



AI in Legal & Regulatory Compliance

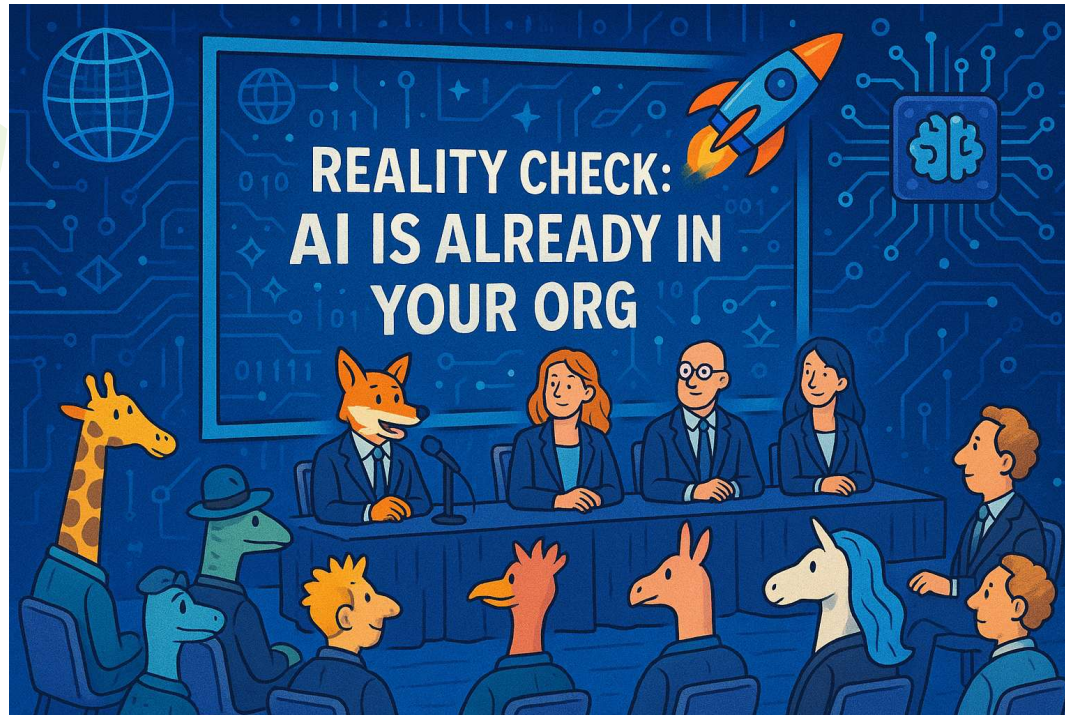
ACC Nutrition Law Symposium 9/12/25

Asa Waldstein

Founder & Principal, Apex Compliance

Education use only. Please do not distribute publicly.

Your Employees Are Using AI



Ensure You Have an AI Use Policy

Don't Train the Mothership



Risk Management & Legal Compliance

- Ensure compliance with evolving regulations
- Prevent unintentional generation of misleading or discriminatory content



Transparency & Accountability

- Define who is responsible for AI outputs and decisions
- Help teams understand what tools are approved and under what conditions



Internal Alignment & Consistency

- Set expectations for how different teams can and cannot use AI tools



Protect Company Reputation

- Set clear boundaries to avoid inappropriate or unethical AI usage
- Reduce the risk of public-facing AI content causing brand harm



Quality Control & Accuracy

Ensure AI-generated content (e.g., documents, code, marketing copy) meets internal standards

- Prevent overreliance on unverified outputs



Enable Safe Innovation

Encourage responsible experimentation within clear guidelines

- Make it easier to adopt powerful tools with confidence



Do You Have an AI Committee?

AI Steering Committee

- mix of employees from entry-level to senior leadership so you get a broad range of perspectives
- develop and review AI policies, ensure compliance with regulations, and educate employees on responsible AI use (encourage AI use and ideas work to understand perspective of employees)

**GIVES EMPLOYEES SAFE
PERMISSION TO FIND WAYS
TO USE AI WITH
GUARDRAILS**

- Reviewing new AI tools

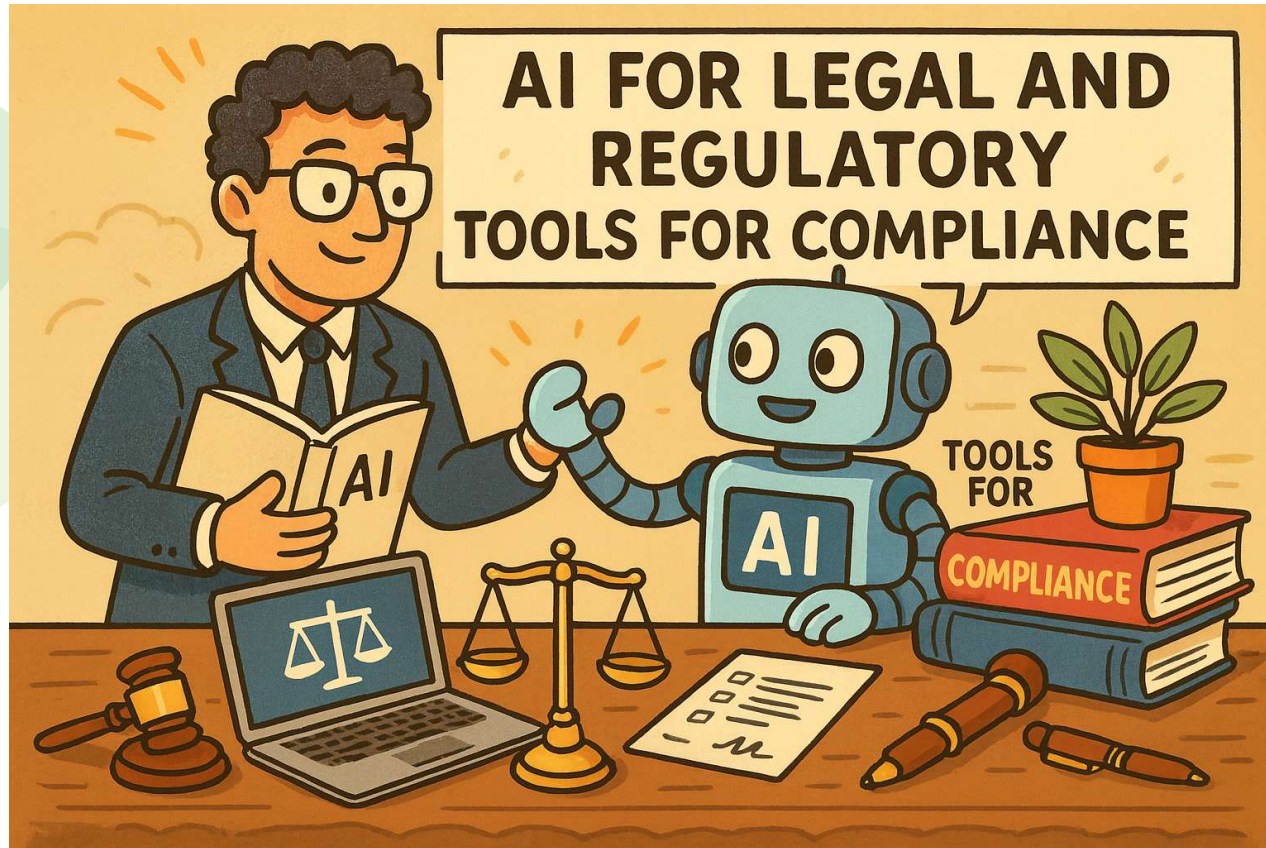
GIVES EMPLOYEES SAFE PERMISSION



Asa Waldstein

- Founder & Principal: Apex Compliance Program
- Principal: Supplement Advisory Group
- Warning Letter Wednesday: 4+ years of weekly posts
- 20+ Years Manufacturing/Marketing Supplements
- Certified Clinical Herbalist (Boulder 2001)





Legal Expert Lisa Ghannoum

Asa Waldstein



**12-year-old
Asa
The beginning
and end of
my "acting"
career.**

Quality & GMP Compliance



Counterfeit Detection: Vision-AI anomaly detection (label issues) and vendor inconsistencies



"Always On" AI can review manufacturing line (weight checks) and quickly surface Out Of Specification issues



AI Assisted Virtual GMP Inspections: Visual "issue" checks, review massive amounts of paperwork

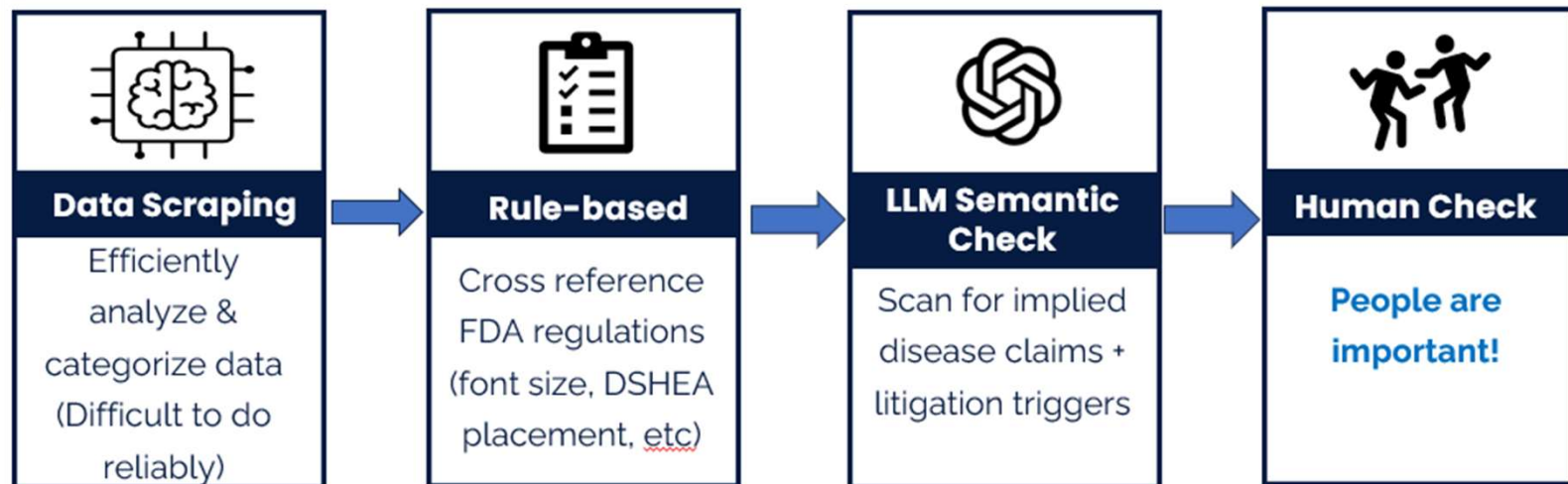


Documentation: AI reviews Batch Production Records (missing signatures, duplicate entries, in-process checks)

Stability: Review formulas to help with predictive stability and expiration dating

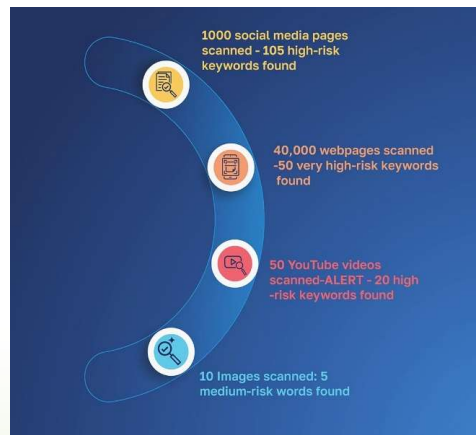
AI Assisted Label Compliance

AI Workflow that Reduces Review Time



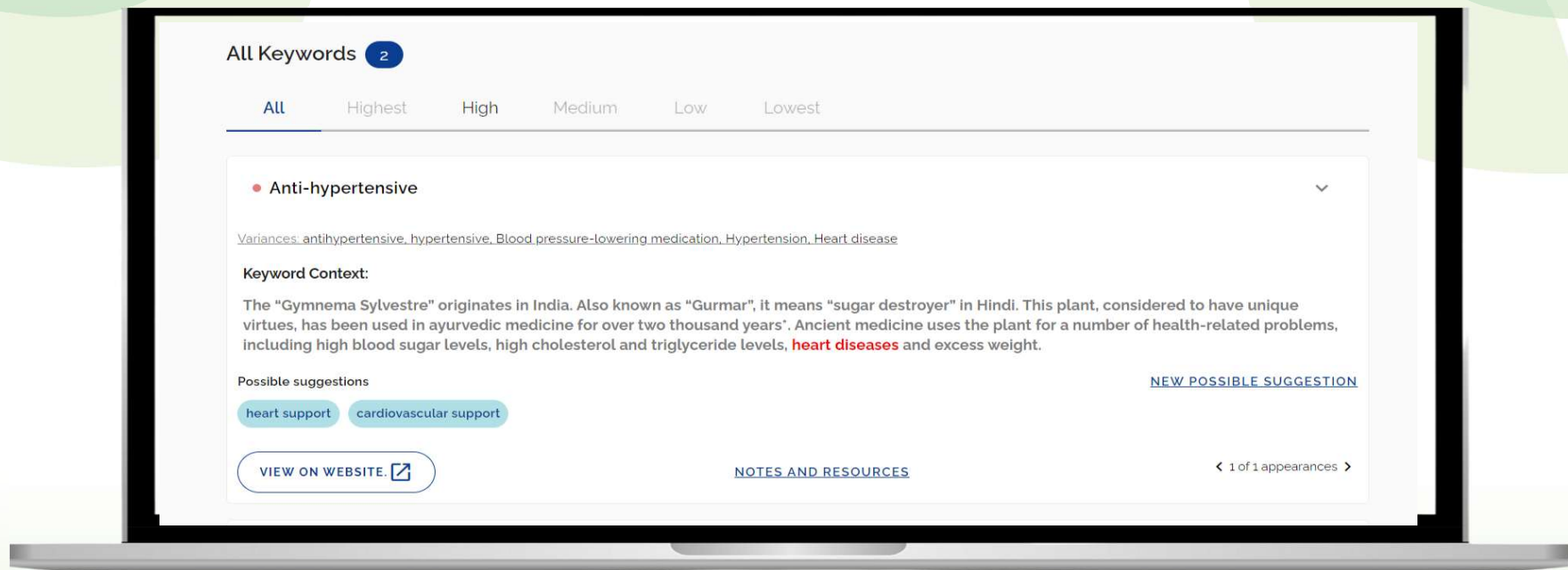
AI Assisted Compliance Review Case Study

Find The Regulatory Landmines and Save Time



AI Assisted Compliance Review Case Study

Websites, YouTube, Instagram, Facebook



AI Assisted Compliance Review Case Study

Comprehensive Reports

| Excel Report of Keyword: Anti-hypertensive | | | |
|---|--------------------|---|--|
| Content | Keyword Risk Level | Possible Suggestion | Notes and Resources |
| The "Gymnema Sylvestre" originates in India. Also known as "Gurmar", it means "sugar destroyer" in Hindi. This plant, considered to have unique virtues, has been used in ayurvedic medicine for over two thousand years*. Ancient medicine uses the plant for a number of health-related problems, including high blood sugar levels, high cholesterol and triglyceride levels, heart diseases and excess weight. | high | If substantiated heart support,cardiovascular support | This and similar words are on the Amazon prohibited word list. |





APEX[®]
COMPLIANCE

Case Study: AI Enhanced Content Review

The screenshot displays the APEX COMPLIANCE software interface for reviewing document suggestions. The top navigation bar shows the path: Projects > Asa Doc > Review possible suggestions. On the right, there are buttons for 'DOWNLOAD CHANGES' and 'BACK'. The main content area is titled 'Document' and shows a list of 'All Keywords' with a count of 4. A modal window is open, titled 'Choose AI-powered suggestions tailored to your content.', showing five options. Option 01 is selected, showing the 'Old text' 'prevents heart disease.' and a 'Smart replace' suggestion 'Supports cardiovascular vitality.' Below the modal, there are buttons for 'Supports heart health', 'Maintains a healthy heart', and 'Assists in maintaining heart health'. A 'New possible suggestion' button is also visible. The bottom of the interface includes a 'NOTES AND RESOURCES' section and a toggle for 'Apply to all' with a count of '1 of 1 appearances'.

Projects > Asa Doc > Review possible suggestions

DOWNLOAD CHANGES BACK

Document All Keywords 4

following the rules in areas they want to focus on, many of which are... Staying ahead of trouble is one of the critical and fun reasons to... enforcement trends. Key Trends: GMP Issues : After two years of... inspections due to COVID, GMP inspections returned in 2022... seeing the fallout of GMP issues in recent warning letters. Finis... composition has been showing up in more warning letters and... of these citations are a rigid interpretation of finished product... requirements. Let 's say there is a blend of botanical ingredien... tested for identity and purity and are blended with a validated... before being encapsulated. In that case , FDA requires a comp... composition of the finished product even if there are no specifi... such as curcuminoid content, to test. It is my understanding FD... encouraging companies to develop new and expensive finishe... composition tests to verify this. This is a new and burdensome... trend to watch. This product prevents heart disease. An ingred... product prevents hair loss. Based on a review of warning letter... reviewing websites around the time of their inspection closeou... they scan websites for disease claims up to a year after the ins... suggest companies re-review their online marketing if recently... search for " forgotten " high - risk statements. Removing these... significantly reduce the likelihood of a combined disease claim... violation warning letter. Even the most reputable companies may have blogs or... statements with risky claims lurking on their website or socials. I use my to... discover these "landmines;" and if I can find them, FDA can also . This product... reduces the risk of generalized anxiety disorder. The ingredients in this product... have been studied for those suffering from depression . MLM distributors cited... in FTC lawsuits : I primarily focus on FDA-related enforcement but occasionally...

Choose AI-powered suggestions tailored to your content.

Option 01 Option 02 Option 03 Option 04 Option 05

Old text
prevents heart disease.

Smart replace If substantiated
Supports cardiovascular vitality.

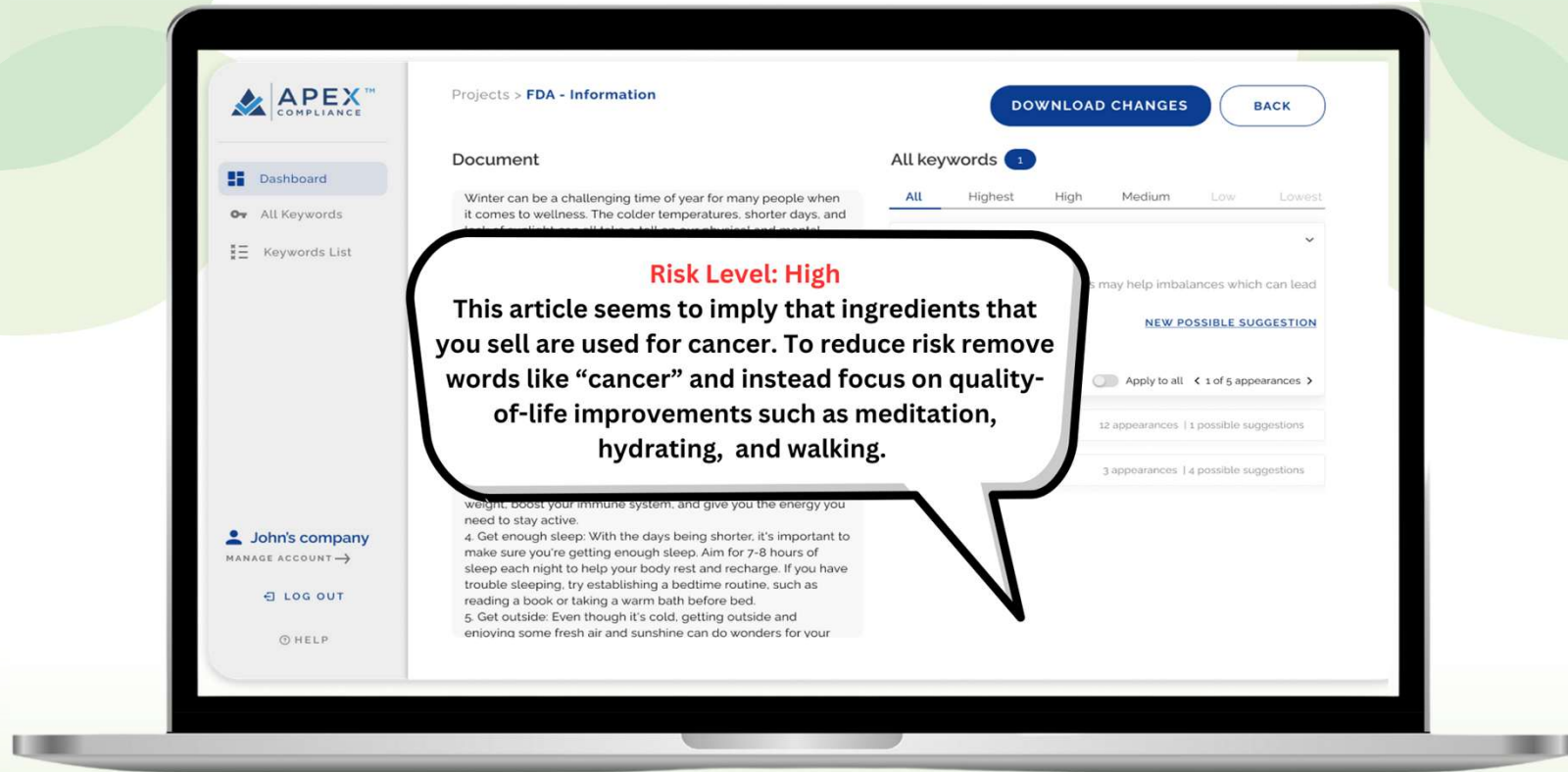
Supports heart health Maintains a healthy heart Assists in maintaining heart health

NOTES AND RESOURCES

Apply to all 1 of 1 appearances

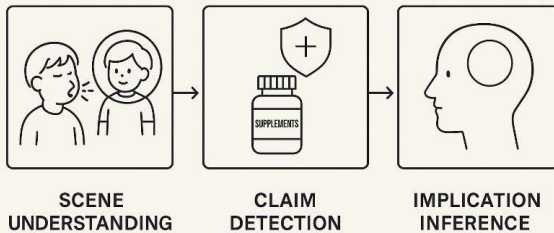
Patent pending technology. Do not distribute publicly

Case Study: AI Enhanced Content Review



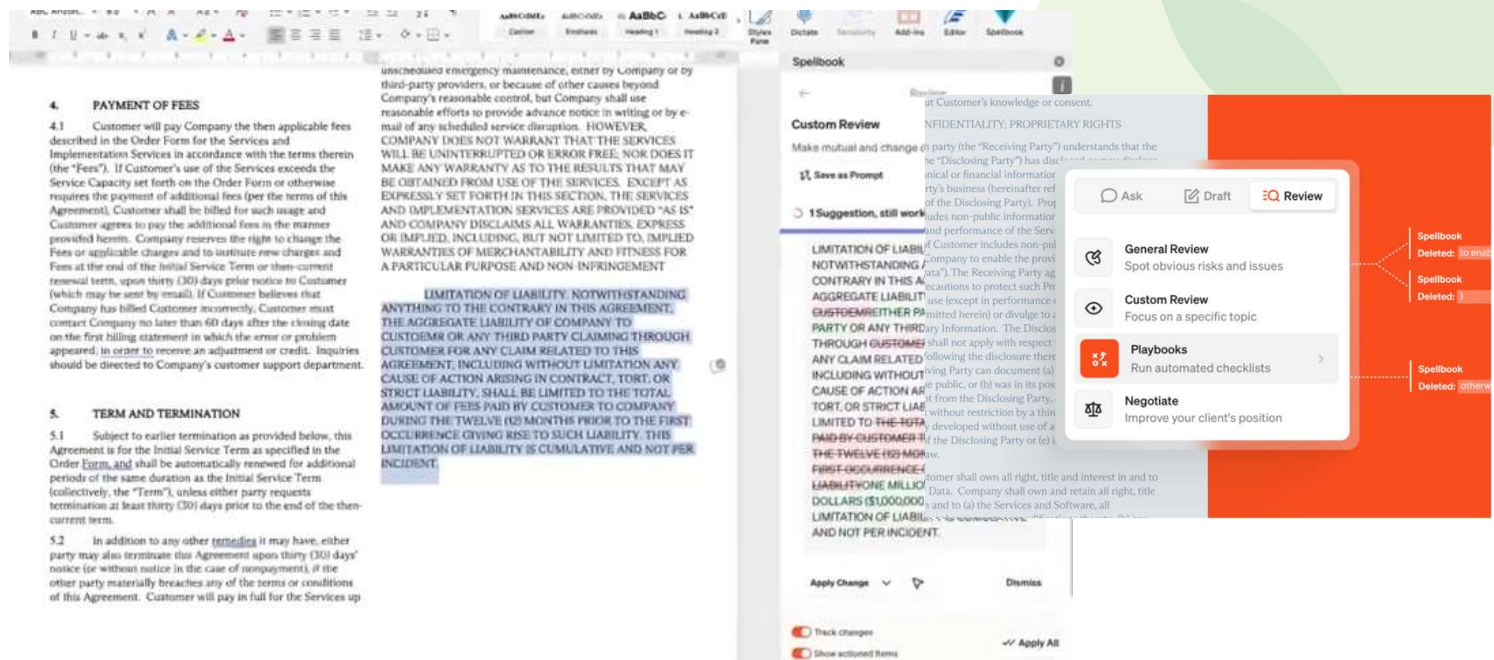
The sneezing child implies a sickness like a cold or flu and the other child appears to be protected within the probiotic straw. This, combined with the “immune strengthening” verbiage, has a medium risk of attracting lawsuits or regulatory issues. To reduce risk, replace “strengthening” with “support” and update the sneezing image to a non-sick image.

HOW AI CAN DETECT IMPLIED CLAIMS



AI Contract Review

Humans must be part of review and sign off process



The screenshot displays a document review interface. On the left, a document titled '4. PAYMENT OF FEES' is shown with several paragraphs of text. The middle section highlights a 'LIMITATION OF LIABILITY' clause. On the right, a 'Spellbook' sidebar is visible, containing a 'Custom Review' section with options like 'General Review', 'Custom Review', 'Playbooks', and 'Negotiate'. Below this, there are 'Track changes' and 'Show actioned items' checkboxes. The interface is designed for collaborative review and sign-off.

AI Agents

The Future of Work

Software programs that take on tasks and can make decisions on their own.

→ A really smart intern that works independently

Asa's Prediction: Everyone will have their own "hive" of personalized AI agents within a couple of years.



AI Agents Compliance Monitoring & Surveillance

Example of agent interaction:

There was an interesting NAD case this week about marking dietary supplements on social media.

Would you like to prepare a 2-minute audio update on key takeaways and how this can impact your company?



Technology Tool

Demystify Complicated Regulations

Google's NotebookLM

I provided the following CFR link to the program and asked it about nutrient content claims.

- [101.13 Nutrient content claims—general principles](#)

Listen to the recording 

Thank You



ApexComplianceProgram.com

