



April 8, 2020

VIA EMAIL

Andrew Smith, Director
Lois Greisman, Associate Director
Rick Quaresima, Acting Associate Director
Bureau of Consumer Protection
Federal Trade Commission
[REDACTED]

Jason Humbert, Captain
Health Fraud Branch Chief
Division of Enforcement
Office of Regulatory Affairs
U.S. Food and Drug Administration
[REDACTED]

Re: New U Life, Inc.'s False and Deceptive Coronavirus Marketing

Dear Mr. Smith, Ms. Greisman, Mr. Quaresima, and Capt. Humbert:

Since our [September 5, 2019 letter](#) notifying your offices of New U Life's deceptive marketing of Somaderm gel, the company – through its distributors – has expanded its deceptive campaign to now include false and deceptive claims that the product can help treat and/or prevent the coronavirus, which has already claimed more than 10,000 lives in the U.S.

Examples of such claims include but are not limited to:¹



Yenni Kilingsworth
Mar 26 at 11:57 PM • 🌐

Growth hormone plays an important role in the development of the immune system. Studies suggest that growth hormone may promote growth of the thymus, a gland responsible for the production of important immune cells called T cells. Increase your immune system before its too late against corona virus !!

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Kathryn Wilson
Mar 28 at 1:54 AM • 🌐

Boost your immune system with Somaderm HGH Homeopathy Transdermal gel. 🍷

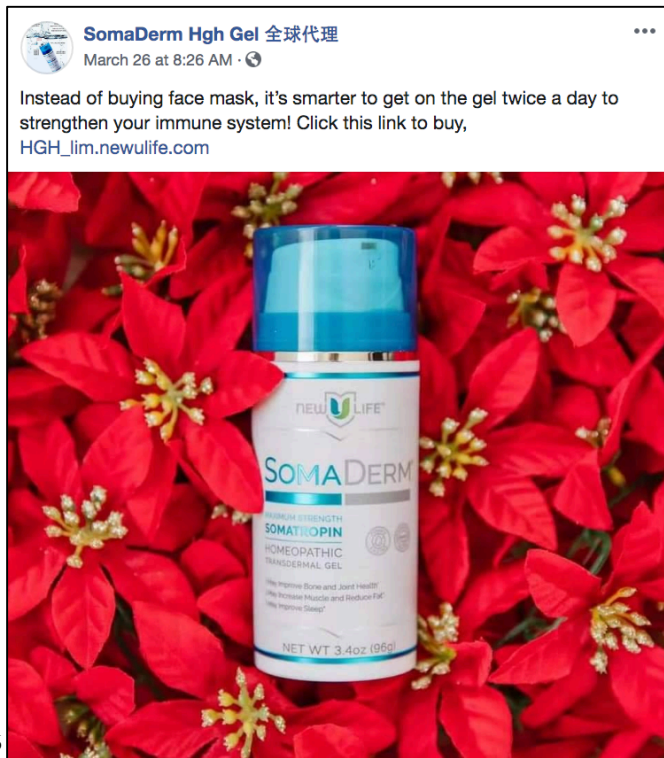
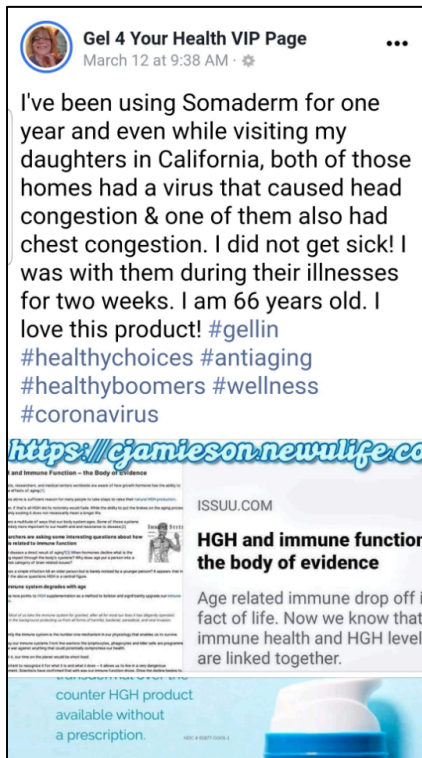
Checkout HGHsurgeon.com and buysomagel.com 🌹

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Kathryn Wilson
March 17 at 4:54 PM • 🌐

Dr Mark ~ Our gel will not prevent us from getting the Corona Virus but it can boost our immune system thus decreasing our risk to catch the Corona Virus or the Flu or any other infections. Plus, a strong immune system will help us heal from the infection. 🍷 GOOD TIME TO TRY OUR SOMADERM GEL 🍷 HGHsurgeon.com & buysomagel.com for more information.

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As both the FTC and FDA have made clear, such immune-boosting claims made in the context of the coronavirus are not structure/function claims, but rather implied disease-treatment and prevention claims, requiring substantiation and FDA approval.

The above deceptive marketing examples show that New U Life and its distributors are taking advantage of consumers' fear of the coronavirus pandemic and using it as an opportunity to sell its Somaderm Gel.⁸ This tactic can cause not only financial harm for consumers but can have serious medical consequences as well. As such, TINA.org strongly urges the FTC and FDA to immediately investigate the claims being made by New U Life and its distributors and take prompt and appropriate enforcement action against those found to be violating the law.

If you have any questions, please do not hesitate to contact us.

Sincerely,

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Bonnie Patten, Esq.
Executive Director
Truth in Advertising, Inc.

Cc via email: Alexy Goldstein, CEO, New U Life

¹ These examples are also available at <https://www.truthinadvertising.org/new-u-life-coronavirus-claims/>.

² https://www.facebook.com/gel4yourhealth/posts/684822302292138?_tn=-R. *See also* https://www.youtube.com/watch?v=mUynPHDAUJo&feature=youtu.be&fbclid=IwAR3Pk_PXrTGAv3FP0fUHvwbDXjhKL0RF3ljRgW0BeVLvA52Ac9AD0IiukiY.

³ <https://www.facebook.com/ykilingsworth/posts/10224026843682927>.

⁴ <https://www.facebook.com/kdw244/posts/10223237225504403>.

⁵ <https://www.facebook.com/kdw244/posts/10223097327047029>.

⁶ <https://www.facebook.com/gel4yourhealth/posts/670906433683725>.

⁷ <https://www.facebook.com/newulife.malaysia/posts/142141147293038>.

⁸ After TINA.org's investigation into New U Life, the Direct-Selling Self Regulatory Council conducted its own investigation into the company's deceptive marketing and ultimately [referred the matter](#) to the FTC in March 2020, making note in its referral that the New U Life salesforce is claiming that Somaderm is effective at treating and healing the coronavirus.