



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

Division of Advertising Practices

Mary K. Engle  
Associate Director

September 3, 2014

Dr. James Liu  
DrNaturalHealing Inc.  
111 McCoy Street  
Milford, DE 19963

Re: AsthmaCare Kit, FTC File No. 142-3102

Dear Dr. Liu:

As you know, the staff of the Federal Trade Commission's Division of Advertising Practices has conducted an investigation into whether your company, DrNaturalHealing, Inc., violated Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, in connection with the marketing of AsthmaCare Kit.

The AsthmaCare Kit consists of a nasal irrigation device and homeopathic spray that purport to prevent or reduce the occurrence of asthma attacks as well as alleviate or reduce the severity of asthma symptoms, including minor shortness of breath, wheezing, or tightness in the chest.

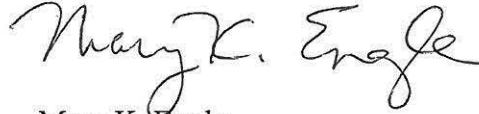
Section 5 of the FTC Act requires that advertising claims be truthful and non-misleading. In addition, for certain types of claims, such as health benefit claims, an advertiser must possess competent and reliable scientific evidence substantiating the claims prior to dissemination. We were concerned that the asthma-related claims for AsthmaCare Kit were not adequately substantiated. Specifically, the health claims relied on limited evidence that nasal irrigation could remove some viruses and allergens from the nasal cavity. However, the evidence did not support the claim that AsthmaCare Kit's nasal irrigation and homeopathic spray could reduce the frequency of asthma attacks or alleviate the severity of asthma symptoms.

Upon review of this matter, we have determined not to recommend enforcement action at this time. We considered a number of factors in reaching this decision. First, you have agreed to cease using the name "AsthmaCare Kit" and to stop making asthma-related claims in marketing the kit. Second, sales of the AsthmaCare Kit were very limited. The FTC staff expects that DrNaturalHealing will ensure that all its health benefit claims are adequately substantiated in the future.

Dr. James Liu  
September 3, 2014  
Page 2

Our decision not to pursue enforcement action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take further action as the public interest may warrant.

Very truly yours,

A handwritten signature in black ink that reads "Mary K. Engle". The signature is written in a cursive style with a large, looped "M" and "E".

Mary K. Engle  
Associate Director for Advertising Practices