



CLAIMS AUDIT REPORT • Demo brand (pre-launch)

Prepared for: Demo brand (pre-launch) • Demo Founder

Surfaces reviewed: 3 marketing sources across 3 channels (Ad copy, Amazon listing, Product label)

Date: September 13, 2026 • **Standards:** Claims Verified standards v1.3, the published standards. The standards are versioned and the current version is published at claimsverified.org/standards (public: claimsverified.org/standards)

Sources reviewed:

- **Ad copy** • ads/draft_first_ads.txt
- **Product label** • label/draft_label.txt
- **Amazon listing** • other/draft_amazon_listing.txt

1. Verdict

FAIL • risk score **246** (for scale: riskier than 100% of the 2,087 top Amazon supplement listings in our database). 6 Critical • 8 High • 4 Medium • 0 Low distinct findings. A claim that appears on more than one channel is counted once; every place it appears is listed under the finding. Critical findings are in the enforcement class that draws FDA warning letters and automated Amazon takedowns; every finding below includes a compliant rewrite.

The FDA structure/function disclaimer is missing from the Amazon listing. Add it wherever structure/function claims appear.

2. Findings

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.

Rules applied • rule CV-NC-12

- 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

- 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

- 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

What kind of finding this is: 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.

Compliant rewrite: “Supports restful sleep”

2. [Critical] Named condition

Published copy: “Natural Sleep Aid for Insomnia Relief”

Where it appears: Amazon listing (body)

Why it fails: Names insomnia, a recognised sleep disorder, and claims relief.

Rules applied · rule CV-NC-12

- 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

- 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

- 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

What kind of finding this is: 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.

Compliant rewrite: “Supports restful sleep”

3. [Critical] Platform policy

Published copy: “Insomnia Relief”

Where it appears: Amazon listing (body)

Why it fails: Disease term in the Amazon title triggers automated suppression.

Rules applied · rule CV-PP-08

- 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

- 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

- 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

What kind of finding this is: 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.

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 (body)

Why it fails: 'Cures' is an explicit disease verb reclassifying the product as an unapproved drug.

Rules applied · rule CV-DV-01

- 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

- 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

- 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

What kind of finding this is: 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.

Corrective action: Remove.

5. [Critical] Named condition

Published copy: “Reduces anxiety and stress hormones”

Where it appears: Amazon listing (body)

Why it fails: Anxiety is a recognised disease; naming it creates a drug claim.

Rules applied · rule CV-NC-01

- 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

- 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

- 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

What kind of finding this is: 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.

Compliant rewrite: “Promotes a sense of calm”

6. [Critical] False regulatory

Published copy: “zero side effects”

Where it appears: Amazon listing (body)

Why it fails: Unsubstantiable safety absolute.

Rules applied · rule CV-FR-07

- 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.

- 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

- 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

What kind of finding this is: 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.

Corrective action: Remove.

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.

Rules applied · rule CV-PP-01

- Meta Advertising Standards — Meta (platform policy, not law)

<https://transparency.meta.com/policies/ad-standards/>

What kind of finding this is: Platform contract, not law

A term of an agreement you signed with a platform, enforced by account action and changeable without notice.

Compliant rewrite: “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.

Rules applied · rule CV-PR-02

- 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

- Stripe Prohibited and Restricted Businesses — Stripe (platform 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

- Square Payment Terms, restricted businesses — Square (platform 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

What kind of finding this is: 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.

Compliant rewrite: ""\$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.

Rules applied · rule CV-PR-01

- 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

- Stripe Prohibited and Restricted Businesses — Stripe (platform 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

- Square Payment Terms, restricted businesses — Square (platform 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

What kind of finding this is: 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.

Compliant rewrite: "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 (body)

Why it fails: Time-to-result claim requires finished-product trial data.

Rules applied · rule CV-SB-03

- FTC Act s.5(a), 15 U.S.C. 45(a) — FTC

<https://www.law.cornell.edu/uscode/text/15/45>

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- 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

- 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 person

- 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

- 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.

What kind of finding this is: 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.

Evidence status: not requested

We asked nothing yet. To close this: Identify the trial supporting the stated timeframe.

Claims Verified does not evaluate the sufficiency of studies, research, testing or other documentation.

Recording evidence as supplied means a document was identified to us and logged, not that we read it or formed a view on whether it supports the claim.

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 (body)

Why it fails: 'Proven' is an absolute FTC will not accept absent finished-product evidence.

Rules applied · rule CV-FR-04

- FTC Act s.5(a), 15 U.S.C. 45(a) — FTC

<https://www.law.cornell.edu/uscode/text/15/45>

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- 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 benefi

- 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 p

- 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 s

- 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.

What kind of finding this is: 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.

Evidence status: not requested

We asked nothing yet. To close this: Identify the human clinical trial(s) on the finished product, or on the ingredient at the dose used, that you rely on for "proven".

Claims Verified does not evaluate the sufficiency of studies, research, testing or other documentation.

Recording evidence as supplied means a document was identified to us and logged, not that we read it or formed a view on whether it supports the claim.

Compliant rewrite: "Formulated with clinically studied ingredients"

12. [High] Substantiation

Published copy: "Doctor recommended"

Where it appears: Amazon listing (body)

Why it fails: Requires a defensible survey that is almost never held.

Rules applied · rule CV-SB-01

- FTC Act s.5(a), 15 U.S.C. 45(a) — FTC

<https://www.law.cornell.edu/uscode/text/15/45>

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- 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

- 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.

- 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

- 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.

What kind of finding this is: 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.

Evidence status: not requested

We asked nothing yet. To close this: Identify the survey behind "#1 doctor recommended": who was surveyed, when, sample size, and what exactly was asked.

Claims Verified does not evaluate the sufficiency of studies, research, testing or other documentation.

Recording evidence as supplied means a document was identified to us and logged, not that we read it or formed a view on whether it supports the claim.

Corrective action: Remove unless a documented survey exists.

13. [High] False regulatory

Published copy: "FDA registered facility"

Where it appears: Amazon listing (body)

Why it fails: Needs precise facility framing; as written it implies regulatory endorsement.

Rules applied · rule CV-FR-03

- 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.

What kind of finding this is: 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.

Compliant rewrite: "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 (body)

Why it fails: Structure/function claims appear without the required FDA disclaimer.

Rules applied · rule CV-ST-01

- 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.

- 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.

What kind of finding this is: Fact about the page

Either the words are there or they are not. You can check this yourself.

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.

Rules applied · rule CV-PR-04

- Stripe Prohibited and Restricted Businesses — Stripe (platform policy, not law)

<https://stripe.com/legal/restricted-businesses>

Businesses that make outrageous claims, use deceptive testimonials, use high-pressure upselling, or use fake testimonials (with or without a written contract)

- 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.

What kind of finding this is: Platform contract, not law

A term of an agreement you signed with a platform, enforced by account action and changeable without notice.

Compliant rewrite: "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.

Rules applied · rule CV-PR-06

- Stripe Prohibited and Restricted Businesses — Stripe (platform policy, not law)

<https://stripe.com/legal/restricted-businesses>

Businesses that make outrageous claims, use deceptive testimonials, use high-pressure upselling, or use fake testimonials (with or without a written contract)

- Square Payment Terms, restricted businesses — Square (platform 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: ... (13) up-sell merchants

- 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.

What kind of finding this is: Platform contract, not law

A term of an agreement you signed with a platform, enforced by account action and changeable without notice.

Corrective action: Remove untrue stock alerts.

17. [Medium] Substantiation

Published copy: “100% natural”

Where it appears: Amazon listing (body)

Why it fails: 'Natural' is challengeable by FTC where processing is involved.

Rules applied · rule CV-SB-09

- FTC Act s.5(a), 15 U.S.C. 45(a) — FTC

<https://www.law.cornell.edu/uscode/text/15/45>

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What kind of finding this is: 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.

Corrective action: Name the actual attribute: 'no artificial colors or sweeteners'.

18. [Medium] Substantiation

Published copy: “non-habit forming”

Where it appears: Amazon listing (body)

Why it fails: Safety claim requiring documented evidence.

Rules applied · rule CV-SB-11

- 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

- 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.

What kind of finding this is: 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.

Corrective action: Remove unless documented.

3. Coverage gaps

This draft covers the sources listed above. To complete the audit:

- DTC website: no material was provided for this channel.
- Email marketing: no material was provided for this channel.
- AI assistant answers: no material was provided for this channel.

For the AI assistant channel, ai_questions.txt in the audit folder lists the exact shopper questions to run in each assistant.

4. Remediation order

Fix Critical findings first (takedown and warning-letter triggers), then High (ad-approval and substantiation exposure), then Medium. Listing edits take effect in days; label changes go on the next print run. We can implement every rewrite above for you: \$500 flat for a single listing, quoted on scope where the audit covers a site, ads and email as well. Two business days either way.

5. What happens next

Once remediated to a pass on re-review, your founding place for the Claims Verified Mark locks at the founding licence rate: seal, public verification page and directory listing issue at registry launch (claimsverified.org/the-mark/).

Marketing copy drifts: agencies push new copy, A+ modules change, competitors get categories swept. Monitoring re-scans your surfaces monthly, alerts you on drift, and includes one re-review: \$750/month, founding rate held for 30 days from this report. Full scope: claimsverified.org/monitoring/.

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

Signature: _____ **Date:** _____

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 captured on the audit date. Claims Verified · Toronto and New York · claimsverified.org

Signature pending

This draft has not been reviewed by the reviewer of record. It is not a deliverable and must not be sent to a client in this state.

This document is a draft. It carries no professional signature and no part of it should be relied upon until it does.