

Speaker 1: Hello, and welcome to legal food talk. I'm your host, Justin Prochnow a shareholder in the Denver office of the international law firm, Greenberg Traurig. And this is a podcast brought to you by our food beverage and agribusiness practice to give you some insights [00:00:30] and knowledge about the world of food, beverage and agribusiness.

Speaker 2: Thanks for joining us today. This is episode number four. We've talked about immunity. We've talked about hemp and CBD. We heard a little about the agribusiness world today. We're going to talk about one of the favorite subjects and that's the subject of weight loss and who better to help join me than my colleague and friend [00:01:00] Michael Goodman, who works with me here in the Denver office of Greenberg Traurig. Welcome Michael. Thanks for having me, Justin. You bet. So Michael and I go back a long way. We went to the same high school just a few years apart, but about 15. Okay. 15 years apart, Michael splits the difference between myself and my daughter, who also graduated 15 years after Michael. So we have a, a long line of Thomas Jefferson, high school Spartans [00:01:30] that, uh, that are here. Um, and in fact, I think we have like five TJ Spartans in our Denver office, a long time school here in Denver, Michael and I worked together on lots of, uh, issues affecting companies in the food beverage and agribusiness world.

Speaker 2: And the topic of weight loss comes up a lot because of course, everyone is looking for that magic pill, that magic thing that they can do, you know, without having to, [00:02:00] uh, exercise hard or eat what they don't want to. And so today we're going to explore the regulation of those weight loss products. Any thoughts ticking off Michael? Yeah. So weight loss products are a hot topic. There are always going to be a hot topic, whether it comes to the FDA, uh, you know, the drug claims or lack of substantiation with the FTC federal trade commission, weight loss, drugs, or weight loss, dietary supplements, [00:02:30] weight loss products are just a big staple in, in advertising and in the GNCs of the U S and the world. One of the reasons we wanted to talk about weight loss products today is because there's generally a particular focus on weight loss in the first couple of months of the year.

Speaker 2: It's a, one of the most common new year's resolutions is, Hey, I'm going to lose some weight and what better way to do it than join the gym, start a new weight [00:03:00] loss program. Uh, you know, there's obviously been lots of ads on TV, about a certain cycling unit at home. And, you know, everyone is looking for that way to drop off a few pounds to start the new year, and then come February, March, April back when people were going to gyms all the time, all of a sudden that gym membership people are looking to cancel it because they realize they're not going to be able to come up with it. And in particular, the FDA and the FTC, [00:03:30] you know, ratchet up their scrutiny of products because they know that there's going to be a proliferation of them in the first couple months of the year.

Speaker 2: So that's going to be our focus today. Talk a little bit about how the FDA and the FTC regulate those products and what things companies should be looking at when they're looking to promote products in those areas. So Michael mentioned there's really two main federal regulatory agencies that regulate [00:04:00] weight loss products. We have the us food and drug administration, and we have the FTC and we're going to tackle the

FDA first. So Michael, when we talked about the FDA and regulating weight loss products, and let's say we have a client who sends us a label that we're reviewing, what are some of the main things that you focus on when you're looking at it from an FDA regulation perspective? Uh, the claims are a big one. Obviously when we look at all the labels, we want to look at the [00:04:30] dietary supplement facts panel, and what's really on the label, but for our talk today, really talking about the claims and what they say on, you know, on the label or on the outside packaging, how they try to attract their customers.

Speaker 2: You know, we do get clients that make, uh, you know, make weight loss claims, whether that be a structure, function, claim, something that just helps the body with its own [00:05:00] natural process, or they extend to shaving the weight off and types of drug claims. Not saying that that's one of them, but it is a contentious subject, even when we're talking to our clients about what they can. And can't say now the interesting thing is, is that, you know, probably to back up to talk a little bit about what a dietary supplement is, let me, let me stop you there for a second. So [00:05:30] there's obviously lots of different weight loss products. We see them in, uh, you know, all types of various forums. And we, we see, of course the capsules, tablets, you know, gel caps, types of products. We see products, uh, you know, shakes.

Speaker 2: We see products that are, uh, offered to, uh, you know, creams for weight loss. So let's start with the basic one. What types of claims am I allowed [00:06:00] to make for L let's start with dietary supplements. I mean, um, what type of claims in the weight loss category am I allowed to make for, you know, a dietary study? Yeah. So Justin, you spoke about two different products. Uh, the first one being something that's a pill form or a drink or mixed form, you know, the shakes, but you also mentioned the creams. So what a dietary supplement must be is something that is ingestible. [00:06:30] So anything that is topical or injectable is never going to be a dietary supplement. What are you saying? I can't make weight loss claims for something that's not a dietary supplement. Well, as long as it discusses and makes claims about your appearance, uh, then you can make that as part of a cosmetic claim, but if it affects the body's [00:07:00] structure or function, that would be a dietary supplement that really can't be used as in a cream form.

Speaker 2: Right? So, I mean, it gets back to the basic, the definitions that are in the food drug and cosmetic act. So, you know, as, as you indicated in the definition of dietary supplement, it says, um, one of the criteria for a dietary supplement is that it has to be intended for ingestion. When we have topical products in the United States, topical products can only be sold [00:07:30] in one of two ways as a cosmetic or as a drug. And the delineation. We get this question a lot. The delineation is not even so much the ingredients, it's the claims that you make about it. So cosmetics can only be sold to cleanse beautify or promote attractiveness. Anything else makes the product a drug. Now, I suppose some people might argue, well, if it's a weight loss cream, you're trying to promote attractiveness. Um, but the reality is if your topical product has any effect on the structure [00:08:00] or function of the body, or it suggests the diagnosis treatment or prevention of disease, it's going to be viewed as a drug.

Speaker 2: So essentially as you indicated, topical weight loss products equals drug. There's no way around it. There's no legitimate way in the eyes of the FDA to sell a topical product as a drug. So if you see these as a diets or as a dietary supplement, well, just in general, there's no legitimate way for you [00:08:30] to sell a, any sort of topical product as anything other than a drug, because they will be claims affecting the structure or function of the body. So to get back to what you were saying about dietary supplement, if the product intended for ingestion, then it is at least eligible for being treated as a dietary supplement. So what's the delineation. When we get into the weight loss category, what's the delineation. What types of claims are allowed for a dietary supplement and what claims would take [00:09:00] it over into the drug category?

Speaker 2: Yeah. And, and generally a lot of dietary supplement, weight loss products do a pretty good job of, of a structure function claim. What a structure function claim is, is just what it sounds like it affects the structure function of the body, but it doesn't cure or mitigate a disease or condition. So that gets us back, sorry to interrupt. But this gets us back to even what I was talking about in episode one, which is the number [00:09:30] one mantra when you're selling non-drug products. Again, if you don't remember anything else about this podcast is you cannot sell a non-drug product to diagnose, treat, cure, or prevent a disease. That's going to be a common theme in all of these podcasts that we do. Whenever we talk about FDA regulation, that's the overriding mantra is you cannot sell non drug products to diagnose, treat, cure, or prevent a disease.

Speaker 2: So in the FDA's view, [00:10:00] addressing issues, conditions such as obesity or overweight or potential BMI levels being too high can venture into the realm of a drug. Um, however, mentioning that, uh, you know, with good diet and exercise, there can be weight loss. That's really just supporting what the body already does. So when the F D [00:10:30] a is looking for one of the, uh, one of the elements, I guess, that the FDA looks for is, is there a condition that you're claiming can be fixed? So again, such as obesity. Yeah. And it goes back to the definition of disease also, which is really important in which a lot of people don't realize is a little bit different than what you would typically think of. I mean, of course we know about the named diseases. [00:11:00] I mean, I don't think there's too many people that are under a misconception that, you know, if you say your product is going to treat cancer, that you're making a disease claim, but it's really important when we talked about disease claims that we remember the definition of disease, which is again, a sad statement of probably both of our lives that, you know, that definition is in the code of federal regulations at 21 CFR 1 0 1 93 G one.

Speaker 2: And that definition of disease is any damage [00:11:30] to an Oregon part structure or system of the body, such that it does not function properly. So it's a little bit more than, you know, just the, the big name, you know, cancer, diabetes, arthritis, Alzheimer's it's anything that causes damage or dysfunction to the body. So in the category of weight loss, the FDA has made it clear obesity is a disease. So you can't talk about obesity. And if you talk about being heavily overweight, [00:12:00] that's probably also an implied claim for disease. I think you can talk about being overweight, especially if you characterize it as being, you know, slightly overweight, mildly overweight, but typically

the safer course of action is for at least from an FDA perspective is going to be in talking about it in terms, as you said, of supporting, you know, weight loss, uh, supporting.

Speaker 2: And a lot of times these days, companies have gone more towards [00:12:30] the weight management type of claim, you know, where you're not specifically, and that's for two reasons. And we're going to talk a lot, you know, about the FTC side of regulation, because that's where it gets a little bit stickier in this category for the purposes of FDA, as long as you're not talking about obesity. And as you said, other symptoms, you know, things like high cholesterol, high blood pressure, which might lead or be no repercussions [00:13:00] of obesity and that you're treating those conditions, you're probably going to be safe from an FDA perspective. Again, FDA is really looking at it, is this the type of claim that's permissible for this type of product. Again, are you making a disease claim? And, you know, if it's a topical product, you know, you really can't be doing that.

Speaker 2: If it's an ingestible, whether it's a food and beverage, or whether it's a supplement, you know, is it a permissible structure function claim, or [00:13:30] does it bleed over into the category of disease? That's really from an FDA perspective, kind of the main concerns for companies to look at what we want to talk a little bit and focus a little bit more on is the FTC side of things. Because look, we certainly want to be compliant with all of the regulatory agencies. So most companies in the industry want to be good, you know, corporate responsible companies. But when [00:14:00] we look at the FDA and the FTC, the FTC is the 900 pound gorilla in the room that you don't want to get angry. So Michael, talk to us a little bit, at least on a, on a overall level, what are the main concerns that the FTC looks at when they're looking at advertising?

Speaker 2: Yeah. So this is one of my favorite topics. Uh, so we've talked about disease claims for the FDA. Well, the FTC, the federal trade commission isn't necessarily [00:14:30] concerned with whether it's a disease claim, whether it affects the structure or function of the body, what it is concerned about is if it can be substantiated by stuff that the legitimate studies on the product. And so, yes, of course, if the FTC gets assuming without the FDA, there's no real argument that it's a structure function claim, or, oh, you know, the [00:15:00] FTC isn't necessarily going to say, this is a, an impermissible disease claim. That's not really their concern. They're going to come in and ask for the studies that can substantiate or show that your claims actually happen when the product is taken as it's instructed. Right? So, I mean, the FTCs main focus, you know, they're the ones charged with enforcing advertising on a federal level.

Speaker 2: And there are three [00:15:30] main things they look at is, as you said, is advertising truthful and not misleading. Is it fair? And do you have adequate substantiation to back it up now in particular that, you know, there, the FTC looks at lots of advertising, but there are some categories of products where they take a particular interest in weight loss products are at the very top of the list of categories of products that the FTC has [00:16:00] historically investigated and take an action on. And it's for the very reason that we talked about at the beginning of this episode, which is everyone's looking for that magic bullet, that pill that will help me drop those pounds without having to put the work into it. And there've been lots of products over the years, you know, for weight

loss. And, and so this is different than what we were talking about with respect to the clubs, because obviously we've seen all kinds of products over the years.

Speaker 2: There was the [00:16:30] ThighMaster with Suzanne Somers back in the, um, uh, you know, uh, in the eighties. And I still watch those. So, and, and, you know, all the workout videos and all of the exercise bikes and the, you know, various products, the FTC has had a long history of looking at those products over the years. And to the extent that they've even, you know, launched different programs, uh, you know, to combat these. So [00:17:00] in 20, I think it was 2014, they launched operation failed resolution. Uh, the FTC announced where they took action against at least four different companies. Uh, you know, in January, at the start of the year, just to kind of send a message that, Hey, you know, we are looking closely at these types of products. You know, I remember a couple of years ago there was some caffeine infused, uh, underwear that was supposed to help you lose weight.

Speaker 2: [00:17:30] So there's all types of patches, creams pills. Um, but at the core of it is really two main things. Again, is the advertising truthful or not misleading. And do you have the substantiation to back it up? You might go here as a, as a, a science background. And so, you know, it takes a look at a lot of our substantiation. What are some of the important things to look at when you're looking at substantiation for claims? Absolutely. This is a, this is a tough [00:18:00] one to tell clients is that sometimes their study may be to show that the product can cause, you know, can, can help with weight loss, but not at the levels that they're selling it. So, or example, just using arbitrary numbers, if, uh, the study shows a hundred milligrams of a particular active ingredient, let's take an example. So let's say, um, I don't know, [00:18:30] even caffeine, you know, let's say we have a study on caffeine just as an example go on from there.

Speaker 2: Yeah. If, if, if the advertisement claims the study, but it's not at the levels that the study studied, sorry, uh, then it's not really substantiated. So for example, if the study uses a hundred milligrams to show that, uh, you know, a hundred milligrams taken over [00:19:00] seven days, once a day, uh, can reduce, uh, weight 10 pounds with diet with other diet and exercise, but the pill only has five milligrams of caffeine taken once a day. And there's no, well, it doesn't really matter what else they say this, the, the claim really doesn't hold true to the study, right? This is a common issue. Probably one of the biggest issues [00:19:30] we have when we were a large part of our day is clients bringing us, you know, labeling marketing, advertising materials, asking us to review websites and see, you know, can we make these types of claims for our product?

Speaker 2: And again, we look at it from the FDA perspective, are these, you know, permissible claims for this type of product. We look at it from the FTC standpoint, okay, it's a permissible claim, but do you actually have the science to back it up? And I would say, that's the number one area [00:20:00] where they say, well, you know, caffeine is well-known for generating energy and increasing metabolism. But again, the reality is you have to have science that supports the level in your product. And that's always really one of the hardest issues I think, is ensuring that you actually have science to back up the levels that are in your product. And, you know, of course there's other things that, um, are involved with substantiation. Is it the same delivery form? [00:20:30] You know,

I mean, if, if you have a, as we've talked about, if you have a liquid product, um, and, and you do a study on a liquid product, my tablet product is not necessarily going to experience the same benefits because the ingredients get differently and maybe it takes longer to get absorbed when it's in capsule form instead of liquid form.

Speaker 2: So there's a lot of considerations when you're looking at substantiation and it's a, it's a [00:21:00] difficult process. Uh, I mean, uh, you know, the studies sometimes are not totally clear. And, and oftentimes when you're looking online, you're just getting the abstract. You're not getting the full study. So if a client comes and says, well, how do I, how do I gather that type of information? What do you say to them? Well, the, the best answer is your own studies, but that's expensive. So, uh, so, you know, there are great websites like NCBI that, [00:21:30] that really are science direct that really can lead to two good studies that you should look at before you really developing your, your weight loss product. Because if you look at the study first and then can relate your product to that study, then you're, you may be in good shape, but it, you know, ultimately, uh, it's, it's best to have, as Justin said, the right delivery system and the right components along [00:22:00] with, uh, the active ingredients as well.

Speaker 2: And it's very difficult, uh, to find studies on that. Um, but it, it can be done. One of the things that's helpful is the FTC has issued, you know, some different guidance on weight loss products, because it has been such a central issue for the FTC. You know, they they've issued things like, uh, the gut-check guidance. Um, and there must be someone at FTC IO [00:22:30] is joke about this, that, um, comes up with these. And I can just imagine them sitting around a table and someone says to them, they're all just like, kind of cheering. Like, yes, that's a great one that they have a guidance for bamboo products, which is called something to the effect of don't be bamboozled that I can just imagine, like the celebration in the FTC meeting of how excited they were, they came up with this great name. So we have the gut-check and they basically identified a number of claims that really should give [00:23:00] pause to an end.

Speaker 2: It really was circulated more for retailers and advertisers for when companies come to them with products, making these types of claims, either kind of suggest that there's not likely to be the substantiation necessary to support those claims. So it's things like, you know, if it causes weight loss of two pounds or more a week for a month or more without any dieting or exercising, I think most of us know if anyone's tried to be on [00:23:30] a diet that you can take all the pills and stuff you want, but if you're not changing your diet and not changing your exercise, it's just not going to happen. So that's certainly, uh, one that, you know, I would say isn't a flat out illegal claim, but let's call it a big yellow flag to the FTC that, okay, we better see some really good science to back that up.

Speaker 2: So I, I'm more of a laid out well. So I see a lot of the good, a good commercials on television, you know, later [00:24:00] on at night. And a lot of them are weight loss products, and I've always wondered what about those small disclaimers at the bottom, uh, that are hard that I can barely read, but fortunately I can, I can pause it and read it. What are your thoughts on that? Yeah, I mean, obviously there, there are some definite guidelines, um, on disclosures that the FTC has issued, you know, they should be close in

proximity to the claims. They should be an easy to read box. They should be [00:24:30] in, um, you know, type size. The FTC likes to say, it's, you know, they call it mice mice type size. I mean, you know, that only mice can read. I mean, generally disclaimers have to be in the same form as the claim too.

Speaker 2: So if someone's making a lot of oral representations on a video or claim, then the disclosure should be oral to it. You shouldn't be talking aloud. And then how does school closure in writing at the bottom? Because some of them may be just listening to that and [00:25:00] never see that disclosure. So it is, it reminds me back to the days of the, the, again, I'm dating myself since, uh, we, uh, discussed how, uh, I was a few years earlier than you in high school, but the federal express guy from the, again, from the eighties who talked like really fast at the end and tries to get into the disclosure. And sometimes you hear it on radio commercials where someone's talking really fast to get in all the disclosures at the end disclosures have to be a parent and ready. And so it's, it, [00:25:30] it is a good point.

Speaker 2: And it's not something that people often do. A couple. Other of the, of the claims that kind of stick out for the FTC, uh, you causing substantial weight loss. Again, no matter what the consumer eats causing permanent weight loss, even after they stopped using the product lose weight, while you sleep is a real popular one. And again, causing substantial weight loss by wearing the product on the body or rubbing it on the skin. Again, we already talked [00:26:00] about that from an FDA standpoint, but from an FTC standpoint, as Michael said, they don't even care so much that that's not a permissible claim for the product. They just don't think there's any way that you have science to back up those types of claims. So I guess if there is science, which, you know, the admittedly we haven't yet seen, um, you know, that that would be the forum to present it that's right.

Speaker 2: The last kind of area that we want to cover in this is the use of testimonials, because it is probably the number one way in which [00:26:30] a lot of weight loss products are promoted is the use of, of consumer and customer testimonials. Because of course there's no better, uh, testimonial for a product than someone who's already used it and experienced this great weight loss. So what are, what are your initial thoughts when you're looking at testimonials? What are some things that come to mind? Oh, man. My favorite one are the social media is, uh, what the question I get the most when it comes to social [00:27:00] media is, well, I understand that I can't make the claim or I can't post the testimonial on my website because that would mean that I accepted as my own advertisement. But what about if somebody else did a testimonial on their own website on social media, Facebook, Instagram, I don't know Twitter.

Speaker 2: Can I like those? Can I repost those? Um, can I comment on them? And the answer [00:27:30] to that is no. When they make a claim that's on there, that if they make a claim, a testimonial that may even be outrageous, it's not really your responsibility necessarily to take it down if there's no relationship. And that's a whole other discussion is if there is a relationship, but assuming that there isn't what I find a lot. And what the FTC also looks to is [00:28:00] whether there is a simple, like by the company on that testimonial, a person's website, and that accepts the testimonial as the company's own,

uh, claims. And then the FTC holds the company account. Yeah. So let me back up. Cause I think you, you mentioned something that maybe not everyone totally understands, and that is because we get this a lot, you know, and again, when we're reviewing websites too, [00:28:30] for a compliance, I'll say, well, you've got a lot of testimonials on here and they're like, yeah, well, we're not saying that.

Speaker 2: It's just what, you know, it's their own opinions. So it's an important concept for people to understand that. That's fine. Again, as you said, if someone makes a statement about a product unsolicited on their own website or something else, you know, that's not attributed to the company, but as soon as a company uses an endorsement or a testimonial in its advertising, whether it's putting [00:29:00] it on its webpage or doing something else with it, it becomes an adopted statement of the company. So the really the rule is you can not use a testimonial that says anything that the company couldn't say itself. So let's say in the area of weight loss, obviously we've talked about the fact, you can't say that a product will, um, treat obesity. So I can't get around that by having a consumer who says, man, I used to be obese [00:29:30] and now I've taken, you know, Michael's weight loss supplement and I'm fit as a fiddle.

Speaker 2: Um, you know, I can't use that, uh, or Michael use that in promoting his product because it's essentially making an obesity claim and what's, he adopts that and uses it in his advertising. He is basically now making the claim that the product treats obesity. So it's really important for people to remember that they can't use endorsements. Additionally, [00:30:00] any endorsements or testimonials that people use in their advertising must, I must be able to substantiate it to the same level as if I'm doing it myself. So let's say that I've got this great, you know, immune support product, Justin's immune support. And, you know, someone writes in a customer review and says, you know, I take Justin's immune support, man. My immune system is, is, uh, great. And I also lost 20 pounds [00:30:30] taking it. So it's even better. Now, if I use that review, I have to be able to substantiate that my product will also help you lose 20 pounds, which guess what is going to be a really hard thing to do.

Speaker 2: So it's, it's another really important thing to remember is, um, once I adopt that, that statements of our own also when a consumer makes a testimonial, it's presumed to be indicative of what a typical person can expect from using the product. So Mike, [00:31:00] go, let's say I get this great testimonial from someone that says, man, I, I lost 75 pounds from, you know, taking my goals, uh, weight management product. What are the considerations, you know, for that? Yeah, there's, there's some pretty big considerations. Like how did you do it if, uh, if the claim is just that, uh, if your testimonial is just that you took it while, you know, right before bed and you woke up a couple of [00:31:30] days later lost 75 pounds and you didn't change your eating habits, you didn't change your workout habits. You didn't change your sleeping habits. Then if, if that is well, if that is the typical result, then that's something to talk about.

Speaker 2: However, that's probably not the typical so resolved. And how do I approve a typical result by studies, by weight loss in the, in the field of weight loss we talked about, you know, before a while you don't necessarily [00:32:00] have to do a study in your pipe, in the field of weight loss. You really do have to do a study on your product to be confident

about, you know, claims of specific weight loss. If you're going to get into that, because what happens is, again, there's no way that 75 pounds is good and to be indicative of what a typical person can use, because it matters on what the starting weight was of someone. So typically you're going to have to disclose, you know, in a, in a 90 day weight loss [00:32:30] study, the typical person lost 1.4 pounds a week for eight weeks. You know, something of that major because it's just not to be typical that someone loses 75 pounds.

Speaker 2: So you have to be very careful when using specific amounts of weight loss. That includes the before and after pictures before and after pictures by themselves are considered testimonials. And again, you need to give very specific disclosures about what a typical person can expect [00:33:00] from a weight loss product. Now, Justin, is there ever a time where you could use the 75 pound weight loss? I think there is. And, you know, to kind of wind up what we're talking about here, there is, if you're very specific about the circumstances. So if it's not typical of what a typical person could expect, you could provide a disclosure that says, you know, with the starting weight of who knows 400 pounds, [00:33:30] you know, this person consumed Michaels, you know, weight management products along with, uh, going for a morning walk, uh, you know, an afternoon walk, uh, limiting calories to 1700 calories a day, and being very specific about the circumstances in which that person lost the weight.

Speaker 2: Um, if it's not going to be typical just by consuming the product, the other way to go. [00:34:00] And we've talked about this before in many circumstances, as you said at the beginning, it's not just the pill or the powder or the shake. It's a whole plan. It's, you know, realistically you're not going to lose weight without a healthy diet and exercise. And the federal trade commission typically says, you know, that you should have something that discloses in conjunction with a healthy diet and exercise program. So it's, you know, take this product, [00:34:30] uh, you know, an exercise plan, manage your calorie intake. And all of those things together to sleep is also a much easier thing to prove than, Hey, this is all going to be done by this one magic product. Um, and that kind of leads us to the conclusion, which is, you know, this is an area that's going to be closely regulated by.

Speaker 2: Uh, we've talked about the FDA and the FTC, but also our favorite group of people, the class action plaintiff's lawyers who really [00:35:00] clearly are going to be looking for products that make unrealistic promises or claims. And we've seen that over the years, whether it's the magic fairy dust that you sprinkle on a pepperoni pizza or a hamburger, um, so that you won't want to eat it as much, or it's the caffeine underwear or it's, you know, the melt, your fat away cream, if the FDA and the FTC are looking at it, plaintiff's lawyers are [00:35:30] certainly going to be looking at it. Well, we appreciate you spending some time with us today. We hope you enjoyed it. If you do, please give us a good review on whatever listening platform you're using this time. And we hope that you tune in for future episodes. So thank you, Michael, for joining me. My pleasure. Thanks for having

Speaker 1: Me, Justin. All right. [inaudible].

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