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Date March 8, 2001

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Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 c St. SW.,  
Washington, D.C. 20204

Re: 21 U.S.C. Section 343(r)(6), Notification of Statements on Dietary Supplements

Dear Sir/Madam:

As President of Premier Direct, Inc., I hereby notify the Food and Drug Administration of the use of statements of nutritional support for the following dietary supplement products:

<u>Product Name</u>	<u>Label Statement(s)</u>
AHF	Helps to maintain homocysteine levels within a normal range. Maintaining homocysteine levels within a normal range plays an important role in heart health and cardiovascular function.
B-Complex (B-50)	The B-Vitamin class is considered to be helpful for promoting and supporting the overall health of your entire body. More specifically, they have a role in the health of your hair, skin, eyes, liver, muscles, and brain function. Moreover, they are coenzymes involved in the production of energy; Helps alleviate shortages that may result from physical stress.
Beta Sistrosterol	Helps promote prostate health; Beneficial for supporting healthy urine flow and function.
Bilberry	For naturally promoting eye health; Antioxidant action; Beneficial for the retina.
Folic Acid	To help maintain homocysteine levels within a normal range;

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Bromelain To enhance the absorption and utilization of Quercetin.

Chromium Picolinate For helping to support the ability of cells to normally utilize insulin.

→ Cordyceps May help to support overall heart health as well as help maintain cholesterol levels within a normal range.

Ester-C An antioxidant; Essential for healthy tissue and gums; A necessity for normal adrenal gland function; Critical for supporting cardiovascular health, A known immune enhancer.

Garlic-Odorless For promoting heart health; To help maintain cholesterol levels within a normal range.

Ginkgo Biloba 24/6 Extract Help to promote healthy circulation; stimulate nerve-cell activity; Helpful for mild memory problems and absentmindedness associated with aging; For supporting healthy sexual function, eye health, cardiovascular health.

Green Tea An established antioxidant; Helpful for promoting immune health, helping to maintain cholesterol levels within a normal range, and healthy weight.

→ Hawthorn Berry Extract For naturally promoting heart health; Helpful for promoting overall heart health...and helping to maintain blood pressure levels within a normal range.

L-Carnitine To promote enhanced energy production that supports the heart; To help deliver essential fatty acids into the mitochondria here it works with CoQ 10-Forte™ to promote overall heart health.

Longevity Complex Naturally supports youthful good health; Pregnenolone may help promote mental clarity as you age; Lipoic acid is a powerhouse antioxidant; Reishi mushroom is a powerful adaptogen.

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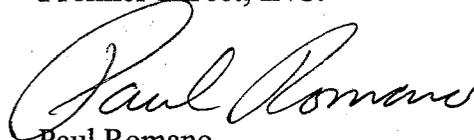
- MSM  
Beneficial in promoting joint mobility; To support nerve fiber impulses, promote healthy circulation, and enhance muscle flexibility; To promote joint mobility and flexibility.
  
- Potassium  
To maintain blood pressure levels within a normal range; To assure proper sodium-to-potassium balance--a key to maintaining blood pressure levels within a normal range.
  
- PROS-TAMINA Plus  
For promoting optimal prostate health; For helping to promote good prostate health and support healthy sexual and urinary function.
  
- Saw Palmetto Extract  
To promote overall prostate health as well as support urinary and sexual function.
  
- Shark Cartilage  
To promote overall blood vessel health, and support healthy cell development at the same time.
  
- Soy Isoflavone  
For supporting and promoting many facets of women's health.
  
- Uric Acid Formula  
Helps support healthy uric acid levels; To regulate uric acid levels by assisting the body's own natural mechanisms.
  
- ↘ Vanadyl Sulfate  
To help maintain blood sugar levels within a normal range; Plays a role in cellular metabolism; Aids in helping to support glucose metabolism; Promotes healthy formation of bones and teeth; Support healthy cardiovascular system; Helps to maintain blood pressure levels within a normal range.
  
- Cetyl Myristoleate  
For promoting and supporting joint health and mobility; Works to lubricate your joints and your entire body, helping to support and promote muscle pliability and joint movement; Nourish and maintain the natural lubricating fluid in your joints and cartilage.

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Collagen	Forms the basis for all connective tissue that runs throughout the body; Provides the strength and support necessary for skin to maintain its resiliency, and promote a more youthful appearance; 'Plays a role in the health of hair, nails, muscles, tendons, cartilage, ligaments, bones, gums, teeth, eyes and blood vessels; collagen protein is the basis for all connective tissue in your body.
Gymneama Sylvestre	To block the sweetness taste sensation; For helping to maintain blood sugar levels within a normal range, and supporting the body's natural ability to use sugar and refined carbohydrates normally.
Lecithin	May help to promote cardiovascular health, support brain function, and aid in the absorption of critical nutrients.
Oregano	Promote healthy sinus and lungs; Promotes a healthy digestive system; Supports normal muscle flexibility; promote general health & well-being; May help promote immune health; For supporting healthy immune system functioning, and helping to support healthy skin.
Tropical NONI-Hawaiian Formula	For thousands of years natives have traditionally used it for many health-related purposes--including: joint health, cellular regeneration, immune health, digestive health, and general wellness.
Zinc	Antioxidant capabilities; Helps maintain normal levels of Vitamin-E in the blood as well as aid in the absorption of Vitamin A; Supports the prostate and overall sexual health.

To the best of my knowledge, and based upon information and belief present at the time of the executing of this notice, I certify that the above information is accurate and **complete**. Premier Direct, Inc. possesses substantiation that the statements are truthful and not misleading.

Sincerely,  
**Premier Direct, INC.**

  
Paul Romano  
President