

Innovation



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Marketing

Quality

Science

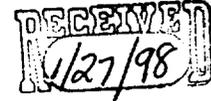
writer's direct dial

1 6 8 3 '98 FEB 18 8 32 (208) 893-6704

January 23, 1998

VIA Federal Express

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



RE: Notification of Product Claims

Dear Sirs:

Notice is hereby given pursuant to the requirements of section 403(r)(6) (21 USC 343(r)(6)) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that Richardson Labs, Inc. located at 3475 Commercial Court, Meridian, Idaho 83642 on or about the past 30 days commenced marketing the dietary supplements bearing structure/function statements on the label and/or in the labeling. Please see the enclosed "Attachment A" for a list of the products and their respective statements.

The attached claims on (1) Energia Pyruvate and (2) Energia Creatine reflect amended or additional claims previously submitted to the FDA.

The undersigned certifies that the information contained in this notice is complete and accurate and that Richardson Labs, Inc. has substantiation that the statements are truthful and not misleading.

If you have any questions, please feel free to contact the undersigned.

Very truly yours,

Edward D. Priddy
Chief Financial Officer

Enc.

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ATTACHMENT "A"

1. **Energia Pyruvate:** a dietary supplement containing Calcium Pyruvate and Chromium Picolinate.

Claims:

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- Research shows that chromium picolinate enhances the loss of body fat while maintaining lean muscle mass [when used in conjunction with the enclosed plan].
- Chromium picolinate enhances blood sugar function and supports metabolic process.

2. **Energia Creatine:** a dietary supplement containing Creatine Monohydrate.

Claims:

- Direct energy for active muscle [when used in conjunction with a diet and exercise program].
- Enhanced muscle recovery [when used in conjunction with a diet and exercise program].
- Delay of muscular fatigue [when used in conjunction with a diet and exercise program].

3. **Richardson Labs Chromium Picolinate:** a dietary supplement containing Chromium Picolinate.

Claims:

- Chromium is an essential trace mineral that enhances blood sugar function and supports metabolic processes.

4. **Coenzyme Q10:** a dietary supplement containing Coenzyme Q10.

Claims:

- Coenzyme Q10 (CoQ10) is a naturally occurring anti-oxidant and is an essential component of mitochondria -- the energy producing unit of the cells of our body.

5. **Advanced Research Products Pyruvate:** a dietary supplement containing Calcium Pyruvate and Chromium Picolinate.

Claims:

- Pyruvate is a naturally occurring substance which is essential to energy metabolism.
- Pyruvate is a key component in the chemical process by which the body creates energy from carbohydrates (sugar) and fat [when used in conjunction with the enclosed plan].