NEWAYS INTERNATIONAL

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April 15, 2005

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

APR 29 2005

Subject: Notification for Statements on Dietary Supplement Labeling
Product: ***Junior Max***

Dear Sir/Madam:

This notification is being submitted on behalf of Neways International, Inc., 2089 Neways Drive, Springville, UT 84663, a distributor of dietary supplement products.

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. 343 (r) (6), and in accordance with the provisions of 21 CFR 101.93 (a), your Agency is hereby notified that Neways International, Inc. has made structure function claims as described in 21 U.S.C. 343 (r) (6) (A), for its dietary supplement ***Junior Max***, as follows:

Statement 1: Junior Max provides nutrients and antioxidants that play crucial roles during the growing years . . . supporting normal growth and development.
Dietary Ingredient(s): Vitamin A, Vitamin C, Vitamin E, Thiamin, Riboflavin, Niacin, Vitamin B6, Folate, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iodine, Zinc, Selenium, Copper, Manganese, Chromium, and Molybdenum.

Statement 2: Helps promote metabolic health by reducing oxidative stress.
Dietary Ingredient(s): Vitamin A, Vitamin C, Vitamin E

Statement 3: Supports health of a child's body during cognitive and motor development.
Dietary Ingredient(s): Zinc

Statement 4: Helps form healthy bones and teeth . . . tooth friendly.
Dietary Ingredient(s): Calcium, Xylitol

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Statement 5:	The liquid formulation of Junior Max immediately places necessary nutrients in contact with the stomach, available for absorption by the body.
Dietary Ingredient(s):	Junior Max
Statement 6:	Junior Max enriches your child's diet with vitamins, minerals, and phytonutrients to keep little bodies in tip-top condition.
Dietary Ingredient(s):	Vitamin A, Vitamin C, Vitamin E, Thiamin, Riboflavin, Niacin, Vitamin B6, Folate, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iodine, Zinc, Selenium, Copper, Manganese, Chromium, and Molybdenum.
Statement 7:	A dose of Junior Max nourishes your children at their roots so they can grow up strong and healthy.
Dietary Ingredient(s):	Vitamin A, Vitamin C, Vitamin E, Thiamin, Riboflavin, Niacin, Vitamin B6, Folate, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iodine, Zinc, Selenium, Copper, Manganese, Chromium, and Molybdenum.
Statement 8:	Junior Max contains a high ORAC (Oxygen Radical Absorbance Capacity) phytonutrient blend of aronia, orange, pomegranate, and grape for superior antioxidant support.

The undersigned certifies that the information contained in this notice is complete and accurate, and that Neways International has substantiation that these statements are truthful and not misleading.

Sincerely,

M. C

Neways, Inc.
(Michael Cunningham, CEO)