



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

Mary K. Engle
Associate Director

September 17, 2019

VIA FEDERAL EXPRESS

Brad Keller
NuLife CBD Oils, LLC
3312 Independence Way
King of Prussia, PA 19434

Dear Mr. Keller:

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 website, www.nulifecbd oils.com, for potential violations of the FTC Act. We are concerned that one or more of the health benefit claims excerpted below may not be substantiated by competent and reliable scientific evidence.

Excerpts from www.nulifecbd oils.com/medical-applications-cbd

The Health Applications of CBD

The Many Ways in Which CBD is Increasing Health and Enhancing Lives

The cannabinoid compound, cannabidiol – otherwise known as CBD, is becoming increasingly respected and acknowledged as a powerful healing modality that treats a wide spectrum of medical conditions. With its low to zero THC content, CBD offers powerful pain relief without the psychotropic effects of feeling “high” that go along with recreational marijuana. Extensive research has gone into the different ways in which CBD affects the endocannabinoid system of the body that regulates our immune system, sleep, nervous system and organ functions. CBD can be used to combat a wide range of medical issues and there are miraculous and positive testimonials in abundance that highlight CBD success stories.

Outlined below are some of the primary areas where CBD products have been proven to be beneficial:

- Pain relief and anti-inflammatory properties for arthritis and rheumatism
- Acne and skin conditions
- Mental disorders such as Autism, ADHD, Bipolar, Anorexia and Schizophrenia
- Addiction recovery
- Lou Gehrig’s Disease (ALS)
- Anxiety, Depression and PTSD
- Neurological disorders such as Parkinson’s, Alzheimer’s Disease, Epilepsy, Stroke, TMI’s, MS and Fibromyalgia
- Cancer treatment for tumor growth inhibitors, increased appetite and pain relief
- Diabetes
- AIDS
- Digestive, Gastrointestinal and Endocrine Disorders such as IBS and Crohn’s
- Sleep Disorders

Below we go into greater detail as to the specific ways that CBD impacts some of our most common ailments.

Cancer Treatment

The impetus behind creating NuLife CBD came from observing a family member's battle with terminal esophageal cancer in 2015 and how powerful and rapid a remedy CBD was during his final days. A mixture of CBD and THC supported him greatly in minimizing his pain and nausea and increasing his appetite. Using a variety of CBD products made his ultimate transition infinitely easier and less painful. Having an increased appetite and decreased nausea allowed him to maintain critical nutrition levels and keep weight on, which is important when dealing with the fallout from chemotherapy and radiation. Throughout the process of his cancer treatment, the CBD allowed him pain free nights where he was able to sleep, and in the end, it increased the overall quality of his life before passing.

According to the **National Cancer Institute**, "Cannabidiol (CBD)... may relieve pain and lower inflammation without causing the 'high' of delta-9-THC. Cannabinoids may be useful in treating the side effects of cancer and cancer treatment." CBD has also been seen as a growth inhibitor in tumors and may impact cellular dysplasia." [sic]

A Miracle Pain Remedy

Do a bit of internet research and you will discover a plethora of reviews and testimonials from people who have traded in their pharmaceutical-grade pain and anti-inflammatory medications for the all-natural benefits of CBD. CBD products are effective in treating both acute and chronic pain and can come in the form of CBD oil, CBD ointment and cannabis pain cream and gel for topical use, vaping CBD oil to be inhaled and CBD gummies, tinctures, capsules and powders to be ingested. 34-year-old Jen Barker from New Mexico had tried everything to minimize the pain she experienced each month during her menstrual cycle, often doubled over with abdominal cramping. She experienced immediate relief from her symptoms upon trying CBD capsules and after 3 months of daily usage her cycle became more manageable than ever before.

Treatment for Epilepsy and Seizures

13-year-old Emma Crozier of Arizona uses CBD to manage the epileptic seizures that have plagued her life since the age of 2. The use of high-grade Medical CBD has reduced the number of her grand mal seizures from multiple a day to one one [sic] or two per week. According to a **Consumer Reports** article, FDA-approved seizure medications “fail about one-third of all sufferers, either because the drugs don’t stop the seizures or because the side effects are too severe.” Epileptic seizures are caused by irregularly misfiring electrical charges within the brain, which can result in convulsions and altered or impaired states of consciousness. The specific cause of epilepsy remains unknown, but can sometimes be the result of traumatic brain or head injuries, hormonal issues or the introduction of a virus.

Treatment for Multiple Sclerosis

Multiple Sclerosis or MS is a chronic autoimmune disease that affects the central nervous system, optic nerves and brain and can be incredibly painful when patients suffer from frequent muscle spasms. CBD has been shown to reduce spasm levels and greatly lower the pain of MS side effects.

Neuroprotection Against Neurological Disorders

Extensive research is currently being conducted around the positive benefits of using CBD to treat a variety of neurological disorders that cause the degeneration of the brain and nerves over time. Patients with disorders such as Alzheimer’s, Multiple Sclerosis (MS), Parkinson’s disease, traumatic brain injuries and the negative effects of an ischemic attack such as a stroke have seen significant success in implementing CBD as part of their treatment plan based on its ability to reduce the inflammation that can make neurodegenerative symptoms worse.

Treatment of Depression and Other Mental Health Applications

Unlike THC, who’s [sic] psychotropic effects can impact anxiety and paranoia levels, CBD has shown great promise in improved cognitive function and enhanced relief for patients suffering from a wide variety of mental disorders such as anxiety, depression, addiction, schizophrenia, bipolar disorder, OCD and PTSD.

Excerpt from www.nulifecbd oils.com/cbd-product-reviews

Reviews

Rated 5 out of 5

Adria (*verified owner*) – July 12, 2019

This cream is wonderful and has really helped my arthritis



CBD Pain Cream – 1000mg CBD 2 Oz

Rated 5 out of 5

Peter Prinsen (*verified owner*) – June 24, 2019

I have arthritis in both feet and after using the 1000 mg product for a few days got significant relief from the pain. Orthotics has helped a little but nothing has helped as much as the cream.



CBD Pain Cream – 1000mg CBD 2 Oz

Rated 5 out of 5

Anonymous (*verified owner*) – June 21, 2019

My blood pressure has always been high... now it is in the low normal range. Diet, Exercise–Same... Only difference is CBD.



CBD Oil 500mg (30ml) Bottle

Excerpt from www.nulifecbd oils.com/what-is-cbd-hemp-oil-cannabidiol-information

The Most Common CBD Uses

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The most common reasons that people use CBD are to provide natural pain relief and anti-inflammation for ailments that include the following:

- Joint pain from osteo and rheumatoid arthritis
- Support for neurodegenerative diseases such as alzheimers and parkinsons
- Treatment for PTSD, depression, anxiety, schizophrenia and other mental health considerations
- Support with chronic insomnia
- Support with quitting smoking and other substance use disorders
- Chronic pain from injuries
- Increased appetite, reduced nausea and pain relief for cancer patients
- Support for treatment-resistant epilepsy in both children and adults
- Support with autoimmunity for inflammatory and pain-associated disorders such as fibromyalgia and MS
- Preventative diabetes measure and effective treatment for existing Type 1

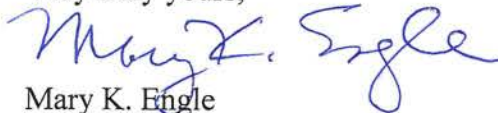
Mr. Brad Keller
NuLife CBD Oils, LLC
September 17, 2019
Page 6

- External uses such as psoriasis and acne
- Antitumor cancer treatments for leukemia, cervical and colon cancers and combination therapy for breast and prostate cancer
- Treatment of antibiotic resistant bacteria

We strongly urge you to review all claims for your products, including consumer testimonials and product reviews, 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