



August 8, 2019

**VIA EMAIL AND OVERNIGHT MAIL**

Attention: Allegations of Regulatory Misconduct Branch  
Office of Compliance  
Center for Devices and Radiological Health  
Food and Drug Administration  
WO Bldg. 66 RM 3523  
10903 New Hampshire Ave.  
Silver Spring, MD 20993  
[CDRHDeviceAllegations@fda.hhs.gov](mailto:CDRHDeviceAllegations@fda.hhs.gov)

Re: Snow Teeth Whitening's Continuing Use of FDA logo

Dear Sir or Madam:

On July 10, 2019, we notified your office that the Arizona-based dental cosmetics company Snow Teeth Whitening was improperly using an FDA logo in violation of the FDA's Logo Policy. Specifically, the company was prominently featuring an FDA logo in its marketing materials, including on its product packaging, website, and social media platforms, as well as falsely stating on its website and in Google ads that the company's product is FDA-approved.

Soon after alerting your office to this issue, Snow Teeth Whitening removed the FDA-approved claims from its website and Google ads, as well as the FDA logo from select marketing materials, including certain images of its product packaging featured on its website and social media pages. However, despite giving the appearance that it has remedied its marketing, Snow Teeth Whitening continues to feature the FDA logo in several other marketing materials. These materials – which are all still in publication as of today, four weeks after TINA.org's initial letter regarding Snow Teeth Whitening's misconduct – include, but are not limited to, website images and videos, social media advertisements and posts, YouTube videos, and images on third-party marketing and selling platforms.



“Dentists Love Snow Teeth Whitening” video on trysnow.com<sup>1</sup>



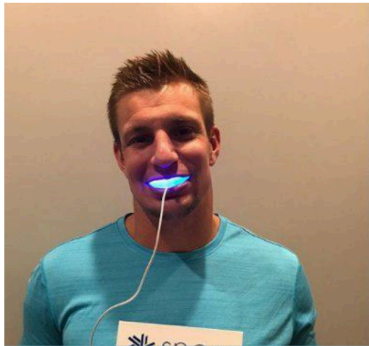
“Snow Teeth Whitening News Show 2018” video on trysnow.com<sup>2</sup>



Snow Teeth Whitening commercial on the company’s YouTube channel<sup>3</sup>





GET SNOW TODAY




A revolutionary breakthrough in teeth whitening technology is changing how the world takes care of their teeth – and is now the most popular at-home teeth whitening solution recommended by dentists and used by dozens of celebrities.

Top images featured on [special.trysnow.com](https://special.trysnow.com)<sup>4</sup>

**snowteethwhitening**  
Sponsored



**15% OFF**

**SNOW**  
TEETH WHITENING SYSTEM FDA

**Shop Now** >


August 7, 2019 Instagram ad<sup>5</sup>

**facebook**

**Rob Gronkowski -Gronk with Snow At-Home Teeth Whitening.**  
Sponsored · 🌐

Off season means no hiding under a helmet. Let's get those teeth SMOOTH and WHITE!  
**Snow Teeth Whitening**  
Who's with me?

Enter code "Gronk" at [TrySnow.com](https://www.trysnow.com) for 25% OFF!...



51.4K 8.1K Comments 2.5K Shares


August 7, 2019 Facebook ad

**Snow At-Home Teeth Whitening**  
Sponsored · 🌐

The world's #1 Teeth Whitening System is 15% OFF for a limited time 🇺🇸

- ❄️ Removes wine and coffee stains
- ❄️ No teeth sensitivity
- ❄️ Just 10 minutes a day

... Continue Reading



**15% OFF**

TRYSNOW.COM  
**15% OFF Sensitivity Free Teeth Whitening**

[Shop Now](#)

August 8, 2019 Instagram ad





Instagram post by Snow Teeth Whitening celebrity endorser, Rob Gronkowski<sup>6</sup>



Amazon listing for Snow Teeth Whitening At-Home All-in-One Kit<sup>7</sup>



July 30, 2019 Facebook post<sup>8</sup>

All of the above Snow Teeth Whitening marketing examples violate the FDA's Logo Policy, and indicate that the company's initial remedial efforts were incomplete and that FDA action is still warranted.

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: Snow Teeth Whitening

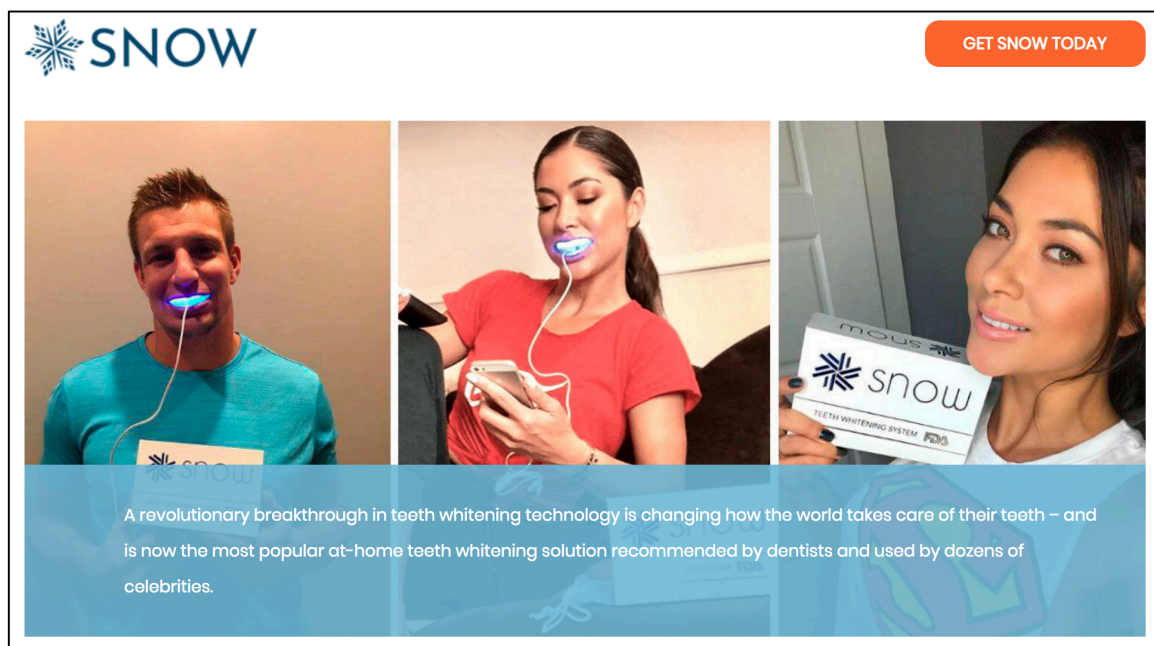
<sup>1</sup> This video is also published on YouTube at [https://www.youtube.com/watch?time\\_continue=12&v=vgAC25KJt-s](https://www.youtube.com/watch?time_continue=12&v=vgAC25KJt-s).

<sup>2</sup> This video is also published on Snow Teeth Whitening's YouTube channel at [https://www.youtube.com/watch?time\\_continue=3&v=7e4Db8cnVSY](https://www.youtube.com/watch?time_continue=3&v=7e4Db8cnVSY).



<sup>3</sup> <https://www.youtube.com/watch?v=VdT6AWwzNk>.

<sup>4</sup> [https://special.trysnow.com/v2/?utm\\_source=hasoffers&utm\\_medium=affiliate&utm\\_content=-4635-1&utm\\_campaign=aff1001](https://special.trysnow.com/v2/?utm_source=hasoffers&utm_medium=affiliate&utm_content=-4635-1&utm_campaign=aff1001).





Similar images also appear at <http://smile-easy.com/>:

The advertisement banner features the 'SNOW' logo in the top left corner, consisting of a stylized snowflake icon and the word 'SNOW' in a bold, sans-serif font. In the top right corner, there is an orange button with the text 'GET SNOW TODAY' in white. The main visual is a horizontal strip of three photographs: a man in a teal shirt using the whitening device, a woman in a red shirt using it while looking at her phone, and a woman holding a box of the 'snow' teeth whitening system. Below these images, a blue semi-transparent box contains white text that reads: 'A revolutionary breakthrough in teeth whitening technology is changing how the world takes care of their teeth – and is now the most popular at-home teeth whitening solution recommended by dentists and used by dozens of celebrities.'


<sup>5</sup> This similar ad also appears on Instagram, including on July 28, 2019.



 **Snow At-Home Teeth Whitening** ...  
Sponsored · 

Get your best smile EVER now for 15% OFF!!

-  Guaranteed Whiter Smile
-  12 Months Worth of Serum
-  Easy-to-Use, Takes Only 10 Minutes
-  5-Year Warranty

... Continue Reading



**15% OFF**   
TEETH WHITENING SYSTEM 

TRYSNOW.COM  
**15% OFF The Most Advanced  
Teeth Whitening System**

[Shop Now](#)

<sup>6</sup> <https://www.instagram.com/p/Bi3A1-YHk8s/?taken-by=gronk>.

<sup>7</sup> <https://www.amazon.com/BRAND-NEW-Whitening-All-One/dp/B07GNVGCDW?th=1>.

<sup>8</sup> <https://www.facebook.com/snowteethwhitening/photos/a.914211535343663/2269828536448616/?type=3&theater>.