

**BBB NATIONAL PROGRAMS**  
The Direct Selling Self-Regulatory Council  
Case Number 35-2021: – Government Referral – UWell Life, Inc.

**COMPANY DESCRIPTION**

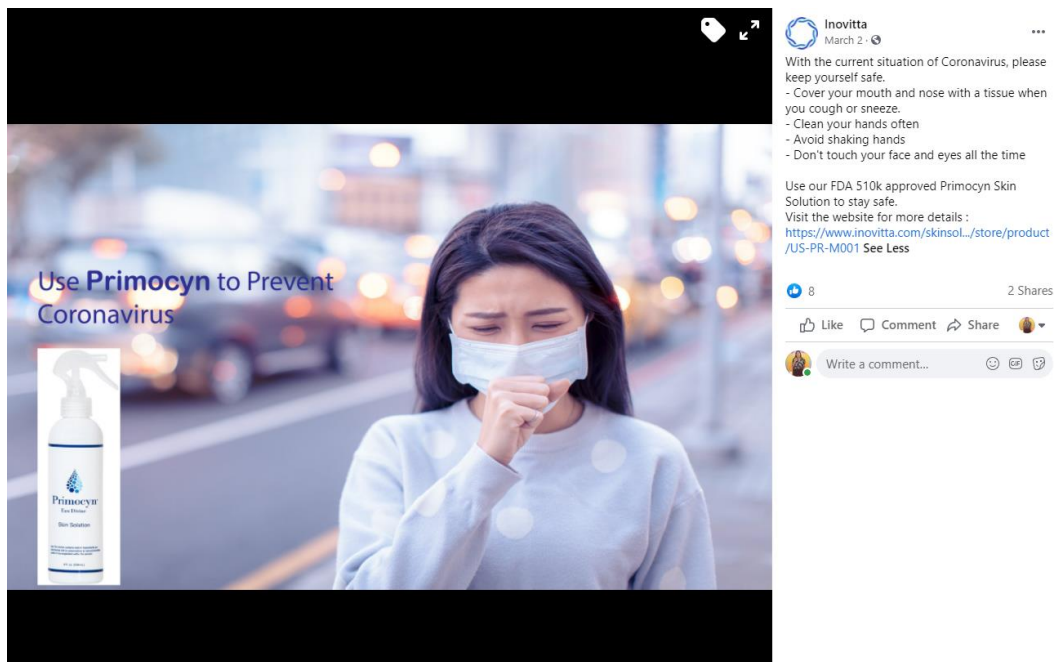
UWell Life, Inc. (“UWell Life” or the “Company”) is a direct selling company that was founded in 2018 and which offers health nutrients, essential vitamins and overall wellness products including Primocyn branded products.

**BASIS OF INQUIRY**

The Direct Selling Self-Regulatory Council (“DSSRC”) is a national advertising self-regulation program administered by BBB National Programs. This inquiry was commenced by DSSRC pursuant to its ongoing independent monitoring of advertising and marketing claims in the direct selling industry.

Specifically, DSSRC identified the following representative product performance claims being disseminated by Company salesforce members and on the Primocyn product website. DSSRC was concerned that the below representative claims communicate that Primocyn products can protect against serious health-related conditions including the corona virus and imply that Primocyn products have been approved by the Food and Drug Administration:

- “With the current situation of Coronavirus, please keep yourself safe... Use our FDA 510K approved Primocyn Skin Solution to stay safe.”  
<https://www.facebook.com/Inovittadotcom/photos/a.544816859472993/559941944627151/>

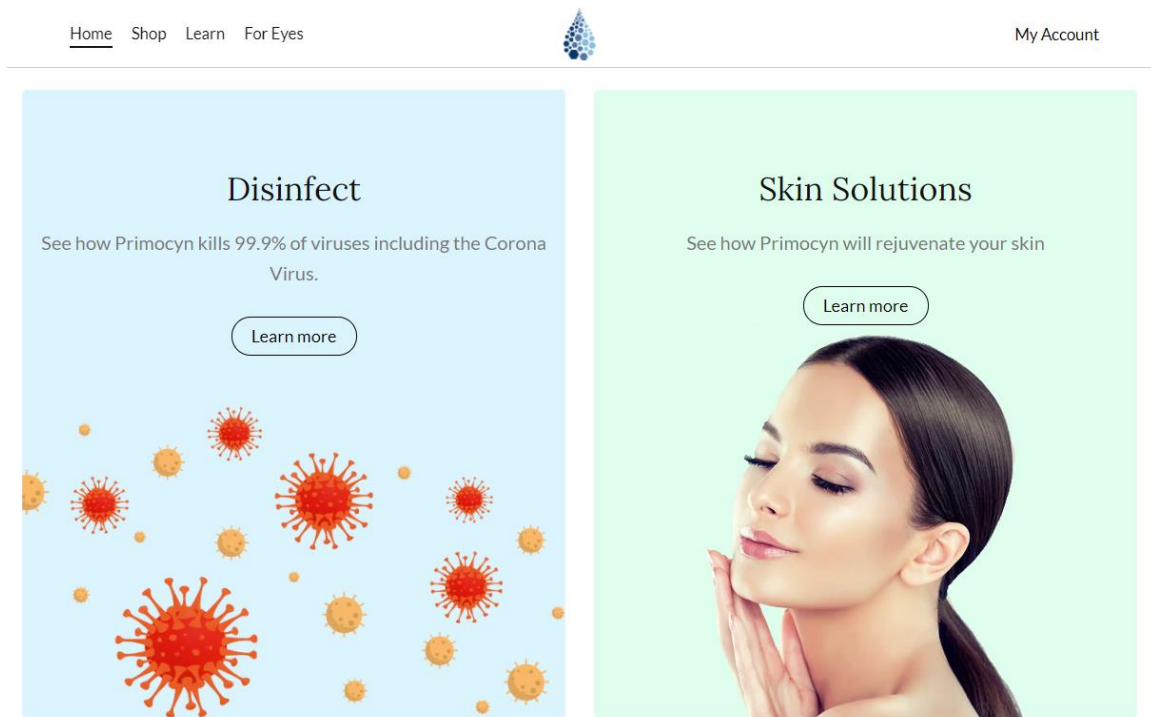


- “Use PrimocynEauDivine to protect against any virus.  
Sprayed E.N.T use !  
FDA 510k cleared!  
Safe to use!  
Increased Immunity!”  
<https://www.facebook.com/Inovittadotcom/photos/a.544816859472993/564482307506448/>
- “American Board of Healthcare Law and Medicine acknowledged Primocyn safely treats antibiotic resistant strains of viruses 🦠, bacteria such as MRSA, fungi and spores such as: Corona Virus – SARS, Avian influenza AH5N1 virus (Bird flu virus), HIV Virus, West Nile Virus, Ebola, Hepatitis A&B, Polio-virus, Tuberculosis, Salmonella, RSV Virus, Herpes Simplex, Influenza AH1!!!!!!  
I am, my family and friends truly believe in a power of this Solution, therefore we are using it everywhere and all the time! Just spray it on your face, head and hands any time as you think you might be in danger with virus, and you will be SAFE!!! Primocyn effectively kill 99.99 % Virus Reduction in 30 seconds and a Reduction of at least 10,000,00 particles/ml in One (1) Minute!!!! Safe for children, pregnant woman and for everyone!!!!”
  - Image of Primocyn Product with copy stating “ANTI CORONA VIRUS”  
<https://www.facebook.com/skincarebyvictoriaf/photos/a.1099780810075702/2940672279319870>
- YouTube video depicting Before & After images of Primocyn product usage  
[https://www.youtube.com/watch?v=GM\\_hQXYIRgw](https://www.youtube.com/watch?v=GM_hQXYIRgw)



How to use Primocyn Eau Divine

- “See how Primocyn kills 99.9% of viruses including the Corona Virus.”  
<https://www.primocyn.com>



- “Disinfects affected areas and kills 99.99% of bacteria and viruses in less than 30 seconds.”  
<https://www.primocyn.com>
- “Primocyn is the 1st non-toxic oxychloride skin solution 510(k) cleared by the FDA”  
<https://www.primocyn.com>

### **COMPANY’S NON-PARTICIPATION IN THE DSSRC PROCESS**

DSSRC first brought the representative claims and issues identified above to the Company’s attention by emailing UWell Life a copy of an inquiry letter on December 17, 2020. The Company was provided with 15-business days to respond to the DSSRC inquiry pursuant to section (II)(4) of the DSSRC Policies and Procedures.

After the Company failed to provide a response within 15 business days, DSSRC attempted to call UWell Life using the telephone number associated with the Company’s headquarters in Buena Park, California. After receiving no response to its telephone calls, a 10-Day notice was sent to the Company on January 19, 2021 indicating that, if the Company failed to provide a response to DSSRC regarding the claims and issue within 10 business days, the matter would be referred to the appropriate government agency.

Shortly after the 10-Day notice was mailed, DSSRC was contacted by UWell Life President/CEO Jackie Cho. Ms Cho explained that she had not received DSSRC's December 17 opening letter and requested that DSSRC resend the letter and that it remove all of the claims at issue. Accordingly, on February 3, 2021 DSSRC sent a second opening letter to Jackie Cho's attention at UWell Life requesting that the company address DSSRC's concerns regarding the subject claims and social media posts on or before February 24, 2021. Again, the company failed to provide a response to DSSRC's inquiry and, subsequently, a 10-Day notice was sent to Jackie Cho's attention at UWell Life by both email and overnight mail indicating that, if the Company failed to provide a response to DSSRC regarding the claims and issue within 10 business days, the matter would be referred to the appropriate government agency.

Notwithstanding the additional opportunity to respond to DSSRC's inquiry, the Company again failed to respond to DSSRC. DSSRC also confirmed that all of the subject claims remain active and accessible to the public.

### **REFERRAL TO GOVERNMENT**

DSSRC determined that the claims that were the subject of this inquiry reasonably communicated that UWell Life products can effectively treat serious health-related conditions including the corona virus. Despite DSSRC exercising its due diligence in attempting to contact UWell Life several times, the Company did not respond to the self-regulatory inquiry. In accordance with section (II)(9) of the DSSRC Policies and Procedures, in the event the company whose marketing is the subject of a DSSRC inquiry fails to participate in the self-regulatory process, DSSRC may refer the matter to an appropriate government agency for review and possible law enforcement action.

Accordingly, based upon the Company's failure to respond to the self-regulatory inquiry, DSSRC referred this matter to the Federal Trade Commission.

(Case No. 35-2021 PCM, closed on 03/20/21)  
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