



October 7, 2024

VIA EMAIL

Samuel A.A. Levine, Director
Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Ave. N.W.
Washington, D.C. 20580
slevine1@ftc.gov

Re: Menopause supplement marketers

Dear Mr. Levine:

As you know, TINA.org recently investigated the marketing for two menopause supplements – Equelle and Amberen – and found that both brands are engaged in widespread deceptive marketing, resulting in TINA.org filing complaints with the FTC and FDA last week.¹

Today, TINA.org has sent letters to 100 other menopause supplement companies, notifying them of this deceptive marketing trend in their industry and urging them to review their menopause marketing to ensure it complies with the law.² Of the 100 companies, 36 previously received a Notice of Penalty Offenses Concerning Substantiation of Product Claims from the FTC,³ providing them actual knowledge that, among other things, it is

an unfair or deceptive act or practice for an advertiser to make a claim relating to the health benefits or safety features of a product without possessing and relying upon competent and reliable scientific evidence that has been conducted and evaluated in an objective manner by qualified persons and that is generally

¹ Oct. 1, 2024 letter from TINA.org to FTC and FDA regarding unsubstantiated and unapproved marketing for Equelle, https://truthinadvertising.org/wp-content/uploads/2024/10/10_1_24-Complaint-from-TINA-re-Equelle-marketing.pdf; Oct. 1, 2024 letter from TINA.org to FTC regarding violations of stipulated order in *FTC v. Lunada Biomedical, Inc., et al.*, Case No. 15-cv-03380, C.D. Cal., https://truthinadvertising.org/wp-content/uploads/2024/10/10_1_24-Complaint-from-TINA-re-Amberen-Order-Violations.pdf.

² Oct. 7, 2024 notification letters from TINA.org to 100 menopause supplement companies, https://truthinadvertising.org/wp-content/uploads/2024/10/10_7_24-Notification-Letters-to-Menopause-Supplement-Companies_Combined.pdf.

³ FTC Penalty Offenses Concerning Substantiation, <https://www.ftc.gov/enforcement/notices-penalty-offenses/penalty-offenses-concerning-substantiation>.

accepted in the profession to yield accurate and reliable results, to substantiate that the claim is true.⁴

At the same time, 64 of the 100 companies to which TINA.org sent letters have not received this formal notice from the FTC. In order to help efficiently address deception in this industry, TINA.org urges the Commission to send a Notice of Penalty Offenses Concerning Substantiation of Product Claims to these companies, which are listed along with contact information in the attached table.

TINA.org hopes that the FTC will not delay in joining our efforts to put the menopause supplement industry on notice that improperly substantiated health claims are simply not permitted, and engaging in deceptive advertising can result in substantial penalties.

Sincerely,



Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.



Bonnie Patten, Esq.
Executive Director
Truth in Advertising, Inc.

⁴ Notice of Penalty Offenses Concerning Substantiation of Product Claims, https://www.ftc.gov/system/files/ftc_gov/pdf/Substantiaton-NPO.pdf.

Menopause Supplement Companies That Have Not Received an FTC NPO re Substantiation

	Company	Website	Mailing Address	Email Address
1	21st Century	https://www.21stcenturyvitamins.com	Leanne Wihardt, President 21st Century HealthCare, Inc. 443 West Alameda Dr. Tempe, AZ 85282	leannew@21stcenturyvitamins.com
2	BB Company	https://betterbody.co	BB Company 304 S. Jones Blvd. Las Vegas, NV 89107	contact@betterbody.co
3	Binto	https://mybinto.com	Suzie Welsh Devine, CEO Binto 1516 N. 5th St., Suite 116 Philadelphia, PA 19122	suzie@mybinto.com
4	BioSchwartz Menopause	https://bioschwartz.com	Matt Davis, CEO BioSchwartz 239 2nd Avenue S., Suite 200 St. Petersburg, FL 33701	support@bioschwartz.com matt@bioschwartz.com
5	Botanic Choice	https://www.botanicchoice.com	Tim Cleland, President Indiana Botanic Gardens, Inc. 3401 West 37th Avenue Hobart, N 46342-1751	tim.cleland@botanicchoice.com custsvc@botanichealth.com
6	Brew Blue Life	https://brewbluelife.com	Brew Blue Tea Pty Ltd. 10 Buchanan Street West End, QLD 4101 Australia	help@brewbluelife.com support@brewbluetea.com
7	Carlyle	https://carlylenutritionals.com	Carlyle Nutritionals LLC Attn: General Counsel 20 Broadhollow Road, Suite 304 Melville, NY 11747	customerservice@carlylenutritionals.com.
8	Cooper Complete	https://coopercomplete.com	Tyler Cooper, CEO Cooper Complete 12330 Preston Road Dallas, TX 75230	tccooper@cooperaerobics.com customerservice@coopercomplete.com
9	CriLa Health	https://criLahealth.com	Sue McKinney, Director CriLa Health 120 NE 26th St. Oklahoma City, OK 73105 (855) 372-5040	info@criLahealth.com sue@criLahealth.com
10	Dr. Emil Nutrition	https://dremilnutrition.com	Emil Hodzovic, Founder & Owner Dr. Emil Nutrition 3700 Butler St. Pittsburgh, PA 15201	info@dremilnutrition.com emilh@dremilnutrition.com
11	Dr. Kelly Ann	https://drkellyann.com	Dr. Kellyann Petrucci Dr. Kellyann LLC 4470 W. Sunset Blvd. Los Angeles, CA 90027-6302	info@drkellyann.com
12	DrFormulas	https://drformulas.com	Bryan Tran, Co-Founder DrFormulas 13805 Alton Pkwy., Suite E Irvine, CA 92618	help@drformulas.com bryan@drformulas.com
13	Earth's Creation	https://earthscritionshop.com	Brandon Passwaters, International Sales Director Earth's Creation 18 Page Ct. Travelers Rest, SC 29690	info@earthscritionusa.com brandonmp@earthscritionusa.com

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14	Elle Sera	https://elle-sera.com	Elissa Corrigan, Founder Elle Sera 9 Dunnings Bridge Road Liverpool L30 6UU United Kingdom	customer@elle-sera.com
15	Estrocare	https://estrocare.life		support@estrocare.life
16	Eu Natural	https://store.eunatural.com	Rachel Sexton, Senior Vice President Wellbeam Consumer Health 2654 W. Horizon Ridge Pkwy., Suite B5 #1087 Henderson, NV 89052	rachel@wellbeam.com info@eunatural.com
17	Feel	https://wearefeel.com	Boris Hodakel, Founder Feel Holdings Ltd. 81-87 High Holborn London WC1V 6DF United Kingdom	hello@wearefeel.com
18	Feminapause	https://www.feminapause.store	Adele Wragg, Founder Feminapause Ltd. 3rd Floor, 86-90 Paul Street London EC2A 4NE United Kingdom	info@feminapause.com
19	Femme Pharma	https://femmepharma.com	Gerie DiPiano, CEO FemmePharma 175 Strafford Ave. Building 4 Wayne, PA 19087	support@femmepharma.com gerianne@fpghc.com
20	Femmenessence (Symphony Natural Health)	https://femmepharma.com	James Frame, CEO Symphony Natural Health 2550 S. Decker Lake Blvd., Unit #28 West Valley City, UT 84119	customer.service@symphonynaturalhealth.com james. frame@symphonynaturalhealth.com
21	Gennev	https://shop.gennev.com	Jill Angelo, CEO Gennev, Inc. 85 S. Atlantic St. Seattle, WA 98134	support@gennev.com jill@gennev.com
22	Happy Healthy Hippie	https://happyhealthyhippieco.com	Kylie Lewis, Owner Happy Healthy Hippie P.O. Box 600312 San Diego, CA 92160	info@happyhealthyhippieco.com klewis@happyhealthyhippieco.com
23	Happy Mammoth	https://store.happymammoth.com	Mathew Murphy, CEO & Founder Happy Mammoth 1910 Thomes Ave. Cheyenne, WY 82001	support@happymammoth.co matthewm@happymammoth.co
24	Health & Her	https://healthandher.com	Kate Bache, Co-founder & CEO Health & Her Ltd., Unit D Tramshed Tech Pendyris St. Cardiff CF11 6BH United Kingdom	contact@healthandher.com
25	Hello Lovely (SilverOnyx)	https://hellolovely.net	Tyler Carner, Vice President of Legal SilverOnyx 16171 S. Bringhurst Blvd., Suite 600 Bluffdale, UT 84065	admin@hellolovely.net tyler@silveronyx.com

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26	Juvenon	https://juvenon.com	Nathan Hamilton, President Juvenon 774 Mays Blvd., Suite 10, PMB 489 Incline Village, NV 89451-9613	cs@juvenon.com hamilton@juvenon.com
27	Key for Her (Femtech)	https://keyforher.com	Donna Ledwidge, Co-Founder Femtech Healthcare Limited Commercial House, Millbank Business Park Lucan, Co. Dublin, Ireland K78X5W6	hello@keyforher.com
28	Menopause Vitamin Co.	https://menopausevitamincompany.co.uk	Melissa Neisler Dickinson, Founder Menopause Vitamin Company Limited 17 Chilton Road Ipswich, Suffolk IP3 8PD United Kingdom	melissa@menopausevitamincompany.co.uk
29	Menoprin (Approved Science)	https://menoprin.com	Approved Science 30 N. Gould St. Ste. 2503 Sheridan, WY 82801	support@menoprin.com
30	MenoRescue	https://menorescue.com	WellMe 8500 Normandale Lake Blvd., Suite 350 Bloomington, MN 55437	Support@WellMe.com
31	Mixhers	https://mixhers.com	Jess Toolson, Founder Mixhers 4030 S. 500 W., Suite 40 Salt Lake City, UT 84123	Help@mixhers.com jess@mixhers.com
32	Modere	https://www.modere.com	Michelle Wilson, General Counsel Modere, Inc. 588 South 2000 West Springville, UT 84663 Ivan Wasserman Amin Talati 5185 MacArthur Blvd. NW Suite 230 Washington, DC 2007	info@modere.com michellew@modere.com ivan@amintalati.com
33	Morphus	https://wearemorphus.com	Andrea Donsky - Co-founder	support@wearemorphus.com andrea@wearemorphus.com
34	Naomi	https://naomiw.com	Naomi Whittel, Founder Naomi Whittel Brands 8609 Westwood Center Dr., Ste. #110 Tysons Corner, VA 22182	nwhittel@wproductslimited.com
35	Nature's Craft	https://shopnaturescraft.com	Meir Leff, CEO Nature's Craft 239 2nd Ave. S. 2nd Floor St. Petersburg, FL 33701 meiri@shopnaturescraft.com hello@shopnaturescraft.com	meiri@shopnaturescraft.com hello@shopnaturescraft.com
36	NovaMD / HydroNova	https://novamd.com	Dr. Vonda Wright, Founder HydroNova / NovaMD 160 W. Camino Real, #1163 Boca Raton, FL 33432	support@drvonda.com
37	O Positiv / Flo Vitamins	https://opositiv.com	Martin Ye, Chief Marketing Officer O Positiv 11740 San Vicente Blvd., Ste. 109-333 Los Angeles, CA 90049	hello@opositiv.com martin@opositiv.com

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38	Onecare	https://www.onecare.store	Lai Yan, CEO Onecare 1979 Marcus Ave, Suite 210 Lake Success, NY 11042	laiyan@onecarewellness.com
39	Ora Organic	https://ora.organic	Will Smelko, CEO Ora Organic 411 W. Monroe St. Austin, TX 78704	will@ora.organic info@ora.organic
40	Our Kindra	https://ourkindra.com	Catherine Balsam-Schwaber, Founder & CEO 1920 Olympic Blvd. Santa Monica, CA 90404 hello@ourkindra.com catherine@ourkindra.com	hello@ourkindra.com catherine@ourkindra.com
41	Phenology	https://myphenology.com	Ian Brady, CEO Hologram Sciences/Phenology 177 Huntington Ave. Ste. 1703 PMB 71158 Boston, MA 02115	ian@hologramsciences.com support@myphenology.com care@myphenology.com
42	Pink Lotus Elements	https://pinklotus.com	Andy Funk, Founding Director Pink Lotus Elements, LLC 100 Wishire Blvd., Ste. 700 Santa Monica, CA 90401	dfunk@pinklotus.com
43	Pink Stork	https://pinkstork.com	Amy Upchurch, CEO & Founder Pink Stork 30 Iroquois Avenue St. Augustine, FL 32084	amy@pinkstork.com cs@pinkstork.com
44	Purica	https://purica.com	Jason Watkin, CEO Purica 6157 Scott Rd. Duncan, BC V9L 6Y8 Canada	jason@purica.com shop@purica.com
45	Rebalance Health	https://rebalancehealth.com	Justin Hai, President & CEO Rebalance Health, Inc. 1855 S. 57th Ct. Suite 100 Boulder, CO 80301	jhai@rebalancehealth.com
46	Rejuvit	https://rejuvit.co	Stephanie Hudson & Nathan Summers, Founders Rejuvit Sciences LLC 312 W. 2nd Street Casper, WY 82601	customer@rejuvit.co
47	Semaine	https://www.semainehealth.com	Lauren Lee, CEO & Co-Founder Semaine 130 Boulevard NE #6 Atlanta, GA 30312	lauren@semainehealth.com support@semainehealth.com
48	SMNutrition	https://smnutrition.com	Anna Pavisha, Compliance Director SMNutrition 239 2nd Ave. S. Suite 200 St. Petersburg, FL 33701	anna@smnutrition.com email@smnutrition.com
49	Source Naturals	https://www.sourcenaturals.com	Carl R. Wiseman, CFO & COO Threshold Enterprises 23 Janis Way Scotts Valley, CA 95066	carlw@thresholdent.com

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50	Stripes	https://iamstripes.com	Cara Kamenev, CEO Stripes 9100 Wilshire Blvd Beverly Hills, CA 90212 policy@iamstripes.com Dan Reid, COO & General Counsel L Catterton 599 West Putnam Ave. Greenwich, CT 06830 dan.reid@latterton.com	policy@iamstripes.com dan.reid@latterton.com
51	Supplements Studio	https://supplementsstudio.com	Ilana Vaks Supplements Studio 8903 Glades Rd. Ste. A14 #4050 Boca Raton, FL 33434	ilana@supplementsstudio.com support@supplementsstudio.com
52	SusieWho	https://susiewho.co.uk	Susie Brient, CEO SusieWho 87 Norwich Road Fakenham NR21 8HH United Kingdom	susie@susiewho.co.uk susie.queenofgreenz@gmail.com
53	Swanson Vitamins	https://www.swansonvitamins.com	Jim Hamel, CEO Swanson Health Products P.O. Box 2803 Fargo, ND 58108-2803	jim.hamel@swansonvitamins.com
54	Tempo	https://www.store.pronovacorp.com	Diego Alegria Carmelino, Brand Marketing Coordinator Pronova 5000 SW 75th Ave., Ste. 113 Miami, FL 33155	dalegriacarmelino@pronovacorp.com info@pronovacorp.com
55	UtaLife	https://ultalife.com	UtaLife 8045 NW 36th St., Suite 508 Doral, FL 33166	support@ultalife.co
56	Vital Nutrients	https://www.vitalnutrients.co	Jane Pemberton, CEO & President Vital Nutrients 45 Kenneth Dooey Dr. Middletown, CT 06457	jane@vitalnutrients.net support@vitalnutrients.com
57	WelleCo	https://www.welleco.com/	Leighton Richards, CEO WelleCo 2A Railway Street Cottesloe, Western Australia 6011	leighton.richards@welleco.com
58	Wile (Nameless CPG)	https://wilewomen.com	Rajaa Grar, Chief Marketing Officer Nameless CPG P.O. Box 11286 630 NE Killingsworth St. Portland, OR 97211-3857	rajaa@namelesscpg.com info@wilewomen.com
59	Windsor	https://www.windsorbotanicals.com	Windsor Botanicals 19c Trolley Square Wilmington, DE 19806	hello@windsorbotanicals.com
60	Winged Wellness	https://wingedwellness.com	Jessica Mulligan, Founder Winged Wellness 2110 W. Slaughter Lane, Ste. 107-313 Austin, TX 78748	jess@wingedwellness.com hi@wingedwellness.com
61	Womaness	https://womaness.com	Sally Mueller, Co-Founder & CEO Well Found LLC, d.b.a. Womaness P.O. Box 28705 St. Paul, MN 55128	sally@womaness.com info@womaness.com

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62	Wonder Labs	https://wonderlabs.com	Wesleigh Hayes, Marketing Director Wonder Laboratories 115 S.C.T. Court, P.O. Box 820 White House, TN 37188	wesleigh@wonderlabs.com wonder@wonderlabs.com
63	XtendLife	https://www.xtend-life.com	Simon Doig, CEO XtendLife 12 Mary Muller Dr. Hillsborough, Christchurch 8022 New Zealand	simon@xtend-life.com customer.service@xtend-life.com
64	Zuma Nutrition	https://www.zumanutrition.com	Jordan Dorn, Co-Founder Zuma Nutrition 23823 Malibu Rd., Ste. 50-470 Malibu, CA 90265	jordan@zumanutrition.com info@zumanutrition.com