



June 12, 2003

Director
Special Nutritionals
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street S.W.
Washington, DC 20204



SENT VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED
ARTICLE #: 7099 3400 0016 4139 9836

RE: MEMORY, BRAIN and LIVER SUPPORT

Dear Sir / Madam:

This is a 30-day notification of a statement of nutritional support for a dietary supplement. The product name is **Andrew Lessman's Memory, Brain and Liver support**. The structure / function claims on all sizes and configurations of this product are identical. They are as follows:

Andrew Lessman's MEMORY, BRAIN and LIVER SUPPORT™ is a blend of natural ingredients, including Phosphatidyl Choline, to provide comprehensive support for memory, concentration and mental function, as well as the brain, nervous system and liver. **Memory, Brain and Liver Support** includes both Ginkgo Biloba and Vinpocetine to help maintain optimum blood flow to the brain, supporting the delivery of nutrients, fuel and oxygen necessary to support normal memory and overall mental functioning. We include Huperzine A, an extract from Chinese Club Moss, to help reduce the depletion of neurotransmitters that may normally occur as we age, while also supporting normal cognitive and memory function. We also add the Ayurvedic herb Bacopa Monniera with its long history of use in India for its support of the delicate tissues of the brain and nervous system. Pregnenolone is also added for additional support of the nervous and circulatory systems and for its support of normal memory functioning as we age. Any brain, liver and nervous system support formula would not be complete without the addition of high levels of the B-Complex vitamins. Perhaps most importantly, **Memory, Brain and Liver Support** provides a concentrated, stable source of the most abundant and important phospholipid in the body, Phosphatidyl Choline (PC). PC is vital to the structure of all cell membranes and for the normal, functioning of the liver, brain and nervous system. Phosphatidyl Choline is now recognized by the US Food and Drug Administration as an essential nutrient and has been observed to help with the mild memory problems associated with aging. PC is a necessary raw material for the production of two vital components of the brain and nervous system: Acetylcholine (a vital neurotransmitter) and Sphingomyelin (required for nerve cell protection). A sufficient amount of Phosphatidyl Choline is an essential component for optimum liver function. PC comprises almost 65% of the liver's cell membranes, which are responsible for the processing and excretion of chemical waste products within the body. Our memory and mental faculties tend to naturally decline with age. **Memory, Brain and Liver Support** is designed to provide the ingredients necessary to help maintain optimum liver, brain and nervous system function, while also providing a ProCaps protected source of the most important phospholipid necessary for the structure of all of your body's trillions of cell membranes Phosphatidyl Choline.

Respectfully Submitted,

Dr Nancy Steely, ND
Director of Research

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