

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.

★ DEC 23 2019 ★

BROOKLYN OFFICE

Civil Action No. _____

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

- v. -

ABH NATURE'S PRODUCTS, INC., ABH
PHARMA, INC., STOCKNUTRA.COM, INC.,
and MOHAMMED "Md." JAHIRUL ISLAM,

Defendants.

CONSENT DECREE OF PERMANENT INJUNCTION

WHEREAS, the United States of America, by its undersigned counsel, having filed a Complaint in this Court (the "Complaint") against ABH Nature's Products, Inc., ABH Pharma, Inc., StockNutra.com, Inc., and Mohammed "Md." Jahirul Islam ("Islam") (collectively, "Defendants"), a copy of which is annexed hereto as Exhibit A;

WHEREAS, Defendants do not admit or deny the allegations in the Complaint, and the parties wish to settle this action without further litigation; and

WHEREAS, Defendants having appeared and consented to entry of this Decree without contest and before any testimony has been taken, and the United States of America having consented to this Decree;

NOW THEREFORE it is HEREBY ORDERED, ADJUDGED, AND DECREED as follows that, pursuant to the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. §§ 301 *et seq.* (the "Act") and the inherent power of this Court:

RD 12/23/19
JK

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

1. This Court has jurisdiction over the subject matter and all parties to this action pursuant to 21 U.S.C. § 332 and its inherent equitable authority, and has personal jurisdiction over all parties to this action.

2. The Complaint states a cause of action against Defendants under the Act.

3. The Complaint alleges that Defendants violate 21 U.S.C. § 331(a) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce articles of food (dietary supplements), as defined by 21 U.S.C. § 321(ff), that are adulterated within the meaning of 21 U.S.C. § 342(g)(1), in that they have been prepared, packed, or held in violation of the current good manufacturing practice regulations for dietary supplements set forth in 21 C.F.R. Part 111 ("dietary supplement cGMP").

4. The Complaint alleges that Defendants violate 21 U.S.C. § 331(k) by causing articles of food (dietary supplements) to become adulterated within the meaning of 21 U.S.C. § 342(g)(1), while such articles are held for sale after shipment of one or more of their components in interstate commerce.

5. The Complaint alleges that Defendants violate 21 U.S.C. § 331(d) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce new drugs, as defined by 21 U.S.C. § 321(p), that are neither approved pursuant to 21 U.S.C. § 355(a) nor exempt from approval pursuant to 21 U.S.C. § 355(i).

6. The Complaint alleges that Defendants violate 21 U.S.C. § 331(a) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce drugs that are misbranded within the meaning of 21 U.S.C. § 352(f)(1) because their labeling fails to bear adequate directions for use.

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

7. Upon entry of this Decree, Defendants and each and all of their directors, officers, agents, representatives, employees, attorneys, successors, and assigns, and any and all persons in active concert or participation with any of them, who have received actual notice of this Decree by personal service or otherwise, are permanently restrained and enjoined under 21 U.S.C. § 332(a), and the inherent equitable authority of this Court, from directly or indirectly receiving, manufacturing, preparing, packing, repacking, labeling, holding, or distributing any articles of food (including but not limited to dietary supplements and their components) at or from 131 Heartland Boulevard, Edgewood, New York, or at or from any other location(s) at which Defendants now or in the future directly or indirectly receive, manufacture, prepare, pack, repack, label, hold, or distribute any articles of food (including but not limited to dietary supplements and their components) (hereafter, "Defendants' Facility" or "Facility"), unless and until:

- A. Defendants retain, at Defendants' expense, an independent person (the "cGMP Expert"), who is without any personal or financial ties (other than a retention agreement) to Defendants and/or their families, and who, by reason of background, training, education, or experience, is qualified to inspect the Facility to determine whether the Facility, methods, processes, and controls are operated and administered in conformity with dietary supplement cGMP. Defendants shall notify FDA in writing of the identity and qualifications of the cGMP Expert within three (3) business days of retaining such expert;
- B. The cGMP Expert performs a comprehensive inspection of the Facility and the methods, processes, and controls that Defendants use to receive, manufacture, prepare, pack, repack, label, hold, and distribute dietary supplements to determine

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

whether Defendants are in compliance with this Decree, the Act, and its implementing regulations;

C. The cGMP Expert certifies in writing to FDA that:

- i. The cGMP Expert has inspected the Facility, methods, processes, and controls that Defendants use to receive, manufacture, prepare, pack, repack, label, hold, and distribute dietary supplements;
- ii. All dietary supplement cGMP deviations brought to Defendants' attention by FDA, the cGMP Expert, or any other source have been corrected; and
- iii. The Facility and the methods, processes, and controls that Defendants use to receive, manufacture, prepare, pack, repack, label, hold, and distribute dietary supplements, are, in the cGMP Expert's opinion, in compliance with this Decree, the Act, and its implementing regulations. The cGMP Expert's report of the inspection, which shall be submitted to FDA at the same time it is presented to Defendants, shall include, but not be limited to, a determination that Defendants have methods, processes, and controls to ensure that they:
 - (1) Conduct appropriate tests or examinations to verify the identity of any component that is a dietary ingredient, prior to use, as required by 21 C.F.R. § 111.75(a)(1)(i);
 - (2) Verify that finished batches of dietary supplements meet product specifications for identity, purity, strength, and composition, and for limits on those types of contamination that may adulterate, or that

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

may lead to the adulteration of, the finished batch of dietary supplements, as required by 21 C.F.R. § 111.75(c); and

- (3) Establish and follow written procedures for laboratory operations, as required by 21 C.F.R. § 111.303.

- D. Defendants retain, at Defendants' expense, an independent person (the "Labeling Expert") who is without any personal or financial ties (other than a retention agreement) to Defendants and/or their families, except that this person may be the same as the cGMP Expert described in Paragraph 7.A of this Decree, and who, by reason of background, training, education, or experience, is qualified to review Defendants' product labeling (including but not limited to labels, catalogs, and websites) and other product claims to determine whether Defendants' claims cause any product that they receive, manufacture, prepare, pack, repack, label, hold, or distribute to be a drug within the meaning of 21 U.S.C. § 321(g)(1). Defendants shall notify FDA in writing of the identity and qualifications of the Labeling Expert within three (3) business days of retaining such expert;
- E. The Labeling Expert conducts a comprehensive review of Defendants' product labeling (including but not limited to labels, catalogs, and websites) and other product claims to determine whether Defendants' claims cause any product that Defendants receive, manufacture, prepare, pack, repack, label, hold, or distribute to be a drug within the meaning of 21 U.S.C. § 321(g)(1);
- F. The Labeling Expert certifies in writing to FDA that: (i) the Labeling Expert has reviewed Defendants' product labeling and other product claims to determine whether Defendants' claims cause any product that they receive, manufacture,

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

prepare, pack, repack, label, hold, or distribute to be a drug within the meaning of 21 U.S.C. § 321(g)(1); and (ii) Defendants' products and claims are, in the Labeling Expert's opinion, in compliance with this Decree, the Act, and its implementing regulations. The Labeling Expert shall prepare a detailed report of this review, which shall be submitted to FDA at the same time it is presented to Defendants, that shall include, but not be limited to, (i) specific results of the Labeling Expert's review, including references to product names and copies of all materials reviewed; and (ii) the Labeling Expert's determination of whether Defendants have implemented procedures that are adequate to ensure that claims do not cause any product that Defendants receive, manufacture, prepare, pack, repack, label, hold, or distribute to be a drug within the meaning of 21 U.S.C. § 321(g)(1), unless and until the product is the subject of an approved new drug application or abbreviated new drug application, or is exempt from approval under an investigational new drug application, 21 U.S.C. §§ 355(a), (b), (i), (j).

For all products for which Defendants have removed claims that caused such products to be drugs within the meaning of the Act, and such products meet the Act's definition of dietary supplement, Defendants shall comply with the dietary supplement provisions of the Act and its implementing regulations, and the requirements of Paragraph 7 of this Decree, before introducing such products into interstate commerce as dietary supplements;

- G. Defendants recall and destroy, under FDA's supervision and in accordance with the procedures and exceptions provided in Paragraph 9 of this Decree, all dietary supplements (including components, raw and in-process materials, and finished

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

products) and drugs (including components, raw and in-process materials, and finished products) that were received, manufactured, prepared, packed, repacked, labeled, held, or distributed between January 1, 2013, and the date of entry of this Decree;

- H. Defendants report to FDA in writing the actions they have taken to:
- i. Correct the dietary supplement cGMP deviations brought to Defendants' attention by FDA, the cGMP Expert, and any other source;
 - ii. Ensure that the facilities, methods, processes, and controls used to receive, manufacture, prepare, pack, repack, label, hold, and distribute dietary supplements are and will be continuously operated in conformity with dietary supplement cGMP; and
 - iii. Ensure that Defendants' claims do not cause any product that they receive, manufacture, prepare, pack, repack, label, hold, or distribute to be a drug within the meaning of 21 U.S.C. § 321(g)(1) unless the product is the subject of an approved new drug application or abbreviated new drug application, or is exempt from approval under an investigational new drug application, 21 U.S.C. §§ 355(a), (b), (i), and (j);
- I. As and when FDA deems necessary, FDA representatives inspect Defendants' Facility, including the buildings, equipment, products, labeling, and all relevant records contained therein, to determine whether the requirements of this Decree have been met and whether Defendants are operating in conformity with the Act, its implementing regulations, and this Decree;

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

- J. Defendants have paid all costs of FDA's inspections, investigations, supervision, analyses, examinations, and reviews with respect to Paragraphs 7 and 9 of this Decree, at the rates set forth in Paragraph 16 of this Decree; and
- K. FDA notifies Defendants in writing that they appear to be in compliance with the requirements set forth in Paragraph 7 of this Decree. In no circumstance shall FDA's silence be construed as a substitute for written notification.
8. Upon entry of this Decree, Defendants and each and all of their directors, officers, agents, representatives, employees, attorneys, successors, assigns, and any and all persons in active concert or participation with any of them, who have received actual notice of this Decree by personal service or otherwise, are also permanently restrained and enjoined under 21 U.S.C. § 332(a), and the inherent equitable authority of this Court, from directly or indirectly receiving, manufacturing, preparing, packing, repacking, labeling, holding, and/or distributing any drugs, as defined by 21 U.S.C. § 321(g)(1), in violation of the Act and/or its implementing regulations, at or from Defendants' Facility.
9. Within fifteen (15) business days after entry of this Decree, Defendants, under FDA's supervision, shall destroy all dietary supplements (including components, raw and in-process materials, and finished products) and drugs (including components, raw and in-process materials, and finished products) in Defendants' possession, custody, or control as of November 20, 2019, with the sole exception of the items identified on Exhibit B hereto, which Defendants represent and warrant under penalty of perjury constitute raw materials and not in-process materials or finished products. Defendants shall bear the costs of destruction and the costs of FDA's supervision. Defendants shall destroy the dietary supplements and drugs in accordance with, and not contrary to, all federal, state, and local laws. With regard to the raw materials

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

identified on Exhibit B, Defendants shall, at their own cost, hold such raw materials in their inventory and not sell, transfer, or otherwise introduce such materials into commerce or use such materials in the manufacturing of any product, unless and until:

- A. Defendants retain, at Defendants' expense, an independent person ("Ingredients Expert"), who is without any personal or financial ties (other than a retention agreement) to Defendants and/or their families, except that this person may be the same as the cGMP Expert described in Paragraph 7.A of this Decree, and who, by reason of background, training, education, or experience, is qualified to inspect the materials identified on Exhibit B. Defendants shall notify FDA in writing of the identity and qualifications of the Ingredients Expert within three (3) business days of retaining such expert;
- B. The Ingredients Expert performs a comprehensive inspection of the materials identified in Exhibit B, to determine whether they: (i) conform with this Decree, the Act, and its implementing regulations; (ii) specifically conform with the firm's component specifications established in accordance with 21 C.F.R. 111.70(b); and (iii) are within the component supplier's expiration dates;
- C. The Ingredients Expert certifies in writing that the raw materials fully comply with this Decree, the Act, its implementing regulations, and component specifications established in conformance with 21 C.F.R. 111.70(b), and are within expiration dates. The Ingredients Expert's report of the inspection shall be submitted to FDA at the same time it is presented to Defendants; and

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

- D. FDA notifies Defendants in writing that they appear to be in compliance with the requirements set forth in subparagraphs 9.A-C of this Decree. In no circumstances shall FDA's silence be construed as a substitute for written notification.

If the Ingredients Expert and/or FDA, upon review of the Ingredients Expert's report of the inspection, determines that any of the raw materials identified on Exhibit B do not comply with this Decree, the Act, and/or implementing regulations, Defendants shall destroy such material(s) within seven (7) days of receiving notice of such determination at Defendants' expense and in accordance with, and not contrary to, all federal, state, and local laws. If the Ingredients Expert does not provide a written determination to FDA in the manner provided for in this Paragraph as to whether any of the raw materials identified on Exhibit B comply with this Decree, the Act, and/or implementing regulations within sixty (60) days of entry of this Decree, Defendants shall destroy such materials within seventy (70) days of entry of this Decree at Defendants' expense and in accordance with, and not contrary to, all federal, state, and local laws.

10. After complying with Paragraph 7 of this Decree and receiving FDA's written notification pursuant to Paragraph 7.K, Defendants shall retain an independent person (the "Auditor") who shall meet the criteria for, and may be the same person as, the cGMP Expert described in Paragraph 7.A, to conduct audit inspections of the Facility and the methods, processes, and controls used to receive, manufacture, prepare, pack, repack, label, hold, and distribute dietary supplements. The following obligations apply to these audits:

- A. The Auditor shall conduct audit inspections no less frequently than once every six (6) months for a period of no less than five (5) years and then at least once every year thereafter. The first audit shall occur not more than six (6) months after Defendants have received FDA's written notification pursuant to Paragraph 7.K.

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

The Auditor must be physically present at the Facility during the audit inspections.

The audit inspections may not be conducted by virtual means (e.g., by camera or videolink).

- B. At the conclusion of each audit inspection, the Auditor shall prepare a detailed written audit report ("Audit Report") analyzing whether Defendants are in compliance with this Decree, the Act, and its implementing regulations and identifying any deviations from such requirements ("Audit Report Observations"). As a part of every Audit Report (except the first one), the Auditor shall assess the adequacy of actions taken by Defendants to correct all previous Audit Report Observations. The Audit Reports shall be delivered contemporaneously to Defendants and FDA by courier service or overnight delivery service, no later than five (5) business days after the audit inspection is completed. In addition, Defendants shall maintain the Audit Reports in separate files at Defendants' Facility and shall promptly make the Audit Reports available to FDA upon request.
- C. If an Audit Report contains any Audit Report Observations, Defendants shall, within ten (10) business days after receipt of the Audit Report, correct those observations, unless FDA notifies Defendants that a shorter time period is necessary. If, after receiving the Audit Report, Defendants believe that correction of the Audit Report Observations will take longer than ten (10) business days, Defendants shall, within five (5) business days after receipt of the Audit Report, submit to FDA in writing a proposed schedule for completing corrections ("Audit Correction Schedule"). The Audit Correction Schedule must be reviewed and approved by FDA in writing prior to implementation by Defendants. In no

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

circumstance shall FDA's silence be construed as a substitute for written approval. Defendants shall complete all corrections according to the approved Audit Correction Schedule. Within twenty (20) business days after Defendants' receipt of an Audit Report, unless FDA notifies Defendants that a shorter time period is necessary, or within the time period provided in an FDA-approved Audit Correction Schedule, the Auditor shall review the actions taken by Defendants to correct the Audit Report Observations. Within five (5) business days after beginning that review, Defendants shall ensure that the Auditor reports in writing to FDA whether each of the Audit Report Observations has been corrected and, if not, which Audit Report Observations remain uncorrected.

11. Upon entry of this Decree, Defendants are permanently restrained and enjoined under 21 U.S.C. § 332(a) from directly or indirectly doing or causing to be done any of the following acts:

- A. Violating 21 U.S.C. § 331(a), by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce articles of food (including but not limited to dietary supplements and their components) that are adulterated within the meaning of 21 U.S.C. § 342(g)(1);
- B. Violating 21 U.S.C. § 331(k), by causing articles of food (including but not limited to dietary supplements and their components) to become adulterated within the meaning of 21 U.S.C. § 342(g)(1), while such articles are held for sale after shipment of one or more of their components in interstate commerce;
- C. Violating 21 U.S.C. § 331(d) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

new drugs, as defined by 21 U.S.C. § 321(p), that are neither approved pursuant to 21 U.S.C. § 355(a) nor exempt from approval pursuant to 21 U.S.C. § 355(i);

- D. Violating 21 U.S.C. § 331(a), by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce articles of drug that are misbranded within the meaning of 21 U.S.C. § 352; and
- E. Failing to implement and continuously maintain the requirements of this Decree.

12. If, at any time after entry of this Decree, FDA determines, based on the results of an inspection, the analysis of a sample, a report, or data prepared or submitted by Defendants, the cGMP Expert, Labeling Expert, Ingredients Expert, Auditor, or any other information, that Defendants have failed to comply with any provision of this Decree, have violated the Act or its implementing regulations, or that additional corrective actions are necessary to achieve compliance with this Decree, the Act, or its implementing regulations, FDA may, as and when it deems necessary, notify Defendants in writing of the noncompliance and order Defendants to take appropriate corrective action, including, but not limited to, ordering Defendants to immediately take one or more of the following actions:

- A. Cease receiving, manufacturing, preparing, packing, repacking, labeling, holding, or distributing any and all products;
- B. Recall, at Defendants' expense, any product that in FDA's judgment is adulterated, misbranded, or otherwise in violation of this Decree, the Act, or its implementing regulations;
- C. Revise, modify, expand, or continue to submit any reports, plans, procedures, or other records prepared pursuant to this Decree;
- D. Submit additional reports or information to FDA as requested;

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

- E. Institute or reimplement any of the requirements set forth in this Decree;
- F. Issue a safety alert; and/or
- G. Take any other corrective actions as FDA, in its discretion, deems necessary to protect the public health or bring Defendants into compliance with this Decree, the Act, or its implementing regulations.

This remedy shall be separate and apart from, and in addition to, any other remedy available to the United States under this Decree or under the law.

13. Upon receipt of any order issued by FDA pursuant to Paragraph 12 of this Decree, Defendants shall immediately and fully comply with the terms of the order. Any cessation of operations or other action described in Paragraph 12 shall continue until Defendants receive written notification from FDA that Defendants appear to be in compliance with this Decree, the Act, and its implementing regulations, and that Defendants may resume operations. Defendants shall pay all costs of recalls and other corrective actions, including the costs of FDA's inspections, investigations, supervision, analyses, examinations, sampling, testing, reviews, document preparation, travel, and subsistence expenses to implement and monitor the remedies set forth in Paragraph 12, at the rates specified in Paragraph 16.

14. Representatives of FDA shall be permitted, without prior notice and as and when FDA deems necessary, to inspect Defendants' Facility and operations and, without prior notice, take any other measures necessary to monitor and ensure continuing compliance with the terms of this Decree, the Act, and all applicable regulations. During such inspections, FDA representatives shall be permitted to: have immediate access to Defendants' places of business including, but not limited to all buildings, equipment, dietary supplement components, raw ingredients, in-process materials, finished and unfinished products, containers, packaging material, labeling, and other

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

material therein; take photographs and make video recordings; take samples of Defendants' dietary supplements, dietary supplement components, and drugs, raw ingredients, in-process materials, finished and unfinished products, containers, packaging material, labeling, and other material; and examine and copy all records relating to the receipt, manufacture, preparing, packing, repacking, labeling, holding, and distribution of any and all of Defendants' products and their components. The inspections shall be permitted upon presentation of a copy of this Decree and appropriate credentials. The inspection authority granted by this Decree is separate from, and in addition to, the authority to make inspections under the Act, 21 U.S.C. § 374.

15. Defendants shall promptly provide any information or records to FDA upon request regarding the receipt, manufacture, preparing, packing, repacking, labeling, holding, and distribution of Defendants' products, including components.

16. Defendants shall pay all costs of FDA's inspections, investigations, supervision, analyses, examinations, and reviews that FDA deems necessary to evaluate Defendants' compliance with any part of this Decree, including the travel incurred by specialized investigatory and expert personnel, at the standard rates prevailing at the time the costs are incurred. As of the date that this Decree is signed by the parties, these rates are: \$97.57 per hour or fraction thereof per representative for inspection and investigative work; \$132.89 per hour or fraction thereof per representative for analytical or review work; \$0.58 per mile for travel expenses by automobile; government rate or the equivalent for travel by air or other means; and the published government per diem rate for subsistence expenses where necessary. In the event that the standard rates applicable to FDA supervision of court-ordered compliance are modified, these rates shall be increased or decreased without further order of the Court. Defendants shall make payment in full to FDA within twenty (20) business days of receiving written notification from FDA of the costs.

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

17. Within five (5) business days after entry of this Decree, Defendants shall post a copy of this Decree in a conspicuous location in a common area at Defendants' Facility and shall ensure that the Decree remains posted for as long as the Decree remains in effect. Within ten (10) business days after entry of this Decree, Defendants shall provide to FDA an affidavit, from a person with personal knowledge of the facts stated therein, stating the fact and manner of compliance with this Paragraph.

18. Within ten (10) business days after entry of this Decree, Defendants shall hold a general meeting or series of smaller meetings for all employees, at which they shall describe the terms and obligations of this Decree. Within fifteen (15) business days after entry of this Decree, Defendants shall provide to FDA an affidavit, from a person with personal knowledge of the facts stated therein, stating the fact and manner of compliance with this Paragraph and a copy of the agenda, list of attendees, and meeting minutes from the meeting(s) held pursuant to this Paragraph.

19. Within ten (10) business days after entry of this Decree, Defendants shall provide a copy of the Decree by personal service or certified mail (return receipt requested) to each and all of their directors, officers, agents, representatives, employees, attorneys, successors, and assigns, and any and all persons or entities in active concert or participation with any of them ("Associated Persons"). Within twenty (20) business days after entry of this Decree, Defendants shall provide to FDA an affidavit, from a person with personal knowledge of the facts stated therein, stating the fact and manner of compliance with this Paragraph, identifying the names, addresses, and positions of all Associated Persons who have received a copy of this Decree, and attaching a copy of the executed certified mail return receipts.

20. In the event that any of the Defendants becomes associated with any additional Associated Person(s) at any time after entry of this Decree, Defendants shall immediately provide

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

a copy of this Decree, by personal service or certified mail (return receipt requested) to such Associated Person(s). Within five (5) business days of each time that any of the Defendants becomes associated with any additional Associated Person, Defendants shall provide to FDA an affidavit, from a person with personal knowledge of the facts stated therein, stating the fact and manner of compliance with this paragraph, identifying the names, addresses, and positions of all Associated Persons who received a copy of this Decree pursuant to this Paragraph, and attaching a copy of the executed certified mail return receipts.

21. Defendants shall notify FDA in writing at least ten (10) business days before any change in ownership, name, or character of their business that occurs after entry of this Decree, including an incorporation, reorganization, creation of a subsidiary, relocation, dissolution, bankruptcy, assignment, sale, or any other change in the structure or identity of ABH Nature's Products, Inc., ABH Pharma, Inc., or StockNutra.com, Inc., or the sale or assignment of any business assets, such as buildings, equipment, or inventory, that may affect obligations arising out of this Decree. Defendants shall provide a copy of this Decree to any prospective successor or assign at least twenty (20) business days prior to any sale or assignment. Defendants shall furnish FDA with an affidavit of compliance with this Paragraph no later than ten (10) business days prior to such assignment or change in ownership.

22. If any Defendant fails to comply with any provision of this Decree, the Act, or its implementing regulations, including any time frame imposed by this Decree, then Defendants shall pay to the United States of America: eight thousand dollars (\$8,000) in liquidated damages for each day such violation continues; an additional sum of five thousand dollars (\$5,000) in liquidated damages per day per violation, for each violation of this Decree, the Act, and/or its implementing regulations; and an additional sum in liquidated damages equal to twice the retail value of any

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

product distributed in violation of this Decree, the Act, and/or its implementing regulations. Defendants understand and agree that the liquidated damages specified in this Paragraph are not punitive in nature and their imposition does not in any way limit the ability of the United States to seek, or the Court to impose, additional civil or criminal penalties to be paid by Defendants, or remedies based on conduct that may also be the basis for payment of liquidated damages pursuant to this Paragraph.

23. Should the United States bring and prevail in a contempt action to enforce the terms of this Decree, Defendants shall, in addition to other remedies, reimburse the United States for its attorneys' fees (including overhead), expert witness fees, travel expenses incurred by attorneys and witnesses, investigational and analytical expenses, administrative and court costs, and any other costs or fees relating to such contempt proceedings.

24. Defendants shall abide by the decisions of FDA, and FDA's decisions shall be final. All decisions conferred upon FDA in this Decree shall be vested in FDA's discretion and, to the extent that these decisions are subject to review, shall be reviewed by the Court under the arbitrary and capricious standard set forth in 5 U.S.C. § 706(2)(A). Review by the Court of any FDA decision rendered pursuant to this Decree shall be based exclusively on the written record before FDA at the time the decision was made. No discovery shall be taken by either party.

25. All notifications, correspondence, and communications to FDA required by the terms of this Decree shall be prominently marked "Decree Correspondence" and addressed to Program Division Director, Office of Human and Animal Food Operations East – Division 1, U.S. Food and Drug Administration, 158-15 Liberty Avenue, Room 4050, Jamaica, NY 11433, and shall reference this civil action by case name and civil action number.

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

26. The Decree resolves only the claims in this statutory injunction action brought under 21 U.S.C. § 332(a) as set forth in the Complaint. Defendants specifically state and agree that entry of this Decree does not preclude any other civil, criminal, or administrative claims that the government may have or may bring in the future against any of the Defendants herein in connection with, or relating to, any of the Defendants' activities involving FDA-regulated products, including the conduct alleged in the Complaint filed with this Decree.

27. This Decree may be executed in separate counterparts, each of which constitutes an original and all of which constitute one and the same Decree. Signatures delivered by facsimile transmission, or as .pdf attachments to emails, shall constitute acceptable, binding signatures for purposes of this Decree.

28. This Court retains jurisdiction over this action and the parties thereto for the purpose of enforcing and modifying this Decree and for the purpose of granting such additional relief as may be necessary or appropriate.

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction


The undersigned hereby consent to entry of the foregoing Decree:

Dated: December 18, 2019

Dated: December ____, 2019

For Defendants

For Plaintiff


Mohammed ~~Wid.~~ Jamirul Islam,
individually, and on behalf of
ABH Nature's Products, Inc.,
ABH Pharma, Inc., and
StockNutra.com, Inc., corporations.

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

EVAN P. LESTELLE
Assistant United States Attorney
(718) 254-7000
Evan.Lestelle@usdoj.gov

JOSEPH H. HUNT
Assistant Attorney General
Civil Division

DAVID M. MORRELL
Deputy Assistant Attorney General

GUSTAV W. EYLER
Director
Consumer Protection Branch

Dated: December ____, 2019

Dated: December ____, 2019

David L. Rosen, BS Pharm, JD
Foley & Lardner LLP
3000 K St., NW, 6th Floor
Washington, DC 20007-5109
Phone: 202-672-5430
Email: drosen@foley.com
Attorney for Defendants

JOSHUA A. FOWKES
Trial Attorney
Consumer Protection Branch
Department of Justice, Civil Division
450 5th Street, NW, Suite 6400-South
Washington, D.C. 20530
202-532-4218
Joshua.A.Fowkes@usdoj.gov

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

The undersigned hereby consent to entry of the foregoing Decree:

Dated: December _____, 2019

For Defendants

Mohammed "Md." Jahirul Islam,
individually, and on behalf of
ABH Nature's Products, Inc.,
ABH Pharma, Inc., and
StockNutra.com, Inc., corporations.

[Redacted]

¹⁸
L. Rosen, BS Pharm, JD
Foley & Lardner LLP
3000 K St., NW, 6th Floor
Washington, DC 20007-5109
Phone: 202-672-5430
Email: drosen@foley.com
Attorney for Defendants

Dated: December 18, 2019

For Plaintiff

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York
271 Cadman Plaza East

[Redacted]

[Redacted]

[Redacted] HUNT
Assistant Attorney General
Civil Division

DAVID M. MORRELL
Deputy Assistant Attorney General

GUSTAV W. EYLER
Director
Consumer Protection Branch

[Redacted]

[Redacted] FOWKES
Trial Attorney
Consumer Protection Branch
Department of Justice, Civil Division
450 5th Street, NW, Suite 6400-South
Washington, D.C. 20530
202-532-4218
Joshua.A.Fowkes@usdoj.gov

United States v. ABH Nature's Products, Inc., et al.
Consent Decree of Permanent Injunction

OF COUNSEL:

ROBERT P. CHARROW
General Counsel

STACY CLINE AMIN
Chief Counsel
Food and Drug Administration
Deputy General Counsel
Department of Health and Human Services

ANNAMARIE KEMPIC
Deputy Chief Counsel for Litigation

WILLIAM THANHAUSER
Associate Chief Counsel, Litigation
United States Department of Health and
Human Services
Office of the General Counsel
Food and Drug Division
10903 New Hampshire Avenue
Bldg. 32, Room 4393
Silver Spring, MD 20993-0002
Phone: (301) 348-3052
Email: William.Thanhauser@fda.hhs.gov

SO ORDERED, this 20 day of December, 2019.

s/ LDH

HONORABLE
UNITED STATES DISTRICT JUDGE

Exhibit A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

- v. -

ABH NATURE'S PRODUCTS, INC., ABH
PHARMA, INC., STOCKNUTRA.COM,
INC., and MOHAMMED "Md." JAHIRUL
ISLAM,

Defendants.

COMPLAINT

Civil Action No.
2:19-CV-06589

(DeArcy Hall, J.)
(Mann, M.J.)

Plaintiff, the United States of America, by and through its undersigned counsel, and on behalf of the United States Food and Drug Administration ("FDA"), hereby alleges as follows:

INTRODUCTION

1. This is a statutory injunction proceeding brought under the Federal Food, Drug, and Cosmetic Act (the "Act"), 21 U.S.C. § 332(a), and the inherent equitable authority of this Court, to preliminarily and permanently enjoin ABH Nature's Products, Inc., ABH Pharma, Inc., and StockNutra.com, Inc. (together, the "Corporate Defendants"), and Mohammed "Md." Jahirul Islam (together with the Corporate Defendants, "Defendants"), from:

A. violating 21 U.S.C. § 331(a) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce articles of food (dietary supplements, within the meaning of 21 U.S.C. § 321(ff)), that are adulterated under 21 U.S.C. § 342(g)(1);

B. violating 21 U.S.C. § 331(k) by causing articles of food (dietary supplements, within the meaning of 21 U.S.C. § 321(ff)), to become adulterated under 21 U.S.C.

§ 342(g)(1), while such articles are held for sale after shipment of one or more of their components in interstate commerce;

C. violating 21 U.S.C. § 331(d) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce new drugs, within the meaning of 21 U.S.C. § 321(p), that are neither approved pursuant to 21 U.S.C. § 355(a) nor exempt from approval pursuant to 21 U.S.C. § 355(i); and

D. violating 21 U.S.C. § 331(a) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce drugs that are misbranded under 21 U.S.C. § 352(f)(1).

JURISDICTION AND VENUE

2. This Court has jurisdiction over the subject matter and all parties to this action under 21 U.S.C. § 332(a) and 28 U.S.C. §§ 1331, 1337, and 1345.

3. Venue in this district is proper under 28 U.S.C. § 1391(b) and (c).

PARTIES

4. Plaintiff is the United States of America. Through FDA, the United States protects the public health by, *inter alia*, ensuring the safety of the U.S. food supply, including assessing dietary supplements for compliance with current good manufacturing practice requirements and proper labeling, and ensuring the safety and efficacy of drugs.

5. Defendant ABH Nature's Products, Inc. ("ABH Nature's Products") is a New York corporation with its principal place of business at 131 Heartland Boulevard, Edgewood, New York (the "Edgewood Facility"), located in this District. ABH Nature's Products, a contract manufacturer, receives components in interstate commerce and manufactures and distributes or causes the distribution in interstate commerce of numerous dietary supplements and drugs. The

dietary supplements and/or drugs manufactured, prepared, packed, repacked, labeled, held, and/or distributed by ABH Nature's Products and its affiliates are sold under various brand names, including, among others, Adapt, BioFinest, Crystal Star, Fitime, Formula 168, Heart Your Heart, Keto, Precision Naturals, and Prometheus Wellness.

6. Defendant ABH Pharma, Inc. ("ABH Pharma") is a New York corporation with its principal place of business at the Edgewood Facility. ABH Pharma acts as the marketing and sales arm for ABH Nature's Products. It takes sales calls, distributes products manufactured by ABH Nature's Products in interstate commerce, and performs billing services. ABH Pharma also operates the website www.abhpharma.com, through which it promotes ABH Nature's Products' contract manufacturing services and products. ABH Pharma shares employees with ABH Nature's Products.

7. Defendant StockNutra.com, Inc. ("StockNutra") is a Delaware corporation that is registered to do business in New York. StockNutra's principal place of business is the Edgewood Facility. StockNutra's website, www.stocknutra.com, identified StockNutra as a subsidiary of ABH Pharma. ABH Pharma has used the StockNutra name for marketing purposes. StockNutra promotes, offers to sell, and takes customer orders for stock supplements (e.g., vitamins, protein powder, collagen, turmeric, various oils, and joint formulas) manufactured or packaged by ABH Nature's Products. StockNutra causes the distribution of dietary supplements in interstate commerce. It takes orders for dietary supplements through its website (www.stocknutra.com), which ABH Pharma fulfills and distributes in interstate commerce. StockNutra shares employees with ABH Nature's Products and ABH Pharma.

8. Defendant Mohammed "Md." Jahirul Islam ("Islam") resides in Flushing, New York. At all relevant times, Islam has been the owner and President of ABH Nature's Products,

and an owner and Chief Executive Officer of ABH Pharma. Islam oversees ABH Nature's Products and ABH Pharma's operations. Islam's principal place of business is at the Edgewood Facility.

9. Defendants have been and are now engaged in the business of manufacturing, packaging, holding, and/or distributing or causing the distribution of (i) dietary supplements within the meaning of 21 U.S.C. § 321(ff), and (ii) drugs within the meaning of 21 U.S.C. § 321(g)(1).

10. Defendants' dietary supplements are manufactured from components received from outside the state of New York including, but not limited to, California and New Jersey. Defendants distribute and/or cause the distribution of their dietary supplements and drugs into interstate commerce outside the state of New York including, but not limited to, to Missouri and Florida.

DEFENDANTS' VIOLATIONS OF THE ACT

Defendants Prepare, Pack, And/Or Hold Adulterated Dietary Supplements

11. The Act and FDA's implementing regulations require persons and entities that manufacture, package, label, and/or hold dietary supplements to operate in compliance with current good manufacturing practices ("cGMP") for dietary supplements. 21 U.S.C. § 342(g)(1); 21 C.F.R. Part 111. FDA's dietary supplement cGMP regulations set forth processes and procedures that must be followed to ensure, among other things, that dietary supplements meet requirements for identity, purity, strength, and composition. 21 C.F.R. Part 111. Dietary supplements not prepared, packed, or held in conformance with the cGMP regulations are deemed to be adulterated under the Act. 21 U.S.C. § 342(g)(1).

12. FDA most recently inspected Defendants' facility, the Edgewood Facility, between October 26 and November 16, 2018 ("November 2018 inspection"). The November 2018 inspection established that the dietary supplements Defendants manufacture, prepare, pack,

repack, label, hold, and/or distribute are adulterated within the meaning of 21 U.S.C. § 342(g)(1), because they are prepared, packed, and/or held in a manner that violates the dietary supplement cGMP regulations.

13. During the November 2018 inspection, an FDA investigator observed significant deviations from the dietary supplement cGMP regulations, including but not limited to, the following:

A. Failure to conduct at least one appropriate test to verify the identity of a dietary ingredient, as required by 21 C.F.R. § 111.75(a)(1)(i);

B. Failure to verify that finished batches of dietary supplements meet product specifications for identity, purity, strength, and composition, as required by 21 C.F.R. § 111.75(c);

C. Failure to implement a system of production and process controls that covers all stages of manufacturing, packaging, labeling, and holding of dietary supplements to ensure the quality of the dietary supplement (21 C.F.R. § 111.55);

D. Failure to include required information in batch production records, as required by 21 C.F.R. § 111.260; and

E. Failure to properly review and investigate a consumer complaint, as required by 21 C.F.R. § 111.560(c).

14. Defendants violate 21 U.S.C. § 331(a) by introducing or delivering for introduction, or causing the introduction or delivery for introduction, into interstate commerce of articles of food (dietary supplements) that are adulterated within the meaning of 21 U.S.C. § 342(g)(1).

15. Defendants violate 21 U.S.C. § 331(k) by causing articles of food (dietary supplements) to become adulterated within the meaning of 21 U.S.C. § 342(g)(1), while such articles are held for sale after shipment of one or more of their components in interstate commerce.

Defendants Distribute Unapproved New Drugs

16. Defendants also violate the Act by introducing or delivering for introduction into interstate commerce “new drugs” that are not FDA approved.

17. The Act defines “drug” as including any products that are “intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease . . .” 21 U.S.C. § 321(g)(1)(B).

18. Under the Act, a “drug” is a “new drug” if, *inter alia*, “the composition . . . is such that such drug is not generally recognized, among experts qualified by scientific training and experience to evaluate the safety and effectiveness of drugs, as safe and effective for use under the conditions prescribed, recommended, or suggested in the labeling thereof.” 21 U.S.C. § 321(p)(1).

19. Under the Act, no person shall introduce or deliver for introduction into interstate commerce any “new drug,” unless FDA has approved a new drug application (“NDA”) or an abbreviated NDA for that drug, or the drug is exempt from approval under an investigational NDA. *See* 21 U.S.C. § 355(a), (b), (i), and (j).

20. Defendants distribute or deliver for distribution various products that meet the definition of “drug” under the Act, based on Defendants’ claims regarding those products. Specifically, FDA has reviewed the product labeling, within the meaning of 21 U.S.C. § 321(m), for several of Defendants’ products, including labeling that appeared on Defendants’ website, www.stocknutra.com. For many of Defendants’ products, the labeling included claims that the product is for use in the cure, mitigation, treatment, or prevention of disease. The following are several examples of such claims, among others made by Defendants:

- A. CoQ 10 100mg (white); CoQ10 with organic olive oil 100 mg: *“Free radicals contribute to . . . the development of health problems, such as heart disease and cancer . . . CoQ10 may help with heart-related conditions by . . . prevent[ing] the formation of blood clots”*;
- B. Odorless Garlic and Parsley Softgel / Odorless Garlic Extract 500MG: *“The active ingredient in garlic, allicin, has antimicrobial properties that protect against bacteria, fungi, and viruses . . . Consumers can enjoy the benefits of garlic without bad breath with Odorless Garlic Extract 500MG”*;
- C. Vitamin D products: *“Our Private Label Vitamin D Supplements Marketed for IBS [irritable bowel syndrome] relief”*; *“Vitamin D . . . does help with depression and anxiety.”*; *“Vitamin D supplementation reduces depression symptoms”*; *“Vitamin D3 with Organic Coconut Oil . . . contains monosaturated fatty acids . . . which is a type of healthy dietary fat that may help lower the risk of heart disease by improving associated risk factors”*; *“Vitamin D3 . . . is involved in . . . reducing inflammation”*;
- D. Stock K2+D3+Bioperine: *“If you have heart disease and are wondering if vitamin K2 will help reduce heart disease the answer is quite possibly”*;
- E. Krill Oil: *“Consumers have relied on the omega-3 fatty acids in krill oil to support good health in ways that reduce the risk of heart disease, high triglycerides, high cholesterol, high blood pressure, stroke, osteoarthritis, depression”*; *“the fatty acids in Krill Oil 500 MG decrease swelling and lower cholesterol. These fats may also reduce the stickiness of blood platelets, which makes the platelets less likely to form dangerous blood clots”*;

F. Whey Protein (chocolate and vanilla flavors): “*Whey protein in the form of protein powder can help in reducing the symptoms associated with anxiety and depression*”; and

G. Horny Goat Weed Extract with Maca & Tribulus: “*Does Horny Goat Weed Really Work? Preventing Cancer . . . Horny goat weed has the ability to inhibit excess blood vessel growth, meaning it prevents cancerous tumor development all over the body.*”; “*One very common reason for horny goat weed manufacturing is to battle osteoporosis. It’s a well-known herb in terms of treatment for this condition . . . the plant doesn’t just fight osteoporosis, but eases joint pain, too*”; “*Some examples of conditions that can be treated by horny goat weed are bronchitis, kidney and liver diseases, high blood pressure, HIV and AIDs*”

21. Defendants’ products also qualify as “new drugs” under the Act. There are no published adequate and well-controlled investigations showing that any of Defendants’ drugs are generally recognized as safe and effective for any use. Qualified experts have not (and cannot, without sufficient investigations) come to a consensus opinion concerning the safety and effectiveness of these products for use under the conditions prescribed, recommended, or suggested in the labeling thereof.

22. Defendants’ “new drugs” are not approved by FDA. According to FDA’s review of its records, none of Defendants’ drugs has been the subject of an NDA, abbreviated NDA, or investigational NDA.

23. Accordingly, Defendants violate 21 U.S.C. § 331(d) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce

new drugs, as defined by 21 U.S.C. § 321(p), that are neither approved pursuant to 21 U.S.C. § 355(a), nor exempt from approval pursuant to 21 U.S.C. § 355(i).

Defendants Distribute Misbranded Drugs

24. Defendants also violate 21 U.S.C. § 331(a) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce drugs that are misbranded within the meaning of 21 U.S.C. § 352(f)(1).

25. Under the Act, a drug is misbranded unless its labeling bears “adequate directions for use” or the drug meets an applicable exemption from the “adequate directions for use” requirement. 21 U.S.C. § 352(f)(1).

26. “Adequate directions for use” is defined as “directions under which the layman can use a drug safely and for the purposes for which it is intended.” 21 C.F.R. § 201.5. “Prescription drugs,” as defined under the Act, cannot have “adequate directions for use,” as defined by 21 C.F.R. § 201.5, because prescription drugs are not safe for lay use but must be used under supervision of a duly licensed practitioner. *See* 21 U.S.C. § 353(b)(1) (defining “prescription drug” as a drug that, “because of its toxicity or other potentiality for harmful effect, or the method of its use, or the collateral measures necessary to its use, is not safe for use except under the supervision of a practitioner licensed by law to administer such drug . . .”). Accordingly, “prescription drugs” are misbranded unless an exemption from the “adequate directions for use” requirement applies.

27. Many of Defendants’ drugs meet the definition of “prescription drugs” under the Act because Defendants claim those drugs are intended for curing, mitigating, treating, or preventing medical conditions that require diagnosis and management by a physician, including, among other conditions, heart disease, depression, and cancer.

28. Defendants' prescription drugs also do not meet any applicable exemptions from the "adequate directions for use" requirement. That is because, as noted above, Defendants' drugs are not FDA approved, and thus do not bear the labeling and information authorized by an approved NDA. *See* 21 C.F.R. §§ 201.100(c)(2), 201.115.

29. In addition, it is not possible to write adequate directions for use for Defendants' drugs because such directions – including dosages, indications, contraindications, warnings, side effects, and necessary collateral measures – must be premised on animal and clinical data derived from extensive, scientifically controlled testing. As noted above, there are no well-controlled clinical test data for any of Defendants' drugs.

30. Accordingly, Defendants' drugs are misbranded within the meaning of 21 U.S.C. § 352(f)(1), and Defendants violate 21 U.S.C. § 331(a) by introducing or delivering for introduction into interstate commerce, or causing to be introduced or delivered for introduction into interstate commerce, misbranded drugs.

DEFENDANTS' HISTORY OF VIOLATIONS OF THE ACT

31. Many of the dietary supplement cGMP deviations observed during FDA's November 2018 inspection are the same as or similar to those observed by FDA during at least five previous inspections of Defendants' Edgewood Facility, including inspections that occurred in or about July 2012; May 2013; August 2013; November 2016; and February 2018. For instance, FDA observed the following significant cGMP deviations, among others, during its February 2018 inspection of the Edgewood Facility:

A. Failure to conduct at least one appropriate test to verify the identity of a dietary ingredient, as required by 21 C.F.R. § 111.75(a)(1)(i);

B. Failure to verify that finished batches of dietary supplements meet product specifications for identity, purity, strength, and composition, as required by 21 C.F.R. § 111.75(c); and

C. Failure to follow written procedures for laboratory operations, as required by 21 C.F.R. § 111.303.

32. FDA has repeatedly warned Defendants about their ongoing deviations from the dietary supplement cGMP regulations. FDA investigators issued Lists of Inspectional Observations (“Form FDA-483s”) to Defendants at the close of each of the six FDA inspections noted above, notifying Defendants that each inspection revealed significant deviations by Defendants from the dietary supplement cGMP regulations.

33. Following FDA’s July 2012 inspection, FDA issued Defendant Islam a Warning Letter, dated October 24, 2012, detailing deviations from the dietary supplement cGMP regulations observed during the inspection. The dietary supplement cGMP deviations noted in the Warning Letter were the same as or similar to those observed during FDA’s November 2018 Inspection. The Warning Letter cautioned that failure to promptly correct deviations could lead to future enforcement action, including an injunction.

34. FDA held a regulatory meeting with Defendant Islam and his management team on March 23, 2017 and discussed with them the deviations from the dietary supplement cGMP regulations observed by FDA at the Edgewood Facility.

35. At the close of the November 2018 inspection, an FDA investigator met with Defendants’ management team to discuss claims appearing on Defendants’ website and in Defendants’ promotional literature that appeared to demonstrate that Defendants’ products were drugs.

36. In responding to the Form FDA-483 provided to Defendants at the conclusion of the November 2018 inspection, Defendants stated that ABH Nature's Products "does not dispute any of [FDA's] inspectional observations."

37. Defendants repeatedly promised to correct their deviations from dietary supplement cGMP regulations. Defendants made such promises in their written responses to FDA's inspectional observations from each of the six FDA inspections noted above, and in discussion with FDA during the 2017 regulatory meeting.

38. Yet, despite these promises, each new FDA inspection has revealed that Defendants continue to deviate from dietary supplement cGMP regulations. Far from correcting the deviations, Defendants have expanded their unlawful conduct, including by distributing unapproved new drugs and misbranded drugs in violation of the Act.

39. Defendants' violations of the Act and failures to comply with cGMP regulations pose a risk to public health. Indeed, three finished dietary supplements that ABH Nature's Products manufactured or packaged have been the subject of voluntary recalls, in June 2017 and January 2018, due to possible *Salmonella* contamination.

40. Based on the foregoing, Plaintiff believes that, unless restrained by this Court, Defendants will continue to violate the Act in the manner set forth above.

41. Defendants' history of violations of the Act and resistance to FDA's efforts to bring Defendants into compliance with the Act demonstrate that injunctive relief is not only appropriate here to secure compliance with the Act, but also needed to protect consumers.

CAUSE OF ACTION
CLAIM FOR INJUNCTIVE RELIEF

42. Plaintiff repeats and incorporates each of the foregoing paragraphs as if fully set forth herein.

43. Defendants violate 21 U.S.C. § 331(a) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce articles of food (dietary supplements) that are adulterated within the meaning of 21 U.S.C. § 342(g)(1) because they have been prepared, packed, or held under conditions that do not meet cGMP regulations, 21 C.F.R. Part 111.

44. Defendants violate 21 U.S.C. § 331(k) by causing articles of food (dietary supplements) that Defendants hold for sale after shipment of one or more of their components in interstate commerce to become adulterated within the meaning of 21 U.S.C. § 342(g)(1).

45. Defendants violate 21 U.S.C. § 331(d) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce new drugs, within the meaning of 21 U.S.C. § 321(p), that are neither approved pursuant to 21 U.S.C. § 355(a) nor exempt from approval pursuant to 21 U.S.C. § 355(i).

46. Defendants violate 21 U.S.C. § 331(a) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce drugs that are misbranded under 21 U.S.C. § 352(f)(1).

47. Defendants' history of cGMP deviations and failure to take corrective action after receiving Form FDA-483s and an FDA Warning Letter suggest there is a reasonable likelihood that these deviations will recur, and that Defendants will continue to violate the Act, unless the United States' requested injunctive relief is granted.

48. Upon a showing that the Defendants are violating 21 U.S.C. § 331, the United States may obtain preliminary and permanent injunctions enjoining such violations. 21 U.S.C. § 332(a).

49. As a result of the foregoing, Defendants' conduct should be enjoined pursuant to 21 U.S.C. § 332.

PRAYER FOR RELIEF

WHEREFORE, the United States respectfully requests, pursuant to 21 U.S.C. § 332(a) and the inherent equitable authority of the Court, that the Court issue an Order and Final Judgment, ordering:

I. Defendants, and each and all of their directors, officers, agents, representatives, employees, attorneys, successors, and assigns, and any and all persons in active concert or participation with any of them, cease receiving, manufacturing, preparing, packing, repacking, labeling, holding, or distributing articles of dietary supplements unless and until:

A. Defendants' facilities, methods, processes, and controls used to receive, manufacture, prepare, pack, repack, label, hold, and distribute dietary supplements are established, operated, and administered in conformity with dietary supplement cGMP regulations and the Act, in a manner acceptable to FDA;

B. Defendants do not cause any dietary supplement that they receive, manufacture, prepare, pack, repack, label, hold, or distribute to be an unapproved new drug within the meaning of the Act, 21 U.S.C. § 321(g)(1)(B), unless and until the product is the subject of an approved new drug application or abbreviated new drug application, or is exempt from approval under an investigational new drug application, 21 U.S.C. § 355(a), (b), (i), and (j); and

C. Defendants do not cause any dietary supplement that they receive, manufacture, prepare, pack, repack, label, hold, or distribute to be a misbranded drug within the meaning of the Act, 21 U.S.C. § 352(f)(1).

II. Defendants, and each and all of their directors, officers, agents, representatives, employees, attorneys, successors, and assigns, and any and all persons in active concert or participation with any of them, be preliminarily and permanently restrained and enjoined under 21 U.S.C. § 332(a) from directly or indirectly doing or causing to be done any of the following acts:

A. Violating 21 U.S.C. § 331(a) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce articles of food (including but not limited to dietary supplements and their components) that are adulterated within the meaning of 21 U.S.C. § 342(g)(1);

B. Violating 21 U.S.C. § 331(k) by causing articles of food (including but not limited to dietary supplements and their components) to become adulterated within the meaning of 21 U.S.C. § 342(g)(1) while such articles are held for sale after shipment of one or more of their components in interstate commerce;

C. Violating 21 U.S.C. § 331(d) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce new drugs, as defined by 21 U.S.C. § 321(p), that are neither approved pursuant to 21 U.S.C. § 355(a) nor exempt from approval pursuant to 21 U.S.C. § 355(i); and

D. Violating 21 U.S.C. § 331(a) by introducing or delivering for introduction, or causing to be introduced or delivered for introduction, into interstate commerce articles of drug that are misbranded within the meaning of 21 U.S.C. § 352(f)(1).

III. FDA be authorized pursuant to this injunction to inspect Defendants' place(s) of business and all records relating to the receipt, manufacturing, preparing, packing, labeling, holding, and distribution of all of Defendants' dietary supplements (and their components) and drugs to ensure continuing compliance with the terms of the injunction, and that Defendants bear the costs of such inspection(s) at the rates prevailing at the time the inspection(s) are accomplished;

IV. Defendants recall and destroy, under FDA's supervision, all dietary supplements (including components, raw and in-process materials, and finished products) and drugs (including components, raw and in-process materials, and finished products) that Defendants received, manufactured, prepared, packed, repacked, labeled, held, or distributed at any time until the date of final judgment in this action, with Defendants to bear the costs of recall and destruction and the costs of FDA's supervision;

V. The United States be awarded the costs and expenses it incurred in investigating and prosecuting this action; and

VI. The United States be awarded such other and further relief as the Court deems just and proper.

Dated: December 18, 2019
Brooklyn, New York

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

JOSEPH H. HUNT
Assistant Attorney General

DAVID M. MORRELL
Deputy Assistant Attorney General

GUSTAV W. EYLER

[REDACTED]
[REDACTED] Branch
[REDACTED]

[REDACTED]

EVAN P. LESTELLE
Assistant United States Attorney
United States Attorney's Office
Eastern District of New York
271-A Cadman Plaza East
Brooklyn, New York 11201
(718) 208-1192
Evan.Lestelle@usdoj.gov

JOSHUA A. FOWKES
Trial Attorney
Consumer Protection Branch
Department of Justice, Civil Division
450 5th Street, NW, Suite 6400-South
Washington, D.C. 20530
(202) 532-4218
Joshua.A.Fowkes@usdoj.gov

Of Counsel:

ROBERT P. CHARROW
General Counsel

STACY CLINE AMIN
Chief Counsel
Food and Drug Administration
Deputy General Counsel
Department of Health and Human Services

ANNAMARIE KEMPIC
Deputy Chief Counsel, Litigation
Food and Drug Administration

WILLIAM THANHAUSER
Associate Chief Counsel, Litigation
United States Department of Health and
Human Services
Office of the General Counsel
Food and Drug Division
10903 New Hampshire Avenue
Bldg. 32, Room 4397
Silver Spring, MD 20993-0002
Phone: (301) 348-3052
William.Thanhauser@fda.hhs.gov

Exhibit B

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
1	P09-765	Panax ginseng extract 4:1	ABH	R0001910	P01	12/1/2019	12/1/2017	25.00000
2	T07-567	TUBER FLEECE FLOWER	ABH	R0003262	T01	12/1/2019	12/1/2017	0.65900
3	CS-ABHP-296	WHITE KIDNEY BEAN	ABH	R0003368	MSC01	12/1/2019	None	50.00000
4	CS-ABHP-178	ORGANIC ASHWAGANDHA POWDER	ABH	R0003845	MSC01	12/1/2019	None	14.26700
5	C15-557	CELERY SEED EXTRACT 4:1	ABH	R0003214	C17	12/3/2019	12/3/2017	25.00000
6	CS-ABHP-133	VITAMIN C (AS ORGANIC CAMU CAMU DRY EXTRACT 20%)-CS	ABH	R0009623	MSC01	12/5/2019	None	0.02000
7	C09-378	CREAM PLUS VANILLA	ABH	R0001355	F10	12/8/2019	12/8/2017	18.00000
8	CS-ABHP-076	URIDINE (AS URIDINE 5' MONOPHOSPHATE DISODIUM SALT)-CS	ABH	R0002400	MSC01	12/8/2019	None	0.92800
9	C08-289	L-CARNITINE	ABH	R0001855	L04	12/9/2019	12/9/2017	22.41400
10	RED-40	FD&C RED #40 POWDER (WATER SOLUBLE)	ABH	R0002525	F11	12/9/2019	12/9/2017	0.89900
11	CS-ABHP-291	PHOSPHATIDYLSERINE 20%	ABH	R0003397	ALGEN	12/9/2019	None	52.27700
12	G02-678	GREEN TEA EXTRACT 95% POLYPHENOLS, 45% EGCG	ABH	R0001670	G09	12/12/2019	12/12/2017	5.89100
13	CS-AMP-013	WHEY PROTEIN ISOLATE	ABH	R0005694	MSC01	12/13/2019	None	1.22400
14	O07-432	Organic acai	ABH	R0001757	O01	12/15/2019	12/15/2017	23.16200
15	O06-567	Organic papaya	ABH	R0001778	O02	12/16/2019	12/16/2017	23.16200
16	CS-ABHP-261	GLUCOSAMINE SULFATE 2KCL	ABH	R0002367	MSC01	12/16/2019	None	458.76000
17	S02-345	STEVIA 98% RA	ABH	R0003522	S12	12/16/2019	12/16/2017	14.63400
18	C15-201	Creatine Monohydrate Granular	ABH	R0004953	C18	12/16/2019	12/16/2017	10.11600
19	O03-676	Organic pomegranate	ABH	R0001777	O02	12/19/2019	12/19/2017	23.16200
20	CS-ABHP-171	ALPHA LIPOIC ACID-CS	ABH	R0002365	MSC01	12/19/2019	None	10.22400
21	L13-225	L-ARGININE AKG 1:1 CRYSTALLINE POWDER	ABH	R0004654	L17	12/23/2019	12/23/2017	7.06500
22	O05-865	ORGANIC CINNAMON POWDER	ABH	R0001033	O01	1/1/2020	12/1/2017	13.24400
23	Y07-567	Yeast extract 4:1	ABH	R0001399	Y01	1/1/2020	1/1/2018	15.69700
24	C09-289	COLEUS FORSKOHLII ROOT EXTRACT 4:1	ABH	R0002047	C10	1/1/2020	1/1/2018	12.77500
25	C09-289	COLEUS FORSKOHLII ROOT EXTRACT 4:1	ABH	R0003338	C01	1/1/2020	1/1/2018	25.00000
26	CS-ABHP-339	SUNFLOWER LECITHIN 20% PHOSPHATIDYLCHOLINE	ABH	R0003741	MSC01	1/1/2020	None	16.44800
27	O09-459	ORGANIC ASHWAGANDHA POWDER	ABH	R0004832	A09	1/1/2020	1/1/2018	25.00000
28	N08-765	ORGANIC NU-MAG (TM)	ABH	R0005465	O01	1/2/2020	1/2/2018	0.90000
29	CS-ABHP-179	MCT Oil Powder	ABH	R0001191	MSC01	1/4/2020	None	1,500.00000
30	O07-435	ORGANIC STEVIA 90% & 40% - NUTRIMARK	ABH	R0003365	O01	1/4/2020	1/4/2018	10.73900
31	CS-ABHP-317	LEUCINE PEPTIDES	ABH	R0003890	MSC01	1/11/2020	None	2.39200
32	CS-ABHP-303	5-HTP (Griffonia Seed Extract)	ABH	R0003681	MSC01	1/17/2020	None	1.38600
33	U09-123	Umbelliferone	ABH	R0003063	U01	1/20/2020	1/20/2018	1.72800
34	P01-002	PUNICIC ACID	ABH	R0002464	P17	1/21/2020	1/21/2018	25.00000
35	N09-897	NATURAL RASPBERRY FLAVOR FAPS 892	ABH	R0001333	F10	1/24/2020	1/24/2018	38.94300
36	S01-111	SPROUT BROWN RICE POWDER	ABH	R0001831	O01	1/25/2020	1/25/2018	50.00000
37	S14-346-1	SOY BEAN POWDER	ABH	R0002979	S10	1/26/2020	1/26/2018	27.00000
38	R05-467	ROSE HIP EXTRACT 10% VC	ABH	R0008727	R05	1/26/2020	1/26/2017	50.00000
39	B07-543	BROCCOLI EXTRACT 20:1	ABH	R0002025	B02	1/27/2020	1/27/2018	8.93500
40	A06-457	Alpha carotene	ABH	R0002344	A02	1/27/2020	None	10.00000
41	E13-203	ELEUTHEROCOCCUS(SIBERIAN GINSENG) 4:1	ABH	R0001891	S10	1/31/2020	1/31/2018	8.93500
42	C09-367	COFFEE BERRY FRUIT EXTRACT (2% POLYPHENOLS)	ABH	R0001622	C17	2/1/2020	2/1/2018	3.80000
43	R08-768	RED RASPBERRY EXTRACT 40%	ABH	R0001709	R05	2/1/2020	2/1/2018	15.10000

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
44	CS-ABHP-066	FENUGREEK SEED EXTRACT (STD. TO 50% SAPONINS)-CS	ABH	R0002224	MSC01	2/1/2020	None	104.93500
45	CS-ABHP-066	FENUGREEK SEED EXTRACT (STD. TO 50% SAPONINS)-CS	ABH	R0002298	MSC01	2/1/2020	None	26.19400
46	CS-ABHP-066	FENUGREEK SEED EXTRACT (STD. TO 50% SAPONINS)-CS	ABH	R0002331	MSC01	2/1/2020	None	300.00000
47	CS-ABHP-179	MCT Oil Powder	ABH	R0001433	MSC01	2/2/2020	None	2,293.46500
48	P08-542	PANAX GINSENG EXTRACT 6%	ABH	R0001939	O01	2/5/2020	2/5/2018	20.50000
49	C08-345	COCOA JD COCOA JB550-11	ABH	R0003280	C24	2/5/2020	2/5/2018	54.74800
50	M09-567	MAGNESIUM LYSINATE GLYCINATE CHELATE	ABH	R0003367	M13	2/6/2020	2/6/2018	0.79400
51	B08-432	BCAA INSTANT 2:1:1 (VEGAN)	ABH	R0003296	B03	2/8/2020	2/8/2018	51.80000
52	CS-ABHP-064	D-ASPARTIC ACID-CS	ABH	R0003588	MSC01	2/9/2020	2/9/2018	225.00000
53	G07-189	GOTU KOLA 10% ASIATICOIDES	ABH	R0004749	ALGEN	2/9/2020	2/9/2018	24.92000
54	965640	SIZE 55 Carnauba Organic Wax NF 452 Powder	ABH	R0004860	C01	2/15/2020	2/15/2018	25.00000
55	F06-345	FLAVOR SWEET FCI 40033175	ABH	R0002346	F24	2/21/2020	2/21/2018	5.41600
56	C06-999	CITRIC ACID ANHYDROUS (coated)	ABH	R0001875	C25	2/26/2020	2/26/2018	32.87200
57	CS-ABHP-100	TAURINE-CS	ABH	R0000568	MSC01	3/1/2020	None	9.24900
58	P09-234	PARSLEY LEAF POWDER	ABH	R0002847	P10	3/1/2020	3/1/2018	47.90800
59	A08-678	ANISE SEED 4:1	ABH	R0003213	A10	3/1/2020	3/1/2018	25.00000
60	I08-230	INVERTASE 3000 SU/G	ABH	R0003319	I01	3/1/2020	3/1/2018	5.00000
61	CS-ABHP-295	APPLE CIDER VINEGAR	ABH	R0003369	MSC01	3/1/2020	None	68.04000
62	M08-458	MANGANESE GLYCINATE 25%	ABH	R0005012	M01	3/1/2020	3/1/2018	3.84300
63	M05-218	MOTHERWORT HERB POWDER	ABH	R0005126	M13	3/1/2020	3/1/2018	1.68800
64	CS-AMP-017	PEA PROTEIN	ABH	R0005698	MSC01	3/1/2020	None	1.22400
65	CS-ABHP-238	Organic Inuline	ABH	R0002155	MSC01	3/2/2020	None	119.59000
66	O09-678	ORGANIC INULIN FROM CHICORY	ABH	R0005144	O02	3/2/2020	None	385.00000
67	CS-ABHP-167	SODIUM HYALURONATE-CS	ABH	R0002672	MSC01	3/4/2020	None	77.60000
68	FE15-752	NATURAL FLAVOR ENCHANCER	ABH	R0001678	F17	3/5/2020	3/5/2018	4.67200
69	B09-490	BA JI TIAN MORINDA extract 4:1	ABH	R0004753	ALGEN	3/5/2020	3/5/2018	15.88900
70	K07-456	KACIP FATIMAH Extract Powder 4:1	ABH	R0002297	K01	3/8/2020	3/8/2018	19.32400
71	CS-ABHP-261	GLUCOSAMINE SULFATE 2KCL	ABH	R0002368	MSC01	3/8/2020	None	900.00000
72	CS-ABHP-268	BIOGURT ZINC	ABH	R0002432	MSC01	3/11/2020	None	1.00000
73	S07-347	SODIUM BHB (SODIUM BETA HYDROXYBUTYRATE)	ABH	R0004381	S06	3/12/2020	3/12/2018	218.00000
74	S09-567	Stevia extract 90% 30%- NUTRIMARK	ABH	R0004581	S05	3/14/2020	3/14/2018	8.39400
75	N09-453	NATURAL LEMONADE FLAVOR FAPS 894	ABH	R0001900	F14	3/19/2020	3/19/2018	40.81900
76	CS-ABHP-267	RN FOLIC ACID	ABH	R0002431	MSC01	3/21/2020	None	1.00000
77	L07-456	L-NORVALINE	ABH	R0003458	N02	3/21/2020	3/21/2018	15.74000
78	CS-ABHP-334	L-NORVALINE	ABH	R0003587	MSC01	3/21/2020	3/21/2018	20.58000
79	CS-ABHP-283	DHEA	ABH	R0002451	MSC01	3/22/2020	None	30.00000
80	C08-389	Calcium carbonate non GRANULAR)	ABH	R0005173	C14	3/25/2020	3/25/2018	69.35900
81	P09-478	Pumpkin seed oil 1000mg	ABH	R0004719	MSC01	3/28/2020	3/28/2018	204.00000
82	CS-ABHP-179	MCT Oil Powder	ABH	R0002052	MSC01	3/29/2020	None	1,384.44000
83	M02-456	MOLYBDENUM TRAACS MOLYBDENUM GLYCINATE CHELATE	ABH	R0004745	ALGEN	3/31/2020	3/31/2018	3.92200
84	CS-ABHP-190	Stress Digest TR Beadlet capsule	ABH	R0000690	MSC01	4/1/2020	None	719.00000
85	F09-111	FIG EXTRACT POWDER 4:1	ABH	R0003041	F04	4/1/2020	4/1/2018	12.27000
86	CS-ABHP-280	Theacrine TM	ABH	R0003407	MSC01	4/1/2020	None	3.70000

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
87	CS-ABHP-353	ORGANIC CAMU CAMU POWDER 12% VITAMIN C	ABH	R0003562	MSC01	4/1/2020	None	91.73100
88	L07-943	Lotus leaf extract 10:1	ABH	R0004970	ALGEN	4/1/2020	4/1/2018	1.30600
89	M08-567	MIXED PHYTOSTEROLS	ABH	R0005307	ALGEN	4/1/2020	4/1/2018	0.83800
90	CS-ABHP-004	HiActives North American Wild Blueberry Powder 1.5%-CS-VH	ABH	R0005524	MSC01	4/2/2020	None	17.69300
91	CS-ABHP-306	L-TYROSINE	ABH	R0003447	MSC01	4/4/2020	None	17.92200
92	CS-ABHP-364	COCONUT OIL POWDER AND SUNFLOWER OIL POWDER	ABH	R0004412	ALGEN	4/4/2020	None	7.50100
93	M04-338	Maitake Mushroom Extract 4:1	ABH	R0003688	M14	4/5/2020	4/5/2018	20.41000
94	CS-ABHP-044	CDP Choline -CS	ABH	R0001554	MSC01	4/7/2020	None	5.00000
95	O09-679	ORGANIC INULIN PREBIOTIC FROM JERUSALEM ARTICHOKE	ABH	R0005102	I01	4/12/2020	4/12/2018	7.66500
96	CS-ABHP-172	N-ACETYL L-CARNITINE HCL-CS	ABH	R0002973	MSC01	4/14/2020	None	9.37000
97	C05-234	CHLOROPHYLLIN POWDER	ABH	R0003425	S01	4/16/2020	4/16/2018	0.90800
98	W09-567	WILD FLAVORS FRENCH VANILLA FAPP571	ABH	R0002174	F19	4/17/2020	4/17/2018	47.66700
99	CS-ABHP-179	MCT Oil Powder	ABH	R0002257	MSC01	4/20/2020	None	735.07100
100	CS-ABHP-090	SUNTHEANINE (R)-CS	ABH	R0000885	MSC01	4/22/2020	None	1.00000
101	CS-ABHP-269	HIGH COPPER YEAST	ABH	R0002433	MSC01	4/22/2020	None	1.00000
102	FE15-752	NATURAL FLAVOR ENHANCER	ABH	R0002212	F17	4/23/2020	4/23/2018	25.00000
103	S04-219	Shatavari Powder	ABH	R0002918	S12	4/23/2020	4/23/2018	11.59100
104	S04-219	Shatavari Powder	ABH	R0002999	S02	4/23/2020	4/23/2018	25.00000
105	CS-ABHP-126	IRON (AS FERROUS FUMERATE)-CS	ABH	R0004511	MSC01	4/23/2020	None	1.43700
106	F06-345	FLAVOR SWEET FCI 40033175	ABH	R0002253	F09	4/26/2020	4/26/2018	2.00000
107	N06-753	NATURAL CHOCOLATE FLAVOR 764-414	ABH	R0002286	F24	4/26/2020	4/26/2018	128.94700
108	CS-AMP-004	ZINC OXIDE	ABH	R0005689	MSC01	4/26/2020	None	3.04300
109	CS-ABHP-248	DEXTROSE	ABH	R0002320	MSC01	4/27/2020	None	694.45600
110	CS-AMP-001	GUAR GUM	ABH	R0005700	MSC01	4/27/2020	None	48.68800
111	CS-ABHP-128	BEEF PROTEIN-BONE-CS	ABH	R0003605	MSC01	4/30/2020	None	459.96700
112	C08-555	CHERRY FLAVOR 23140174	ABH	R0002548	F09	5/1/2020	5/1/2018	4.35400
113	S08-432	SHILAJIT EXTRACT 6:1	ABH	R0002854	S02	5/1/2020	5/1/2018	4.06000
114	SOH-151	SHATAVARI 20% POWDER	ABH	R0002897	S10	5/1/2020	5/1/2018	24.21000
115	CS-ABHP-009	Parsley Juice Powder-CS-VH	ABH	R0003982	MSC01	5/1/2020	None	0.08000
116	CS-AMP-014	WHEY PROTEIN HYDRO	ABH	R0005695	MSC01	5/2/2020	None	1.22400
117	CS-ABHP-149	MACA ROOT POWDER-CS	ABH	R0002254	MSC01	5/3/2020	None	135.66600
118	N08-435	NATURAL MELON FLAVOR FCI 61059174	ABH	R0002546	F09	5/3/2020	5/3/2018	20.28300
119	CS-ABHP-323	CREATINE MONOHYDRATE-CS	ABH	R0003811	MSC01	5/3/2020	None	25.00000
120	M01-222	LEMON MANGO FLAVOR 50123 FCI 175	ABH	R0002549	F09	5/7/2020	5/7/2018	24.37700
121	G08-489	GUI ZHI (CINNAMON TWIG EXTRACT 10:1)	ABH	R0004754	ALGEN	5/9/2020	5/9/2018	20.44500
122	CS-ABHP-343	ASTAXANTHIN 2% HAEMATOCOCCUS PLUVIALI	ABH	R0003846	A01	5/10/2020	None	0.91100
123	F03-127	Fenugreek Extract (Std to 20% Hydroxyisoleucine)	ABH	R0003269	F01	5/16/2020	5/16/2018	7.14800
124	C09-267	CREAPURE(R)	ABH	R0003202	C12	5/19/2020	5/19/2018	9.50000
125	M02-345	MARQUIFORZA	ABH	R0003740	M13	5/19/2020	5/19/2018	16.86700
126	CS-WB-011	Organic nu-flow (r)	ABH	R0005118	MSC01	5/20/2020	None	4.90100
127	S07-889	SCHISANDRA BERRY POWDER	ABH	R0002902	S10	5/22/2020	5/22/2018	28.92100
128	CS-ABHP-329	WPC 80% (SUNFLOWER)	ABH	R0003361	MSC01	5/22/2020	None	28.12500
129	O08-289	ORGANIC MILK THISTLE 80% SILYMARIN	ABH	R0002911	O01	5/23/2020	5/23/2018	10.22000

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
130	L04-222	LION'S MANE P.E. 30% POLYSACCHARIDES	ABH	R0004407	L01	5/23/2020	5/23/2018	5.30200
131	C07-432	COCOA BUTTER BUDS 38303	ABH	R0003120	C09	5/24/2020	5/24/2018	10.13000
132	CS-GL-028	(Active aloe (R) Aloe vera GEI Qmatrix(R)200X-CS	ABH	R0002720	MSC01	5/30/2020	None	0.50000
133	CS-ABHP-287	Beef Liver Powder Undefatted	ABH	R0002496	MSC01	6/1/2020	None	99.84500
134	V07-543	VIDHARI	ABH	R0003026	V01	6/1/2020	6/1/2018	22.52500
135	K08-543	KATUJA	ABH	R0003027	K01	6/1/2020	6/1/2018	23.02000
136	O08-568	Folic acid	ABH	R0003308	O01	6/1/2020	6/1/2018	24.88700
137	CS-ABHP-226	Exocyan™ Cran S Organic-CS-VH	ABH	R0004409	MSC01	6/1/2020	None	0.20000
138	G09-509	GREEN COFFEE BEAN 45%	ABH	R0005088	G17	6/1/2020	6/1/2018	19.39200
139	A05-123	ALFALFA EXTRACT 4:1	ABH	R0005679	A10	6/1/2020	6/1/2018	25.00000
140	C06-986	Citric acid powder	ABH	R0004137	C12	6/4/2020	6/4/2018	0.20000
141	CS-ABHP-330	GRASS FED WPC 80%	ABH	R0003362	MSC01	6/8/2020	None	666.37500
142	S02-112	SUCROSE (DOMINO SUGAR)	ABH	R0002606	S02	6/11/2020	6/11/2018	19.57000
143	CS-AMP-015	MALTODEXTRIN	ABH	R0005696	ALGEN	6/12/2020	None	12,132.23000
144	CS-AMP-012	DEXTROSE	ABH	R0005693	ALGEN	6/15/2020	None	48.68800
145	B01-112	BITTER BLOCKER 10015175	ABH	R0002658	F18	6/20/2020	6/20/2018	21.08900
146	T08-009	TART CHERRY FCI2301485	ABH	R0002660	F22	6/20/2020	6/20/2018	68.95100
147	O09-789	ORGANIC KALE POWDER	ABH	R0003250	O03	6/23/2020	6/23/2018	33.99200
148	FE15-752	NATURAL FLAVOR ENHANCER	ABH	R0002695	F10	6/28/2020	6/28/2018	25.00000
149	CS-EUSA-001	PHARMANUTRIENTS HUMIC FULVIC	ABH	R0003102	MSC01	7/1/2020	None	5.38000
150	CS-ABHP-333	L-CARNITINE FUMARATE	ABH	R0003590	MSC01	7/1/2020	7/1/2018	2.90200
151	B09-567	BETA CAROTENE 10% DC LOT# SBQ-S07062	ABH	R0004686	B09	7/1/2020	7/1/2018	7.41600
152	T13-105	BETAINE ANHYDROUS	ABH	R0003662	B11	7/4/2020	7/4/2018	5.80400
153	T08-009	TART CHERRY FCI2301485	ABH	R0002743	F09	7/6/2020	7/6/2018	113.40000
154	M08-664	MASKING AGENT FCI58015175	ABH	R0002744	F09	7/6/2020	7/6/2018	50.19400
155	C09-235	CALCIUM BHB (CALCIUM BETA HYDROXY BUTYRATE)	ABH	R0004379	C30	7/6/2020	7/6/2018	13.00000
156	L09-789	Longjack 100:1	ABH	R0003960	L11	7/9/2020	7/9/2018	6.22700
157	CS-ABHP-252	ORGANIC APPLE CIDER VINEGAR POWDER	ABH	R0002890	MSC01	7/11/2020	None	0.99000
158	CS-ABHP-044	CDP Choline -CS	ABH	R0001522	MSC01	7/13/2020	None	14.69200
159	CS-ABHP-223	BENTONITE CLAY	ABH	R0001266	MSC01	7/14/2020	None	10,205.80000
160	O09-152	OAT GRASS LEAF & STEM EXTRACT 10:1	ABH	R0003388	O01	7/16/2020	7/16/2018	23.73500
161	C06-122	CORIANDER SEED POWDER	ABH	R0003141	C18	7/19/2020	7/19/2018	35.39200
162	CS-ABHP-061	Ginkgo Biloba Leaf Extract (24% Flavone glycosides, 6% Lacto	ABH	R0002196	MSC01	7/20/2020	None	16.44900
163	B09-124	BING CHERRY	ABH	R0003317	B11	7/21/2020	7/21/2018	24.90800
164	CS-AMP-020	LACTASE + BROMELAIN	ABH	R0005704	MSC01	7/23/2020	None	4.86200
165	B09-123	BLACK CHERRY	ABH	R0003318	B11	7/25/2020	7/25/2018	27.14800
166	O07-567	ORGANIC SPINACH POWDER	ABH	R0003248	O03	7/26/2020	7/26/2018	13.99200
167	P09-689	PRUNELLA 3% ROSMARINI ACID	ABH	R0005123	S01	7/27/2020	7/27/2017	0.66600
168	S07-889	SCHISANDRA BERRY POWDER	ABH	R0003355	S04	7/28/2020	7/28/2018	25.00000
169	CS-RHLLC-005	NATIVE STARCH	ABH	R0005223	MSC01	7/28/2020	None	359.69700
170	T04-515	TRICALCIUM PHOSPHATE POWDER	ABH	R0005657	C04	7/28/2020	7/28/2018	200.00000
171	C09-432	CHOKEBERRY POWDER	ABH	R0003316	C28	7/29/2020	7/29/2018	24.90800
172	B02-289	BOSEWELLIA SERATTA EXTRACT 10:1	ABH	R0003608	B04	7/29/2020	7/29/2018	23.39300

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
173	C06-986	Citric acid powder	ABH	R0004929	C16	7/30/2020	7/30/2018	619.47500
174	P08-543	PINK HIMALAYAN SEA SALT	ABH	R0003188	P02	8/1/2020	8/1/2018	8.76500
175	L12-204	LIPASE 5000 FIP/G	ABH	R0003263	L03	8/1/2020	8/1/2018	4.59800
176	S05-213	SODIUM SELENATE 1%	ABH	R0003644	S02	8/1/2020	8/1/2018	25.00000
177	S09-679	SHU DI HUANG REMANEA GLUTINOSA	ABH	R0004653	R01	8/1/2020	8/1/2018	3.61200
178	H08-390	HAWTHORNE EXTRACT 4:1	ABH	R0004727	H05	8/1/2020	8/1/2018	5.00000
179	C09-567	CHROMIUM CHROMEMATE (R) CM-100M	ABH	R0004766	C01	8/1/2020	8/1/2018	0.68600
180	CS-ABHP-096	Caffeine Anhydrous	ABH	R0008666	MSC01	8/1/2020	None	0.65000
181	V08-234	VANILLA FAPW808	ABH	R0003152	F09	8/2/2020	8/2/2018	95.96400
182	V08-234	VANILLA FAPW808	ABH	R0003271	F13	8/2/2020	8/2/2018	28.74000
183	C06-986	Citric acid powder	ABH	R0004930	C16	8/3/2020	8/3/2018	22.68000
184	CS-ABHP-310	ORGANIC OLIVE LEAF POWDER	ABH	R0003244	MSC01	8/8/2020	None	0.50000
185	O07-111	STEVIA EXTRACT 90% ORGANIC	ABH	R0004155	S09	8/11/2020	8/11/2018	20.00000
186	N08-435	NATURAL MELON FLAVOR FCI 61059174	ABH	R0003154	F18	8/15/2020	8/15/2018	77.13000
187	G07-453	GRAPE SKIN POWDER	ABH	R0003315	G02	8/15/2020	8/15/2018	45.26800
188	S09-345	SAND GINGER ROOT POWDER (Kaempferia Galanga)	ABH	R0003668	G01	8/15/2020	8/15/2018	23.47000
189	C09-800	COCOA POWDER (DUTCH)	ABH	R0004184	O03	8/19/2020	8/19/2018	17.32000
190	M09-654	MASKING AGENT FCI58024185	ABH	R0003173	F09	8/20/2020	8/20/2018	12.12000
191	J02-123	JERZEE CWS50 SUNFLOWER NP1P	ABH	R0003487	S02	8/22/2020	8/22/2018	146.48800
192	U09-345	UBIQUINOL (REDUCED VERSION OF CO-Q10)	ABH	R0004780	C09	8/24/2020	8/24/2018	0.85200
193	CS-ABHP-279	AGMATINE SULFATE	ABH	R0003669	MSC01	8/25/2020	None	45.53600
194	CS-ABHP-143	MAGNESIUM BHB-CS (compound solution)	ABH	R0003836	MSC01	8/26/2020	None	25.00000
195	CS-ABHP-338	S-ADENOSYL L-METHIONINE DISULFATE TOSYLATE	ABH	R0003730	MSC01	8/30/2020	None	3.66800
196	CS-ABHP-287	Beef Liver Powder Undefatted	ABH	R0002497	MSC01	8/31/2020	None	250.00000
197	D07-567	DIASTASE 1000 DP/G	ABH	R0003286	D04	9/1/2020	9/1/2018	14.59800
198	B006-003	Black Currant Fruit Powder	ABH	R0003507	B10	9/1/2020	9/1/2018	4.90800
199	CS-ABHP-202	Boswellia serrata extract 50%	ABH	R0003879	MSC01	9/1/2020	None	25.67400
200	G07-467	GREEN TEA DRY DECAFFEINATED EXTRACT (GREENSELECT)	ABH	R0004658	G10	9/1/2020	9/1/2018	3.18700
201	CS-ABHP-009	Parsley Juice Powder-CS-VH	ABH	R0004984	ALGEN	9/1/2020	None	21.13000
202	CS-RHLLC-003	SODIUM BHB	ABH	R0005353	MSC01	9/1/2020	None	8.65400
203	N08-567	Natural milk chocolate fci24045184	ABH	R0003222	F18	9/4/2020	9/4/2018	22.68000
204	N08-654	Natural marshmallow FCI57009175	ABH	R0003223	F18	9/4/2020	9/4/2018	22.68000
205	S08-456	SOUR CANDY FCI 28018185	ABH	R0003224	F18	9/4/2020	9/4/2018	47.76800
206	CS-VH-026	BUTTERNUT SQUASH POWDER	ABH	R0004525	MSC01	9/8/2020	None	13.16400
207	C09-654	Columbian INSTANT DARK ROAST Arabica Coffee 100% ESFF/SDDRE	ABH	R0003337	C15	9/12/2020	9/12/2018	31.23300
208	C09-654	Columbian INSTANT DARK ROAST Arabica Coffee 100% ESFF/SDDRE	ABH	R0003346	C15	9/12/2020	9/12/2018	180.00000
209	A08-267	ASHITABA	ABH	R0003461	A09	9/13/2020	9/13/2018	24.90800
210	C05-732	L-carnitine base	ABH	R0005027	L12	9/16/2020	9/16/2018	23.88700
211	O08-287	ORGANIC CARDAMON SEED POWDER	ABH	R0001416	O02	9/18/2020	9/18/2017	13.73900
212	N09-679	NUCIFERINE 2%	ABH	R0005070	ALGEN	9/18/2020	9/18/2018	11.13200
213	L04-222	LION'S MANE P.E. 30% POLYSACCHARIDES	ABH	R0004554	L17	9/19/2020	9/19/2018	10.00000
214	P09-456	Pycnogenol	ABH	R0005006	P01	9/19/2020	9/19/2018	0.91100
215	M07-235	MAGNESIUM BHB (MAGNESIUM BETA HYDROXYBUTYRATE)	ABH	R0004382	M12	9/20/2020	9/20/2018	56.00000

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
216	CS-ABHP-316	MILK PROTEIN ISOLATE	ABH	R0003680	MSC01	9/25/2020	None	48.33300
217	B08-478	BLESSED THISTLE HERB POWDER 4:1	ABH	R0004269	B10	9/26/2020	9/26/2018	22.21400
218	H08-657	HOLI BASIL 2% URSOLIC ACID	ABH	R0003609	H01	9/27/2020	9/27/2018	21.53500
219	O09-680	OCTACOSANOL 10%	ABH	R0005358	P09	9/27/2020	9/27/2018	15.45500
220	R09-290	Reishi 50% polysaccharide	ABH	R0005096	R01	9/29/2020	9/29/2018	25.00000
221	C04-378	CRANBERRY EXTRACT 5:1	ABH	R0002114	C10	10/1/2020	10/1/2017	3.00700
222	I06-123	INVERTASE 1000 INV/G	ABH	R0003436	I01	10/1/2020	10/1/2018	4.59800
223	H08-123	HOVENIA DULCIS	ABH	R0003642	H05	10/1/2020	10/1/2018	18.73400
224	P02-378	PLEURISY ROOT EXTRACT 4:1	ABH	R0003672	P17	10/1/2020	10/1/2018	19.37700
225	CS-ABHP-298	MAGNESIUM CITRATE	ABH	R0003713	MSC01	10/1/2020	10/1/2018	350.00000
226	L08-678	LACTOBACILLUS ACIDOPHILLUS 5 BIL/G	ABH	R0003722	A01	10/1/2020	10/1/2018	2.43800
227	P01-632	POLYGUNUM MULTIFLORUM 10:1	ABH	R0004750	ALGEN	10/1/2020	10/1/2018	25.00000
228	M08-124	MONO AMMONIUM GLYCYRRHIZINATE	ABH	R0004775	M13	10/1/2020	10/1/2018	19.44400
229	M03-789	Morinda citrifolia	ABH	R0004788	M01	10/1/2020	10/1/2018	2.69400
230	CS-RHLLC-002	MAGNESIUM BHB	ABH	R0004962	MSC01	10/1/2020	None	0.79200
231	K09-289	KOREAN GINSENG POWDER 10 % GINSENOIDES	ABH	R0005305	ALGEN	10/1/2020	10/1/2018	109.98800
232	CS-ABHP-226	Exocyan™ Cran S Organic-CS-VH	ABH	R0005525	MSC01	10/1/2020	None	23.21800
233	CS-ABHP-250	Sodium citrate	ABH	R0002302	MSC01	10/2/2020	None	100.00000
234	CS-ABHP-090	SUNTHEANINE (R)-CS	ABH	R0001319	MSC01	10/4/2020	None	81.00000
235	W09-189	WILD FLVORS CHOCOLATE FAPP574	ABH	R0003352	F20	10/4/2020	10/4/2018	5.84800
236	O02-456	ORGANIC TURMERIC EXTRACT 95% CURCUMINOIDS GRANULAR	ABH	R0004908	C04	10/7/2020	10/7/2018	7.82000
237	S09-490	SAPHORA EXTRACT 95%	ABH	R0004751	ALGEN	10/8/2020	10/8/2018	25.00000
238	CS-VH-024	SPINACH POWDER CERTIFIED ORGANIC	ABH	R0004526	MSC01	10/10/2020	None	2.28400
239	C15-202	CREATINE HCL	ABH	R0004115	C26	10/11/2020	10/11/2018	35.41000
240	O07-432	Organic acai	ABH	R0004655	ALGEN	10/11/2020	10/11/2018	15.00000
241	O07-432	Organic acai	ABH	R0005222	A02	10/11/2020	10/11/2018	15.00000
242	L09-237	LONICERA CAERULEA FREEZE DRIED BERRY POWDER	ABH	R0004249	H05	10/12/2020	10/12/2018	6.50000
243	CS-ABHP-068	COLLAGEN BOVINE A-CS	ABH	R0000913	MSC01	10/14/2020	None	5,000.00000
244	CS-ABHP-056	PREGNENOLONE-CS	ABH	R0003579	MSC01	10/15/2020	None	0.30800
245	CS-ABHP-133	VITAMIN C (AS ORGANIC CAMU CAMU DRY EXTRACT 20%)-CS	ABH	R0004026	C27	10/15/2020	10/15/2018	100.00000
246	A09-456	ACEROLA FRUIT CONCENTRATION EXTRACT	ABH	R0004675	A14	10/15/2020	10/15/2018	4.96800
247	V02-111	VANADYL SULFATE 19%	ABH	R0004692	V01	10/15/2020	10/15/2018	0.78000
248	CS-ABHP-323	CREATINE MONOHYDRATE-CS	ABH	R0003812	MSC01	10/16/2020	None	50.00000
249	D09-123	D-CHIRO-INOSITOL	ABH	R0004069	D03	10/18/2020	10/18/2018	20.38500
250	CS-ABHP-358	L-CITRULINE MALATE 2:1- CS	ABH	R0003832	L16	10/23/2020	10/23/2018	17.10000
251	C15-111	Cauliflower juice powder	ABH	R0005073	ALGEN	10/23/2020	10/23/2018	20.73800
252	CS-ABHP-044	CDP Choline -CS	ABH	R0003780	MSC01	10/24/2020	None	12.00000
253	N08-256	Beta NADH (as beta -NADH disodium salt)	ABH	R0003996	N02	10/25/2020	10/25/2018	0.25400
254	O03-123	ORGANIC PARSLEY POWDER	ABH	R0004541	P09	10/25/2020	10/25/2018	23.86700
255	S02-345	STEVIA 98% RA	ABH	R0003823	S09	10/29/2020	10/29/2018	20.00000
256	O08-111	Organic Moringa Powder	ABH	R0003937	O01	10/29/2020	10/29/2018	20.94100
257	CS-ABHP-102	BCM-95 (R) (BIO-CURCUMIN (R))-CS	ABH	R0000840	MSC01	11/1/2020	None	0.10400
258	CS-ABHP-102	BCM-95 (R) (BIO-CURCUMIN (R))-CS	ABH	R0001084	MSC01	11/1/2020	None	71.00000

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
259	L08-567	LUNGWORT LEAF POWDER	ABH	R0003580	L04	11/1/2020	11/1/2018	20.41000
260	U07-234	UNDERNATURED TYPE 11 COLLAGEN	ABH	R0004124	U01	11/1/2020	11/1/2018	0.75100
261	M04-665	MULLIEN LEAF POWDER	ABH	R0004562	M05	11/1/2020	11/1/2018	4.87400
262	T08-178	TRIPHALA POWDER	ABH	R0004569	T01	11/1/2020	11/1/2018	5.00000
263	D09-190	DICREATINE MALATE	ABH	R0004777	M07	11/1/2020	11/1/2018	9.13300
264	S08-189	SCHIZANDRA FRUIT	ABH	R0004850	S10	11/3/2020	11/3/2018	7.62000
265	S08-189	SCHIZANDRA FRUIT	ABH	R0004918	S02	11/3/2020	11/3/2018	25.00000
266	S09-590	Sodium copper chloophyllin	ABH	R0004143	S01	11/5/2020	11/5/2018	2.00000
267	C09-347	Calcium disodium edta	ABH	R0004838	C19	11/10/2020	11/10/2018	7.52700
268	M09-107	MAGNESIUM OXIDE	ABH	R0005337	M01	11/12/2020	11/12/2018	22.66100
269	H03-290	HORNY GOAT WEED 1% ICARIINS	ABH	R0004757	E02	11/13/2020	11/13/2018	12.88200
270	C09-190	CALCIUM SILICATE	ABH	R0004277	C10	11/15/2020	11/15/2018	22.68000
271	L07-578	Larch Arabinogalactans Powder	ABH	R0004548	L02	11/15/2020	11/15/2018	25.00000
272	A14-256	ASTRAGIN (R)	ABH	R0004350	A01	11/16/2020	11/16/2018	1.00000
273	M08-569	MULBERRY LEAF EXTRACT 1% DNJ	ABH	R0005540	M13	11/16/2020	11/16/2018	11.96400
274	V09-345	VITEX AGNUS CASTUS (CHASTE TREE BERRY EXTRACT)0.6 ANGUSIDES	ABH	R0004576	C27	11/18/2020	11/18/2018	3.14900
275	O08-345	OYSTER CALCIUM	ABH	R0005243	ALGEN	11/19/2020	11/19/2018	3.78000
276	M07-235	MAGNESIUM BHB (MAGNESIUM BETA HYDROXYBUTYRATE)	ABH	R0004383	M12	11/20/2020	11/20/2018	100.00000
277	E09-287	EGGSHELL MEMBRANE COLLAGEN-GENERIC	ABH	R0004797	ALGEN	11/20/2020	11/20/2018	26.84900
278	O09-567	Ophiopogon Japonicus Extract 50%	ABH	R0003941	O01	11/26/2020	11/26/2018	8.38600
279	S07-346	SODIUM GO BHB (SODIUM BETA HYDROXYBUTYRATE)	ABH	R0005654	S16	11/27/2020	11/27/2018	204.31500
280	O03-124	ORGANIC GARLIC POWDER	ABH	R0004542	G02	11/29/2020	11/29/2018	11.36700
281	C08-457	Chaga Mushroom Powder	ABH	R0004547	C09	11/29/2020	11/29/2018	25.00000
282	V08-654	VANIFOLIA	ABH	R0004726	V02	11/29/2020	11/29/2018	12.74300
283	M09-679	MONK FRUIT 30% (MFC-E30P)	ABH	R0005402	M05	11/30/2020	11/30/2018	0.92000
284	CS-ABHP-250	Sodium citrate	ABH	R0002301	MSC01	12/1/2020	None	34.25000
285	B07-346	BIFIDOBACTERIUM BREVE	ABH	R0003866	B11	12/1/2020	12/1/2018	49.55000
286	K006-008	KSM-66 ASHWAGANDHA 5% WITHANOLIDES	ABH	R0003997	A09	12/1/2020	12/1/2018	0.00050
287	K006-008	KSM-66 ASHWAGANDHA 5% WITHANOLIDES	ABH	R0003997	ALGEN	12/1/2020	12/1/2018	0.50600
288	R04-127	RICE BRAN POWDER	ABH	R0005369	R02	12/1/2020	12/1/2018	20.51900
289	CS-VH-027	BARLEY GRASS JUICE POWDER CERTIFIED ORGANIC	ABH	R0004521	MSC01	12/2/2020	None	1.14200
290	C09-786	CREAM FCI 34010184	ABH	R0003697	F16	12/4/2020	12/4/2018	22.68000
291	F07-457	FRUIT PUNCH FCI 42013184	ABH	R0003698	F16	12/4/2020	12/4/2018	15.36900
292	O08-589	ORANGE FCI 65027174	ABH	R0003699	F16	12/4/2020	12/4/2018	15.89100
293	P01-267	PEANUTBUTTER MARSHMALLOW	ABH	R0003700	F16	12/4/2020	12/4/2018	15.01000
294	A08-345	APPLE FCI 06016174	ABH	R0003702	F16	12/4/2020	12/4/2018	12.36000
295	M09-457	MANGO FCI 550441884	ABH	R0003703	F16	12/4/2020	12/4/2018	14.14900
296	R09-267	ROCKET POP FCI04008185	ABH	R0003704	F16	12/4/2020	12/4/2018	3.62000
297	N08-567	Natural milk chocolate fci24045184	ABH	R0003705	F16	12/4/2020	12/4/2018	22.68000
298	M02-345	MARQUIFORZA	ABH	R0004205	M06	12/4/2020	12/4/2018	10.00000
299	CS-ABHP-193	MAGNESIUM THREONATE/MAGTEIN	ABH	R0001223	RECD	12/6/2020	None	0.00300
300	CS-ABHP-342	Tilapia deodorized deep sea marine collagen	ABH	R0003967	F01	12/10/2020	12/10/2018	30.53000
301	F08-356	FIGWORT AERIAL PARTS POWDER	ABH	R0004593	F01	12/11/2020	12/11/2018	24.10000

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
302	B08-590	BAIZHU (AtractylodesEXTRACT 10:1)	ABH	R0004752	ALGEN	12/11/2020	12/11/2018	20.44500
303	F08-008	FLAVOR SWEET FCI40033175	ABH	R0003779	F09	12/12/2020	12/12/2018	2.00000
304	L09-237	LONICERA CAERULEA FREEZE DRIED BERRY POWDER	ABH	R0004253	H05	12/12/2020	12/12/2018	6.50000
305	O09-509	ORGANIC GREEN TEA POWDER	ABH	R0004773	G10	12/12/2020	12/12/2018	25.00000
306	O02-980	ORGANIC APPLE CIDER VINEGAR	ABH	R0004682	A08	12/18/2020	12/18/2018	36.63400
307	O03-125	ORGANIC ACEROLA POWDER	ABH	R0004543	A01	12/19/2020	12/19/2018	12.36700
308	CS-WB-005	MAGNESIUM STEARATE	ABH	R0004811	MSC01	12/19/2020	None	20.00000
309	T08-567	TENDOGUARD (R)	ABH	R0004990	T01	12/26/2020	12/26/2018	10.00000
310	CS-THRIVR-003	ASHWAGANDHA EXTRACT	ABH	R0004267	MSC01	12/28/2020	None	25.00000
311	M07-234	MAGNESIUM GO BHB (MAGNESIUM BETA HYDROXYBUTYRATE)	ABH	R0005652	M07	12/28/2020	12/28/2018	76.70700
312	O01-234	Organic Bilberry Fruit Powder	ABH	R0001602	O02	12/29/2020	12/29/2017	22.02900
313	B09-729	BORAGE OIL POWDER	ABH	R0004096	B10	12/29/2020	12/29/2018	0.81700
314	CS-ABHP-347	BETA NICOTINAMIDE MONONUCLEOTIDE	ABH	R0004180	N02	12/29/2020	12/29/2018	0.56000
315	P05-212	PAPAYA EXTRACT 4:1	ABH	R0004537	P01	12/29/2020	12/29/2018	8.99200
316	O02-982	ORGANIC LEMON POWDER	ABH	R0004652	L03	12/29/2020	12/29/2018	25.89600
317	CS-ABHP-151	GREEN COFFEE BEAN EXTRACT 50% CHLOROGENIC ACID	ABH	R0002953	MSC01	1/1/2021	None	244.32800
318	C09-287	Cranberry extract 25% proans	ABH	R0004090	C28	1/1/2021	1/1/2019	3.61000
319	G02-289	GYMNEMA LEAF EXTRACT (GS4 (R))	ABH	R0004701	G17	1/1/2021	1/1/2019	0.96000
320	C08-480	CHAMOMILE EXTRACT 10:1	ABH	R0004728	C10	1/1/2021	1/1/2019	25.00000
321	C05-282	CHINESE RED GINSEG ROOT POWDER	ABH	R0004731	C01	1/1/2021	1/1/2019	1.27800
322	CS-ZH-005	PAPAYA LEAF POWDER	ABH	R0005001	MSC01	1/1/2021	None	10.65200
323	B09-190	BURDOCK EXTRACT 10:1	ABH	R0004774	B11	1/3/2021	1/3/2019	24.32700
324	A09-577	ASHWAGANDHA EXTRACT 4:1	ABH	R0004776	A10	1/6/2021	1/6/2019	21.86000
325	CS-ABHP-179	MCT Oil Powder	ABH	R0003837	MSC01	1/7/2021	None	925.00000
326	CS-ABHP-129	HYDROLYZED BOVINE GELATIN-CS	ABH	R0004201	B08	1/8/2021	1/8/2019	130.00000
327	CS-ABHP-061	Ginkgo Biloba Leaf Extract (24% Flavone glycosides, 6% Lacto	ABH	R0002908	MSC01	1/9/2021	None	100.00000
328	C08-340	Calcium phosphate	ABH	R0004779	C02	1/9/2021	1/9/2019	25.00000
329	C09-291	CORNUS OFFICINALIS FRUIT EXTRACT	ABH	R0005377	A02	1/9/2021	1/9/2019	23.18200
330	G04-111	GreenTeaLeafExtract(50% POLY,30%CATECHINS,1%CAFFEINE)DECAFE	ABH	R0002136	G17	1/11/2021	1/11/2018	11.47400
331	CS-VH-022	OAT GRASS LEAF POWDER CERTIFIED ORGANIC	ABH	R0004483	MSC01	1/14/2021	None	13.99700
332	P09-678	PRETICK 70 p	ABH	R0005025	ALGEN	1/15/2021	None	142.06300
333	CS-ABHP-362	ErgoActive 5%	ABH	R0004162	ALGEN	1/18/2021	None	0.50000
334	CS-VH-028	OAT GRASS JUICE POWDER CERTIFIED ORGANIC	ABH	R0004522	MSC01	1/22/2021	None	1.14200
335	CS-THRIVR-002	REISHI MUSHROOM EXTRACT	ABH	R0004122	MSC01	1/25/2021	None	40.00000
336	O09-678	ORGANIC INULIN FROM CHICORY	ABH	R0004992	ALGEN	1/26/2021	1/26/2019	7.96600
337	B01-112	BITTER BLOCKER 10015175	ABH	R0004009	F23	1/28/2021	1/28/2019	22.68000
338	R06-345	RED SUPERNOVA 28122184	ABH	R0004014	F23	1/28/2021	1/28/2019	5.85000
339	L09-237	LONICERA CAERULEA FREEZE DRIED BERRY POWDER	ABH	R0004250	H05	1/28/2021	1/28/2019	6.50000
340	O02-981	ORGANIC CAYENNE	ABH	R0005175	C12	1/28/2021	1/28/2019	74.49400
341	B07-456	BLUE RASPBERRY FCI 79018174	ABH	R0004010	F23	1/29/2021	1/29/2019	8.64000
342	N08-234	NATURAL LEMON LIME 51021185	ABH	R0004011	F23	1/29/2021	1/29/2019	28.53500
343	CS-VH-029	WHEAT GRASS JUICE POWDER CERTIFIED ORGANIC	ABH	R0004523	MSC01	1/31/2021	None	1.14200
344	S09-456	SODIUM NITRATE	ABH	R0004550	S02	1/31/2021	1/31/2019	25.00000

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
345	C07-478	CAYENNE EXTRACT	ABH	R0004223	C02	2/1/2021	2/1/2019	5.00000
346	CS-ABHP-360	DIGESTIVE ENZYME	ABH	R0004575	MSC01	2/1/2021	None	50.00000
347	T08-768	TONG KAT/LONG JACK POWDER	ABH	R0004720	L01	2/1/2021	2/1/2019	9.05700
348	N01-346	NATURAL MIXED CAROTENOIDS 10% BEADLET	ABH	R0004759	ALGEN	2/1/2021	2/1/2019	1.36000
349	H09-478	HORSE CHESTNUT BETA ESCIN 40%	ABH	R0004981	H06	2/3/2021	2/3/2019	24.93600
350	T03-678	TONGKAT ALI EXTRACT 100:1	ABH	R0004676	L17	2/9/2021	2/9/2019	21.56600
351	N06-753	NATURAL CHOCOLATE FLAVOR 764-414	ABH	R0004020	F10	2/11/2021	2/11/2019	25.00000
352	N06-753	NATURAL CHOCOLATE FLAVOR 764-414	ABH	R0004021	F10	2/11/2021	2/11/2019	5.00000
353	CS-AMP-002	SODIUM CHLORIDE	ABH	R0005701	MSC01	2/12/2021	None	36.51600
354	O08-548	ORGANIC LEMON STRAWBERRY FLAVOR FCI 501132184	ABH	R0004023	F09	2/13/2021	2/13/2019	7.86700
355	O09-678	ORGANIC INULIN FROM CHICORY	ABH	R0005209	IO2	2/16/2021	2/16/2019	125.00000
356	K04-111	KELP 0.1% Iodine	ABH	R0004845	K02	2/18/2021	2/18/2019	56.68700
357	F08-345	Fish collagen granular- instant soluble.	ABH	R0004322	F03	2/20/2021	2/20/2019	1,500.00000
358	M09-235	MARINE COLLAGEN	ABH	R0004546	ALGEN	2/20/2021	2/20/2019	1,700.00000
359	S15-797	SELENIUM GLYCINATE COMPLEX 1%	ABH	R0004854	S01	2/22/2021	2/22/2019	2.30500
360	CS-AMP-011	WAZY MAZE	ABH	R0005692	ALGEN	2/23/2021	None	48.68800
361	CS-ABHP-148	Horny goat weed 10% icariins-cs	ABH	R0002812	MSC01	2/24/2021	None	358.38900
362	L09-237	LONICERA CAERULEA FREEZE DRIED BERRY POWDER	ABH	R0004251	H05	2/26/2021	2/26/2019	6.50000
363	L09-237	LONICERA CAERULEA FREEZE DRIED BERRY POWDER	ABH	R0004252	H05	2/26/2021	2/26/2019	6.50000
364	C15-797	COPPER BISGLYCINATE CHELATE 10%	ABH	R0004471	C01	2/27/2021	2/27/2019	4.83000
365	M09-198	MILK PROTEIN ISOLATE 90%	ABH	R0005136	MSC01	2/28/2021	2/28/2019	37.66700
366	C08-345	COCOA JD COCOA JB550-11	ABH	R0005544	C24	2/28/2021	2/28/2019	113.40000
367	B16-335	BOSWELLIA SERRATA P.E. (Std. to 70% Boswellic Acids)	ABH	R0008306	B13	2/28/2021	None	25.00000
368	A08-490	APPLE POLYPHENOLS 20%	ABH	R0004772	ALGEN	3/1/2021	3/1/2019	5.00000
369	R09-111	ROOIBOS (RED) HERBAL TEA POWDER	ABH	R0004950	R01	3/1/2021	3/1/2019	25.00000
370	A08-490	APPLE POLYPHENOLS 20%	ABH	R0004965	ALGEN	3/1/2021	3/1/2019	6.00000
371	O09-287	OLIVE LEAF P.E. 40% OLEUROPEIN	ABH	R0005180	O01	3/1/2021	3/1/2019	25.00000
372	CS-AMP-010	CARB 10	ABH	R0005685	MSC01	3/2/2021	None	48.68800
373	M08-568	Mesima Mushroom Powder	ABH	R0005215	M01	3/3/2021	3/3/2019	25.00000
374	L09-467	LEUCINE PEPTIDES	ABH	R0005141	L09	3/6/2021	3/6/2019	3.27900
375	S07-456	SOY ISOFLAVONE 22% (STD. TO. 7% DIADZEIN,12%GENISTEIN)	ABH	R0004163	S01	3/10/2021	3/10/2019	7.55600
376	CS-ABHP-305	MONK FRUIT 50% mogrosides V 98% total mogrosides	ABH	R0003586	MSC01	3/11/2021	None	3.61000
377	M09-190	MILLET SEED 5%	ABH	R0004982	M01	3/12/2021	3/12/2019	25.00000
378	B07-345	BCAA INSTANT 2:1:1	ABH	R0004611	ALGEN	3/15/2021	3/15/2019	29.17700
379	R08-346	ROYAL SUN BLAZEI POWDER-MYCELIUM	ABH	R0005011	R06	3/15/2021	3/15/2019	25.00000
380	C15-109	Cabbage juice powder	ABH	R0005116	C18	3/16/2021	3/16/2019	11.90300
381	B08-568	BONE BROTH PROTEIN	ABH	R0004767	MSC01	3/24/2021	3/24/2019	6,867.21300
382	B07-290	BUTTERFLY PEA TEA POWDER	ABH	R0004974	B01	3/25/2021	3/25/2019	50.00000
383	B08-567	GRASSFED BOVINE COLLAGEN PEPTIDES	ABH	R0005541	B16	3/25/2021	3/25/2019	4,607.78800
384	O08-356	ORGANIC GINGER POWDER	ABH	R0004972	G07	3/26/2021	3/26/2019	16.22800
385	W0208	WATERCRESS JUICE POWDER	ABH	R0002537	W02	3/27/2021	3/27/2018	5.70700
386	H01-590	HALIOTIS	ABH	R0004973	ALGEN	3/28/2021	3/28/2019	50.00000
387	CS-ABHP-278	BETA ALANINE	ABH	R0003665	MSC01	3/29/2021	None	20.86600

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
388	M07-345	MANGANESE AA CHELATE 20%	ABH	R0004820	M13	4/1/2021	4/1/2019	3.74400
389	G09-239	Gum acacia powder- H-550 ISC GUMS	ABH	R0004988	G09	4/1/2021	4/1/2019	3.55900
390	G09-239	Gum acacia powder- H-550 ISC GUMS	ABH	R0005098	G17	4/1/2021	4/1/2019	25.00000
391	C08-678	Chicory root extract 10:1	ABH	R0005309	C18	4/1/2021	4/1/2019	9.22900
392	S09-356	SUNFLOWER LECITHIN 20% PHOSPHATIDYLCHOLINE	ABH	R0005367	S09	4/1/2021	4/1/2019	13.05200
393	N02-123	NAT SMOOTHENAL (R) 2G FUNCTIONAL FIX	ABH	R0004408	F10	4/3/2021	4/3/2019	8.37200
394	L04-234	LACTASE 1000 POWDER	ABH	R0004282	L09	4/4/2021	4/4/2019	21.73700
395	CS-ABHP-249	Sodium chloride	ABH	R0002319	MSC01	4/5/2021	None	135.30000
396	R09-678	RUBUS COREANUS MIQUEL	ABH	R0005379	R05	4/8/2021	4/8/2019	23.18200
397	CS-VH-025	PUMPKIN POWDER CERTIFIED ORGANIC	ABH	R0004524	MSC01	4/9/2021	None	13.18400
398	B06-345	BANANA FCI 08008184	ABH	R0004456	F12	4/10/2021	4/10/2019	17.70000
399	F07-456	FRUIT PUNCH FCI 42011174	ABH	R0004457	F12	4/10/2021	4/10/2019	13.55100
400	M09-876	MIXED BERRY (natural flavor powder) 09077174	ABH	R0004458	F12	4/10/2021	4/10/2019	17.17900
401	A01-290	ACAI POMAGRANTE	ABH	R0004459	F12	4/10/2021	4/10/2019	135.41200
402	CS-VH-023	WHEAT GRASS LEAF POWDER CERTIFIED ORGANIC	ABH	R0004481	MSC01	4/11/2021	None	13.99700
403	O09-390	Organic apple cider vinegar with mother	ABH	R0005645	A01	4/12/2021	4/12/2019	12.37600
404	L07-987	LIONS MANE EXTRACT 30% BETA GLUCANS	ABH	R0005740	L02	4/12/2021	4/12/2019	25.00000
405	CS-VH-021	BARLEY GRASS LEAF POWDER CERTIFIED ORGANIC	ABH	R0004482	MSC01	4/14/2021	None	13.99700
406	CS-ABHP-357	S-Acetyl Glutathione	ABH	R0004529	L09	4/15/2021	4/15/2019	0.84800
407	C10-234	Coconut flavor	ABH	R0004460	F12	4/16/2021	4/16/2019	3.36800
408	C08-389	Calcium carbonate non GRANULAR)	ABH	R0005174	C14	4/22/2021	4/22/2019	375.00000
409	M03-234	MILK BUDS 66836 Peru	ABH	R0005574	MSC01	4/22/2021	None	3.00000
410	CS-ABHP-107	Ginger Extract 5% Gingerols	ABH	R0002751	MSC01	4/23/2021	None	13.00000
411	A09-109	ADVANTA THRIVE II CORN POWDER 1290-01 90% IN LONG CHAIN	ABH	R0005308	ALGEN	4/23/2021	4/23/2019	8.70100
412	CS-BS-001	SPECTRA	ABH	R0004674	ALGEN	4/26/2021	None	2.27500
413	K08-125	KAEMPFERIA PARVIFLORA EXTRACT 5% 5,7 DIMETHOXYFLAVONE	ABH	R0005119	K01	4/27/2021	4/27/2019	0.90200
414	CS-AMP-019	SUCRALOSE POWDER	ABH	R0005703	MSC01	4/28/2021	None	17.52700
415	R08-378	RASPBERRY FLAVOR 79063184	ABH	R0004520	F11	4/29/2021	4/29/2019	0.07500
416	L08-123	LEMON GF 50055184	ABH	R0004571	F19	4/29/2021	4/29/2019	20.03900
417	M08-457	MASKING AGENT 58021175	ABH	R0004572	F19	4/29/2021	4/29/2019	3.37100
418	N08-788	NATURAL CHOCOLATE FLAVOR 24084184	ABH	R0004573	F19	4/29/2021	4/29/2019	14.60200
419	M09-234	GO MCT 70% COCONUT ON ACACIA	ABH	R0004678	ALGEN	4/29/2021	4/29/2019	371.06200
420	CS-ABHP-294	GARCINIA CAMBOGIA EXTRACT 60%HCA	ABH	R0002813	MSC01	5/1/2021	None	150.00000
421	CS-ABHP-008	Goldenseal Root Powder-CS-VH	ABH	R0004388	MSC01	5/1/2021	None	2.21500
422	S08-567	STRAWBERRY GF 83008194	ABH	R0004574	F19	5/1/2021	5/1/2019	6.97800
423	C09-191	CS3 PROBIOTIC MIX	ABH	R0004714	P17	5/1/2021	5/1/2019	11.83100
424	D08-346	DIGESEB	ABH	R0004715	D03	5/1/2021	5/1/2019	22.36200
425	B09-289	Butchers Broom Extract (Std to 10% Saponins)	ABH	R0005596	ALGEN	5/1/2021	5/1/2019	37.50100
426	CS-AMP-008	BCAA	ABH	R0005683	MSC01	5/2/2021	None	12.17200
427	O02-980	ORGANIC APPLE CIDER VINEGAR	ABH	R0005264	A15	5/9/2021	5/9/2019	1,160.00000
428	W09-110	WHEY PROTEIN CONCENTRATE	ABH	R0005138	MSC01	5/10/2021	5/10/2019	152.43100
429	M09-234	GO MCT 70% COCONUT ON ACACIA	ABH	R0005231	M09	5/12/2021	None	240.00000
430	M09-107	MAGNESIUM OXIDE	ABH	R0005504	M02	5/13/2021	5/13/2019	100.00000

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
431	CS-ABHP-098	Palmitoylethanolamide (PEA)	ABH	R0005324	MSC01	5/16/2021	None	0.65800
432	CS-ABHP-136	FOS (FRUCTOSE OLIGOSACCHARIDE)-CS	ABH	R0000378	MSC01	5/21/2021	None	200.00000
433	CS-ABHP-290	LIONS MANE EXTRACT (STD TO 30% POLYSACCHARIDE)	ABH	R0003287	MSC01	5/22/2021	None	17.55500
434	H07-456	HMB(as Calcium HMB Monohydrate)	ABH	R0005030	C18	5/24/2021	5/24/2019	11.65300
435	X09-459	XIANG FU-NUT GRASS RHIZOME	ABH	R0004975	X01	5/27/2021	5/27/2019	14.75100
436	O02-982	ORGANIC LEMON POWDER	ABH	R0005208	L04	5/27/2021	5/27/2019	60.00000
437	CS-ABHP-293	GREEN COFFEE BEAN EXTRACT 4:1	ABH	R0003218	MSC01	5/28/2021	None	226.37500
438	P05-212	PAPAYA EXTRACT 4:1	ABH	R0005110	P17	5/28/2021	5/28/2019	25.00000
439	O08-356	ORGANIC GINGER POWDER	ABH	R0005315	G11	5/28/2021	5/28/2019	317.80000
440	T03-678	TONGKAT ALI EXTRACT 100:1	ABH	R0005390	T02	5/28/2021	5/28/2019	50.00000
441	CS-ABHP-136	FOS (FRUCTOSE OLIGOSACCHARIDE)-CS	ABH	R0000379	MSC01	5/29/2021	None	292.20000
442	G04-211	GRAPE SEED POWDER	ABH	R0004305	G01	6/1/2021	6/1/2018	1.73400
443	B03-020	BLACK PEPPER EXTRACT 4:1	ABH	R0004730	B01	6/1/2021	6/1/2018	4.46400
444	CS-GL-042	SHILAJIT EXTRACT 50% FULVIC ACID 20% HUMIC ACID-CS	ABH	R0005399	MSC01	6/1/2021	None	1.00000
445	S15-159	SENSORIL®	ABH	R0005629	S12	6/1/2021	6/1/2019	14.70000
446	R08-234	RESVERATROL 20%	ABH	R0005417	R05	6/15/2021	6/15/2019	1.73600
447	C13-111	Chromium Picolinate 99%	ABH	R0005712	C01	6/23/2021	6/23/2019	0.81900
448	M09-289	MCT OIL POWDER 70% ON ACACIA	ABH	R0005480	M11	6/24/2021	6/24/2019	98.28000
449	L09-902	LESPEDeza CUNEATA G.DON	ABH	R0005378	L01	6/25/2021	6/25/2019	23.18200
450	D09-679	DIGESEB SUPER PB	ABH	R0005355	ALGEN	7/1/2021	7/1/2019	13.72700
451	D09-680	DE 111 PROBIOTIC	ABH	R0005387	P02	7/3/2021	7/3/2019	4.21600
452	CS-AMP-003	SOY LECITHIN	ABH	R0005702	ALGEN	7/8/2021	None	24.34400
453	A07-234	AMINO MASKER CARMi 22969	ABH	R0005031	F09	7/9/2021	7/9/2019	1.29100
454	C09-288	CEREBELLE TM	ABH	R0005157	W03	7/16/2021	7/16/2019	6.81600
455	S01-555	Sheep Placenta Freeze Dried Extract Powder	ABH	R0005176	S10	7/18/2021	7/18/2019	0.70000
456	P09-578	PEACH MANGO 2X 68003194	ABH	R0005156	F10	7/19/2021	7/19/2019	1.44600
457	CS-ABHP-308	BACOPA MONNIERI EXTRACT 20% BACOPASIDES	ABH	R0003481	MSC01	7/26/2021	None	6.10000
458	CS-ABHP-220	Rhodiola rosea 3% salidroside 1% rosavins	ABH	R0003694	MSC01	7/26/2021	None	35.26100
459	CS-ABHP-293	GREEN COFFEE BEAN EXTRACT 4:1	ABH	R0003691	MSC01	7/28/2021	None	25.00000
460	G09-680	GRASS FED BUTTER POWDER	ABH	R0005319	ALGEN	7/28/2021	7/28/2019	9.70800
461	A08-234	AMINO MASKING VFCl 58044185	ABH	R0005287	F20	7/30/2021	7/30/2019	19.53800
462	M08-664	MASKING AGENT FCI58015175	ABH	R0005288	F20	7/30/2021	7/30/2019	113.40000
463	N08-788	NATURAL CHOCOLATE FLAVOR 24084184	ABH	R0005289	F20	7/30/2021	7/30/2019	22.68000
464	V08-456	VANILLA ICE CREAM 91083184	ABH	R0005290	F20	7/30/2021	7/30/2019	21.94800
465	E08-203	ECHINACEA PURPUREA HERB POWDER	ABH	R0003737	E01	8/1/2021	8/1/2018	12.47800
466	CS-ZH-004	CHAPARRAL POWDER	ABH	R0004998	MSC01	8/1/2021	None	14.37700
467	CS-ZH-006	CATS CLAW POWDER	ABH	R0004999	MSC01	8/1/2021	None	5.65200
468	V09-765	VANADIUM (AS VANADIUM AMONO ACID CHELATE,1%)	ABH	R0005131	V02	8/1/2021	None	3.92700
469	C15-199	CLA OIL POWDER 50%	ABH	R0005331	ALGEN	8/1/2021	8/1/2019	16.96900
470	G09-109	Gum blend (FUSION) ISC SILK 700	ABH	R0005430	F03	8/1/2021	8/1/2019	21.17300
471	S16-225	S-Acetyl Glutathione -emthion (R)	ABH	R0005497	L18	8/1/2021	8/1/2019	4.81000
472	Z07-226	ZINC GLUCONATE DIHYDRATE 14%	ABH	R0005565	Z02	8/1/2021	8/1/2019	50.00000
473	K07-589	KSM-66 ASHWAGANDHA 5% WITHANOLIDES (VEGAN)	ABH	R0005677	A11	8/1/2021	8/1/2019	31.10300

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
474	CS-WB-010	Organic Maca Powder	ABH	R0005146	MSC01	8/2/2021	None	44.53700
475	N09-346	101 NEP	ABH	R0005227	S01	8/5/2021	8/5/2019	1.63400
476	N09-190	NATURAL AND ARTIFICIAL CHOCOLATE 24042184	ABH	R0005285	F20	8/5/2021	8/5/2019	41.65400
477	N09-191	NATURAL AND ARTIFICIAL MARSHMALLOW 57010185	ABH	R0005286	F20	8/5/2021	8/5/2019	14.01900
478	CS-ABHP-328	BULGARIAN TRIBULUS (STD TO 95% SAPONINS)	ABH	R0003469	MSC01	8/11/2021	None	14.56200
479	CS-THRIVR-004	Natural Chicken Broth Flavor (Vanns)	ABH	R0004291	MSC01	8/13/2021	None	135.60000
480	CS-THRIVR-001	Natural Chicken Soup Flavor (Vanns)	ABH	R0004292	MSC01	8/14/2021	None	271.20000
481	CS-ABHP-311	L-GLUTAMINE	ABH	R0003800	MSC01	8/18/2021	None	16.60000
482	CS-AMP-018	WHEY PROTEIN 80%	ABH	R0005699	MSC01	8/28/2021	None	1,217.20000
483	M09-568	MASKING 501	ABH	R0005375	F09	8/29/2021	8/29/2019	7.12500
484	N09-908	NATURAL BLUEBERRY FLAVOR FAPP566	ABH	R0005385	F10	8/29/2021	8/29/2019	40.72400
485	M05-459	MICROENCAPSULATED CAFFEINE POWDER	ABH	R0005551	E01	9/1/2021	9/1/2019	22.70000
486	C09-234	CALCIUM GO BHB (CALCIUM BETA HYDROXY BUTYRATE)	ABH	R0005651	C06	9/3/2021	9/3/2019	136.78500
487	C08-554	CHERRY BERRY FLAVOR FCI 23156175	ABH	R0005423	ALGEN	9/5/2021	9/5/2019	32.54000
488	V07-234	VANILLA ICING	ABH	R0005490	ALGEN	9/10/2021	9/10/2019	21.98100
489	C06-123	CHOCOLATE PEANUT BUTTER FCI 24095184	ABH	R0005491	ALGEN	9/10/2021	9/10/2019	12.12600
490	WO1-003	WATERMELON 2X 94002194	ABH	R0005492	ALGEN	9/10/2021	9/10/2019	12.75000
491	CS-AMP-006	CHOCOLATE FL	ABH	R0005691	MSC01	9/11/2021	None	450.26200
492	CS-ABHP-005	Bearberry Extract (std. to 20% arbutin)-CS-VH	ABH	R0003995	MSC01	9/14/2021	None	0.20000
493	CS-ABHP-005	Bearberry Extract (std. to 20% arbutin)-CS-VH	ABH	R0005004	MSC01	9/14/2021	None	1.02500
494	CS-ABHP-005	Bearberry Extract (std. to 20% arbutin)-CS-VH	ABH	R0005534	MSC01	9/14/2021	None	25.00000
495	V09-390	VANILLA BEAN FCI 91084184	ABH	R0005493	ALGEN	9/16/2021	9/16/2019	6.68200
496	CS-AMP-009	L-GLUTAMINE	ABH	R0005684	MSC01	9/25/2021	None	12.17200
497	L08-680	LACTOBACILLUS ACIDOPHILLUS 10 BIL/G	ABH	R0005555	L09	9/26/2021	9/26/2019	2.00300
498	CS-ABHP-007	Goldenrod Herb Powder-CS-VH	ABH	R0005494	MSC01	10/1/2021	None	17.53500
499	E07-178	EV NOLMAX (TM)-15%	ABH	R0005603	E02	10/2/2021	10/2/2019	0.32300
500	W09-567	WILD FLAVORS FRENCH VANILLA FAPP571	ABH	R0005591	F17	10/3/2021	10/3/2019	36.28000
501	CS-ABHP-348	SUNFLOWER LECITHIN POWDER	ABH	R0003693	MSC01	10/23/2021	None	18.96700
502	CS-ABHP-111	DEFATTED DESICATED BEEF LIVER POWDER-CS-VH	ABH	R0004986	MSC01	12/1/2021	None	35.58500
503	CS-ZH-003	GALANGAL ROOT POWDER	ABH	R0005002	MSC01	12/1/2021	None	14.37700
504	CS-WB-017	JOHN WORT EXTRACT-CS	ABH	R0005150	MSC01	12/18/2021	None	16.00200
505	CS-ABHP-289	BOSWELLIA SERRATE EX (WORKVEL) FROM VERDURE SCIENCE-CS-VH	ABH	R0003535	MSC01	2/1/2022	None	11.18900
506	CS-ZH-002	GRAVIOLA LEAF POWDER	ABH	R0005003	MSC01	2/1/2022	None	9.37700
507	CS-TLHI-002	GRAVIOLA LEAF POWDER	ABH	R0005461	MSC01	2/1/2022	None	50.00000
508	CS-BS-002	L-GLUTATHIONE REDUCED	ABH	R0004673	MSC01	2/7/2022	None	3.65000
509	CS-ABHP-006	Dandelion Extract 4:1-CS-VH	ABH	R0004413	MSC01	2/28/2022	None	0.20000
510	CS-ABHP-006	Dandelion Extract 4:1-CS-VH	ABH	R0005523	ALGEN	2/28/2022	None	4.51000
511	CS-ABHP-006	Dandelion Extract 4:1-CS-VH	ABH	R0005737	ALGEN	2/28/2022	None	25.00000
512	S09-902	SEMEN CUSCUTAE	ABH	R0005005	S01	3/12/2022	3/12/2019	13.22000
513	CS-ABHP-251	Potassium chloride	ABH	R0002318	MSC01	3/16/2022	None	335.11000
514	C06-128	CYPERUS ROTUNDUS (XIANG FU) POWDER UNSULFURED	ABH	R0004837	C17	3/26/2022	3/26/2019	20.70800
515	CS-ABHP-180	120MM T/E FS GREEN CAPS	ABH	R0000614	MSC01	4/3/2022	None	2,496.00000
516	C06-909	COPPER AMINO ACID CHELATE 20%	ABH	R0002514	C02	4/9/2022	None	4.32400

Exhibit B to Consent Decree for Permanent Injunction
United States v. ABH Nature's Products, Inc., et al.

Entry	Item	Description	Location	Lot	Store	Expire Date	Manufacture Date	Quantity Onhand
517	CS-AMP-007	CREATINE MONO	ABH	R0005682	MSC01	4/17/2022	None	243.44000
518	M09-290	MIRACOAL ELECTRO CAPSULE	ABH	R0005183	MSC01	5/1/2022	None	160.00000
519	CS-ABHP-008	Goldenseal Root Powder-CS-VH	ABH	R0005503	MSC01	5/1/2022	None	25.00000
520	CS-EUSA-002	DR.LAUB HUMIC FULVIC	ABH	R0003168	MSC01	5/16/2022	None	2.28000
521	CS-AMP-005	COCOA POWDER	ABH	R0005690	MSC01	7/18/2022	None	961.18000
522	L07-457	L-ARGININE HCL (FERMENTATION)	ABH	R0002413	L15	1/5/2023	1/5/2018	1.90400
523	CS-ABHP-315	BROCCORAPHANIN TM	ABH	R0003578	MSC01	9/1/2023	None	35.66400
524	YELLOW#6	FD&C YELLOW 6 ALUM LAKE 35-42% (096101001)	ABH	R0003353	F10	9/10/2023	9/10/2018	6.00000