



January 6, 2005

Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

Dear Sir or Madam;

This letter will serve as a 30-day notification, pursuant to 403 (r) (6) of the Federal Food, Drug & Cosmetic Act and regulations promulgated thereunder.

Product Manufacturer: IdeaSphere Inc.
150 Motor Parkway
Hauppauge, NY 11788

Text of statement being made: "antioxidant activity" "overall health and wellness"
"helps support detoxification"

Dietary supplement ingredients: Young Barley Grass, Green Algae, Wheat Grass, Spirulina, Echinacea
Purpurea, Alfalfa Concentrate.

Dietary supplement brand and name: Twinlab Ultra Harvest PREMIUM VEGGIE JUICE TABLETS

As required, enclosed are two photocopies of this notification.

The signee certifies that the information contained in this notice is complete and accurate, and that IdeaSphere Inc., has substantiation that the statements being made are truthful and not misleading.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Lyskanycz", with a long horizontal flourish extending to the right.

Myron Lyskanycz
Vice President of Marketing
IdeaSphere Inc.

978 0162 LET 15449

Enclosures