

The Legal Agency, LLC.

11931 Dorothy St. Los Angeles, CA 90049

RE: Request for Opinions on the Communication Language used in Garlive Recovery advertising in Georgia

To Whom It May Concern-

This letter is concerned with the request for opinions about the communication adopted in advertisement about the dietary supplements in the “Garlive Recovery and Garlive Oral Spray, in relation to applicable laws in the United States and in the state of Georgia. Additionally, the question + answers (Exhibit 4) answers all reference the following exhibits: (1) Product Brochure of both Garlive Recovery + Garlive Oral Spray, (2) Product Label of both Garlive Recovery + Garlive Oral Spray, (4) July 4 Meeting Notes, and (5) Patent Discussion over Hydroxytyrosol/ other benefits of the Garlive product.

Under the Dietary Supplement Health and Education Act of 1994 (DSHEA): Manufacturers and distributors of dietary supplements and dietary ingredients are prohibited from marketing products that are adulterated or misbranded. That means that these firms are responsible for evaluating the safety and labeling of their products before marketing to ensure that they meet all the requirements of the Federal Food, Drug, and Cosmetic Act as amended by DSHEA and FDA regulations. FDA remains the authority to take action against any adulterated or misbranded dietary supplement product after it reaches the market. If products containing hydroxytyrosol bear any nutrient content or health claims on the label or in labeling, such claims are subject to the applicable requirements and are under the purview of the Office of Nutrition and Food Labeling (ONFL) in the Center for Food Safety and Applied Nutrition. The ONFL has approved this dietary supplement on labels as long as they conform to their regulations. Additionally, as Georgia is in the United States, dietary supplements in the State of Georgia are subject to the regulations of the DSHEA and ONFL. Both DSHEA + ONFL are referenced throughout.

Sincerely,

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7/23/2022

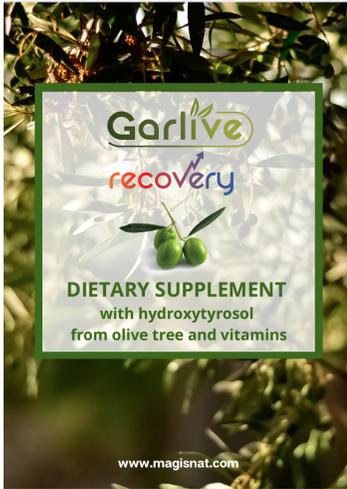
Brittany Peck, Esq. 72456

Attached: (1A) Garlive Recovery Product Brochure, (1B) Garlive Oral Spray, (2A) Label of Garlive Recovery Product, (2B) Label of Garlive Oral Spray, (3) Website Question + Answers from July 4, 2022 meeting, (4) Patent Discussion

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(1A) Garlive Recovery DIETARY SUPPLEMENT Brochure



Mediterranean diet

The **Mediterranean diet** is rich in olive oil, fruits and vegetables that contain **polyphenols**.

The **typical foods** of the **Mediterranean diet** contain **substances** which help **maintain** an optimal **state of health** and **restore** the **physiological balance** of the organism.

HYDROXYTYROSOL
The most potent antioxidant

Hydroxytyrosol is an **olive tree polyphenol** and one of the **most potent antioxidants** in the world. It is **present in the vegetables of the Mediterranean diet**. Hydroxytyrosol, easily orally absorbed (it reaches the bloodstream in 15 or 20 minutes) and there are **no problems with accumulation or toxicity** (it is eliminated through the kidneys or digestive system about 6-8 hours after its absorption).*

Our mission is:

- to **study natural substances** extracted from **typical plants of the Mediterranean diet**, which have shown **beneficial effects on the human body**;
- to **offer them** to those who want to **enrich their diet**.

*These statements have not been evaluated by the Food and Drug Administration. This dietary supplement is not intended to diagnose, treat, cure or prevent any disease.



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7/23/2022

Garlive RECOVERY

Garlive Recovery is a Dietary Supplement* with hydroxytyrosol from olive tree and vitamins.

MORE POLYPHENOLS IN 1 TABLET THAN IN 1/2 LITER OF OLIVE OIL**

Hydroxytyrosol, the olive tree's most abundant polyphenol, is present in Garlive Recovery **at high dosage**.

Polyphenols from olive tree, a typical plant of the Mediterranean diet, provide a broad range of **beneficial effects** against **age-related diseases, metabolic syndrome, brain disorders and cardiovascular diseases*****

100 MG (1 TABLET GARLIVE RECOVERY) vs **50 MG** (1/2 LITER OF OLIVE OIL)

*Dietary supplements do not possess any therapeutic or preventive properties.
**Equivalent data based on study showing average polyphenols content of common olive oil to be 10 mg per 100 grams. https://doi.org/10.3390/foods19020086
*** These statements have not been evaluated by the Food and Drug Administration. This

Garlive RECOVERY

This is the only **dietary supplement** combining **polyphenols** from the olive tree with **this particular vitamin formulation**.

Vitamins are an essential component of modern-day health.

Supplementing the diet with Garlive Recovery* is recommended because **today's lifestyles** are associated with **vitamin deficiencies****

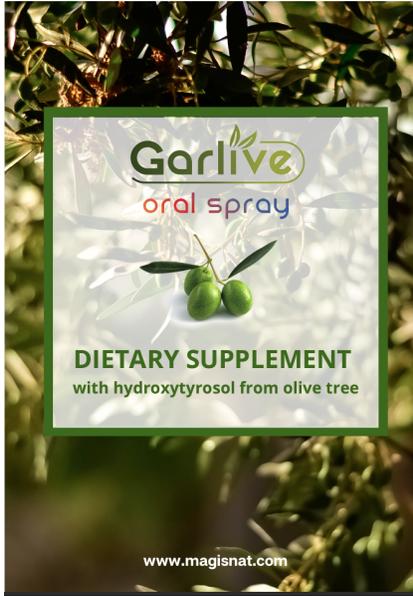
This dietary supplement is not to be intended a substitute for a varied diet and must be used as part of a healthy lifestyle. Keep the product out of reach from children under 18 years of age. Do not exceed the recommended daily dose. For the usage of the product during pregnancy and during breastfeeding it is advisable to seek the advice of a doctor. Do not take it in case of illness or suspected hypersensitivity or allergy to one or more of its components.
Store at room temperature in a cool and dry place, away from direct light and heat sources. Maximum storage temperature 30°C. Do not use if the package is not intact and/or after the expiration date. The expiration date refers to the product correctly stored and in unopened packaging.
In order to obtain further information about potential interaction with drugs and/or other substances in the diet, it is advisable to seek the advice of a doctor.
The recommended daily dose of Garlive Recovery is one pill per day, preferably in the morning.

Supplement Facts	
Serving Size: 1 Tablet (1g)	
Amount Per Serving	
% Daily Value*	
Hydroxytyrosol	100%
Vitamin B1 (Thiamine)	100%
Vitamin B2 (Riboflavin)	100%
Vitamin B3 (Niacin)	100%
Vitamin B6 (Pyridoxine)	100%
Vitamin B12 (Cobalamin)	100%
Vitamin C (Ascorbic Acid)	100%
Vitamin E (Tocopherol)	100%
Vitamin K (Phylloquinone)	100%
Vitamin D (Ergocalciferol)	100%
Vitamin A (Retinol)	100%
Vitamin P (Biotin)	100%
Vitamin H (Pantoic Acid)	100%
Vitamin M (Inositol)	100%
Vitamin Q (Ubiquinone)	100%
Vitamin U (Choline)	100%
Vitamin Y (Selenium)	100%
Vitamin Z (Zinc)	100%
Vitamin AA (Aspartic Acid)	100%
Vitamin AB (Alanine)	100%
Vitamin AC (Arginine)	100%
Vitamin AD (Asparagine)	100%
Vitamin AE (Glutamic Acid)	100%
Vitamin AF (Glutamine)	100%
Vitamin AG (Glycine)	100%
Vitamin AH (Histidine)	100%
Vitamin AI (Isoleucine)	100%
Vitamin AJ (Leucine)	100%
Vitamin AK (Lysine)	100%
Vitamin AL (Methionine)	100%
Vitamin AM (Proline)	100%
Vitamin AN (Serine)	100%
Vitamin AO (Threonine)	100%
Vitamin AP (Tryptophan)	100%
Vitamin AQ (Valine)	100%
Vitamin AR (Cysteine)	100%
Vitamin AS (Tyrosine)	100%
Vitamin AT (Phenylalanine)	100%
Vitamin AU (Glycine)	100%
Vitamin AV (Sarcosine)	100%
Vitamin AW (Creatine)	100%
Vitamin AX (Guanidinoacetic Acid)	100%
Vitamin AY (Methionine Sulfonium)	100%
Vitamin AZ (Homocysteine)	100%
Vitamin BA (Carnitine)	100%
Vitamin BB (Creatine)	100%
Vitamin BC (Guanidinoacetic Acid)	100%
Vitamin BD (Methionine Sulfonium)	100%
Vitamin BE (Homocysteine)	100%
Vitamin BF (Carnitine)	100%
Vitamin BG (Creatine)	100%
Vitamin BH (Guanidinoacetic Acid)	100%
Vitamin BI (Methionine Sulfonium)	100%
Vitamin BJ (Homocysteine)	100%
Vitamin BK (Carnitine)	100%
Vitamin BL (Creatine)	100%
Vitamin BM (Guanidinoacetic Acid)	100%
Vitamin BN (Methionine Sulfonium)	100%
Vitamin BO (Homocysteine)	100%
Vitamin BP (Carnitine)	100%
Vitamin BQ (Creatine)	100%
Vitamin BR (Guanidinoacetic Acid)	100%
Vitamin BS (Methionine Sulfonium)	100%
Vitamin BT (Homocysteine)	100%
Vitamin BU (Carnitine)	100%
Vitamin BV (Creatine)	100%
Vitamin BW (Guanidinoacetic Acid)	100%
Vitamin BX (Methionine Sulfonium)	100%
Vitamin BY (Homocysteine)	100%
Vitamin BZ (Carnitine)	100%
Vitamin C1 (Creatine)	100%
Vitamin C2 (Guanidinoacetic Acid)	100%
Vitamin C3 (Methionine Sulfonium)	100%
Vitamin C4 (Homocysteine)	100%
Vitamin C5 (Carnitine)	100%
Vitamin C6 (Creatine)	100%
Vitamin C7 (Guanidinoacetic Acid)	100%
Vitamin C8 (Methionine Sulfonium)	100%
Vitamin C9 (Homocysteine)	100%
Vitamin CA (Carnitine)	100%
Vitamin CB (Creatine)	100%
Vitamin CC (Guanidinoacetic Acid)	100%
Vitamin CD (Methionine Sulfonium)	100%
Vitamin CE (Homocysteine)	100%
Vitamin CF (Carnitine)	100%
Vitamin CG (Creatine)	100%
Vitamin CH (Guanidinoacetic Acid)	100%
Vitamin CI (Methionine Sulfonium)	100%
Vitamin CJ (Homocysteine)	100%
Vitamin CK (Carnitine)	100%
Vitamin CL (Creatine)	100%
Vitamin CM (Guanidinoacetic Acid)	100%
Vitamin CN (Methionine Sulfonium)	100%
Vitamin CO (Homocysteine)	100%
Vitamin CP (Carnitine)	100%
Vitamin CQ (Creatine)	100%
Vitamin CR (Guanidinoacetic Acid)	100%
Vitamin CS (Methionine Sulfonium)	100%
Vitamin CT (Homocysteine)	100%
Vitamin CU (Carnitine)	100%
Vitamin CV (Creatine)	100%
Vitamin CW (Guanidinoacetic Acid)	100%
Vitamin CX (Methionine Sulfonium)	100%
Vitamin CY (Homocysteine)	100%
Vitamin CZ (Carnitine)	100%
Vitamin D1 (Creatine)	100%
Vitamin D2 (Guanidinoacetic Acid)	100%
Vitamin D3 (Methionine Sulfonium)	100%
Vitamin D4 (Homocysteine)	100%
Vitamin D5 (Carnitine)	100%
Vitamin D6 (Creatine)	100%
Vitamin D7 (Guanidinoacetic Acid)	100%
Vitamin D8 (Methionine Sulfonium)	100%
Vitamin D9 (Homocysteine)	100%
Vitamin DA (Carnitine)	100%
Vitamin DB (Creatine)	100%
Vitamin DC (Guanidinoacetic Acid)	100%
Vitamin DD (Methionine Sulfonium)	100%
Vitamin DE (Homocysteine)	100%
Vitamin DF (Carnitine)	100%
Vitamin DG (Creatine)	100%
Vitamin DH (Guanidinoacetic Acid)	100%
Vitamin DI (Methionine Sulfonium)	100%
Vitamin DJ (Homocysteine)	100%
Vitamin DK (Carnitine)	100%
Vitamin DL (Creatine)	100%
Vitamin DM (Guanidinoacetic Acid)	100%
Vitamin DN (Methionine Sulfonium)	100%
Vitamin DO (Homocysteine)	100%
Vitamin DP (Carnitine)	100%
Vitamin DQ (Creatine)	100%
Vitamin DR (Guanidinoacetic Acid)	100%
Vitamin DS (Methionine Sulfonium)	100%
Vitamin DT (Homocysteine)	100%
Vitamin DU (Carnitine)	100%
Vitamin DV (Creatine)	100%
Vitamin DW (Guanidinoacetic Acid)	100%
Vitamin DX (Methionine Sulfonium)	100%
Vitamin DY (Homocysteine)	100%
Vitamin DZ (Carnitine)	100%
Vitamin E1 (Creatine)	100%
Vitamin E2 (Guanidinoacetic Acid)	100%
Vitamin E3 (Methionine Sulfonium)	100%
Vitamin E4 (Homocysteine)	100%
Vitamin E5 (Carnitine)	100%
Vitamin E6 (Creatine)	100%
Vitamin E7 (Guanidinoacetic Acid)	100%
Vitamin E8 (Methionine Sulfonium)	100%
Vitamin E9 (Homocysteine)	100%
Vitamin EA (Carnitine)	100%
Vitamin EB (Creatine)	100%
Vitamin EC (Guanidinoacetic Acid)	100%
Vitamin ED (Methionine Sulfonium)	100%
Vitamin EE (Homocysteine)	100%
Vitamin EF (Carnitine)	100%
Vitamin EG (Creatine)	100%
Vitamin EH (Guanidinoacetic Acid)	100%
Vitamin EI (Methionine Sulfonium)	100%
Vitamin EJ (Homocysteine)	100%
Vitamin EK (Carnitine)	100%
Vitamin EL (Creatine)	100%
Vitamin EM (Guanidinoacetic Acid)	100%
Vitamin EN (Methionine Sulfonium)	100%
Vitamin EO (Homocysteine)	100%
Vitamin EP (Carnitine)	100%
Vitamin EQ (Creatine)	100%
Vitamin ER (Guanidinoacetic Acid)	100%
Vitamin ES (Methionine Sulfonium)	100%
Vitamin ET (Homocysteine)	100%
Vitamin EU (Carnitine)	100%
Vitamin EV (Creatine)	100%
Vitamin EW (Guanidinoacetic Acid)	100%
Vitamin EX (Methionine Sulfonium)	100%
Vitamin EY (Homocysteine)	100%
Vitamin EZ (Carnitine)	100%
Vitamin F1 (Creatine)	100%
Vitamin F2 (Guanidinoacetic Acid)	100%
Vitamin F3 (Methionine Sulfonium)	100%
Vitamin F4 (Homocysteine)	100%
Vitamin F5 (Carnitine)	100%
Vitamin F6 (Creatine)	100%
Vitamin F7 (Guanidinoacetic Acid)	100%
Vitamin F8 (Methionine Sulfonium)	100%
Vitamin F9 (Homocysteine)	100%
Vitamin FA (Carnitine)	100%
Vitamin FB (Creatine)	100%
Vitamin FC (Guanidinoacetic Acid)	100%
Vitamin FD (Methionine Sulfonium)	100%
Vitamin FE (Homocysteine)	100%
Vitamin FF (Carnitine)	100%
Vitamin FG (Creatine)	100%
Vitamin FH (Guanidinoacetic Acid)	100%
Vitamin FI (Methionine Sulfonium)	100%
Vitamin FJ (Homocysteine)	100%
Vitamin FK (Carnitine)	100%
Vitamin FL (Creatine)	100%
Vitamin FM (Guanidinoacetic Acid)	100%
Vitamin FN (Methionine Sulfonium)	100%
Vitamin FO (Homocysteine)	100%
Vitamin FP (Carnitine)	100%
Vitamin FQ (Creatine)	100%
Vitamin FR (Guanidinoacetic Acid)	100%
Vitamin FS (Methionine Sulfonium)	100%
Vitamin FT (Homocysteine)	100%
Vitamin FU (Carnitine)	100%
Vitamin FV (Creatine)	100%
Vitamin FW (Guanidinoacetic Acid)	100%
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Vitamin GI (Methionine Sulfonium)	100%
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Vitamin HC (Guanidinoacetic Acid)	100%
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Vitamin IV (Guanidinoacetic Acid)	100%
Vitamin IU (Methionine Sulfonium)	100%
Vitamin IV (Homocysteine)	100%
Vitamin IU (Carnitine)	100%
Vitamin IV (Creatine)	100%
Vitamin IU (Guanidinoacetic Acid)	100%
Vitamin IV (Methionine Sulfonium)	100%
Vitamin IU (Homocysteine)	100%
Vitamin IV (Carnitine)	100%
Vitamin IU (Creatine)	100%
Vitamin IV (Guanidinoacetic Acid)	100%</

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(1B) Garlive Oral Spray Brochure



Mediterranean diet

The **Mediterranean diet** is rich in olive oil, fruits and vegetables that contain **polyphenols**.

The **typical foods** of the **Mediterranean diet** contain **substances** which help **maintain** an optimal **state of health** and **restore** the **physiological balance of the organism**.



HYDROXYTYROSOL The most potent antioxidant

Hydroxytyrosol is an **olive tree polyphenol** and one of the **most potent antioxidants** in the world. It is **present in the vegetables of the Mediterranean diet**. Hydroxytyrosol, easily orally absorbed (it reaches the bloodstream in 15 or 20 minutes) and there are **no problems** with **accumulation or toxicity** (it is eliminated through the kidneys or digestive system about 6-8 hours after its absorption).*

Our mission is:

- to **study natural substances** extracted from **typical plants of the Mediterranean diet**, which have shown **beneficial effects on the human body**;
- to **offer them** to those who want to **enrich their diet**.

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MAGISNAT

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7/23/2022

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ORAL SPRAY



Garlive Oral Spray is a **Dietary Supplement*** with **hydroxytyrosol from olive tree**.

OLIVE LEAF AND OLIVE FRUIT EXTRACTS

- BOLSTER THE IMMUNE SYSTEM****: olive polyphenols are shown to be potent immunity boosters.**
- SUPPORT CARDIOVASCULAR HEALTH****: olive polyphenols have been shown to encourage healthy cardiovascular function by supporting healthy cholesterol levels as well as artery health & function.**
- ARE POTENT ANTIOXIDANTS****: hydroxytyrosol is one of the most potent antioxidants discovered in nature. **
- SUPPORT BRAIN HEALTH****: hydroxytyrosol has been shown to exhibit neuro-protective properties.**
- HAVE EFFECTS ON MICROBES****: hydroxytyrosol and olive polyphenols have effects on bacteria, fungi and viruses. Their intake also affects the microbiota, microorganisms present in the human body.**

*Dietary supplements do not possess any therapeutic or preventive properties.

**These statements have not been evaluated by the Food and Drug Administration. This dietary supplement is not intended to diagnose, treat, cure or prevent any disease.



ORAL SPRAY

This dietary supplement is not to be intended a substitute for a varied diet and must be used as part of a healthy lifestyle. Keep the product out of reach from children under 18 years of age. Do not exceed the recommended daily dose. For the usage of the product during pregnancy and during breastfeeding it is advisable to seek the advice of a doctor. Do not take in cases of known or suspected hypersensitivity or allergy to one or more of its components.

Store at room temperature in a cool and dry place, away from direct light and heat sources. Maximum storage temperature 104°F. After opening, consume within 20 days. Do not use if the package is not intact and/or after the expiration date. The expiration date refers to the product correctly stored and in unopened packaging.

In order to receive further information about potential interaction with drugs and/or other substances in the diet, it is advisable to seek the advice of a doctor. The recommended dose of Garlive Oral Spray is two or three sprays on the back of the throat two or three times a day.

Maximum dose: 8 sprays a day in total.

Supplement Facts

Amount Per 1 mL	% Daily Value
Carbohydrate Less than 1g	0%
Sugar Less than 1g	0%
of which: Added Sugar 0g	0%
Hydroxytyrosol 0.035mL	**
Alpha-Cyclodextrins 0.025mL	**

*Percent Daily Values are based on a diet of other people's misdeeds.

**Daily Value Not Established.

In 1 mL --> 20.30 mg of olive tree polyphenols, of which 1.02 mg of hydroxytyrosol.



8 SPRAYS

Divided in:
2/3 sprays two or three times a day

*Dietary supplements do not possess any therapeutic or preventive properties.

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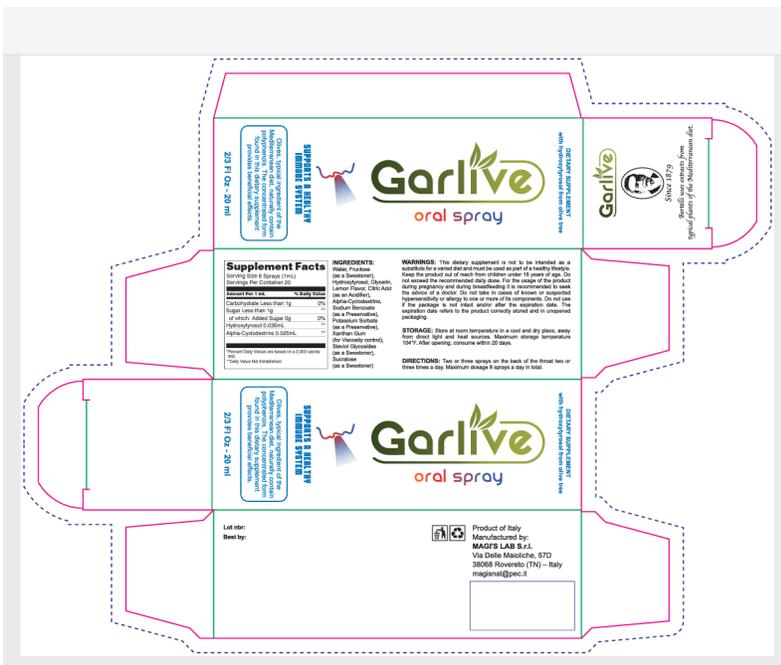
(2) Product Labels- Garlive Recovery + Garlive Oral Spray



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(3) Website Q +A

REQUEST FOR OPINIONS ABOUT THE COMMUNICATION ADOPTED IN ADVERTISEMENT ABOUT THE DIETARY SUPPLEMENTS GARLIVE RECOVERY AND GARLIVE ORAL SPRAY, IN RELATION TO APPLICABLE LAWS IN THE UNITED STATES AND IN THE STATE OF GEORGIA

Please note references to label and brochure, which are attached as (1) and (2) in this matter.

On the label and in the brochure of Garlive Oral Spray, we mention some properties of hydroxytyrosol and olive polyphenols, always indicating the note: **"These statements have not been evaluated by the Food and Drug Administration. This dietary supplement is not intended to diagnose, treat, cure or prevent any disease."** (p. 2-3).

On page 3, as some properties of polyphenols are indicated, we also added a disclaimer: **"Dietary supplements do not possess any therapeutic or preventive properties."** Indeed, we know that some therapeutic or preventive properties cannot be attributed to dietary supplements, so we want to be sure that the way of communication used in this brochure is correct.

QUESTION 1: Is such a way of communication compliant with the law?

Yes, as this is Generally Recognized as Safe (GRAS) product AND there are labels such as "not intended to diagnose, treat, cure, or prevent any disease AND that the dietary supplement does not possess any therapeutic..." [SEE Exhibit 1A, 1B, 2A, 2B.] this is an acceptable way of communicating that is compliant with the law.

Moreover, on page 4, we have also included the following WARNINGS:

- This dietary supplement is not to be intended a substitute for a varied diet and must be used as part of a healthy lifestyle.
- Keep the product out of reach from children under 18 years of age.
- Do not exceed the recommended daily dose.
- For the usage of the product during pregnancy and during breastfeeding it is advisable to seek the advice of a doctor.
- Do not take in cases of known or suspected hypersensitivity or allergy to one or more of its components.
- Do not use if the package is not intact and/or after the expiration date. The expiration date refers to the product correctly stored and in unopened packaging.

QUESTION 2: Are the warnings we have given correct and sufficient?

On page 4 is also stated the storage information: **"Store at room temperature in a cool and dry place, away from direct light and heat sources. Maximum storage temperature 104°F. After opening, consume within 20 days,"** and the directions: **"The recommended dose of Garlive Oral Spray is two or three sprays on the back of the throat two or three times a day. Maximum dosage: 8 sprays a day in total"** (see label).

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Yes, these warnings are sufficient to protect the integrity of the Garlive product + dietary supplement benefits.

QUESTION 3: Are the storage and directions correct and sufficient?

Finally, on page 4 of the brochure we state the safety tips (information that is written only in the brochure): **"In order to receive further information about potential interaction with drugs and/or other substances in the diet, it is advisable to seek the advice of a doctor."**

Yes, this safety disclaimer is sufficient to protect the integrity of the Garlive product even if the consumer is taking additional drugs/substances.

QUESTION 4: Is this enough of an indication of potential danger with interactions, considering the composition? Is it correct to put it only in the brochure or is it mandatory to state it in the label as well? This indication was not put on the label because our consultant told us that there is a list of active ingredients where it is indicated by FDA to report safety tips, such as risk for those who take certain drugs/take certain supplements/have certain diseases; but according to our consultant the raw materials we used did not fall into this category.

Yes, this is enough indication of potential danger- you must put it in both the brochure [See Exhibit 1A, 1B] and the label [See Exhibit 2A, 2B].

GARLIVE RECOVERY - BROCHURE AND LABEL

On the label and in the brochure of Garlive Recovery, we mention some properties of hydroxytyrosol and olive polyphenols, always indicating the note **"These statements have not been evaluated by the Food and Drug Administration. This dietary supplement is not intended to diagnose, treat, cure or prevent any disease."** (pp. 2-3-4).

On page 3, as some properties of polyphenols are indicated, we also added a disclaimer: **"Dietary supplements do not possess any therapeutic or preventive properties."**

Indeed, we know that some therapeutic or preventive properties cannot be attributed to dietary supplements, so we want to be sure that the way of communication used in this brochure is correct.

QUESTION 5: Is such a way of communication compliant with the law?

On page 4, we also state: **"Supplementing the diet with Garlive Recovery* is recommended because today's lifestyles are associated with vitamin deficiencies.**"** (DISCLAIMERS: ***Dietary supplements do not possess any therapeutic or preventive properties. **These statements have not been evaluated by the Food and Drug Administration. This dietary supplement is not intended to diagnose, treat, cure or prevent any disease.**)

Yes, this way of communication is compliant with the law, but I would not go any further with "today's lifestyles are associated with vitamin deficiencies."

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QUESTION 6: Is such a way of communication compliant with the law?

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We also added the following WARNINGS on page 4:

- This dietary supplement is not to be intended a substitute for a varied diet and must be used as part of a healthy lifestyle.
- Keep the product out of reach from children under 18 years of age.
- Do not exceed the recommended daily dose.
- For the usage of the product during pregnancy and during breastfeeding it is advisable to seek the advice of a doctor.
- Do not take in cases of known or suspected hypersensitivity or allergy to one or more of its components.
- Do not use if the package is not intact and/or after the expiration date. The expiration date refers to the product correctly stored and in unopened packaging.

Yes, this way of communication is complaint with the law- these warnings are sufficient on both the brochure [See Exhibits 1A, 1B] and the lable [See exhibit 2A, 2B].

QUESTION 7: Are these warnings correct and sufficient?

On page 4 is also stated the storage information: "Store at room temperature in a cool and dry place, away from direct light and heat sources. Maximum storage temperature 104°F," and the directions: "The recommended daily dose of Garlive Recovery is one pill per day, preferably in the morning" (see label).

Yes, these warnings are correct, however, you should include another disclaimer that you should check with your doctor, as it is hard to predict "the recommended" dose for a multitude of people.

QUESTION 8: Are the storage and directions correct and sufficient?

Finally, on page 4 of the brochure we state the SAFETY TIPS (information that is written only in the brochure): "In order to receive further information about potential interaction with drugs and/or other substances in the diet, it is advisable to seek the advice of a doctor."

Yes, these storage and other directions/ recomendations are in line with the labeling act + other regulations.

QUESTION 9: Is this enough of an indication of potential danger with interactions, considering the composition? Is it correct to put it only in the brochure or is it mandatory to state it in the label as well? This indication was not put on the label because our consultant told us that there is a list of active ingredients where it is indicated by FDA to report safety tips, such as risk for those who take certain drugs/take certain supplements/have certain diseases; but according to our consultant the raw materials we used did not fall into this category.

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While it is not mandatory, it is always better to put more disclaimers than not. I would ignore your consultants advice and put on the label to avoid any potential legal issues or delays down the road.

RESEARCHES AND PATENT

On the MAGISNAT website and on the MAGISNAT-RD subdomain we sometimes report scientific studies on olive tree polyphenols, which we then follow up with a photograph of our supplement with the disclaimer **"None of the reported studies or the patent can be used to claim the properties of dietary supplements. Dietary supplements do not possess any therapeutic or preventive properties."**:

QUESTION 10: is this notice correct?

Yes- this is a good disclaimer to ensure your customers do not confuse this with medicine.

In addition, we also publish our patents; with the patent related to polyphenols from olive tree that has already been published, "COMPOSITION FOR THE PREVENTION OF INFECTION BY SARS-CoV-2," we report the warning: **"None of the reported studies or THE PATENT can be used to claim the properties of dietary supplements. Dietary supplements do not possess any therapeutic or preventive properties."**

QUESTION 11: Is this way of presenting the information correct?

Yes- this is a good disclaimer to ensure your customers do not confuse this with medicine, similar to above. However, I would go one step further and stay ahead of any potential legal issues and state that nothing in this brochure (or product label) should indicate that this would be beneficial towards any potential or prevention of infection by SARS-CoV-2.

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(4) Magisnat Meeting Notes



MAGISNAT MEETING - July, 4th 2022

The topic was the quality of the hydroxytyrosol-based dietary supplement developed by MAGISNAT, Garlive Recovery.

We first discussed the WHO publications:

Q. Can micronutrient (vitamin and mineral) supplements prevent COVID-19 in healthy individuals or cure it in those with COVID-19 disease?

A. No. There is currently no guidance on micronutrient supplementation for the prevention of COVID-19 in healthy individuals or for the treatment of COVID-19. Micronutrients are critical for a well-functioning immune system and play a vital role in promoting health and nutritional well-being. Wherever possible, micronutrient intakes should come from a nutritionally balanced and diverse diet, including from fruits, vegetables and animal source foods.

Q. Are vitamin D supplements needed if individuals are not exposed to sunlight due to lockdowns?

A. Vitamin D can be made in the skin by exposure to sunlight or obtained through the diet from natural sources (e.g. fatty fishes such as salmon, tuna and mackerel, fish liver oils, beef liver, cheese and egg yolks), or from vitamin D-fortified foods or vitamin D-containing supplements.

In situations where individuals' vitamin D status is already marginal or where foods rich in vitamin D (including vitamin D-fortified foods) are not consumed, and exposure to sunlight is limited, a vitamin D supplement in doses of the recommended nutrient intakes (200-600 IU, depending on age) or according to national guidelines may be considered.

For more information about nutrition see:

"WHO guidelines on Vitamin and mineral requirements in human nutrition,"



We also asked Professor Tamasso Bucari (Department of Pharmaceutical Sciences, Food Science and Nutrition Section, University of Perugia, Italy) for his opinion on the product's qualities and characteristics; he composed a press note answering that question, which has been disseminated in newspapers and blogs (links are listed below).

This work is to be considered important, because it seems that a very small



TheGameTV.org, with magisnat about news, reviews and curiosities about music, manga and anime

TheGameTV.org 2, blog publishing news

Hype News, blog publishing news

Daily Silicon Valley, daily Magazine For Entrepreneurs



Brand Education, brand magazine

New Edge Time, American daily newspaper magazine based out of San Francisco

Spotfield, blog publishing news

GARLIVE RECOVERY IS CITED IN SOCIAL

Click for the link Social

- Brand Education
- Brand Education
- Brand Education
- Brand Education
- About Insider

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number of people in the U.S. take olive polyphenols directly from foods (such as fermented olives, olive paste, extra virgin olive oil, or olive polyphenol concentrates in the form of supplements).



None of the reported studies or the patent can be used to claim the properties of dietary supplements. Dietary supplements do not possess any therapeutic or preventive properties.

IN NUTRITION, FOLLOW THE SCIENCE

The main focus of this meeting was to verify how many scientific papers hypothesize the important role played in particular by olive tree polyphenols in dietary supplementation.

• SCIENTIFIC ARTICLES PUBLISHED IN PUBMED*

1. "Hydroxytyrosol: A natural compound with promising pharmacological activities"***
2. "Impact of phenolic-rich olive leaf extract on blood pressure, plasma lipids and inflammatory markers: a randomized controlled trial"
3. "Antioxidant activity of Hydroxytyrosol and Vitamin E Reduces systemic inflammation in children with paediatric NAFLD"
4. "Effect of Long-Term Hydroxytyrosol Administration on Body Weight, Fat Mass and Urine Metabolomics: A Randomized Double-Blind Prospective Human Study"
5. "Antioxidant Effects of a Hydroxytyrosol-Based Pharmaceutical Formulation on Body Composition, Metabolic State, and Gene Expression: A Randomized Double-Blind, Placebo-Controlled Crossover Trial"
6. "Secoiridoids delivered as olive leaf extract induce acute improvements in human vascular function and reduction of an inflammatory cytokine: a randomised, double-blind, placebo-controlled, cross-over trial"
7. "The Effect of Olive Leaf Extract on Upper Respiratory Illness in High School Athletes: A Randomised Control Trial"
8. "Olive Leaf Extracts Act as Modulators of the Human Immune Response"
9. "Evidence that Vitamin D Supplementation Could Reduce Risk of Influenza and COVID-19 Infections and Deaths"
10. "Western Dietary Pattern: Antioxidant Intakes and Oxidative Stress: Importance During the SARS-CoV-2/COVID-19 Pandemic"
11. "Link between Viral Infections, Immune System, Inflammation and Diet"

***Our scientific publication

GARLIVE RECOVERY IS CITED IN AMERICAN BLOG AND NEWSPAPER

Click for the link American blog and newspaper:

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(5) Patent Discussion



HYDROXYTYROSOL PATENT*

As early as the time of Hippocrates, olive trees were considered very important both from a dietary point of view and for human health. For this reason, Hellas (ancient Greece) was the major exporter of the beneficial effects of olive fruit, oil and leaves. This theory has also been verified by the discovery on the Greek island of Santorini of fossilized olive leaves from 60,000 years ago. So, it does not take much imagination when talking to a Greek olive grower to know that these roots are in the MEDITERRANEAN DNA.




As you can understand, the Mediterranean diet is the focal point for improving the well-being of people with particular diseases, such as eating disorders. This is why MAGISNAT decided to deepen and focus its studies on this topic and, specifically, on natural molecules, such as hydroxytyrosol.

In April 2022, a patent was published regarding a composition that comprises α -cyclodextrin and hydroxytyrosol and/or their nutraceutically acceptable derivatives, such as salts or esters, in particular for application as a food supplement or medical device, in alternative as a cosmetic mouthwash or traditional medicinal product of plant origin (botanical) or food for special medical purposes.*

The composition is effective in preventing SARS-CoV-2 infection. The composition is suitable for an application as a spray or mouthwash. A related dispensing device is also described. The composition is also effective in contrasting halitosis in subjects that wear a mask for a prolonged period.*

[DOWNLOAD PATENT](#)

WARNING:
 None of the reported studies or THE PATENT can be used to claim the properties of dietary supplements. Dietary supplements do not possess any therapeutic or preventive properties.

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