

Metagenics[®]

Genetic Potential Through Nutrition

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LAW DEPARTMENT

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3/24/98

March 5, 1998

Office of Special Nutritionals
Center for Food Safety And Applied Nutrition
Food and Drug Administration
200 C Street, SW
Washington, DC 20204

Certified Mail
Return Receipt

Re: Structure Function Claims/FDA Notification

Dear Sir or Madam:

Enclosed please find the above document prepared in accordance with the proposed regulation 21 C.F.R. Section 101.93.

Should you have any questions or comments, please do not hesitate to contact Beverly Chin or me at the above number.

Sincerely,

Gloria S. Donovan

Gloria S. Donovan
Legal Assistant

Enclosure

cc: Beverly Chin, Esq.

975 MAR 21 10:11

97S-0162

see also docket 97S-0163

LET 1466

Notice is hereby given pursuant to the requirements of section 403(r)(6)(21 U.S. C. 343(r)(6) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that Metagenics, Inc. with its principal place of business at 971 Calle Negocio, San Clemente, California 92673, (714)366-0818, has commenced marketing the following dietary supplements bearing the following statement(s) on the label and/or in the labeling:

METAGENICS BRAND

Name of Supplement	Name of Ingredient or Supplement that is Subject to the Claim	Text of Claim
ADRENOGEN™	B Vitamins	Provides nutritional support for adrenal function with select B vitamins involved in hormone production and regulation.
AZEO-PANGEN™	Raw Pancreas Enzyme Concentrate	Provides support for digestive function. Proteases break down protein, amylases break down carbohydrates, lipases break down fats.
AZEO-PANGEN™ EXTRA STRENGTH	Raw Pancreas Enzyme Concentrate	Provides support for digestive function. Proteases break down protein, amylases break down carbohydrates, lipases break down fats.
BIO-SCORB™	Vitamin C and Bioflavonoids	Have important antioxidant properties.
C-ULTRASORB POWDER™	Vitamin C	In addition to its well-known functions as an antioxidant, vitamin C is essential for collagen production and plays an important role in immune function.

C-ULTRATABS™	Vitamin C	In addition to its well-known function as an antioxidant, vitamin C is essential for collagen production and plays an important role in immune function.
CAL APATITE®	Calcium	Calcium, along with regular exercise and a healthy diet, can play a significant role in reducing the rate of bone loss or bone thinning and in protecting bone strength.
CAL APATITE® WITH MAGNESIUM	Microcrystalline Hydroxyapatite; Calcium; Magnesium	Designed to help people build and maintain strong, healthy bones. Calcium, along with exercise and a healthy diet, can play a significant role in reducing the rate of bone loss or bone thinning and in protecting bone strength. Magnesium plays an important role in bone health.
CAL APATITE® CHEWABLE	Microcrystalline Hydroxyapatite; Calcium; Vitamin D	Comprehensive bone support. Calcium, along with regular exercise and a healthy diet, can play a significant role in reducing the rate of bone loss or bone thinning and in protecting bone strength.
CAL APATITE® HRT	Calcium; Magnesium	Calcium, along with exercise and a healthy diet, can play a significant role in reducing the rate of bone loss or bone thinning and in protecting bone strength. Magnesium also plays an important role in bone health.
CAL MATRIX™	Microcrystalline Hydroxyapatite; Calcium; Phosphorus; Vitamin D; Zinc; Magnesium; Manganese; Copper; Vitamin C; Glucosamine Sulfate	Nutritional bone support. Contains vitamins, minerals and additional nutrients that are important in bone formation and repair.

CANDICIN™	Blend of Grapefruit Seed Extract; Goldenseal; Bearberry Leaf	Blend of selected herbs and herbal extracts that have traditionally been used to help support the body's defense system and to support a healthy intestinal environment
CARDIOGENICS™	Amino Acids; Mineral Aspartates (Magnesium, Potassium, Calcium, Selenium, Chromium)	Formulated to supply nutrition for the muscle cells of the heart and other tissues.
CHLOROTENE™	Beta-Carotene	Provides antioxidant protection.
COLLAGENICS®	Free Form Amino Acids; Advanced Mineral Chelates; Horsetail Herb; Vitamin C	Nutritional support for connective tissue. Supports the growth and construction of connective tissue.
CORTICO-B5B6™	Pantothenic Acid (Vitamin B5); Vitamin B6	Nutritional support for Co-Enzyme A Production. Includes water soluble B-Vitamins that are important for many physiological functions such as hormone production and energy metabolism. Pantothenic acid is converted into co-enzyme A, which is necessary for the body's production of energy.
DMG (LIQUID)	Dimethylglycine	Serves as a methyl group donor. Methyl groups are involved in the formation and proper function of vitamins, hormones, enzymes, neurotransmitters, RNA, DNA, and creatine. Useful as nutritional support for liver and cardiovascular function.
E-400 SELENIUM™	Selenium; Vitamin E	Helps protect tissues against oxidative damage. Selenium functions in the body as a component of the antioxidant enzyme glutathione peroxidase.

		<p>Vitamin E is a fat-soluble antioxidant that helps protect against free radical damage to fatty substances within the body and may help modulate balanced eicosanoid synthesis.</p> <p>Vitamin E is an antioxidant that supports cardiovascular health.</p> <p>Both vitamin E and Selenium increase cellular antioxidant capacity.</p>
ENDOCRINE-M™	Ginseng; Vitamin E; L-Carnitine; Zinc	<p>Designed to provide nutritional support for men and help support a healthy male organ system.</p> <p>Siberian ginseng is a favorite Chinese herb traditionally used to support male health.</p>
ENDOCRINE MASTER™	Pure Hypothalamus Concentrate (Bovine); Pure Pituitary Concentrate (Bovine)	In mammals, the hypothalamus regulates the secretions of the pituitary gland. The pituitary in turn, has wide effects on the endocrine system.
EPA-DHA COMPLEX™	Eicosapentaenoic Acid (EPA); Docosahexaenoic Acid (DHA); Vitamin E	<p>EPA and DHA are polyunsaturated fatty acids that nutritionally support healthy cholesterol levels and cardiovascular health.</p> <p>EPA-DHA Complex promotes healthy cellular balance of these essential fatty acids and supports healthy, balanced eicosanoid synthesis.</p> <p>A healthy balance of eicosanoids helps to support proper cardiovascular and nervous system function and immune system function.</p>
FEM CONTROL™	Rutin; Vitamin C; Vitamin A; Iron; Vitamin B6; Vitamin B12; Folic Acid; Blue Cohosh Root; Dong Quai Root; Agrimony Leaf; Cramp Bark;	<p>Support for menstrual flow.</p> <p>Combines selected Eurasian and Native American herbal extracts with a comprehensive</p>

	Shepherd's Purse Herb; Anise Seed	blend of nutrients that support the tissues involved in healthy menstruation.
FEM ENDOCRINE™	Vitamin A; Bioflavonoid Complex; Vitamin E; Magnesium; Vitamin B6; Flaxseed Oil; Iodine	A combination of selected vitamins, minerals and high quality raw gland concentrates that supports the endocrine system.
FEM ESSENTIALS™	Chromium; Vanadium; Vitamin E; Vitamin C; Beta-Carotene	A comprehensive nutrient blend, featuring chromium and vanadium, to help support fat and sugar metabolism along with a comprehensive antioxidant profile.
FEM ESTRO™	Ginseng; Vitamin E; Vitamin B5 (Pantothenic Acid); Bioflavonoid Complex; Para Aminobenzoic Acid	Menopause formula. A unique blend of ginseng, vitamins, adrenal concentrate, and bioflavonoids formulated to provide nutritional support for women during menopause.
FEM ESTROPLEX™	Extracts of Black Cohosh Root, Wild Yam, Chinese Gentian Root, Chasteberry fruit, Valerian Root, Motherwort Root and Licorice Root; Rutin; Vitamin C; Para-Aminobenzoic Acid; Pantothenic Acid; Vitamin B6; Vitamin E	Natural menopausal support. Designed to provide nourishment for the mid-life woman or those who desire increased phytoestrogen intake. Contains antioxidants and complex herbal extracts that have been traditionally used to support balance during menopause and help maintain cardiovascular health, along with nutrients that support the adrenal glands' adaptive response. The formula provides the significant phytonutrient benefits of black cohosh extract, cardiovascular support from vitamin E, and the peaceful influence of valerian, motherwort, and vitamin B6.
FEM HERBAL™	Dong Quai Root; Rehmannia Root; Peony Root; Licorice Root; Codonopsis Root; Poria; Ligustrum root; Atractylodes	Herbal menstrual support. A classical combination of Chinese herbal extracts

	Rhizome	traditionally used to support women's reproductive health.
FEM MONTHLY™	Bupleurum Root; Peony Root; Dong Quai Root	Herbal pre-menstrual support. An ancient Chinese botanical formula traditionally used to nourish the liver and promote the flow of liver ch'i.
FEM OSTEO™	Microcrystalline Hydroxyapatite Concentrate; Calcium; Phosphorus; Trace Minerals; Magnesium	Designed to help women build and maintain strong, healthy bones, and support healthy muscle function. Magnesium plays a role in bone metabolism and supports muscle function.
FEM OSTEO HRT™	Microcrystalline Hydroxyapatite Concentrate; Calcium; Phosphorus; Trace Minerals; Magnesium	Provides comprehensive nutritional bone support. Special nutritional support for menopausal and post-menopausal women taking hormone replacement therapy (estrogen). Calcium, along with regular exercise and a healthy diet, can play a significant role in reducing the rate of bone loss or bone thinning and in protecting bone strength. Magnesium also plays an important role in bone health. Over one-half of the total body stores of magnesium are found in bone tissue.
FEM PREMENSTRUAL™	Taurine; Magnesium; Chasteberry; Cramp Bark; Ginger Root; Salvia Root; Wild Lettuce Leaf; Licorice Root; Pantothenic Acid; Vitamin B6	Premenstrual support formula. Designed to provide support to metabolic pathways involved in hormone metabolism and muscular contraction and relaxation. The formula features nutrients to support liver involvement in hormone metabolism and balance, and to support the adrenal glands' adaptive

		glucose tolerance factor which, with insulin, assists in the movement of glucose into cells.
GLUCOSAMINE SULFATE	Glucosamine sulfate	Nutritional support for joint and other connective tissues. Helps support healthy joint and other connective tissues by providing glucosamine, a naturally occurring precursor for proteoglycan synthesis. Proteoglycans are key components of the ground substance that helps to make up connective tissue.
GLYCOGENICS™ B-COMPLEX WITH C	B-complex vitamins (Vitamins B6, B2, B1, B12 and Pantothenic Acid)	B-complex vitamins are actively involved in the breakdown and metabolism of carbohydrates, proteins, and fats.
HEMAGENICS™	Iron; Succinic Acid; Glycine; Folic Acid; Vitamin B6; Vitamin B12	Nutritional support for red blood cell formation. A highly specialized hematinic formula that provides iron, succinic acid, glycine, and other nutrients such as folic acid and vitamins B6 and B12 that support the formation and maintenance of healthy red blood cells. A highly specialized formula that nourishes the blood.
INFLAVANOID™	Vitamin C; Lemon Bioflavonoid Complex; Turmeric; Ginger	Nutritional support for healthy, balanced eicosanoid synthesis.
INTRINISI B12/FOLATE™ with intrinsic factor	Vitamin B12; Folic Acid	Provides vitamin B12 and folic acid which play important roles in the proper synthesis of DNA and, therefore, the growth and function of cells in the body.
JUICY FRUIT-C™	Vitamin C	Vitamin C is an important antioxidant nutrient that plays a role in immune function and is essential for the production of collagen, a protein that forms the basis for connective

		tissue, the most abundant tissue in the body.
L-CARNITINE WITH CHROMIUM	L-Carnitine; Chromium	<p>A blend of two nutrients that play important roles in the metabolism of fats.</p> <p>L-Carnitine is an amino acid that mediates the transfer of fatty acids across the membranes of the mitochondria where they are oxidized as fuel for energy.</p> <p>Chromium is an essential component of glucose tolerance factor, a cofactor for the action of insulin, and helps support healthy glucose metabolism.</p>
MAG B3B5 COMPLEX™	Niacinamide; Vitamin B3; Vitamin B5 (Pantothenic Acid); Magnesium; Vitamin B1; Vitamin B6; Vitamin E	Provides nutritional support for the body systems which utilize these nutrients including the nervous system, smooth muscles, and other soft tissues.
MAG CITRATE	Magnesium; Calcium	Provides a blend of magnesium citrate with calcium citrate for nutritional support of both muscle function and bone formation. In addition to many other functions, calcium and magnesium play important roles in muscle contraction and relaxation responses.
MAG GLYCINATE	Magnesium	<p>Magnesium is a cofactor in many metabolic reactions. It is intimately involved in ATP (energy) production and plays an important role in biosynthesis, growth, bone mineralization, thermogenesis, and intestinal motility.</p> <p>It also functions as a calcium channel regulator in muscle and plays an essential role in muscle relaxation response.</p>

META EPO™	Evening Primrose Oil (Gamma-Linolenic Acid)	<p>Contains pure evening primrose oil, a natural source of gamma-linolenic acid (GLA).</p> <p>As a precursor of the important prostaglandin E1 series (PGE1), GLA helps to support healthy eicosanoid balance.</p> <p>As an essential fatty acid, GLA helps to support healthy skin, joint function, and balanced eicosanoids -- natural hormone-like compounds produced within the body.</p> <p>Proper eicosanoid balance plays an important role in supporting an appropriate inflammatory response and the maintenance of good health.</p>
METAGEST™	Betaine Hydrochloride (HCL); Pepsin; Gentian Root	<p>Nutrients to support digestion.</p> <p>Provides betaine HCl, a source of hydrochloric acid which initiates the digestive process, combined with the proteolytic enzyme pepsin (porcine-derived), and gentian root, an herbal bitter traditionally used to support digestion.</p>
METAZYME™	Plant-derived Enzymes	<p>Plant-derived enzymes for healthy digestion.</p> <p>Contains a complement of naturally occurring enzymes derived from the <i>Aspergillus oryzae</i> fungus and is designed to nutritionally support healthy digestion.</p> <p>Provides enzymes to support the breakdown of carbohydrate, protein, fat and plant cellulose.</p>
MG/K ASPARTATE	Magnesium; Potassium	<p>Magnesium plays an important role in normal growth, development, and energy</p>

		production, and potassium is a key electrolyte in cellular function.
MINERAL HEALTH™	Calcium; Magnesium	Magnesium and calcium are both essential for good bone health and muscle function.
MULTIGENICS™	Beta-Carotene; Vitamin C; Vitamin E	Provides antioxidant protection.
MULTIGENICS™ Without Iron	Vitamin B6; Vitamin B2; Vitamin B1; Vitamin B12; Vitamin C; Calcium; Magnesium; Folic Acid	Selected nutrients to support liver and adrenal function. High levels of ratio-balanced B vitamins, with extra B12, to support homocysteine metabolism. 2 to 1 ratio of calcium to magnesium for balanced nutritional bone support.
MULTIGENICS™ Without Iron and Beta-Carotene	Vitamin B6; Vitamin B2; Vitamin B1; Vitamin B12; Vitamin C; Calcium; Magnesium; Pantothenic Acid; Folic Acid	High levels of selected nutrients to support liver and adrenal function. High levels of ratio-balanced B Vitamins with extra B12 to support homocysteine metabolism. 2 to 1 ratio of calcium to magnesium for balanced nutritional bone support.
MULTIGENICS™ Without Iron and Copper	Vitamin B6; Vitamin B2; Vitamin B1; Vitamin B12; Vitamin C; Calcium; Magnesium	High levels of selected nutrients to support liver and adrenal function. High levels of ratio-balanced B vitamins, with extra B12 to support homocysteine metabolism. 2 to 1 ratio of calcium to magnesium for balanced nutritional bone support.
MULTIGENICS™ CHEWABLE	Beta-Carotene; Vitamin C; Vitamin E	Provides balanced antioxidant protection.
MULTIGENICS™ Maintenance Formula	Beta-Carotene; Vitamin E; Vitamin C; Vitamins B1, B2, B6, B5, B12; Folic Acid; Calcium; Magnesium	Provides balanced antioxidant protection. Features selected nutrients to support liver and adrenal

		<p>function.</p> <p>Ratio-balanced B vitamins, with extra B12 to support homocysteine metabolism.</p> <p>2 to 1 ratio of calcium to magnesium for balanced nutritional bone support.</p>
MULTIGENICS™ POWDER	Beta-Carotene; Vitamin E; Vitamin C	Provides balanced antioxidant protection.
MYCELIZED® Vitamin E	Vitamin E	Vitamin E is nature's fat-soluble antioxidant "cell protector" and is involved in the proper functioning of all major organ systems in the body.
MYOPLEX™	Magnesium; Calcium	<p>Nutrients to support the muscle relaxation response.</p> <p>Magnesium and calcium play a role in muscular contraction and relaxation responses.</p>
NIACIN PLUS™	Niacin; Magnesium; Vitamin B6;	<p>Designed to provide nutritional support for peripheral circulation.</p> <p>The diversity of niacin's role in the body make it essential for the supply of energy to and the maintenance of all body cells.</p>
OMEGA-EFA™	Eicosapentaenoic Acid; Docosahexaenoic Acid; Gamma-Linolenic Acid; Vitamin E	<p>This special blend of dietary essential fatty acids (EFA's) supports a healthy balance of eicosanoids.</p> <p>A healthy balance of eicosanoids helps to support proper cardiovascular and nervous system function and immune system function.</p> <p>EFA's also support healthy hair, skin and nails.</p>
OSTEO-CITRATE™	Calcium; Magnesium	Calcium, along with regular exercise and a healthy diet, can play a significant role in reducing the rate of bone loss or bone thinning and in

		<p>protecting bone strength.</p> <p>Magnesium plays an important role in calcium metabolism and functions together with calcium in bone formation, muscle contraction and relaxation and nerve transmission.</p>
OSTEO-GENICS™	Calcium; Magnesium; Vitamin D; Vitamin C	<p>Provides calcium, magnesium, Vitamin D and other nutrients that are involved in normal bone formation and metabolism.</p> <p>A scientifically formulated blend of nutrients designed to support bone formation.</p>
PHYTOPHASE™	Broccoli Concentrate; Turmeric Extract; Garlic Concentrate; Limonene	<p>Phytonutrients for detoxification.</p> <p>Designed to support healthy liver detoxification with an emphasis on Phase II enzyme activity.</p> <p>Phase II enzymes play a vital role in the biochemical process of detoxification, helping the body rid itself of harmful toxins.</p> <p>In addition to providing detoxification support, the specialized ingredients have antioxidant properties, which may help against oxygen free radicals generated during the detoxification process.</p>
PROANTHO-C™	Vitamin C; Grape Seed Extract	<p>Combines grape seed extract – a rich source of the antioxidant bioflavonoid known as proanthocyanidin -- with vitamin C, in the form of Ultra Potent-C®, well-known for its antioxidant properties.</p>
PROBIOPLEX®	Concentrate of Globulin Protein from Whey	<p>Contains patented globulin proteins from whey that may inhibit adherence of a variety of unfriendly microorganisms</p>

		in the intestinal tract.
PROBIOPLEX INTENSIVE CARE™	Fructooligosaccharides; Lactoferrin; Lactoperoxidase; Concentrate of Globulin Proteins	A patented, innovative probiotic support formula containing special fructooligosaccharides which may help promote the growth and activity of friendly bacteria such as Lactobacillus acidophilus and Bitidobacterium infantis. Also contains lactoferrin, lactoperoxidase and a concentrate of globulin proteins that may inhibit adherence of a variety of unfriendly microorganisms in the intestine.
REISHITAKI™	Shitake Mycelia; Reishi Mycelia	Immune system support. Traditionally used in the Orient to promote vitality. The polysaccharides found in Reishitaki nutritionally support the immune system.
SILYMARIN 80	Milk Thistle Extract (Silymarin)	Provides milk thistle extract standardized to 80% silymarin, which has antioxidant properties and nutritionally supports healthy liver function and detoxification.
SUPERGARLIC 3X™	Raw Garlic Concentrate	Garlic is traditionally known for its antioxidant properties and provides support for the cardiovascular system and the immune system. Made from a highly potent “super strain” garlic from the Xiangiang Province of China, cultivated specifically for its health promoting properties.
THYMIC –SYNERGY™	Vitamin C; Zinc	Provides nutritional support for the immune system.
THYMOGEN™	Raw thymus concentrate (bovine)	The thymus gland plays a key role in the body’s immune system.

ULTRA BIFIDUS®	Bifidobacterium infantis culture	Supplemental bifidobacteria is used to help maintain a healthy balance of intestinal flora and is especially useful following antibiotic therapy.
ULTRA BIFIDUS® DF	Bifidobacterium infantis culture	Supplemental bifidobacteria is used to help maintain a healthy balance of intestinal flora and is especially useful following antibiotic therapy.
ULTRA DOPHILUS®	Lactobacillus acidophilus	Lactobacillus acidophilus is used to help maintain a healthy balance of intestinal flora and a healthy intestinal environment.
ULTRA DOPHILUS® DF	Lactobacillus acidophilus	Lactobacillus acidophilus is used to help maintain a healthy balance of intestinal flora and a healthy intestinal environment.
ULTRA EPA-DHA™	Vitamin E; Eicosapentaenoic Acid (EPA); Docosahexaenoic Acid (DHA)	<p>EPA and DHA are polyunsaturated fatty acids that nutritionally support healthy cholesterol levels and cardiovascular health.</p> <p>Promotes healthy cellular balance of these essential fatty acids, which function as precursors for eicosanoid synthesis.</p> <p>A healthy balance of eicosanoids helps to support proper cardiovascular and nervous system function and immune system function.</p>
ULTRA FLORA PLUS®	Fructooligosaccharides; Lactobacillus acidophilus; Bifidobacterium infantis; Globulin Proteins from Whey	<p>Lactobacillus acidophilus and Bifidobacterium infantis -- "friendly" flora that help support a healthy intestinal environment.</p> <p>Fructooligosaccharides are an excellent food source for the beneficial bacteria and help to promote their growth in the intestines.</p> <p>Globulin proteins from whey may inhibit adherence of a</p>

		variety of unfriendly microorganisms in the intestinal tract.
ULTRA FLORA PLUS® DF	Fructooligosaccharides; Lactobacillus acidophilus; Bifidobacterium infantis	Lactobacillus acidophilus and Bifidobacterium infantis “friendly” flora that help to support a healthy intestinal environment. Fructooligosaccharides are an excellent food source for the beneficial bacteria and help to promote their growth in the intestines. Provides a source of excellent natural gastrointestinal probiotic nutrition.
ULTRA POTENT - C® 500	Vitamin C	Supports immune function by promoting increased natural killer cell activity and increased white blood cell movement. In addition to its immune support function and well-known antioxidant properties, vitamin C is essential for the production of collagen and connective tissues.
ULTRA POTENT - C® 1000	Vitamin C	Supports immune function by promoting increased natural killer cell activity and increased white blood cell movement. In addition to its immune support function and well-known antioxidant properties, vitamin C is essential for the production of collagen and connective tissues.
ULTRA POTENT – C® 250mg CHEWABLE	Vitamin C	Supports immune function by promoting increased natural killer cell activity and increased white blood cell movement to the site of the action. In addition to its immune support function and well-

		known antioxidant properties, vitamin C is essential for the production of collagen and connective tissues.
ULTRA POTENT-C® POWDER	Vitamin C	In addition to its well-known function as an antioxidant, vitamin C is essential for collagen production and plays an important role in immune function.
ULTRA PROSTAGEN™	Saw Palmetto; Pumpkin Seeds; Amino Acids; Zinc	Nutritional support for healthy prostate function. Designed to promote healthy prostate function and proper urinary function. Saw palmetto extract may modulate the function of enzymes responsible for maintaining normal hormonal balance and prostate size.
ZINCAID™	Vitamin C; Zinc	Designed to provide nutritional support for the body's defense system.

ETHICAL NUTRIENTS BRAND

20 Day Detox DIGESTIVE SYSTEM™	Dietary Fiber; Fructooligosaccharides; Glutamine; Globulin Protein Complex	Support for intestinal detoxification, beneficial intestinal bacteria & healthy intestinal lining. A combination of soluble and insoluble fibers along with other factors to support healthy function of the digestive tract and reduction of intestinal toxins. The different types of fiber in this formula help promote normal bowel regularity, normal intestinal bacteria, healthy toxin elimination and a healthy intestinal lining.
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		<p>Special bovine antibody complex (globulin protein from whey) is added to inhibit adherence of unfriendly organisms in the intestinal tract.</p> <p>Fructooligosaccharides are added to nourish and support the growth of friendly bacteria such as bifidobacteria.</p> <p>Glutamine and other nutrients are supplied to help support a healthy intestinal lining.</p> <p>May be used as part of a 20 day detoxification program, or on a regular basis to support general health and to help maintain healthy function of the digestive tract.</p>
20 Day Detox INSURANCE™	Beta-Carotene; Vitamin C; Vitamin E	<p>Multivitamin/Mineral and antioxidant for general detoxification support.</p> <p>The antioxidants in this formula help protect against oxidative stress.</p> <p>May be used during a detoxification program, or on a regular basis to support general health and healthy liver detoxification.</p>
20 Day Detox LIVER™	A combination of cruciferous vegetables, vitamin C, citrus bioflavonoid complex, green tea leaf extract, milk thistle extract, grape seed extract	<p>May help promote a balance during liver detoxification and may reduce the oxidative stress that occurs during the detoxification process.</p> <p>May be used during a detoxification program or on a regular basis to support general health and help maintain healthy liver detoxification.</p>
ADRENAL GLANDULAR PLUS™	Pantothenic Acid; Vitamin B6; Vitamin B2	Provides nutritional support for adrenal function. The body's adrenal gland produce

		stress hormones, steroid hormones, and blood pressure regulating hormones.
BONE BUILDER™ with BORON	Boron	Boron is a trace mineral that may play a role in maintaining bone health.
BONE BUILDER™ Chewable	Calcium; Vitamin D; Magnesium; Zinc; Copper; Manganese	Contains calcium and vitamin D plus the added essential minerals magnesium, zinc, copper, and manganese for additional bone support.
BONE BUILDER™ With Magnesium Glycinate	Microcrystalline Hydroxyapatite; Calcium; Phosphorus; Magnesium Vitamin D	Rich in vitamin D for enhanced bone support. Bone Builder is an excellent supplement for those concerned about bone loss or anyone desiring to build and maintain strong, healthy bones.
BONE BUILDER™ with Silica	Microcrystalline Hydroxyapatite; Calcium; Phosphorus; Magnesium; Silica; Vitamin D; Vitamin C	Provides MCHC along with additional calcium, plus silica, magnesium and vitamins that are involved in normal bone formation and metabolism.
BONE BUILDER™ with Silica Plus	Microcrystalline Hydroxyapatite; Calcium; Phosphorus; Calcium; Magnesium; Vitamin D; Vitamin C	A scientifically formulated blend of nutrients designed to support bone formation and strengthening.
CAROTENE PLUS™	Beta-Carotene Complex; Vitamin E	Provides antioxidant protection.
CHROM PICO PLUS™	Chromium	Chromium is an essential component of glucose tolerance factor, assisting insulin in the biochemical regulation of fat, carbohydrate, and protein metabolism and supporting healthy glucose metabolism.
ESTER-C® Maxitabs	Vitamin C	In addition to its well-known function as an antioxidant nutrient, vitamin C is essential for collagen production and plays an important role in immune function.
COLLAGEN SUPPORT TABS™	L-Proline; L-Lysine; L-Cystine; Vitamin C; Iron; Silica	Nutritional support for soft tissue and connective tissue.

		<p>Supports the synthesis of connective tissue during normal growth or following an injury.</p> <p>Contains nutrients known to be involved in the biochemical processes which support the growth and construction of connective tissue.</p>
INNER STRENGTH®	Globulin Protein from Whey	Helps inhibit adherence of unfriendly microorganisms in the intestine.
INTESTINAL CARE™	Fructooligosaccharides; Bifidobacterium infantis; Lactobacillus acidophilus; Globulin Protein from Whey	<p>Lactobacillus acidophilus and Bifidobacterium infantis are two important types of friendly bacteria that help support a healthy intestinal environment.</p> <p>Fructooligosaccharides are an excellent food source for the beneficial bacteria and help to promote their growth in the intestines.</p> <p>Also included in the formula are bioactive globulin protein from whey which may inhibit adherence of a variety of unfriendly microorganisms in the intestinal tract.</p> <p>Provides excellent natural gastrointestinal probiotic nutrition.</p>
INTESTINAL CARE™ DF	Fructooligosaccharides; Lactobacillus acidophilus; Bifidobacterium infantis	<p>Advanced probiotic formula to promote the growth of friendly intestinal bacteria.</p> <p>Lactobacillus acidophilus and Bifidobacterium infantis are two types of friendly bacteria that help support a healthy intestinal environment.</p> <p>In addition, Intestinal Care contains fructooligosaccharides which are an excellent food source for the beneficial bacteria and</p>

		<p>help to promote their growth in the intestines.</p> <p>Provides an excellent, dairy-free source of natural gastrointestinal probiotic nutrition.</p>
INTESTINAL FLORA FACTORS™ Powder	Fructooligosaccharides; Lactoferrin; Lactoperoxidase; Globulin Protein Concentrate	<p>Fructooligosaccharides may help promote the growth and activity of friendly intestinal bacteria, such as <i>Bifidobacteria infantis</i>.</p> <p>Lactoferrin, lactoperoxidase and globulin protein concentrate may help to inhibit adherence of a variety of unfriendly microorganisms in the intestine.</p>
IRON GLYCINATE PLUS™	Iron; Vitamin B6; Vitamin B1; Folic Acid; Vitamin B12; Copper	<p>Nutritional support for Red Blood Cell formation.</p> <p>Contains nutrients for maintaining healthy red blood cells.</p> <p>A synergistic blend of ingredients that support the formation and maintenance of healthy red blood cells.</p>
LIPOTROPIC Plus™	Choline; Inositol; Taurine; DL-Methionine; Trimethylglycine; Vitamin B6; Folic Acid; Vitamin B12	<p>Nutrients for fat metabolism.</p> <p>A highly specialized formula that provides a broad-spectrum, unique blend of lipotropic nutrients (nutrients that play a role in fat metabolism), traditional herbs, and other nutrients used by the liver to help convert cholesterol into bile acids.</p> <p>A unique blend of pharmaceutical grade free-form amino acids, vitamins, minerals, herbs and accessory food factors which are potent lipotropic factors.</p>
MALIC MAGNESIUM™	Magnesium; Malic Acid; Manganese; Vitamin B6;	Nutritional support for muscle function.

	Vitamin B1	<p>Contains nutrients that are involved in energy production in many cells of the body, including muscle cells.</p> <p>Magnesium is an essential co-factor for the production of energy in muscle.</p> <p>Malic acid is an important intermediate in an energy producing metabolic process called the Krebs Cycle. The Krebs Cycle consists of a series of cellular reactions that transform intermediates of sugars, fatty acids and amino acids into metabolites which are used to manufacture energy in each cell of the body.</p>
MAXI BIFIDUS™	Bifidobacterium infantis	Supplemental bifidobacteria is used to help maintain a healthy balance of intestinal flora and may be especially useful following antibiotic therapy.
MAXI BIFIDUS™ DF	Bifidobacterium infantis	Can be used routinely by people of all ages (infants to senior citizens) as a food supplement to secure and maintain a healthy GI flora.
MAXI DOPHILUS™	Lactobacillus acidophilus	L. acidophilus is used to help maintain a healthy balance of intestinal flora and healthy intestinal environment.
MAXI DOPHILUS™ DF`	Lactobacillus acidophilus	Preliminary studies have shown that the NCFM strain is capable of producing numerous benefits that may be important to human health.
MAXIGEST™	Pepsin; Gentian Rose; Betaine Hydrochloride (HCL)	Provides betaine HCL, a source of hydrochloric acid which initiates the digestive process, combined with the proteolytic enzyme pepsin (porcine-derived) and gentian root, an herbal bitter traditionally used to support

		digestion.
MILK THISTLE	Milk thistle extract (Silymarin)	<p>Nutritional support for the liver.</p> <p>This formula is standardized to 80% silymarin, which has antioxidant properties and nutritionally supports healthy liver function and detoxification.</p>
MYCEL® Vitamin E	Vitamin E	Vitamin E is nature's fat soluble antioxidant "cell protector" and is involved in the proper functioning of all major organ systems in the body.
OPTIMUM LEVELS ANTIOXIDANT™	Beta-Carotene; Vitamin C; Vitamin E; Selenium	Provides broad nutritional support against free radicals.
SHITAKI REISHI™	Reishi and Shitaki Mushroom Concentrate	The Chinese tree mushrooms are traditionally used in the Orient to promote vitality. They are rich in polysaccharides which support immune function.
STRESS B-COMPLEX	B-Complex Vitamins (Niacinamide, Vitamin B6, Vitamin B2, Vitamin B1, Vitamin B12)	B-complex vitamins are actively involved in the breakdown and metabolism of carbohydrates, proteins and fats for energy production.
THYRO-VITAL™	L-Tyrosine	<p>Provides nutrients for healthy thyroid function. The thyroid gland produces thyroxine, an important hormone which regulates the body's basal metabolic rate.</p> <p>Optimal thyroid function helps to maintain normal weight, energy level and mental alertness.</p> <p>Nutritional support for metabolism.</p>
TRI-GEST™	Protease; Amylase; Lipase	<p>Nutritional support for digestive function.</p> <p>A comprehensive enzyme complex containing high levels of each of the three key</p>

		enzyme categories for digestive function: protease for protein digestion, amylase for starch digestion and lipase for fat digestion.
TRU-GARLIC™	Raw Garlic Concentrate	Allicin is a key component of garlic that may be associated with certain health benefits.
TURMERIC FLAVONOID COMPLEX™	Lemon Bioflavonoid Complex; Vitamin C; Ginger Extract; Turmeric Rhizome	Provides a scientifically formulated blend of phytochemicals from the select herbs, ginger and turmeric, together with citrus bioflavonoid complex and vitamin C, that may inhibit the production of PGE2 and leukotrienes.
WOMEN'S CHANGE™	Ginseng; Bioflavonoids; Vitamin E; Vitamin B5 (Pantothenic Acid); PABA; Vitamin C; Ginseng	Provides nutrients to support health and well-being during menopause. A unique blend of ginseng, vitamins, adrenal concentrate and bioflavonoids, formulated to provide nutritional support to women during menopause.
WOMEN'S MULTI™	Vitamin A; Beta-Carotene; Vitamin C; Niacinamide; Vitamin B5 (Pantothenic Acid); Choline; Bioflavonoid complex; Vitamin B6; Vitamin D; Vitamin E; Vitamin B12; Vitamin B2; Folic Acid; Vitamin B1; L-Tyrosine; Calcium; Magnesium; Potassium; Manganese; Zinc; Iron; Copper; Chromium; Iodine; Dong Quai Root; Ginger Root; Licorice Root	Premenstrual formula. Contains nutrients and traditional Chinese herbs that may help promote balance particularly during the premenstrual period.

UNIPRO BRAND

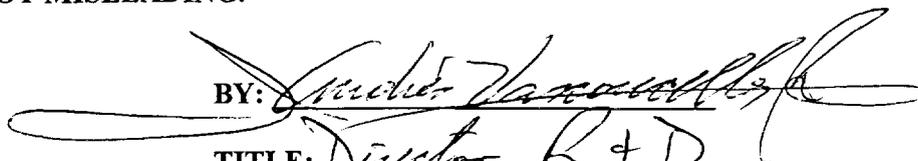
TRIBULUS SYNERGY™	Withania somnifera; Mucuna pruriens; Nelumbium speciosum; Tribulus terrestris extract	Contains a blend of Ayurvedic herbs traditionally used for strength and vitality.
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AMINO 1000	Amino acids from whey protein hydrolysate	<p>Predigested lactalbumin may be easily absorbed and produce higher nitrogen retention than free form amino acids.</p> <p>Amino acids are important for lean muscle tissue growth, endurance, and hormone and antibody production.</p>
ATHLETE'S ANTIOXIDANT™	Beta-Carotene; Vitamin E; Vitamin C	<p>Helps fight free radical damage</p> <p>Antioxidants help fight free radical damage to muscle resulting from increased oxygen use and exercise.</p>
BASIC PLUS™	A multiple vitamin and mineral supplement	<p>Provides micronutrients for the nutritional support of protein, carbohydrate and fat metabolism.</p> <p>Contains vitamins, minerals and other nutrients which play a role in oxygen, fat, carbohydrate and amino acid metabolism.</p>
CLA	Conjugated Linoleic Acid	Product may play a role in eicosanoid modulation.
CREATINE PHASE I™: MUSCLE LOAD	Creatine Monohydrate	<p>The theory behind oral supplementation with creatine is that creatine phosphate, which is synthesized in the body from creatine may provide a rapid means of forming energy at the onset of muscular contraction.</p> <p>A recent study indicates that creatine supplementation may increase leg muscle torque. Further research is needed to confirm these effects.</p>
CREATINE PHASE II™ MUSCLE MAINTENANCE	Creatine Monohydrate	The theory behind oral supplementation with creatine is that creatine phosphate, which is synthesized in the body from creatine, may provide a rapid means of forming energy at the onset of

		<p>muscular contraction.</p> <p>Creatine supplementation may increase leg muscle torque. Further research is needed to confirm these effects.</p>
CREATINE PLUS™	L-Carnitine; B-Vitamins; Betaine; Choline; Inositol	<p>Nutritional support for fat metabolism.</p> <p>Provides nutrients which play a role in the conversion of fat to energy during exercise.</p> <p>Contains nutrients involved in fat metabolism, such as methyl donors, lipotropic agents and L-carnitine. These nutrients may play a role in the conversion of fat to energy during exercise.</p>
DMG	Dimethylglycine	<p>May provide methyl donor for energy production.</p> <p>Supplies methyl groups which are used in the generation of metabolic energy.</p>
MYO-SYSTEM XL™	Blend of high amylose cornstarch and beta-glucan rich oat fiber; Fructose	<p>Includes a special blend of carbohydrates (a blend of high amylose cornstarch and beta-glucan rich oat fiber) which may be beneficial in the modulation of healthy blood glucose levels. This offers the advantage of an excellent energy source, designed not to cause a rapid rise in blood sugar.</p> <p>Fructose has a very low glycemic index which may help in controlling blood sugar.</p> <p>A special blend of carbohydrates designed to provide energy without causing a high glycemic effect (extreme rise in blood sugar).</p>

MUSCL-FLEX™	100% Pure lyophilized (freeze-dried) Perna Canallculus Mussel	Nutritional support for soft tissues. May be nourishing to the soft tissues.
UNIPRO'S PERFECT PROTEIN®	Hydrolized Whey Protein	Contains easy to absorb forms of amino acids which may be excellent for absorption and nitrogen retention.

THE UNDERSIGNED CERTIFIES THAT THE INFORMATION IN THIS NOTICE IS COMPLETE AND ACCURATE AND THAT METAGENICS, INC. HAS SUBSTANTIATION THAT THE STATEMENTS CONTAINED HEREIN ARE TRUTHFUL AND NOT MISLEADING.

BY: 
 TITLE: Director, R & D