Prepared for Demo Acquirer under terms version 2026-10-15. Show it to a platform, processor or buyer as evidence that every claim was reviewed. Anyone else relying on it for their own decisions needs our written reliance letter.

CLAIMS DILIGENCE REVIEW — Demo portfolio (acquisition target)

> **Sample report. The brand, products and copy are invented. The reviewer's name is withheld on samples and printed on every client file.**

Prepared for: Demo Acquirer
Scope: 3 Amazon listings, one per product
Ruled against: Claims Verified standards v1.4.1 · 109 standards
Scan date: October 11, 2026 · **Date:** October 13, 2026

> **Prepared for a transaction and confidential to the acquirer and its advisers. A review of public marketing claims against published rules; not legal advice, not a product-safety or formulation review, and not a prediction of enforcement.**

1. Portfolio summary

Products reviewed	3
Failing	3 of 3
Findings	8 Critical · 19 High · 7 Medium · 0 Low (34 in all)
Not in this scope	website, ads, email, label and AI answers (not supplied)
FDA warning letters, FTC actions and NAD decisions naming the target	see section 5

2. By product

Immune support, 90 capsules (Product A)

Verdict: FAIL · 6 Critical · 9 High · 3 Medium
Where: Amazon listing · **Category rank:** 11 of 194 in Immune (1 = highest risk)

SEVERITY	CLAIM AS PUBLISHED	WHY IT FAILS
Critical	“fight back against symptoms of seasonal sniffles”	Implies the product fights symptoms of colds, an infectious disease claim.
Critical	“help combat symptoms related to common seasonal conditions”	Combating symptoms of seasonal illness is a disease/symptom-relief claim.
Critical	“helps give your immune system the extra support it needs to fight back against symptoms”	Symptom-fighting language is drug-claim framing.
Critical	“keep you protected year round”	Implies prevention of illness, a drug claim.

Cortisol support, magnesium glycinate (Product B)

Verdict: FAIL · 1 Critical · 5 High · 3 Medium
Where: Amazon listing · **Category rank:** 20 of 402 in Stress (1 = highest risk)

SEVERITY	CLAIM AS PUBLISHED	WHY IT FAILS
Critical	“Demo Cortisol-Calm Supplement”	Product name implies soothing/lowering cortisol, a physiological correction claim built into the name.
High	“cortisol balance and adrenal health”	'Balance' of a hormone implies correcting a pathological imbalance.
High	“enhances your body’s natural ability to regulate cortisol”	'Regulates' a hormone implies pharmacological control.
High	“promote cortisol balance and support adrenal health”	Hormone-balance framing implies correcting an abnormal state.

Cortisol support for women, 120 capsules (Product C)

Verdict: FAIL · 1 Critical · 5 High · 1 Medium
Where: Amazon listing · **Category rank:** 28 of 402 in Stress (1 = highest risk)

Prepared for Demo Acquirer under terms version 2026-10-15. Show it to a platform, processor or buyer as evidence that every claim was reviewed. Anyone else relying on it for their own decisions needs our written reliance letter.

SEVERITY	CLAIM AS PUBLISHED	WHY IT FAILS
Critical	“Made for adrenal fatigue”	'Adrenal fatigue' names a purported endocrine disease state, making this a disease claim.
High	“Botanical hormone balance blend”	'Hormone balance' implies correcting a pathological hormonal imbalance.
High	“Restore true cortisol balance and bring your levels back into harmony”	'Restore' implies correcting an abnormal cortisol state.
High	“a natural blend made to regulate your cortisol”	'Regulate' implies pharmacological control of a hormone level.

3. Remediation, by kind

What fixing the file involves. Counted, not priced: the cost of each kind depends on the target's own suppliers and channels.

KIND	FINDINGS	WHAT IT TAKES
Copy edits	33	Paste-ready rewrites the standard allows, on your dashboard. Days, not weeks.
Label changes	0	None found in scope; labels were not supplied.
Product names that are claims	1	A rename: new listing identity, packaging and trademark work. The costliest line in the file.

4. What this review does not cover

- Product safety, formulation, ingredient identity or potency.
- Substantiation files the target holds; we review whether a claim needs evidence, not the evidence.
- Not supplied (website, ads, email, label, AI answers) or not public at the scan date.
- The likelihood or size of any enforcement action. Exposure is described, never priced.

5. Enforcement on record

We searched our own feeds of FDA warning letters, FTC actions and NAD decisions for “Demo portfolio”.

None found in our feeds as of 13 October 2026.

Our feeds hold 19 FDA warning letters dated 15 July 2025 to 29 September 2026, 3 FTC actions dated 2 June 2026 to 15 July 2026 and 13 NAD decisions dated 11 December 2025 to 16 September 2026. They cover supplement and health claims only and are not a full search of FDA, FTC or NAD records. An empty result is a limit of our feeds, not a clean record.

---

6. Evidence index

For each finding, the document the target named to support the claim, and whether the target told us a structure/function notice covering it is on file with FDA. We record what the target told us. We make no judgement on whether any document is adequate to support the claim.

The target named a document for 4 of 34 findings.

#	CLAIM	DOCUMENT THE TARGET NAMED	STRUCTURE/FUNCTION NOTICE, PER THE TARGET
1	“fight back against symptoms of seasonal sniffles”	None supplied	Not stated
2	“help combat symptoms related to common seasonal conditions”	None supplied	Not stated
3	“helps give your immune system the extra support it needs to fight…”	None supplied	Not stated
4	“keep you protected year round”	None supplied	Not stated
5	“Whether you need extra protection at home, school or on the go”	None supplied	Not stated
6	“features ingredients with powerful natural properties to protect…”	None supplied	Not stated
7	“Demo Cortisol-Calm Supplement”	None supplied	Not stated
8	“Made for adrenal fatigue”	None supplied	Not stated
9	“Immunity Boost for Adults”	None supplied	Not stated
10	“Demo brand immunity boost defense formula”	None supplied	Not stated
11	“clean & ultra pure immunity boost”	None supplied	Not stated
12	“immunity boost”	None supplied	Not stated
13	“Demo brand immunity boost formula”	None supplied	Not stated
14	“Demo brand immunity boost capsules”	None supplied	Not stated
15	“PURE IMMUNITY BOOSTER FORMULA”	None supplied	Not stated
16	“our formula works at a cellular level to fortify your immune system”	None supplied	Not stated
17	“Our professional grade immune support supplements”	None supplied	Not stated
18	“manufactured without gmos”	Non-GMO Project certificate for Product A	Not stated

#	CLAIM	DOCUMENT THE TARGET NAMED	STRUCTURE/FUNCTION NOTICE, PER THE TARGET
19	“cortisol balance and adrenal health”	None supplied	Not stated
20	“enhances your body’s natural ability to regulate cortisol”	None supplied	Not stated
21	“promote cortisol balance and support adrenal health”	None supplied	Not stated
22	“This formula helps lower cortisol, stabilize mood”	None supplied	Not stated
23	“helps maintain balanced cortisol levels”	Published ashwagandha trial (journal article)	Filed with FDA, letter dated 3 March 2025, per the target
24	“Botanical hormone balance blend”	None supplied	Not stated
25	“Restore true cortisol balance and bring your levels back into harmony”	None supplied	Not stated
26	“a natural blend made to regulate your cortisol”	None supplied	Not stated
27	“Plus the immune-boosting power of vitamin C”	None supplied	Not stated
28	“Results you can count on!”	None supplied	Not stated
29	“No GMOs, no artificial additives”	None supplied	Not stated
30	“make all our supplements to exceed expectations set by cGMP (Current…”	Contract manufacturer's GMP audit certificate, 2025	Not stated
31	“made in the USA with the finest quality globally sourced ingredients”	None supplied	Not stated
32	“making it a superior alternative to traditional cortisol cocktails”	None supplied	Not stated
33	“offers a natural, effective alternative to cortisol cocktails”	None supplied	Not stated
34	“Magnesium Glycinate 200mg L-Theanine 150mg Ashwagandha 150mg”	Supplement Facts panel for Product B	Not stated

A structure/function notice covers structure/function statements only. A line ruled as a disease claim cannot be notified and has to come off (21 CFR 101.93(g)).

Independent pharmacist review: Reviewed by a licensed pharmacist, independent review of marketing-claims findings against the published Claims Verified standards. Licence on file, verifiable on the public register.

Sign-off

Claims Review Report · Form CV-AR

Independent review of the marketing-claims findings in this report under the published Claims Verified standards, version **v1.4.1**. Findings reflect copy as captured on **the capture dates listed under Sources reviewed**.

Signature	Date signed
	13 October 2026

Licensed pharmacist

Licence on file

Sample report. The reviewer's name, licence number and signature are printed on every client file and withheld on samples.

Sample file. A client file carries its report ID here.

Review of marketing language only. Not product testing, formulation or facility compliance. Findings are the reviewer's professional opinion under the published Claims Verified standards.