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October 09, 2004

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

OCT 29 2004

SENT VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED
ARTICLE #: 7099 3400 0016 4139 9539

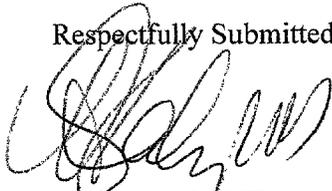
RE: MILLION ORAC

Dear Sir / Madam:

This is a 30-day notification of a statement of nutritional support for a dietary supplement. The product name is **Million ORAC**. The structure / function claims on all sizes and configurations of this product are identical. They are as follows:

The higher the ORAC value the greater the anti-oxidant activity, and research indicates that consumption of foods with a high ORAC value can significantly increase the body's anti-oxidant capacity. These ingredients are exceptionally powerful and deliver high concentrations of anti-oxidants that target and neutralize a broad range of damaging free radicals within the body. We also include Resveratrol, Apple polyphenols, Grape Seed, Blueberry and Prune extracts for their protection and support of the cardiovascular system, as well as Turmeric and Pine Bark for their support of a wide variety of tissues, organs and systems. Mother Nature delivers powerful anti-oxidant tools to protect us from free radical damage and our **Million ORAC** formula represents the most pure and potent array of powerful natural anti-oxidants that we have been able to assemble into one formula.

Respectfully Submitted,



Nancy Steely, ND
Director of Research & Development

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