



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

Mary K. Engle
Associate Director

September 9, 2019

VIA FEDERAL EXPRESS

Jared Forbush
4Bush Holdings, LLC
318 West 250 South
Kaysville, UT 84037-2443

Dear Mr. Forbush:

The Federal Trade Commission (“FTC”) is an independent federal agency whose mission is to maintain a competitive marketplace for the benefit of both businesses and consumers. The FTC seeks to protect consumers by enforcing laws and rules that promote truth in advertising and fair business practices, and by educating consumers and businesses about their rights and responsibilities. We are writing to express concern that you may be making false or unsubstantiated advertising claims about the health benefits of products containing cannabidiol (CBD), a chemical compound derived from the cannabis plant..

Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52, prohibit unfair or deceptive advertising. Specifically, it is unlawful to advertise that a product can prevent, treat, or cure human disease unless the advertiser possesses 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. This substantiation requirement applies whether the advertiser disseminates such health claims directly via traditional advertising or indirectly via the use of a product name, website name, or metatags. This requirement also extends to consumer endorsements. It’s not enough that an endorsement represents the consumer’s honest opinion or experience. Reasonable consumers may interpret an endorsement claiming a health benefit from the use of a product as representing that the product is likely to be effective in achieving that benefit. Under FTC law, an advertiser must possess and rely on competent and reliable scientific evidence to support health claims, both express and implied, made through the use of endorsements.

FTC staff has reviewed your websites, including www.magicgreenoildrops.com, for potential violations of the FTC Act. We are concerned that one or more of the health benefit claims excerpted below may be false or not substantiated by competent and reliable scientific evidence.

Excerpts from www.magicgreenoildrops.com

Complete Relief CBD - Clinically Validated Cannabidiol

* * *

**SPECIAL REPORT: Woman Paralyzed By Pain Discovers
Breakthrough Relief Called 'Nature's Oxycontin'....**

Complete Relief CBD has been called "Nature's Oxycontin" because it **quickly relieves even the most agonizing pain.... Many say it works like magic.** Some say it works better than prescription painkillers like Vicodin and Oxycontin....

* * *

[Dr.] Jamie [Richardson] applied for a research grant to run the first ever **FDA approved clinical trial involving CBD.**

With the help of **Harvard researchers and medical doctors**, Jamie led a clinical trial studying the effects of CBD on pain and inflammation.

The results were astonishing. Through their research, they discovered a multitude of other health benefits of CBD they never anticipated. Richardson's team ran additional follow-up studies that concluded CBD is nothing short of a real medical miracle.

CBD has now been clinically proven to:

* * *

Reduce social anxiety, cognitive impairment, and discomfort in patients diagnosed with Generalized Social Anxiety Disorder (SAD)

Decrease cancer spread by "turning off" genes involved in tumor development

Combat neurodegenerative disorders like Alzheimer's by removing plaque that block neuron-signaling

Reduces cigarette addiction by modulating the rewarding the effects of nicotine

[R]estore respiratory stability to those experiencing sleep Apnea

Clears acne by inhibiting lipid synthesis on the skin

Regulates blood sugar and lowers insulin resistance

Provide relief to those suffering from IBD (Chron's [sic] or Colitis) through its anti-inflammatory effects

Improves symptoms of MS (multiple sclerosis) by providing durable protection to neurons

Prevents obesity....

[Dr. Jamie Richardson] teamed up with his group of Harvard researchers to create Complete Relief CBD, a brand of medical grade CBD supplements developed through thousands of hours of research and clinical trials....

All 5 [venture capital investors from the television show *Shark Tank*] jumped on the opportunity to invest in Complete Relief CBD with confidence, calling it the...

“Natural Miracle Cure That Will Bring Down Big Pharma”

* * *

Morgan Freeman: “The Only Thing That Offers Relief For Fibromyalgia is CBD”

* * *

[O]ur senior editor Tanya Johnson volunteered for our experiment. Tanya was chosen because of her history with Rheumatoid Arthritis, a painful autoimmune condition doctors don't yet have a complete cure for.

Below is her story...

Tanya's Real Life Experience With Complete Relief CBD...

One day, while watching an episode of *The Doctors*, I heard Dr. Travis Stork talk about a natural solution to pain management and inflammation that's even more effective than prescription meds. Of course, the solution was CBD and the brand he recommended was Complete Relief CBD.... So I decided to order a risk-free sample and give it a shot.

Within a few weeks, my pain completely disappeared and my normal panic attacks began to subside.... I not only saved thousands of dollars, but also the hassle of doctor visits and therapy sessions thanks to Complete Relief CBD.

* * *

Get a Risk-Free Trial Today>>

* * *

Finally a Cannabidiol Supplement that is medically validated and absolutely legal!

Excerpts from www.offer.firstclassherbalistcbd.com[...]; Linked from the
“Get a Risk-Free Trial Today” Button

The Science of CBD (CANNABIDOIL)

* * *

CBD Oil has been medically proven to positively regulate your endocannabinoid system] addressing issues such as... hypertension[] and even cardiovascular issues....

- **Psychological Benefits:** [I]n some cases may offer a safe remedy for depression and bipolar disorders.
- **Neurological Benefits:** Our CBD Oil’s positive impact on the neural system helps reduce age-related cognitive decline....

REAL SUCCESS STORIES!

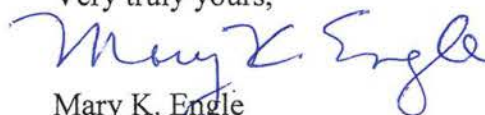
“After a big cancer scare, I started taking CBD about 6 months ago and LOVE IT! My Oncologist said whatever you are doing to keep doing it. I have used a few brands and my favorite is by far Herbalist Oils CBD. My energy is slowly coming back and I feel wonderful.”

- Kandi

We strongly urge you to review all claims for your products, including consumer testimonials, and ensure that those claims are supported by competent and reliable scientific evidence. Violations of the FTC Act may result in legal action seeking a federal district court injunction or an administrative cease and desist order. An order also may require that you refund money to consumers.

With regard to the advertising claims discussed above, please notify staff attorney Keith Fentonmiller via electronic mail at kfentonmiller@ftc.gov within fifteen (15) working days of receipt of this letter, of the specific actions you have taken to address FTC staff’s concerns. If you have any questions regarding compliance with the FTC Act, please contact Mr. Fentonmiller at 202-326-2775.

Very truly yours,



Mary K. Engle
Associate Director
Division of Advertising Practices