

# O'DONNELL FORMULAS INC.

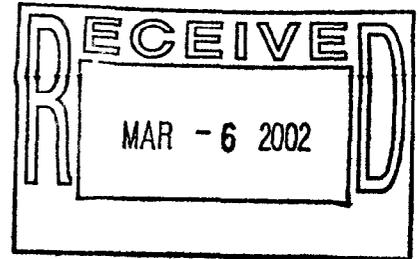
1145 Linda Vista Dr., Suite 110

San Marcos, CA 92069

Phone: 760-471-1901 Fax: 760-471-1878

February 21, 2002

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



Re: Dietary Supplement Statement of Support Notification

To Whom It May Concern:

O'Donnell Formulas Inc. 1145 Linda vista Dr., Suite 110, San Marcos, CA USA 92069, who is the distributor of the following dietary supplement products, intends to make the following statement(s) of support: "MSM" is a naturally occurring sulfur compound. The eighth most abundant element in the body. "COLLAGEN TYPE II has a high concentration of glucosamine and chondroitin, which strengthens cartilage and increases new cartilage cell production." "CMO" your joints require maintenance. CMO can enhance your joint maintenance by supplementing the body's supply of synovial fluid that acts as a lubricant for many joints and tendons. This claim is being made for The Flex Formula which is contained in O'Donnell Formulas, Inc. The Flex Formula. This submission is being made in compliance with 21 CFR 101.93.

The undersigned is an authorized representative of the O'Donnell Formulas Inc. and certifies that the information contained in this notice is complete and accurate, and that O'Donnell Formulas, Inc. has substantiation that the above statement(s) are truthful and not misleading.

Wanda O'Donnell, President  
O'Donnell Formulas, Inc.

**THE FLEX FORMULA**  
BY O'DONNELL FORMULAS, INC.

- MSM is a naturally occurring sulfur compound. The eighth most abundant element in the body.\*
- COLLAGEN TYPE II has a high concentration of glucosamine and chondroitin, which strengthens cartilage and increases new cartilage cell production.\*
- CMO your joints require maintenance. CMO can enhance your joint maintenance by supplementing the body's supply of synovial fluid that acts as a lubricant for many joints and tendons.\*

\* 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.

Do not use if seal is broken

**THE FLEX FORMULA™**  
BY O'DONNELL FORMULAS, INC.  
A DIETARY SUPPLEMENT

METHYLSULFONYL METHANE (MSM)  
BY LIGNISUL®

COLLAGEN TYPE II  
RICH IN GLUCOSAMINE & CHONDROITIN  
FEATURING ARTHROCOLL™ OF CYVEK  
IRVINE, CA 92606

CETYL MYRISTOLEATE (CMO)  
Vegetable source from 835 mg. Fatty acid ester complex powder

90 Caplets

**Supplement Facts**

Serving Size 1 Caplet 3 Times a Day  
Servings Per Container 30

Amount Per Serving	%Daily Value
Total Carbohydrate	0g <1%*

Proprietary Blend Each 3 caplets contain  
1,000mg MSM Lignisul®  
500mg COLLAGEN TYPE II from chicken  
60mg Vegetable source CMO (from 835mg fatty acid ester complex powder)

\*Daily Value not established

Other ingredients: Rice flour  
No Sugar • No Wheat  
Not to be taken by lactating or pregnant women

Manufactured for  
O'Donnell Formulas, Inc.  
San Marcos, CA 92069

97S 0162 LET 9576