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Mr. Lawrence Tabak  
Tabak's Health Products  
3198 Airport Loop Drive  
Suite G  
Costa Mesa, California 92626

Dear Mr. Tabak:

This is in response to your letter of December 20, 2000 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission states that Tabak's Health Products is making the following claims, among others, for the products below:

**BetiPlus™**

"...maintain healthy blood sugar levels..."

**HeartShield™**

"...prevention of coronary heart disease..."

**Mega JointWellness™**

"...relieve pain, stiffness, inflammation and tenderness..."

21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statements that you are making for these products suggest that they are intended to treat, prevent, cure, or mitigate diseases. These claims do not meet the requirements of 21 U.S.C. 343(r)(6). These claims suggest that these products are intended for use as drugs within the meaning of 21 U.S.C. 321(g)(1)(B), and that they are subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA's Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, 7520 Standish Place, Rockville, Maryland 20855.

975-0163

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You also made a submission for the product **SlenderBlend™**. This product is claimed to be a "meal replacement drink." This product is not a dietary supplement within the meaning of 21 U.S.C. 321(ff). This product is a conventional food. 21 U.S.C. 321(ff) states, in part, that the term dietary supplement means a product that "is not represented for use as a conventional food or as a sole item of a meal or the diet." Therefore, if you intend to market this product as a dietary supplement, it may not be represented as a meal replacement or, in any other manner, as a conventional food.

Please contact us if we may be of further assistance.

Sincerely,

*for Robert Moore*

John B. Foret

Director

Division of Compliance and Enforcement

Office of Nutritional Products, Labeling

and Dietary Supplements

Center for Food Safety

and Applied Nutrition

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-300

FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of Enforcement, HFC-200

FDA, Los Angeles District Office, Office of Compliance, HFR-PA240

cc:

HFA-224 (w/incoming)

HFA-305 (docket 97S-0163)

HFS-22 (CCO)

HFS-800 (r/f, file)

HFS-810

HFS-811 (file)

HFD-40 (Behrman)

HFD-310

HFD-314 (Aronson)

HFS-605

HFV-228 (Benz)

GCF-1 (Nickerson)

f/t:HFS-811:afp:5/30/01:docname:73931:disc4

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**Products**

20/20 Caps™

Arthritis-Ease®

BetiPlus™

BoneKeeper™

CholestLo™

DreamCaps™

EnergyCaps™

GluChon 1500™

GoodMood  
Food™

HeartShield™

Mega  
JointWellness™

The  
MegaWellness™  
Systems

Nature's  
Shape™

PotencyPlus™

ProstLo™

ReFaze™

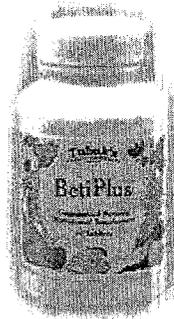
ReguCleanse™

SensiClean™ &  
SensiMask™

SlenderBlend™

Slimming Tea™

ThinkCaps™



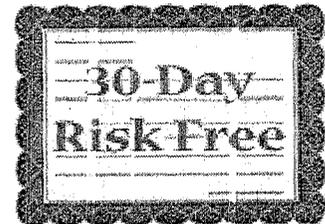
*Added nutritional support*

**Help Maintain Healthier  
Blood Sugar Levels... Naturally**

(Not intended to have an effect on abnormal blood glucose)

**BetiPlus™** contains dietary ingredients designed to nutritionally support your body. Here's what's been said about some of the ingredients in **BetiPlus™** . . .

- Bitter Melon Fruit Extract was found to enhance blood glucose balance.<sup>6</sup>
- Alpha-lipoic Acid has been shown to help support healthy blood sugar levels.<sup>7</sup>
- Vanadyl sulfate has been shown to help maintain healthy blood glucose.<sup>8</sup>
- Fenugreek Seed was shown to help maintain a balance between critical blood components.<sup>9</sup>
- Biotin was found to have a positive effect on glucose.<sup>10</sup>



Two **BetiPlus™** tablets per day, as part of your healthy diet and exercise plan, provides meaningful nutritional support to help maintain the quality of your life.

**\$25.97**

[Click Here!  
To Order](#)

**Contains:**

Vitamin C, Thiamin, Riboflavin, Niacin, Vitamin B6, Folate, Vitamin B12, Biotin, Pantothenic acid, Magnesium, Zinc, Copper, Chromium, Alpha-Lipoic acid, Bitter melon fruit extract, Gymnema leaf extract and Vanadyl sulfate.

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease. Never stop taking medications without first consulting your doctor. Not intended to have an effect on abnormal blood glucose.

# Superior, Science-Based Nutritional Supplements

Some people wonder how Tabak's Health Products - which started just six years ago - became a *leading* direct marketer of nutritional supplements.

Actually, the answer is quite simple. It's because of our core belief that, above all else, we must provide **superior, science-based nutritional supplements, that improve the quality of your life.**

Take Red Yeast Rice powder, the main ingredient in our CholestLo™ product, as a prime example.

Clinical tests using Red Yeast Rice powder, standardized to .4% showed that it supports healthy cholesterol levels.

Powder not standardized like this simply won't work. Ours, on the other hand, which is standardized to .4%, produces the desired effect!

**What we do in our research department is select ingredients for our formulas that are based on science.**

This means we search for clinical studies that show how an ingredient actually affects the structure or function of your body in a beneficial way.

We dig further to see what daily dose was used in the study.

We look at the specification or standardization of the ingredient.

Then, when we order our raw materials, we insist on receiving a Certificate of Analysis to verify it meets our standards. (See the example below).

More importantly, the ingredients we select are based on science - *not* on cost. We are not interested in making cheap products.

Instead we create superior formulas that can enhance your health and improve the quality of your life!

When it comes to your body and your health, believe us, you want the best.

**Our pledge to you**  
You get superior, science-based formulas.

Plus, the ingredients are supported by clinical trials proving how they affect the structure and function of your body in a positive way.

The bottom line? Our formulas can *actually* enhance your health and impact your life, like never before! Therefore, they are worth *far more* than the small amount we ask for them! You have our word on it!



Supplement Facts	
Serving Size: 1 Capsule Servings per Container: 60	
Amount Per Serving:	% Daily Value*
Vitamin E (as dl-alpha tocopherol acetate)	10IU 33%
Niacin	10 mg 50%
Chromium (as chromium polynicotinate)	200 mcg 167%
Red Yeast Rice Extract (Monascus purpureus) (standardized to 0.4%)	600 mg *
Beta 1,3 D-Glucan	350 mg *
Hawthorn Berry (Crataegus cuneata)	100 mg *
*Daily Value not established Other ingredients: Cellulose, Calcium Phosphate Hydrous, Magnesium Stearate and Stearic Acid	
In the example above, note how the certificate of analysis - that we insist on receiving - confirms the ingredient meets our standards.	

CERTIFICATE OF ANALYSIS		
PRODUCT: RED YEAST RICE EXTRACT 0.4%		
LOT NUMBER: 145495		
ITEM	SPECIFICATION	RESULT
SPECIES:	Monascus purpurea	CONFORMS
APPEARANCE:	POWDER	CONFORMS
COLOR:	RED TO DARK RED	CONFORMS
ODOR:	TYPICAL	CONFORMS
TASTE:	CHARACTERISTIC	CONFORMS
MOISTURE:	NOT MORE THAN 8.0%	3.5%
(CSC MOISTURE 56 @ 65 TEMP)		
CARRIER:	TERRA ALBA	CONFORMS
LOVASTATIN:	NOT LESS THAN 0.4%	0.45%
(HPLC)		
Date: April 19, 1999		QUALITY CONTROL 4012
EXAMPLE		

A portion of our profits go directly to the Leukemia & Lymphoma Society.

This product is not intended to diagnose, treat, cure or prevent a disease, but rather is a dietary supplement intended solely for dietary support. These statements have not been evaluated by the Food and Drug Administration. Do not change or stop taking any prescription medicine without consulting your doctor. If you are pregnant or lactating, consult your doctor before use. Keep out of reach of children. Individual results will vary. Follow label directions. **Not intended to have an effect on abnormal blood glucose.**

Our Guiding Philosophy:

**Superior, Science-Based Nutritional Supplements**

# Advanced Nutritional Support For Maintaining Healthy Blood Glucose

(Not intended to have an effect on Abnormal Blood Glucose)

Dear friend,

Here's an exciting opportunity for you to try **BetiPlus™** - a special formula that can help support normal blood sugar levels.

Here's what's been discovered about some of the ingredients in **BetiPlus™**:

- \* *Bitter Melon fruit extract* was found to maintain healthy blood glucose levels.<sup>1</sup>
- \* *Alpha-lipoic acid* has been shown to have beneficial effects in supporting the balance of critical components of the blood.<sup>2,3,4</sup>
- \* *Vanadyl sulfate* has been shown to help keep blood sugar

levels within the normal range.<sup>5,6</sup>

\* A recent Japanese clinical study concluded that *biotin* has a positive effect on blood.<sup>7</sup>

\* The effect of *fenugreek* seed on blood glucose levels has been well documented.<sup>9</sup>

## Suggested Dosage

Take two tablets daily with food. You may either take them together or one in the morning and one later on in the day. It's up to you.

If you have any questions, please consult your Health Care Professional before use.

(over, Please)



Friendly, knowledgeable customer service is a top priority at Tabak's Health Products.

## Supporting References

1. Welihinda J, et al.: "Effect of Momordica charantia on the glucose tolerance in maturity onset diabetes." *J Ethnopharmacol* 1986 Sep; 17(3): 277-82.
2. Packer L, et al.: "alpha-Lipoic acid as a biological antioxidant." *Free Radic Biol Med* 1995 Aug; 19(2): 227-50.
3. Packer L, et al.: "Neuroprotection by the metabolic antioxidant alpha-lipoic acid." *Free Radic Biol Med* 1997; 22(1-2): 359-78.
4. Ziegler D, et al.: "Treatment of symptomatic diabetic peripheral neuropathy with the anti-oxidant alpha-lipoic acid. A 3-week study multicentre randomized controlled trial (ALADIN Study)." *Diabetologia* 1995 Dec; 38(12): 1425-33.
5. Boden G, et al.: "Effects of vanadyl sulfate on carbohydrate and lipid metabolism in patients with non-insulin-dependent diabetes mellitus." *Metabolism* 1996 Sep; 45(9): 1130-5.
6. Poucheret P, et al.: "Vanadium and diabetes." *Mol Cell Biochem* 1998 Nov; 188(1-2): 73-80.
7. McCarty MF. "High-dose biotin, an inducer of glucokinase expression, may synergize with chromium picolinate to enable a definite nutritional therapy for type II diabetes." *Med Hypotheses* 1999 May; 52(5): 401-6.
8. Sharma RD, et al.: "Effect of fenugreek seeds on blood glucose and serum lipids in type I diabetes." *Eur J Clin Nutr* 1990 Apr; 44(4): 301-6.

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**BetiPlus™**

BetiPlus™ contains special ingredients for advanced nutritional support. More importantly, they can help you maintain blood sugar levels in a healthy range. Naturally.

*Bitter Melon fruit extract, Alpha-lipoic acid and Vanadyl sulfate help to keep blood components in a normal state of balance.*

As part of your healthy diet and exercise plan, BetiPlus™ can help maintain your quality of life! (Not intended to have an effect on abnormal blood glucose.)

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**HeartShield™**

HeartShield™ is one of the best comprehensive supplements I've ever seen to support and maintain a healthy heart. It contains ...

*Coenzyme Q10:* which promotes a healthy cardiovascular system.

*Folic Acid:* is important in maintaining a healthy heart muscle.

*Vitamin E:* is a powerful antioxidant which helps promote a healthy circulatory system.

*Selenium:* helps protect red blood cells and other cell membranes.

*Magnesium:* helps maintain healthy artery walls and normal blood pressure.

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# Important Facts You Should Know About Your HeartShield™ And Keeping Your Heart Healthy!

Dear friend,

Here's an exciting opportunity for you to try HeartShield™ - an amazing nutritional supplement designed especially for the maintenance of a healthy cardiovascular system.

Cardiovascular disease claims more than one million lives annually. Over forty million Americans have some form of heart or blood vessel disease.

Many of these people display no symptoms.

They are completely unaware of a potentially serious illness until . . . they suffer a heart attack or stroke.

Today, by changing your diet and exercise program and by using the ingredients found in HeartShield™, you can lower your chances of becoming one of these heart disease "statistics."

## Proper Dosage

Like all vitamins, HeartShield™ should be taken *with* food. The recommended dose is two capsules a day. It doesn't matter whether you take one in the morning and one at night, or both in the morning or both at night. You should take them whenever it suits your individual needs.

Proper diet and exercise should be combined with HeartShield™. Favorable cardiovascular effects have been reported with the use of unsaturated fatty acids, vegetarian and semi-vegetarian diets, dietary fiber, plant sterols, vitamins and minerals.<sup>1</sup>

Your diet should be a low-calorie diet, which includes lots of fruits and vegetables. Moderate exercise such as walking, jogging or swimming would be ideal. We

highly recommend that you make the proper changes in your diet while using HeartShield™.

The components of HeartShield's™ unique formula were designed to help maintain healthy cholesterol levels, sustain optimum blood pressure levels, and promote proper arterial flow. HeartShield™ contains the following scientifically researched ingredients:

*Coenzyme Q10*: increases cardiac output and enhances functional capacity.<sup>2</sup> Over an eight year study Coenzyme Q10 was shown to promote a healthy cardiovascular system.<sup>3</sup>

*Folic Acid*: along with Vitamin B6 may be important in the primary prevention of coronary heart diseases shown in a study published in JAMA.<sup>4,5</sup>

*Vitamin E*: supports a healthy heart.<sup>6</sup>

*Selenium*: is important to your heart because it is an essential component of the enzymes GPX and PHGPX, which protect red blood cells and other cell membranes from damage.<sup>7</sup>

*Magnesium*: is another key mineral for protecting heart health. How does magnesium help your heart? When fatty acid levels increase in your bloodstream, due to emotional stress, your magnesium level is reduced. Therefore, it's a good idea to supplement your diet with magnesium. In addition, it helps to protect your artery walls from damage due to sudden blood pressure increases, so it's important for you to maintain an adequate level of magnesium in your bloodstream.<sup>8</sup>

*Ginkgo Biloba Extract*: acts as a vasodilator, helping to open up



Friendly, knowledgeable customer service is a top priority at Tabak's Health Products.

blood vessels and therefore allow better blood flow. It helps to keep your heart and the rest of your body well supplied with blood, oxygen, and vital nutrients.<sup>9,10</sup>

. . . Your heart is the center of your body's energy and vitality. Therefore, it's critical to take excellent care of your cardiovascular system. HeartShield™, with its unique formula, gives your heart optimum nutritional support, when combined with proper diet and exercise.

The sooner you start using HeartShield™, the sooner your heart and cardiovascular system can benefit from this advanced formula.

## Satisfied customers agree, HeartShield™ lives up to its name

"I decided to give HeartShield™ a try. First I showed it to my doctor. He said it was OK to take. After taking it for a month, I feel that my heart is on a healthy path. I'd recommend HeartShield™ to anyone."

— José Delapeña, FL

"I'm a retired aircraft electrician. I was already taking Selenium, Ginkgo Biloba and Coenzyme Q10 when I found out about HeartShield™. I'm 65 and I've never had any heart problems, and I want to keep it that way. If you're concerned about your heart, you should try HeartShield™ too."

— John Worthey, MI

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Niacin	10 mg	50%
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Red Yeast Rice Extract (Monascus purpureus) (standardized to 0.4%)	600 mg	
Beta-1,3-D-Glucan	300 mg	
Hawthorn Berry (Crataegus cuneata)	100 mg	*

\*Daily Value not established  
Other ingredients: Cellulose, Calcium Phosphate Hydrate, Magnesium Stearate and Stearic Acid

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Date: April 19, 1999		QUALITY CONTROL 4012
EXAMPLE		

## Supporting References

- Kendler BS. "Recent nutritional approaches to the prevention and therapy of cardiovascular disease." Prog Cardiovasc Nurs. 1997 Summer;12(3):3-23.
- Sacher HL, et al: "The clinical and hemodynamic effects of coenzyme Q10 in congestive cardiomyopathy." Am J Ther. 1997 Feb 1;4(2/3):66-72.
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Feb4;279(5):359-64.

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- Murasato Y, et al: "Effect of magnesium\

deficiency on autonomic circulatory regulation in conscious rats." Hypertension. 1999 Aug;34(2): 247-52.

- Tosaki A, et al: "Ginkgo biloba extract (Egb 761) improves postschemic function in isolated pre-conditioned working rat hearts." Coron Artery Dis. 1994 May;5(5):443-50.
- Pietri S, et al: "Ginkgo biloba extract (Egb 761) pretreatment limits free radical-induced oxidative stress in patients undergoing coronary bypass surgery." Cardiovasc Drugs Ther. 1997 Apr;11(2):121-31.
- Gore JM and Dalen JE. "Cardiovascular disease." JAMA. 1994 Jun 1;27(21):1660-1.

A portion of our profits go directly to the Leukemia & Lymphoma Society.

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Our Guiding Philosophy:

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SensiMask™

SlenderBlend™

Slimming Tea™

ThinkCaps™



*Specially formulated for your heart!*

**Keep Your Heart Healthy With These  
Powerful "Cardio" Nutrients**



**"Felt Dramatically Better - More Energy"**

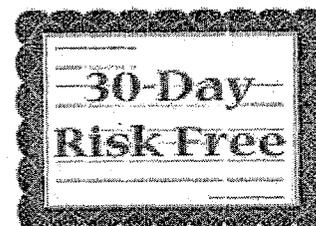
"I started taking HeartShield™ twice a day... along with a healthier diet and exercise program... within two weeks, I felt dramatically better! I now have more energy to do things."

- Bill Shick, age 68

A strong, healthy heart is a key to a lifetime of good health. Now, you can take an amazing nutritional supplement called **HeartShield™** to help you . . .

- Maintain a healthy cardiovascular system.
- Sustain optimum blood pressure levels.
- Promote proper arterial flow.
- Maintain a healthy heart, safely and naturally.

All of these benefits - and many more - are possible with a formula that includes: Coenzyme Q10, a vitamin-like substance that supports your heart muscle<sup>25</sup> . . . Folic Acid, which helps regulate the level of homocysteine in your blood<sup>26</sup> . . . Selenium, which has been called a "heart-specialized antioxidant"<sup>27</sup> . . . Vitamin E, Hawthorne and other heart-healthy nutrients.



**\$29.97**

[Click Here!  
To Order](#)

**Contains:**

Vitamin E, Vitamin B6, Folate, Vitamin B12, Magnesium, Selenium, Coenzyme Q10, Ginkgo biloba leaf extract, Hawthorne berry, Cayenne pepper, Garlic bulb (odorless), L-taurine and Choline.

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease. Never change or stop taking medications without first consulting your doctor. Testimonials should be considered a best case scenario. Individual results will vary.

**Mega JointWellness™**

It seems odd to me because our customers - lots of them - say it helps maintain healthy joints. It does so by helping your body produce more collagen - the building block of your joint cartilage. With sufficient cartilage your joints can function normally, without grinding together.

In addition, Mega JointWellness™ supplies a glucosamine/chondroitin complex that supports tissue, ligament and muscle health as well as enhances the elasticity of your cartilage. Mega JointWellness™ truly is EXCELLENT in helping to give your joints a full range of motion.

# Support the formation of Healthy Joint Connective Tissue

Dear friend,

Here's an exciting opportunity for you to try Mega JointWellness™ - a powerful, nutrient-rich supplement, with ingredients proven to promote joint wellness.

One slightly rounded scoop of Mega JointWellness™ contains:

Gelatin, Hydrolyzed Collagen and MSM (methyl-sulfonyl methane) complex . . . .6.6 g.  
Glucosamine Sulfate and Chondroitin Sulfate blend . . . .1500mg.  
Vitamin C (ascorbic acid) . . . .300mg.

Stevia extract (Stevia rebaudiana bertonii) . . .60mg.

Mega JointWellness™ contains a unique combination of co-factors specially formulated to support healthy cartilage formation.

How?

By supplying the essential building blocks of collagen.

What is collagen, you ask? It's the key structural element of your cartilage.

Collagen is the "glue", if you will, that keeps your cartilage intact and functioning properly. Without sufficient collagen, your cartilage simply dries out and wears away. Then, when you move, your bones "grind" together where they join. This can cause serious discomfort.

How can you avoid this? Or help reverse this trend if it's already begun?

Spur your body to produce more collagen.

And that's exactly what the ingredients in Mega JointWellness™ do. They supply the co-factors you need to make more collagen.

But there's even more exciting news. Mega JointWellness™ also supplies a 1500-mg. Glucosamine/chondroitin complex, which is known to:

- \* Support the formation of healthy joint connective tissue in knees, elbows, back, fingers, knuckles, hips and shoulders
- \* Support the creation of healthy synovial fluid for lubricating your joints properly
- \* Enhance the elasticity of your vertebrae and promote spinal disk wellness
- \* Support the natural formation of cartilage and ligaments for normal joint function

Best of all, results can be noticed within 6-8 weeks of using Mega JointWellness™ daily.

Tip: Mix Mega JointWellness™ with your favorite hot or cold non-carbonated beverage - tea, orange juice, apple juice, etc. Don't mix into plain water. It can taste a little odd that way, and you might not drink it! You can also try mixing it into your breakfast cereal or oatmeal, or even into apple sauce.

Mixing the product with apple juice or orange juice seems to be favored amongst our customers. It would be worthwhile for you to experiment mixing it into different beverages (or foods) to find the taste that suits you best. If you take the time to do this, you are more likely to take it each day and therefore, it will work for you.

Place the powder in your glass before you pour in the beverage. It dissolves better that way. One "slightly" rounded scoop should be mixed into your favorite beverage daily.



Friendly, knowledgeable customer service is a top priority at Tabak's Health Products.

Mega JointWellness™ is the perfect nutritional drink to take every day for optimal joint health. It contains no sugar, yeast or starch. Nothing is artificial. And it has no unwanted side effects.

It's completely safe. Natural. And effective.

It *can* and *should* be combined with Arthritis-Ease®, the homeopathic remedy to relieve pain, stiffness, inflammation and tenderness in joints. Arthritis-Ease® is available from Tabak's Health Products.

P.S. Mega JointWellness™ promotes joint wellness. Please do begin taking it today.

P.P.S. Please note: You may see little white "flakes" floating in your drink after you mix it. This is quite normal and you should not be able to taste them at all.

### "Seems To Help Joints In Feet!"

"After I fractured my feet in an accident in 1983, I had a lot of discomfort when walking. My feet were always bothering me! I started using Mega JointWellness™ after seeing a Tabak's Health Products catalog. It seems to help the joints in my feet, and now I'm able to walk much better."

-Stuart Taba, III

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We look at the specification or standardization of the ingredient.

Then, when we order our raw materials, we insist on receiving a Certificate of Analysis to verify it meets our standards. (See the example below).

More importantly, the ingredients we select are based on science - *not* on cost. We are not interested in making cheap products.

Instead we create superior formulas that can enhance your health and improve the quality of your life!

When it comes to your body and your health, believe us, *you want the best.*

## Our pledge to you

You get superior, science-based formulas.

Plus, the ingredients are supported by clinical trials proving how they affect the structure and function of your body in a positive way.

The bottom line? Our formulas can *actually* enhance your health and impact your life, like never before!

Therefore, they are worth *far more* than the small amount we ask for them! You have our word on it!



Supplement Facts	
Serving Size: 1 Capsule Servings per Container: 60	
Amount Per Serving:	% Daily Value*
Vitamin E (as dl-alpha tocopherol acetate)	10IU 33%
Niacin	10 mg 50%
Chromium (as chromium polynicotinate)	200 mcg 167%
Red Yeast Rice Extract (Monascus purpureus) (standardized to 0.4%)	600 mg *
Beta-1,3-D-Glucan	200 mg *
Hawthorn Berry (Crataegus cuneata)	100 mg *
*Daily Value not established	
Other ingredients: Cellulose, Calcium Phosphate Hydrous, Magnesium Stearate and Stearic Acid	
In the example above, note how the certificate of analysis - that we insist on receiving - confirms the ingredient meets our standards.	

## CERTIFICATE OF ANALYSIS

PRODUCT: RED YEAST RICE EXTRACT 0.4%		
LOT NUMBER: 145495		
ITEM	SPECIFICATION	RESULT
SPECIES:	Monascus purpurea	CONFORMS
APPEARANCE:	POWDER	CONFORMS
COLOR:	RED TO DARK RED	CONFORMS
ODOR:	TYPICAL	CONFORMS
TASTE:	CHARACTERISTIC	CONFORMS
MOISTURE:	NOT MORE THAN 8.0%	3.5%
(ISC MOISTURE 56 @ 65 TEMP)		
CARRIER:	TERRA ALBA	CONFORMS
LOVASTATIN:	NOT LESS THAN 0.4%	0.45%
(HPLC)		
Date: April 19, 1999		QUALITY CONTROL 4012
EXAMPLE		

## Supporting References

- Crolle G and D'Este E: "Glucosamine sulfate for the management of arthrosis." *Current Therapeutic research* 7: 104-9 (1980).
- Tapadinhas MJ, et al.: "Oral glucosamine sulfate in the management of arthrosis: Report on a multi-centre open investigation in Portugal." *Pharmatherapeutica* 2: 157-68 (1982).
- Morreale, RM.: "Comparison of the Anti-inflammatory Efficacy of Chondroitin Sulfate and Diclofenac Sodium in Patients with Knee Osteoarthritis." *Journal of Rheumatology* 23: 1385-91 (1996).
- Mazieres, B. et al.: "Revue du Thumatism et des Maladies Osteo-Articulaires" 50(7-8): 466-72 (1992).
- Pipitone, V.R.: "Chondroprotection with Chondroitin sulfate." *Drugs in Experimental and Clinical Research* 17(1): 3-7 (1992).
- DOAmbrosio E, Casa B, Bompasi R, et al.: "Glucosamine sulphate: a controlled clinical investigation in arthrosis." *Pharmatherapeutica* 2: 504-508 (1998).
- Kelly GS, "The role of glucosamine sulfate and chondroitin sulfates in the treatment of degenerative joint disease." *Altern Med Rev* 3(1): 27-39 (1998).
- Brown KE, et al.: "Gelatin/chondroitin G-sulfate microspheres for the delivery of therapeutic proteins to the joint." *Arthritis Rheumatology* 41(12): 2185-95 (1998).
- Pujalte JM, et al.: "Double-blind clinical evaluation of oral glucosamine sulphate in the basic treatment of osteoarthritis." *Curr Med Res Opin* 7: 110-114 (1980).

A portion of our profits go directly to the Leukemia & Lymphoma Society.

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease. Never stop taking medications without first consulting your doctor. Testimonials should be considered a best case scenario. Results will vary.

Our Guiding Philosophy:

**Superior, Science-Based Nutritional Supplements**

1-3020

1-3020

1-3020

Read this only  
if you've  
decided NOT to  
send for your  
FREE TRIAL.

Read this only  
if you've  
decided NOT to  
send for your  
FREE TRIAL.

Read this only  
if you've  
decided NOT to  
send for your  
FREE TRIAL.

I've racked my brains. I can't think of one reason not to send in your ~~FREE TRIAL Coupon.~~

When you do, you'll receive a 30-day supply of Mega JointWellness™ to sample.

Try it out and see how it supports healthy cartilage formation and normal joint functioning.

If you feel that Mega JointWellness™ has helped you, pay the bill that comes with it.

If not, send it back and pay us nothing. There will be no questions asked and you won't owe us a dime.

Go to your FREE TRIAL Coupon. Tear it off. Pop it in the mail. Today. It's that easy.

I've racked my brains. I can't think of one reason not to send in your ~~FREE TRIAL Coupon.~~

When you do, you'll receive a 30-day supply of Mega JointWellness™ to sample.

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If not, send it back and pay us nothing. There will be no questions asked and you won't owe us a dime.

Go to your FREE TRIAL Coupon. Tear it off. Pop it in the mail. Today. It's that easy.

# FREE 30-DAY TRIAL

[DATE]

[KEY CODE]

[FIRSTNAME, LASTNAME]  
[STREET ADDRESS]  
[CITY, STATE, ZIPCODE]

[FIRSTNAME, make corrections above if needed.]

Tear Here and Mail Today!

From The Desk of:

*Lawrence Tabak*

RE: FREE 30-DAY TRIAL of Unique Nutrition Formula Promotes  
Normal Cartilage Formation and Healthy Joints.

To: [Firstname] [Lastname]  
[Street Address]  
[Cityname], [ST] [Zipcode]

[Month] [Date], [Year]

Dear [Firstname],

I'd like to send you a FREE 30-DAY TRIAL of Mega JointWellness™  
- an amazing all-natural drink that supports proper joint function.

Taking Mega JointWellness™ Really Promotes Joint Health!

Here's why: Mega JointWellness™ contains a unique combination of  
co-factors specially formulated to maintain healthy joint cartilage.

In fact, these clinically proven ingredients actually help your  
joints to function properly and normally.

How [FIRSTNAME]?

By supplying the essential building blocks of collagen.

Collagen is the key structural element of your cartilage. It's  
the "glue", if you will, that keeps your cartilage intact and  
functioning properly.

Without sufficient collagen, your cartilage simply dries out and  
wears away. Then, when you move, your bones "grind" together where  
they join. This can cause serious discomfort.

How can you avoid this? Or help reverse this trend if it's  
already begun?

Simple.

Spur your body to produce more collagen.

And that's exactly what the ingredients in Mega JointWellness™  
do. They supply the co-factors you need [FIRSTNAME] . . .

(Please turn over)

## **30-DAY FREE TRIAL**

Mail To:  
Tabak's Health Products  
30-Day  
**FREE TRIAL**  
Priority Order Processing Center  
3198 Airport Loop Drive Suite G  
Costa Mesa, CA. 92626-3407

(Make Corrections To Your Name or Address on Other Side if Needed)

Mail Coupon Today!

**YES!** I want to maintain healthy joints. Please rush me my **FREE 30-DAY TRIAL** of all natural Mega JointWellness™. It supplies collagen to support normal cartilage formation. In addition, it promotes healthy joint tissue and ligament function.

If I don't want Mega JointWellness™ for any reason, I'll return the unused portion or empty container to you and owe nothing - no questions asked. But if I decide to keep it, I'll gladly pay the bill of only \$29.97 plus shipping and continue to receive a fresh supply each month with a bill. I may cancel future shipments at any time.

-2-

to make more collagen.

Best of all, you can receive a **FREE 30-DAY TRIAL** of Mega JointWellness™ and you can begin using it and trying it out . . . **before** you pay one red cent! That's how confident we are that your joints will benefit from Mega JointWellness™. If you don't agree, just return it and owe nothing - no questions asked.

But there's something else I have to tell you about Mega JointWellness™. It also supplies a glucosamine/chondroitin complex, which is known to:

- support the creation of healthy synovial joint fluid<sup>1</sup>
- maintain tissue, ligament and muscle health<sup>2</sup>
- promote spinal disk wellness<sup>3</sup>
- enhance the elasticity of your vertebrae<sup>4</sup>

Plus, Mega JointWellness™ is completely safe, natural, and effective for daily use. You can expect to notice results within as little as 4-8 weeks.

Ready to get your **FREE 30-DAY TRIAL** of Mega JointWellness™? Tear off the Free Trial coupon attached. Pop it into the enclosed reply envelope. Mail it. It's that easy.

Sincerely,

*Lawrence Tabak*

Lawrence Tabak  
President, Tabak's Health Products

P.S. A **FREE 30-DAY TRIAL** of all natural Mega JointWellness™ has been set aside for you. It supplies collagen to support normal cartilage formation and it promotes healthy joint tissue and ligament function.

P.S.S Remember, this is a **FREE 30-DAY TRIAL**. What do you really have to lose? Mail the coupon below . . . right now!

#### Supporting References

1. Crolle G and D'Este E: "Glucosamine sulfate for the management of arthrosis." Current Therapeutic research 7: 104-9 (1980).
2. Mazieres, B. et al.: "Revue du Thumatism et des Maladies Osteo-Articulaires" 50(7-8): 468-72 (1992).
3. Pipitone, V.R.: "Chondroprotection with Chondroitin sulfate." Drugs in Experimental and Clinical Research 17(1): 3-7 (1992).
4. DOAmbrosio E, Casa B, Bompastri R, et al.: "Glucosamine sulphate: a controlled clinical investigation in arthrosis." Pharmatherapeutica 2: 504-508 (1995).

A portion of our profits go directly to the Leukemia & Lymphoma Society.

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Superior, Science-Based Nutritional Supplements

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# FREE 30-DAY TRIAL

X

Sign name here

[DATE]

[KEY CODE]

[FIRSTNAME, LASTNAME]  
[STREET ADDRESS]  
[CITY, STATE, ZIPCODE]

[CUSTOMER#]

[FIRSTNAME, sign your name above. Correct address if needed.]

[Tear Here and Mail Today!]

From The Desk of:

*Kimberly Penttila*

[FIRSTNAME,] Minimize Normal Aging Joint Discomfort

To: [Firstname] [Lastname]  
[Street Address]  
[Cityname], [ST] [Zipcode]

[Month] [Date], [Year]

Dear [Firstname],

What would you say if I told you you could lessen joint discomfort that occurs normally as you age?

Shoulders. Neck. Back. Hips. Knees. Wherever you're "aging."

What would you say [FIRSTNAME] if I told you you could do it . . . naturally. No drugs. No chemicals. No side-effects.

And . . . how would you react if I told you you could try this amazing product - Mega JointWellness™ for 30-days in your home with . . .

No obligation to keep it.  
Absolutely no obligation to buy it.

And no obligation to pay me a thin dime!

You'd tell me I'm nuts, right? "Whose going to make a crazy offer like that?"

Well, there's no misprint here [FIRSTNAME].

I'm going to send you a Free 30-Day Trial of Mega JointWellness™ to try out, before you decide to buy.

It contains ingredients specially formulated to give comfort to your joints.

These clinically proven nutrients actually help your joints to function normally by supplying the essential building blocks of collagen.

Collagen is the "glue" that keeps your cartilage together and working properly.

Without enough collagen, your cartilage simply thins out and wears away. Then, when you move, your bones "grind" together where they join. This can cause discomfort.

So how do you avoid this [FIRSTNAME]?

(Please turn over)

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

## **30-DAY FREE TRIAL**

Mail To:  
Tabak's Health Products  
30-Day  
**FREE TRIAL**  
Priority Order Processing Center  
3198 Airport Loop Drive Suite G  
Costa Mesa, CA. 92626-3407

(Make Corrections To Address on Other Side if Needed)

Mail Coupon Today!

**YES!** I want to minimize normal aging joint discomfort. Please rush my **FREE 30-DAY TRIAL** of all-natural Mega JointWellness™.

If I don't want Mega JointWellness™ for any reason, I'll return the unused portion or empty container to you and owe nothing - no questions asked. But if I decide to keep it, I'll gladly pay only \$29.97 plus shipping and continue to receive a fresh supply monthly, with a bill. I may cancel future shipments at any time.

-2-

The answer is simple.

Get your body to produce more collagen.

And that's exactly what the ingredients in Mega JointWellness™ do. They supply the co-factors you need to make more collagen.

Mega JointWellness™ is completely safe and effective for daily use.

And . . . It's All Natural.

Best of all, you'll notice results in as little as 4-8 weeks.

Look, why put up with normal aging joint discomfort? Why put up with the aggravation? The frustration?

When you swing your arms in the air or touch your toes you can say "I feel so old" or you can say . . .

"I Feel Great!!"

It's really up to you!

I'm betting you'll want to say "I feel great!" And that's why you must send for your free 30-day trial of Mega JointWellness™.

After a month, if you don't believe it's benefited you, simply return the unused portion or empty container and owe nothing. No questions will be asked. And you won't owe a dime.

Tear off your Free Trial coupon. Pop it into the enclosed envelope. Mail it.

What could be easier or fairer than that? Do it now - your joints will smile and say "thank you master."

Sincerely,

*Kimberly Penttila*

Kimberly Penttila  
For Mega JointWellness™

P.S. Minimize normal aging joint discomfort. Send for your Free 30-Day Trial of natural Mega JointWellness™ today.

P.S.S Grab the enclosed coupon. It's already got your name and address on it. Pop it into the enclosed envelope. Mail it!

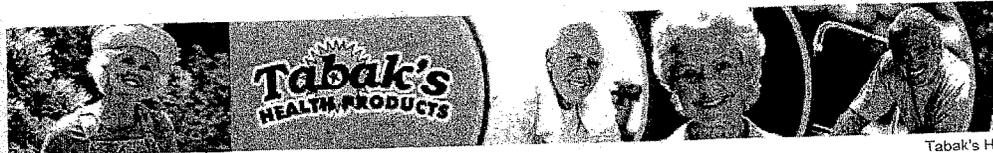
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Mega JointWellness™

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PotencyPlus™

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SlenderBlend™

Slimming Tea™

ThinkCaps™

VitalOne™



Help Support the structure of your joint cartilage!

Safe, Long-Lasting Relief From Ar Pain!

People all across America are raving about an amazing nutritional drink, **Mega JointWellness™**.

Why? It contains a unique combination of co-factors specially formulated to support healthy cartilage formation.

It does so by supplying the essential building blocks of collagen, the key structural element of your cartilage.

Collagen is the "glue," in other words, that keeps your cartilage intact and functioning properly. Without sufficient collagen, your cartilage simply dries out and wears down. Then, when you move, your bones "grind" together at their joints, causing discomfort.

By supporting your body's supply of collagen, your cartilage will stay lubricated and move more freely.

But that's not all, **Mega JointWellness™** also supplies a healthy dose of glucosamine/ chondroitin complex. This complex is known to . . .

- \* Help maintain healthy cartilage and ligaments.<sup>28</sup>
- \* Help sustain healthy tissue.<sup>29</sup>
- \* Provide the natural building blocks you need to maintain healthy connective tissue.<sup>30</sup>
- \* Nourish the creation of healthy synovial fluid, which keeps your joints moving properly.<sup>31</sup>
- \* Support normal cartilage formation in your knees, elbows, back, fingers, knuckles, hips and shoulders.<sup>32</sup>

It's Safe and All-Natural, Too!

The all-natural ingredients in **Mega JointWellness™** help your body maintain healthy cartilage. Even better, it does it safely and naturally, without side effects.

Plus, you don't have to wait months to feel new energy in your tired joints. You can expect to notice results within as little as 4 to 8 weeks.

Simply mix one scoop of **Mega JointWellness™** into your favorite non-carbonated beverage each day. Order **Mega JointWellness™** today!



**\$29.97**

**Click Here!  
To Order**

**Contains:**

Gelatin hydrolysate and MSM complex, Glucosamine sulfate and Chondroitin sulfate blend, Vitamin C and Stevia extract.

These statements have not been evaluated by the Food and Drug Administration. They are not intended to diagnose, treat, cure, or prevent any disease.





## Reduce Normal Aging Joint Discomfort

A Free 30-Day  
Trial of Mega  
JointWellness™ is  
Waiting For You



Dear friend,

We'd like to send you a Free 30-Day Trial of Mega JointWellness™ - which contains nutrients specially formulated to lessen joint discomfort that occurs normally as you age.

These clinically proven ingredients actually help your joints to function properly and normally.

Mega JointWellness™ also supplies a glucosamine/chondroitin complex which is known to:

- Support the creation of synovial lubricating fluid around your joints
- Maintain tissue, ligament and muscle health
- Promote spinal disk wellness
- Enhance the elasticity of your vertebrae
- Support the normal formation of healthy cartilage

Plus, Mega JointWellness™ is completely safe, and effective for daily use. Plus it's all-natural! Best of all, you can expect to notice results within as little as 4-8 weeks.

### Our Offer Is Simple

I want to reduce normal aging joint discomfort. Please rush my FREE 30-DAY TRIAL of all natural Mega JointWellness™. It supplies collagen to support normal cartilage formation. In addition, it promotes healthy joint tissue and ligament function.

If I don't want Mega JointWellness™ for any reason, I'll return the unused portion or empty container to you and owe nothing - no questions asked.

If I decide to keep it, I'll gladly pay only \$29.97 plus shipping and continue to receive a fresh supply monthly, with a bill. I may cancel future shipments at any time.

Your offer sounds amazing - so I'm going ahead.

Please Send No Money Now

AGREE

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

**SlenderBlend™**

Replacing meals with a low calorie "shake" is a proven method for reducing weight. It really works.

SlenderBlend™ tastes delicious - better than a chocolate milkshake. It's a complete meal in a glass. It has far less fat, sugar and calories than a regular meal.

Plus, it contains the added vitamins and minerals your body needs.

Slim down and stay healthy, naturally.

# How to Achieve Maximum Weight Results with your SlenderBlend™

Dear Friend,

Thank you for sending for your SlenderBlend™.

SlenderBlend™ -- along with your special weight-loss report, "How to Melt Fat Without Fire" -- offers a systematic and proven approach to weight control.

**Please DO get started now . . .**

Whether you drink it in the morning or at night, you'll find that SlenderBlend™ is the complete meal replacement system you've been searching for.

What makes SlenderBlend™ stand out from other meal replacement drinks? The answer is simple. The taste. While other meal replacement drinks taste like "chalk," SlenderBlend™ is mouth watering delicious. It's like drinking a glass of rich melted Swiss chocolate.

Now you'd think that to get SlenderBlend™ to taste so good it would have to be loaded with high amounts of fat, sugar and calories, right?

Not so with SlenderBlend™. The total fat is less than 1 gram. The sugar is .85 grams. And the calories are 84.

SlenderBlend™ is not just a great tasting chocolate drink. It has been formulated into a "full meal replacement" with all the terrific vitamins and minerals your body needs throughout the day.

Because SlenderBlend™ quenches your appetite and your tastebuds are satisfied, you have less of a craving for food. You have less of an urge to snack throughout the day.

*This is the core of the problems for countless Americans just*

*(please turn over)*

like yourself: People tend to snack throughout the day.

Many aren't even aware they're hitting the snacks too often. Overeating becomes a habit. And a "heavyweight" problem.

It's a nervous reaction: You eat out of boredom or habit.

Well, SlenderBlend™ helps you curb your craving for sweets. And along with a healthy diet and exercise, you can achieve the weight loss results you seek.

Losing weight is actually quite simple. I didn't say easy. I said simple. Either you must reduce what you take in. Or you must increase what you burn up (exercise). SlenderBlend™ works by allowing you to substitute one (or two) of your meals each day with a "better than delicious" chocolate milkshake. A milkshake you will actually look forward to drinking. A milkshake that gives you a nice content feeling in your belly . . . but without the fat, the sugar or the calories of a regular meal.

SlenderBlend™ is amazing. Why do I say amazing? Because that's what it is! It is the best tasting chocolate milkshake I have ever tried.

Simply mix SlenderBlend™ with 8 oz. of cold skim milk. Shake it up in your Free Shaker you've received. Drink it. Then watch as the figure you've always dreamed of becomes reality!

Sincerely,

*Lawrence Tabak*

Lawrence Tabak

President, Tabak's Health Products

P.S. With SlenderBlend™ and your special report, "How to Melt Fat Without Fire," you're on the path to achieving and maintaining the weight you want. So do me a favor, please. Begin using your SlenderBlend™ right away! And send me your "success story" when you reach your desired weight. I'd love to hear from you.

This product is not intended to diagnose, treat, cure or prevent a disease, but rather is a dietary supplement intended solely for nutritional support. These statements have not been evaluated by the Food and Drug Administration. SlenderBlend should be used in conjunction with a proper diet and exercise program. Individual results will vary.

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