



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!

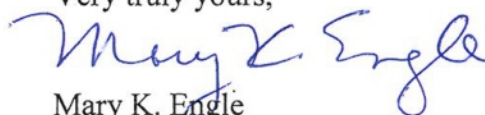
“After a big cancer scare, I started taking CBD about 6 months ago and LOVE IT! My Oncologist said whatever you are doing to keep doing it. I have used a few brands and my favorite is by far Herbalist Oils CBD. My energy is slowly coming back and I feel wonderful.”

- 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



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..

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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.

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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

* * *

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

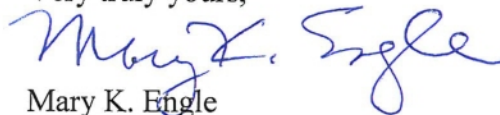
Mr. Brad Keller
NuLife CBD Oils, LLC
September 17, 2019
Page 6

- External uses such as psoriasis and acne
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- Treatment of antibiotic resistant bacteria

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Mary K. Engle
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September 9, 2019

VIA FEDERAL EXPRESS

NuLife CBD Oils, LLC
1000 Continental Dr.
King of Prussia, PA 19406

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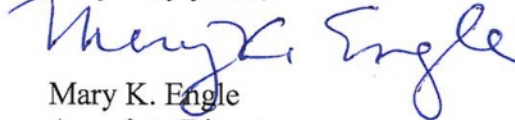
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- Support for treatment-resistant epilepsy in both children and adults
- Support with autoimmunity for inflammatory and pain-associated disorders such as fibromyalgia and MS
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- External uses such as psoriasis and acne
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Mary K. Engle
Associate Director
Division of Advertising Practices



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

Mary K. Engle
Associate Director

September 9, 2019

VIA FEDERAL EXPRESS

Brett Benning, CEO
Ocanna Co.
1002 E. University Dr. Ste. 101
Phoenix, AZ 85034

Dear Mr. Benning:

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FTC staff has reviewed your website, www.ocannacbd.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.ocannacbd.com/product/gummies

OCANNA CBD GUMMIES

Delicious and highly effective, our CBD infused gummies...

BENEFITS

- Fights inflammation – the root cause of most major degenerative diseases, including arthritis, heart disease, fibromyalgia, cancer, asthma, and a wide spectrum of autoimmune disorders. May also aid with... epileptic seizures and anxiety disorders.

* * *

Related products

Cream

Ocanna's organic CBD Cream is formulated with... CBD extract that reduces inflammation, providing... arthritis pain relief...

* * *

Oil

Ocanna CBD Oil is a natural dietary supplement that may be effective in the fight against... depression, PTSD, ... and epilepsy, in addition to a broad spectrum of inflammatory diseases including heart disease, arthritis, fibromyalgia, [and] asthma....

* * *

Excerpts from www.ocannacbd.com/cbd-hope-for-digestive-distress

CBD – Hope for Digestive Distress

* * *

The study of CBD's (cannabinoids) and their potential curative affects [sic] on gut health and the issues directly relating to it, should be considered one of the more exciting aspects of this amazing curative. For anyone suffering with the activity-limiting issues of digestive distress, be it Crohns, IBS, ulcers, GERD, Leaky Gut and more, the potential to ease or alleviate their symptoms goes well beyond heartening.... [C]hronic digestive ailments such as Crohns disease have been experimentally treated with promising results using CBD. Crohns disease is the result of ulcers and lacerations within the stomach and small intestines that remain untreated for a prolonged duration. The soothing anti-inflammatory properties of CBD are invaluable for such disorders.

Excerpts from www.ocannacbd.com/cbd-a-potent-therapy-for-fibromyalgia

CBD – A Potent Therapy For Fibromyalgia

* * *

[U]sing a plant-based product like CBD oils and cream to reduce both fibromyalgia pain and inflammation... can be an excellent alternative.

* * *

Excerpts from www.ocannacbd.com/promising-affects-of-cbd-on-arthritis-pain

Promising Affects [sic] of CBD on Arthritis Pain

* * *

CBD- A Potent Therapy For Arthritis

CBD is best known for its analgesic properties (pain relief), anti-inflammatory abilities (reducing swelling and the localized burning sensation), along with antibacterial properties. This makes it very effective in mitigating the most common symptoms of arthritis.

CBD products can ease or eliminate arthritic symptoms....

* * *

For those suffering from the excruciating pain of arthritis, CBD is a precious, plant-based gift.

In 2008, a review related to research on CBD and its ability to manage pain foretold the possibility of CBD becoming a potent formulation in the near future. With every new study and report, we see more scientific evidence surfacing that shows how and why CBD is effective in treating arthritis

Excerpts from www.ocannacbd.com/testimonials-supporting-cbd-and-wellness

I have good news. It DOES work

Just wanted to give a review update on my newfound journey with Ocanna CBD. I think it's been a good 2 weeks or so that I've been on this CBD oil, and I have some good news. It DOES work. I utilize this amazing oil for my panic/anxiety attacks. I woke up yesterday and realized I hadn't had any in a little while, then stopped and attributed it to this bottle of goodness. If CBD can help so many people to either get off of meds or lessen the use of them, let's utilize it more. It

has piqued my curiosity so much so that I will be trying out the Chews maybe next month. Thanks Team Ocanna!

–Shan Apr 12, 2018

My patients with Autism

Yes!!! I am recommending it after trying it myself to my patients with Autism. The topical is my favorite because can put on the bottoms of their feet or up their backs and can start with just a small amount to be sure they tolerate it well. Then can go up. Once they have used the topical, then go to the oil. We are starting slowly with 1-2 drops then working up. Have 2 kids on it, both are 4 years old and so far so good! Parents are happy they are sleeping through the night!

– Windy Jun 19, 2018

Osteoarthritis

I'm a retired Marine, after spending 20 years in uniform, romping and stomping all over the globe. Unfortunately, it left me with osteoarthritis in all of my main joints. I was maxing out my pain meds and didn't want to have to get doped up with strong narcotics, so I needed to do something. After taking CBD oil for 2 weeks I noticed a difference and after 2 months I've been able to cut my pain meds in half. As I continue to adjust the dosage of CBD, I'm hoping to cut back further on the pain meds or get off them completely.

– Michael Nov 05, 2018

Arthritis Relief At Last!

Severe arthritis pain is an unwelcome companion in my life. Both hands and feet are so bad with rheumatoid arthritis that I've got fused joints in both. It's the bone-on-bone pain in my right hip and knee that really slowed me down though. I could hardly go anywhere because moving hurt so much. And at night – there was no quality sleep because of excruciating pain. Nothing seemed to cut the pain or give me any real relief.

Then my daughter sent me Ocanna 300mg CBD cream hoping it might work. I was amazed at what a difference it made. In just a few days, I was able to walk throughout two stores alongside my husband, and never had to stop or slow down. Better yet, I'm sleeping without fighting constant pain, even when I accidentally roll onto my right side.

I admit to hesitating about using a cannabis-based product (that's just how my generation views this stuff), but now that I've experienced how effective it really is, I'll never hesitate again. I'm an 85-year old believer in the power of Ocanna and their CBD cream!

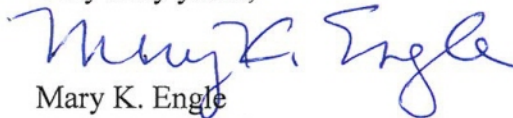
– Barbara March 18, 2019

Brett Benning, CEO
Ocanna Co.
September 9, 2019
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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