



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

Consumer Protection Division
800 Fifth Avenue • Suite 2000 • MS TB 14 • Seattle WA 98104-3188
(206) 464-7744

April 23, 2020

Johnny T. Stine
North Coast Biologics
500 Yale Ave. N.
Seattle, WA 98109

NOTICE TO CEASE AND DESIST

RE: Unfair or Deceptive Acts Related to COVID-19 Pandemic

Dear Mr. Stine:

After receiving information indicating that you are selling and administering a COVID-19 “vaccine,” I had an investigator review some of your Facebook posts. The investigator observed that you are making false or unsupported claims about your so-called “vaccine” that may mislead consumers during the public health emergency related to the COVID-19 pandemic.

Exaggerating or misrepresenting the health benefits of your “vaccine” violates the Consumer Protection Act, RCW 19.86.020, which makes unfair or deceptive acts or practices illegal in trade or commerce in Washington. The Attorney General’s Office is actively investigating deceptive claims related to the COVID-19 pandemic and will take legal action against those who are violating the law.

As you know, Washington is struggling with this pandemic. No effective treatment or vaccine for COVID-19 has been identified and only a limited number of cleaning and disinfecting products have been shown to remove the virus from surfaces or skin. In this time of uncertainty, consumers should not have to worry about being misled about the health benefits of products that have not been evaluated or established as effective to treat or prevent the virus. My office will hold those who deceive the public with unproven or false statements regarding the effectiveness of COVID-19 treatments or preventative measures accountable during this emergency.

You must immediately stop making misrepresentations about your COVID-19 “vaccine.” Continuing to do so may result in a lawsuit against you and the imposition of civil penalties of up to \$2000 per violation. Please send your response to this Notice to Shannon.Smith@atg.wa.gov within five days.

Sincerely,

A handwritten signature in blue ink that reads "Bob Ferguson". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

BOB FERGUSON
Attorney General

RWF/jlg