



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](http://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.

