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2/8/02

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

Re: **Statements of Nutritional Support**

Dear Sir:

Please consider the following as notification Statements of Nutritional Support used by Bentley Myers International Co. in product labeling listed below.

Distributor Name & Address: Bentley Myers International Co.
203 - 2780 Granville Street
Vancouver, BC V6H 4E7
Canada

<u>Statement Text</u>	<u>Name of Subject Dietary Ingredient(s)</u>	<u>Brand Name</u>
"Supports healthy prostate"; "Promotes more regular sleep and increased sex drive"; "Enhances performance ability"; "Contributes to desire and ability to enjoy and perform sexually"; "Maintain normal healthy function"; "Helps rekindle youthful sexuality"	Graminae extract	ProstAlleve
"Reduces the signs of aging"; "Super charges your body's own natural hormone"	L- alphaglycerolphosphorylcholine, Phosphatidyl choline, Phosphatidyl serine, Tribulus terrestris, Colostrum,	Primostat

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<u>Statement Text</u>	<u>Name of Subject Dietary Ingredient(s)</u>	<u>Brand Name</u>
production"; "Enhances youthful appearance, energy levels and sexual function"; "Improves overall health"	(con't) Chrysin	Primostat (con't)
"Promotes youthful sex drive"; "Supplies building blocks to maintain hormone levels"; "Maintains healthy sexual function"; "Strengthens the immune system"; "Helps the body remain healthy"; "Supports youthful testosterone levels"; "Elevates overall well-being and sexuality"; "Enhances youthful and successful sexual performance"	4-androstenediol, 4-androstenedione, 5-androstenediol, 5-androstenedione, 19-nor 4-androstenedione, 19-nor 5-androstenediol	AchieveES
"Helps regulate fat digestion, absorption and metabolism"	oligopeptides, lipase, citrus aurantium, yerba mate, ginger root extract, pyruvate, cayenne, ma huang extract, guarana extract, white willow bark extract, inulin, uva ursi, buchu leaf, citrus pectin, wheat bran, glucomannan, couch grass, corn silk, hydrangea, juniper berry, psyllium, bentonite, lactobacillus acidophilus, goldenseal	MillenexES

The information contained in this notice is complete and accurate as I can ascertain from the compiled research. The above distributor has substantiation that the statements are truthful and not misleading.


Bernard Bubman, R.Ph.
Research Consultant