

November 14, 2000

VIA UPS OVERNIGHT & Regular Mail

U.S. Food and Drug Administration
Center for Food Safety and Applied Nutrition
Office of Special Nutritionals, HFS-450
200 C. Street S.W.

Washington, District of Columbia 20204 73 '00 SEC -1 17:26

rec 11/16/00

Re: Prolab Nutrition Inc., a wholly owned subsidiary of Natrol, Inc.

Dear Sir or Madam:

I am the counsel for Prolab Nutrition, Inc., a seller of dietary supplement products, and a wholly owned subsidiary of Natrol, Inc., a manufacturer of dietary supplements.

On behalf of Prolab Nutrition, Inc. and pursuant to the requirement of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. §343 (c) (6), your Agency is hereby notified that Prolab Nutrition, Inc. proposes to make statements of "nutritional support", as described in 21 U.S.C. §343(1)(6)(a), for its dietary supplements as follows:

- (1) N-Large 2: is a powerful/ mass-gaining support formula designed to promoted size on the hardest gainers.
- (2) ProCort-X: contains phosphatidylserine, a nutrient which may act on the brain to calm down stress response and help manage cortisol levels. This product also contains Siberian Ginseng which acts as a natural adaptogen and helps protect the body from stress. Also included are Glutamine Peptides which naturally counteract the course of muscle breakdown.
- (3) GlycoGen: Energy and Endurance formula; Supports Peak Muscle Performance; Replenishes key electrolytes for pre-exercise recovery.
- (4) ProBEND: This professional strength formula is designed to support and promote healthy joint function in the hard training athlete.
- (5) Glutamine Powder: Can help support recovery after intense training by promoting energy repletion, maintaining a healthy immune system and maximizing your body's buffering capacity against acid build-up.
- (6) Cuts II: is a maximum potency formula designed to supplement your training program in order to help support energy metabolism, and promoted lean mass. Cuts II was specifically formulated to compliment your intense training program while provided potent levels of key nutrients like L-Carnitine, which has been found to maximize your training programs. Combined with a reduced calorie diet, may help eliminate excess body fat and promote a lean muscular appearance.

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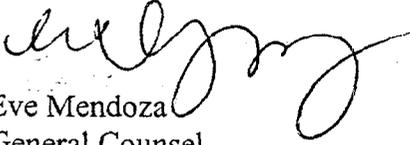
- (7) CreaVate: Advanced strength and endurance nutrient.
- (8) CARBOGEN: is an amazing patented enzyme formulation designed to maximize complex carbohydrate breakdown for increased available energy. Taken with meals, helps increase energy by enhancing glucose levels and provides for efficient energy support for harder training and maximized performance.
- (9) BCAA Plus: Super anti-catabolic formula. Important for muscle growth and recuperation.
- (10) Aminogen: Enhances protein digestion.

Please be advised that the label of each of the above dietary supplement products includes the statement that "The FDA has not evaluated these statements. This product is not intended to diagnose, treat, cure or prevent disease."

If you have any questions regarding the foregoing, do not hesitate to contact the undersigned at your convenience.

Sincerely,

NATROL, INC.



Eve Mendoza
General Counsel

cc: Elliott Balbert