Prepared for Demo brand (pre-launch) 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 REVIEW · Demo brand (pre-launch)

> **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 brand (pre-launch) · Demo Founder
Reviewed: 3 marketing sources across 3 channels (Ad copy, Amazon listing, Product label)
Report date: 14 October 2026
Standards: Claims Verified standards v1.4.1, 109 published standards. The standards are versioned and the current version is published at claimsverified.org/standards

Sources reviewed, and when each was captured:

- **Ad copy** · ads/draft_first_ads.txt, as supplied, file dated 12 October 2026
- **Product label** · label/draft_label.txt, as supplied, file dated 12 October 2026
- **Amazon listing** · other/draft_amazon_listing.txt, as supplied, file dated 12 October 2026

Scope: The three drafts you sent: first ads, label and Amazon listing. Website, email and AI answers are outside a claims review. The full audit covers them.

1. Verdict

FAIL · risk score **246**. 6 Critical · 8 High · 4 Medium · 0 Low, 18 findings in all.

A claim that appears on more than one channel is counted once, and every place it appears is listed under the finding.

For scale, as drafted this copy would rank riskiest of the 351 sleep listings we have checked. The riskiest live one scores 211. The risk score is our own measure. Each finding adds points by severity: Critical 25, High 10, Medium 4, Low 1. It is not a score from Amazon, the FDA or any other regulator.

Critical findings are the kind of claim that can draw FDA warning letters and automated Amazon takedowns. Each finding below comes with its fix: a rewrite at the strongest wording the standard allows where the line can be reworded, and the step to take where it cannot.

The FDA disclaimer is missing from the Amazon listing. Add it wherever benefit claims appear.

2. Findings

Each finding names its rule and what kind of finding it is:

- **Fact about the page.** Either the words are there or they are not. You can check this yourself.
- **Interpretation of a governing test.** We applied a published legal test to your published copy. A reasonable reviewer applying the same test could differ at the margin.
- **Substantiation requirement, not a ruling.** The claim may be permissible if you hold evidence meeting the cited standard. We have not seen your evidence and do not assess its sufficiency. Claims Verified does not evaluate the sufficiency of studies, research, testing or other documentation. We have not asked for your evidence. If you name a document to us it is logged as supplied, which does not mean we read it or formed a view on whether it supports the claim.
- **Platform contract, not law.** A term of an agreement you signed with a platform, enforced by account action and changeable without notice.

1. [Critical] Named condition

Published copy: “Struggling with insomnia?”
Where it appears: Ad copy (ads/draft_first_ads.txt)
Why it fails: Names insomnia, a recognized sleep disorder, as the product's target.
Rule: CV-NC-12, Appendix A · Interpretation of a governing test
Rewrite the standard allows: “Supports restful sleep”

2. [Critical] Named condition

Published copy: “Natural Sleep Aid for Insomnia Relief”
Where it appears: Amazon listing (other/draft_amazon_listing.txt)
Why it fails: Names insomnia, a recognised sleep disorder, and claims relief.
Rule: CV-NC-12, Appendix A · Interpretation of a governing test
Rewrite the standard allows: “Supports restful sleep”

3. [Critical] Platform policy

Published copy: “Insomnia Relief”
Where it appears: Amazon listing (other/draft_amazon_listing.txt)
Why it fails: A disease term in the Amazon title can trigger automated suppression.
Rule: CV-PP-08, Appendix A · Interpretation of a governing test
Corrective action: Remove disease terms from title, bullets, A+ content, and backend keywords.

4. [Critical] Disease verb

Published copy: “cures restless nights”
Where it appears: Amazon listing (other/draft_amazon_listing.txt)
Why it fails: 'Cures' is an explicit disease verb. It can get the product treated as an unapproved drug.
Rule: CV-DV-01, Appendix A · Interpretation of a governing test
Corrective action: Remove.

5. [Critical] Named condition

Published copy: “Reduces anxiety and stress hormones”
Where it appears: Amazon listing (other/draft_amazon_listing.txt)
Why it fails: Anxiety is a recognised disease. Naming it creates a drug claim.
Rule: CV-NC-01, Appendix A · Interpretation of a governing test
Rewrite the standard allows: “Promotes a sense of calm”

6. [Critical] False regulatory

Published copy: “zero side effects”
Where it appears: Amazon listing (other/draft_amazon_listing.txt)
Why it fails: Unsubstantiable safety absolute.
Rule: CV-FR-07, Appendix A · Interpretation of a governing test
Corrective action: Remove the claim.

7. [High] Platform policy

Published copy: “Struggling with insomnia?”
Where it appears: Ad copy (ads/draft_first_ads.txt)
Why it fails: Meta prohibits ad copy implying knowledge of a user's personal health status.
Rule: CV-PP-01, Appendix A · Platform contract, not law
Rewrite the standard allows: “Formulated to support restful sleep.”

8. [High] Processor policy

Published copy: “just pay shipping”
Where it appears: Ad copy (ads/draft_first_ads.txt)
Why it fails: Presents a paid enrollment as free without disclosing recurring charge terms.
Rule: CV-PR-02, Appendix A · Interpretation of a governing test
Rewrite the standard allows: “$4.95 shipping today. Your first full bottle ships in 30 days at $59, and every 30 days after, until you cancel.”

9. [High] Processor policy

Published copy: “Try Demo brand free - just pay shipping!”
Where it appears: Ad copy (ads/draft_first_ads.txt)
Why it fails: Trial offer with no disclosure of price, frequency, or cancellation terms.
Rule: CV-PR-01, Appendix A · Interpretation of a governing test
Rewrite the standard allows: “Trial ships today for $4.95, then $59 every 30 days until you cancel. Cancel online anytime.”

10. [High] Substantiation

Published copy: “Fall asleep in 15 minutes”
Where it appears: Amazon listing (other/draft_amazon_listing.txt)
Why it fails: Time-to-result claim requires finished-product trial data.
Rule: CV-SB-03, Appendix A · Substantiation requirement, not a ruling
Evidence to hold: Identify the trial supporting the stated timeframe.
Corrective action: Remove unless a trial supports the exact timeframe.

11. [High] False regulatory

Published copy: “clinically proven herbal blend”
Where it appears: Amazon listing (other/draft_amazon_listing.txt)
Why it fails: 'Proven' is an absolute the FTC does not accept without finished-product evidence.
Rule: CV-FR-04, Appendix A · Substantiation requirement, not a ruling
Evidence to hold: Identify the human clinical trial(s) on the finished product, or on the ingredient at the dose used, that you rely on for "proven".
Rewrite the standard allows: “Formulated with clinically studied ingredients”

12. [High] Substantiation

Published copy: “Doctor recommended”
Where it appears: Amazon listing (other/draft_amazon_listing.txt)
Why it fails: Requires a defensible survey that is almost never held.
Rule: CV-SB-01, Appendix A · Substantiation requirement, not a ruling
Evidence to hold: Identify the survey behind "#1 doctor recommended": who was surveyed, when, sample size, and what exactly was asked.
Corrective action: Remove unless a documented survey exists.

13. [High] False regulatory

Published copy: “FDA registered facility”
Where it appears: Amazon listing (other/draft_amazon_listing.txt)
Why it fails: Needs precise facility framing. As written it implies regulatory endorsement.
Rule: CV-FR-03, Appendix A · Interpretation of a governing test
Rewrite the standard allows: “Manufactured in an FDA-registered facility”

14. [High] Structural

Published copy: “Bullet 3: 100% natural, zero side effects, non-habit forming”
Where it appears: Amazon listing (other/draft_amazon_listing.txt)
Why it fails: benefit claims appear without the required FDA disclaimer.
Rule: CV-ST-01, Appendix A · Fact about the page
Corrective action: Add: 'This statement has not been evaluated by the Food and Drug Administration.

15. [Medium] Processor policy

Published copy: “The sleep secret doctors won't tell you.”
Where it appears: Ad copy (ads/draft_first_ads.txt)
Why it fails: Sensational health framing on Stripe's outrageous-claims prohibited list.
Rule: CV-PR-04, Appendix A · Platform contract, not law
Rewrite the standard allows: “Supports restful sleep.”

16. [Medium] Processor policy

Published copy: “Limited stock - only 12 left!”
Where it appears: Ad copy (ads/draft_first_ads.txt)
Why it fails: Stock scarcity alert that is likely not true in real time is deceptive and prohibited.
Rule: CV-PR-06, Appendix A · Platform contract, not law
Corrective action: Remove untrue stock alerts.

17. [Medium] Substantiation

Published copy: “100% natural”
Where it appears: Amazon listing (other/draft_amazon_listing.txt)
Why it fails: 'Natural' is challengeable by FTC where processing is involved.
Rule: CV-SB-09, Appendix A · Interpretation of a governing test
Corrective action: Name the actual attribute: 'no artificial colors or sweeteners'.

18. [Medium] Substantiation

Published copy: “non-habit forming”
Where it appears: Amazon listing (other/draft_amazon_listing.txt)
Why it fails: Safety claim requiring documented evidence.
Rule: CV-SB-11, Appendix A · Interpretation of a governing test
Corrective action: Remove unless documented.

3. Order of work

Fix Critical findings first, the lines that can draw a takedown or a warning letter. Then High findings, the lines that can hold up ad approval or need evidence on file. Then Medium findings. Listing edits take effect in days. Label changes go on the next print run. We can make every change above for you. The price is quoted on scope, because an audit can cover a site, ads and email as well as a listing.

4. Evidence index

For each finding in section 2, the document you named to support the claim, and whether you told us a structure/function notice covering it is on file with FDA. We record what you told us. We make no judgement on whether any document is adequate to support the claim.

You named a document for 3 of 18 findings.

Structure/function notice to FDA, per the brand: None filed yet, as the product is not on sale.

#	CLAIM	DOCUMENT YOU NAMED
1	“Struggling with insomnia?”	None supplied
2	“Natural Sleep Aid for Insomnia Relief”	None supplied
3	“Insomnia Relief”	None supplied
4	“cures restless nights”	None supplied
5	“Reduces anxiety and stress hormones”	None supplied
6	“zero side effects”	None supplied
7	“Struggling with insomnia?”	None supplied
8	“just pay shipping”	None supplied
9	“Try Demo brand free - just pay shipping!”	None supplied
10	“Fall asleep in 15 minutes”	Ingredient supplier's sleep-onset study summary (PDF, sent with the drafts)
11	“clinically proven herbal blend”	Ingredient supplier's clinical trial summary (PDF, sent with the drafts)
12	“Doctor recommended”	None supplied
13	“FDA registered facility”	None supplied
14	“Bullet 3: 100% natural, zero side effects, non-habit forming”	None supplied
15	“The sleep secret doctors won't tell you.”	None supplied
16	“Limited stock - only 12 left!”	None supplied
17	“100% natural”	None supplied
18	“non-habit forming”	Formulator's letter on the ingredients

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)).

5. Enforcement on record

We searched our own feeds of FDA warning letters, FTC actions and NAD decisions for “Demo brand (pre-launch)”.

None found in our feeds as of 14 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. Change log

No re-check has run yet. For each listing, page and channel below, this section will record the line as it read before, what replaced it, the date we saw the change live and a dated capture of the page as it then read. We re-read each one when you tell us the changes are live. Until then, note the date you make each change: Amazon asks for the dates of changes in an appeal, and FDA closes a warning letter only on corrections it can verify.

LISTING, PAGE OR CHANNEL	FINDINGS TO CHANGE	RE-CHECK
ads/draft_first_ads.txt	6	Not yet run
Amazon listing · other/draft_amazon_listing.txt	12	Not yet run

7. How to use this file

This file records what your copy said on the dates shown, which published rule each line breaks, and the fix for each. It does not decide an appeal or a review. Amazon, the processor, the ad platform or the buyer decides.

Amazon listing appeal. Amazon's appeal guidelines ask for the root causes, the specific actions taken with the dates of the changes, and supporting evidence for every product under review.

- **Root causes.** Section 2 names each line that broke a rule, where it appeared and the rule. Appendix A quotes Amazon's own policy where a rule rests on it.
- **Specific actions and dates.** The fix under each finding is the change to make. Section 6 records each change by listing, the date it was seen live and a dated capture of the page.
- **Keeping it fixed.** Say how new copy is checked before it goes live. The standards to check it against are published at claimsverified.org/standards. Appendix A lists the rules this copy broke.

Payment processor review. A processor reviewing a supplement account looks for disease or drug claims and for how trials and renewals are disclosed. Send the signed file whole. Section 1 gives the verdict, and the signature block names the reviewer and the register where the licence can be checked. The findings under Processor policy are the lines a processor's own terms cover. The last page is a one-page summary for an underwriting file.

Ad disapproval appeal. Find the disapproved line in section 2. Change the ad to the rewrite the standard allows, or take the step listed, then request another review and attach the page for that finding. The findings under Platform policy name the platform's rule in Appendix A.

Buyer's diligence request. A retail buyer or an acquirer asks who reviewed the claims, against what, and when. Send the signed file with Appendix A. It does not replace the evidence behind a claim. Where a finding lists evidence to hold, the buyer can ask to see that evidence as well. Section 4 lists the document you named for each claim. Section 5 lists the FDA, FTC and NAD records in our feeds that name you.

8. What happens next

Once remediated to a pass on re-review, your founding place for the Claims Verified Mark is held. The Mark comes with monitoring at no licence fee: seal, public verification page and register entry go live the day your licence is issued (claimsverified.org/the-mark/).

Marketing copy drifts: agencies push new copy, A+ modules change, competitors get categories swept. Monitoring re-scans what the audit covered every 28 days, alerts you on drift, and keeps the fix-and-appeal promise in force while it runs: from $350 a month for up to 5 products, $950 a month for up to 25. Full scope: claimsverified.org/monitoring/.

Appendix A. Rules applied

Each finding names its rule by number. The table shows the published sources each rule rests on, and each source is printed once below it with the passage we read. A source that is not law says so.

RULE	CATEGORY	RESTS ON
CV-DV-01	Disease verb	A1, A2, A3
CV-FR-03	False regulatory	A5
CV-FR-04	False regulatory	A5, A6, A11, A12, A13
CV-FR-07	False regulatory	A1, A5, A6
CV-NC-01	Named condition	A1, A2, A3
CV-NC-12	Named condition	A1, A2, A3
CV-PP-01	Platform policy	A7
CV-PP-08	Platform policy	A1, A2, A4
CV-PR-01	Processor policy	A8, A9, A10
CV-PR-02	Processor policy	A8, A9, A10
CV-PR-04	Processor policy	A5, A9
CV-PR-06	Processor policy	A5, A9, A10
CV-SB-01	Substantiation	A5, A6, A12, A13, A14
CV-SB-03	Substantiation	A5, A6, A11, A12, A13
CV-SB-09	Substantiation	A5
CV-SB-11	Substantiation	A1, A5
CV-ST-01	Structural	A15, A16

Sources

A1. FDCA s.201(g)(1)(B), 21 U.S.C. 321(g)(1)(B) · FDA
https://www.law.cornell.edu/uscode/text/21/321

> articles intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease in man or other animals

A2. 21 CFR 101.93(g) · FDA
https://www.ecfr.gov/current/title-21/section-101.93

> (g)(2)(i) has an effect on a specific disease or class of diseases ... (x) otherwise suggests an effect on a disease or diseases

A3. Food and Drugs Act, R.S.C. 1985 c. F-27, s.3 and Schedule A · Health Canada
https://laws-lois.justice.gc.ca/eng/acts/F-27/section-3.html

> No person shall advertise any food, drug, cosmetic or device to the general public as a treatment, preventative or cure for any of the diseases, disorders or abnormal physical states referred to in Schedule A.1.

A4. Amazon Seller Central, Dietary Supplements policy · Amazon (platform policy, not law)
https://sellercentral.amazon.com/help/hub/reference/external/G201829010

> Make disease claims or implied disease claims, unless the FDA approved the statement. Disease claims include claims to diagnose, cure, reduce, treat, or prevent a disease in humans

A5. FTC Act s.5(a), 15 U.S.C. 45(a) · FTC
https://www.law.cornell.edu/uscode/text/15/45

> Unfair methods of competition in or affecting commerce, and unfair or deceptive acts or practices in or affecting commerce, are hereby declared unlawful.

A6. FTC Health Products Compliance Guidance (December 2022) · FTC (agency guidance, not a regulation)
https://www.ftc.gov/business-guidance/resources/health-products-compliance-guidance

> Before disseminating an ad, advertisers must have adequate substantiation for all objective product claims conveyed, expressly or by implication. ... As a general matter, substantiation of health-related benefits will need to be in the form of randomized, controlled human clinical testing to meet the competent and reliable scientific standard.

A7. Meta Advertising Standards · Meta (platform policy, not law)
https://transparency.meta.com/policies/ad-standards/

A8. Restore Online Shoppers' Confidence Act, 15 U.S.C. 8403 · FTC
https://www.law.cornell.edu/uscode/text/15/8403

> provides text that clearly and conspicuously discloses all material terms of the transaction before obtaining the consumer's billing information

A9. Stripe Prohibited and Restricted Businesses · Stripe (payment processor policy, not law)
https://stripe.com/legal/restricted-businesses

> Negative option marketing, negative option membership clubs and reduced price trials with unclear or hidden pricing

A10. Square Payment Terms, restricted businesses · Square (payment processor policy, not law)
https://squareup.com/us/en/legal/general/payment

> Except where prohibited by law, you may not use the Payment Services for the following businesses or business activities: ... (6) direct marketing or subscription offers or services

A11. Competition Act, R.S.C. 1985 c. C-34, s.74.01(1)(b) · Competition Bureau Canada
https://laws-lois.justice.gc.ca/eng/acts/C-34/section-74.01.html

> makes a representation to the public in the form of a statement, warranty or guarantee of the performance, efficacy or length of life of a product that is not based on an adequate and proper test thereof, the proof of which lies on the person making the representation

A12. Walmart Standards for Suppliers, Label and Market Products Accurately · Walmart (supply contract, not law)
https://corporate.walmart.com/suppliers/requirements/standards-for-suppliers

> Make sure all product labels and descriptions are clear, accurate, truthful, and not misleading. Include all appropriate disclaimers, disclosures, and warranties, and support any claims you make with adequate substantiation.

A13. Canadian Code of Advertising Standards, clause 1(e) · Ad Standards Canada (self-regulatory code, not law)
https://adstandards.ca/code/the-code-online/

> All advertising claims and representations must be supported by competent and reliable evidence, which the advertiser will disclose to Ad Standards upon its request.

A14. 16 CFR 255.1 · FTC
https://www.ecfr.gov/current/title-16/part-255

> Endorsements must reflect the honest opinions, findings, beliefs, or experience of the endorser.

A15. FDCA s.403(r)(6), 21 U.S.C. 343(r)(6) · FDA
https://www.law.cornell.edu/uscode/text/21/343

> A statement under this subparagraph may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases.

A16. 21 CFR 101.93(c) · FDA
https://www.ecfr.gov/current/title-21/section-101.93

> This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

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.

Review of marketing language only, not product testing, formulation, facility compliance, or legal advice. Findings are our professional opinion against the published standards, based on the marketing copy as it read on the capture dates listed under Sources reviewed. Claims Verified · Toronto · claimsverified.org

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

14 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.

Summary for payment processors and acquirers

One page for an underwriting file. Every figure is from this report.

Brand	Demo brand (pre-launch)
Scope	3 sources across 3 channels, captured 12 October 2026
Standards	Claims Verified standards v1.4.1, 109 standards
Findings by severity	6 Critical · 8 High · 4 Medium · 0 Low, 18 in all
Critical means	The kind of claim that can draw an FDA warning letter or an Amazon takedown
What was rewritten	9 of 18 findings come with a rewrite the standard allows; 9 need a step instead (remove, rename or hold evidence). Section 6 records what has changed live, with dates.
Trial, subscription and cancellation wording	The copy was checked against our 3 trial and subscription standards: 2 findings (section 2). The checkout, the cancellation flow and any notice sent before a charge were not in scope.
Policy pages read	None. No terms, refund, privacy or cancellation page was in the scope of this review.
Visa high-integrity list	Visa's high-integrity list covers merchants that bill on a negative option subscription (MCC 5968) and pharmacies (MCC 5122, 5912) (Visa Integrity Risk Program guide, 6 Apr 2023). A supplement seller that does neither is not on it. This review does not establish how the brand bills; the copy reviewed offers a trial that turns into a recurring charge.
Enforcement on record	None found in our feeds as of 14 October 2026. A limit of our feeds, not a clean record (section 5).
Date and signer	Report dated 14 October 2026. Signed by the licensed pharmacist named in the signature block of this file, on the date shown there

This page summarises the report and does not replace it. It says nothing about the merchant's dispute or chargeback history, which the processor holds.

Prepared for Demo brand (pre-launch) 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.