

FDA ATTY

CONTRACT IN-HOUSE COUNSEL & CONSULTANTS, LLC

December 10, 2019

To Whom It May Concern:

My name is Marc Sanchez. I am a food and drug attorney in private practice. I also teach food law at Northeastern University and wrote Food Law for Non-Lawyers (ISBN 978-3-319-12471-1) among other books, articles and interviews.

My firm was engaged to act as regulatory counsel for Boomer Naturals. As regulatory counsel, I have reviewed the Company's product labeling along with a focus on compliance with both Food and Drug Administration (FDA) and Federal Trade Commission (FTC) statutes and regulations. The following provides an overview of some of the reasons as to why the Company's product labeling is deemed to be FDA and FTC compliant and consequently appropriate for stocking on the shelves.

All labeling of Company's dietary supplements, pet foods, and cosmetics products were reviewed to mitigate reclassification by the FDA as a new unapproved drug. New drug (or disease) claims are a short-hand for saying structure/function claims related to a particular product, cross the permitted line, from dietary supplement, to a new unapproved drug. The inclusion of any structure-function claim on animal foods or cosmetics is prohibited. The labels appropriately employ structure/function claims on dietary supplements and avoids any drug claims on cosmetics or pet foods. This approach mitigates the risk of the labels being reclassified as drugs.

Finally, all ingredients were assessed for compliance with FDA regulations and found suitable for use in human foods and supplements and animal feed.

Kind Regards,



Marc C. Sanchez, Esq.
Contract In-House Counsel
Boomer Naturals