



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of Advertising Practices

March 15, 2018

Laura Brett, Esq., Senior Vice President
National Advertising Division
112 Madison Avenue, 3rd Floor
New York, NY 10016

Re: NAD Referrals About Advertising for Max Synapse LLC and Super Flora Probiotic, LLC dietary supplements

Dear Ms. Brett:

In 2016 and 2017, the National Advertising Division referred two separate matters to the Federal Trade Commission concerning companies owned by Robert J. Gullery. The first NAD compliance investigation involved Max Synapse LLC's claims that its dietary supplement supports short-term memory, drastically increases long-term memory, increases concentration, and has been proven to drastically increase memory and recall. The second compliance investigation involved Super Flora Probiotic, LLC's claims that its dietary supplement ends frequent bathroom emergencies, stops urgent diarrhea and digestive problems, promotes weight loss, and boosts the immune system.

Your referrals indicated that Max Synapse and Super Flora Probiotic did not respond to inquiries or otherwise participate in the NAD's self-regulatory process. Accordingly, you referred the matters to the FTC for our review.

After we alerted Mr. Robert J. Gullery to these two NAD referrals, Max Synapse and Super Flora Probiotic agreed to cooperate with NAD's inquiries. The NAD attorneys assigned to these matters have confirmed with FTC staff that these companies have ceased the challenged advertising claims and no longer sell these products.

Accordingly, it appears no additional FTC action is warranted at this time. The FTC reserves the right to take such further action as the public interest may require. The FTC fully supports the NAD's self-regulatory process, and we sincerely appreciate these referrals and the opportunity to continue to assist in supporting NAD.

Very truly yours,

A handwritten signature in black ink, appearing to read "Devin W. Domond".

Devin W. Domond
Chief of Staff for Advertising Practices