable for their unlawful deception. The agency’s responsibility to enforce the law is paramount when, as here, the deceit is accompanied by a significant risk to public health and safety.

As explained below, unscrupulous snake oil salesmen continue to target the most vulnerable with promises of magical cures. The financial harm done to consumers is obvious. The active dissemination and proliferation of misinformation—particularly about COVID-19 vaccines—may be less so, but the impact is real and demonstrable. Homeopathy peddlers, and the concomitant pain and suffering that follows their schemes, compels the FTC to act with requisite urgency.

### **Homeopathy Harms**

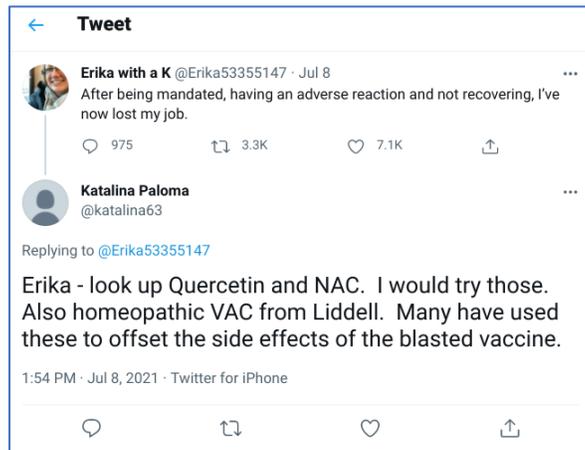
The Center for Inquiry (CFI) has long battled the predatory practices of pseudoscience peddlers. As an organization dedicated to the pursuit of a world in which public policy is guided by evidence, science, and compassion—rather than superstition, pseudoscience, or prejudice—CFI continuously speaks out against deceptive trade practices. Whether against a large corporation or individual bad actor, combating the damage wrought by magical thinking to the financial security and health of victims motivates our consumer protection work. Homeopathic products typify the harm we endeavor to prevent.

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<sup>1</sup> *Pub. L. No. 116-260, Title XIV.*

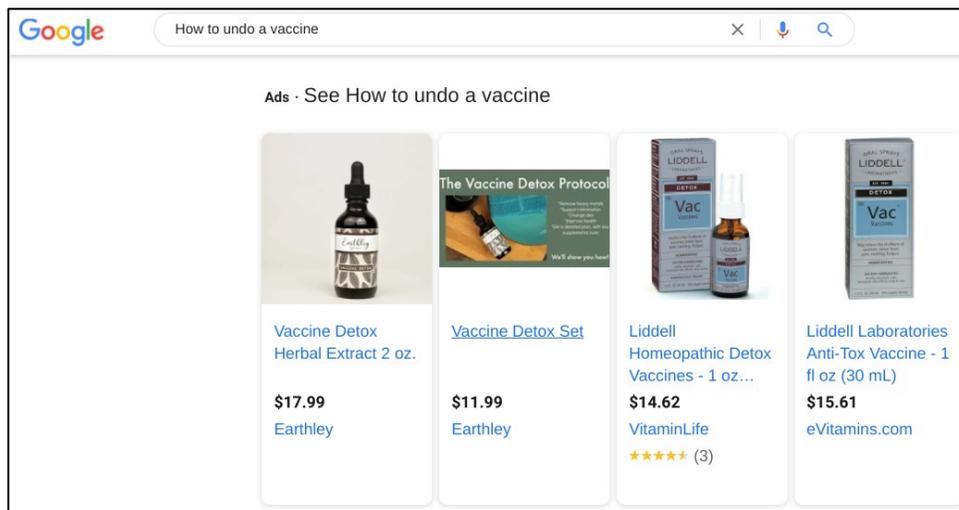
The uncontrolled trade of pseudoscientific remedies extends beyond damage to the individual victims. Misinformation dissuades patients from seeking evidence-based treatments, while deception and fraud induce the purchase of worthless products. Compounding financial harm from the initial purchase, the patient forgoes science-based, effective treatment while also introducing unknown, untested, and seemingly unregulated substances into their bodies. Unfortunately, the harmful results are predictable and coming to fruition in real-time.

While sufficient to compel action, the pandemic heightens these harms. For instance, despite clear evidence-based safety and efficacy determinations related to current COVID-19 vaccines, vaccine-hesitant individuals take to the internet for information. There, they are met by slick advertisements and word of mouth recommendations for homeopathic products intended to reverse life-saving vaccines:



(<https://twitter.com/katalina63/status/1413194903207743490>)

Alarming, a Google query for, “**How to undo a vaccine**” yields the following results:



Among the offending products advertised for sale:

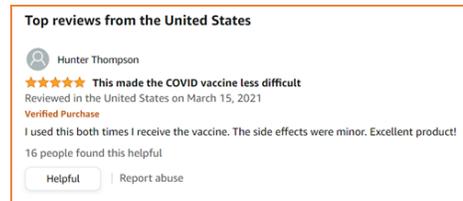
**Vaccines Detox,**  
Liddell Laboratories,

“Vaccines combines low dilution ingredients that may help **relieve current symptoms** and high dilution ingredients that may help to lessen the **ill effects of present and past vaccinations.**” [emphasis added]<sup>2</sup>

**Listed “Active Ingredients”**

- Arnica Montana 3X
- Hypericum Perforatum 6X
- Ledum Palustre 30C
- Morbillinum 30X
- Natrum Muriaticum 6X
- Silicea 30C
- Sulphur Iodatum 200C
- Thuja Occidentalis 200C
- Urtica Urens 3X

**Cost:** \$19.49



(<https://www.amazon.com/gp/customer-reviews/R3961QLOXX5UG8/>)

At the outset, the bottle contains 20 percent alcohol yet apparently has no child safety measures in place. Further, consumers interested in learning about the listed “active ingredients” must consult the sole authoritative source of this information, the *Homœopathic Pharmacopœia of the United States* (HPUS).

The Federal Food, Drug and Cosmetic Act defines “drug” to include “articles recognized in the [...] official Homœopathic Pharmacopœia of the United States...”<sup>3</sup> The HPUS is owned and published by the Homeopathic Pharmacopœia Convention of the United States (HPC), a private nonprofit corporation. HPC charges an individual \$499.00 for 30-day access to the drug information while an unlimited number of users, for one year, costs \$15,000.00.<sup>4</sup>

While CFI continues to await a response from HPC regarding affordable access to what is in essence codified law, the dangers of the vaccine “detox” are nevertheless discoverable. For instance, “Morbillinum” likely is more easily recognized by its Preferred Substance Name, “**Measles Virus.**”<sup>5</sup> The ingredient “Natrum Muriaticum” is commonly known as “table salt” while the tree from which “Thuja Occidnetalis” is derived contains thujone—a neurotoxic, genotoxic,

<sup>2</sup> <https://www.liddell.net/product/vaccines-detox/>

<sup>3</sup> 21 U.S.C. § 321(f).

<sup>4</sup> <https://www.hpus.com/what-is-the-hpus-online-database.php>

<sup>5</sup> <https://fda.report/UNII/HT3R7C012Q> (“Alternate Names” includes “MORBILLINUM [HPUS]”)

and carcinogenic abortifacient.<sup>6</sup> Should HPC ultimately decide to grant access to the legal definitions of the listed ingredients—let alone respond to CFI’s request to view the HPUS—we will provide additional information as it becomes available.

### CONCLUSION

The dissemination of misinformation, exploitation of fears, and immediate risk to public health and safety detailed above compel agency action. The FTC is empowered to prevent fraud, deception, and unfair business practices; homeopathic hucksters must be held to account for the harm done—particularly in the midst of a deadly pandemic.

CFI remains ready to provide assistance in achieving our shared goals of protecting consumers against the suffering caused by pseudoscience fraudsters. Please contact the undersigned should you require additional information. CFI welcomes the agency’s prompt response and substantive action.

Sincerely,



Aaron D. Green

*Staff Counsel*

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<sup>6</sup> Zámboriné Németh, É., Thi Nguyen, H., [Thujone, a widely debated volatile compound: What do we know about it?](https://doi.org/10.1007/s11101-020-09671-y) *Phytochem Rev* 19, 405–423 (2020). <https://doi.org/10.1007/s11101-020-09671-y>.