

RightLife™

P.O. Box 782

RECEIVED
3/31/98

APR 1 4P 2:23

Humble, TX 77347
(281) 812-7217
(800) 630-3438

TO: Office of Special Nutritional (HFS-450), Center for Food Safety and Applied Nutrition, Food and Drug Administration, 200 C St. SW., Washington, DC 20204

FROM: RIGHTLIFE INCORPORATED

**RE: 21 CFR Part 101 :[Docket No. 96N-0240]
Food Labeling; Notification Procedures for Statements on Dietary Supplements**

The following statements are printed on our products and substantiated by our company. The "responsible person" for substantiation is company representative and President Keith Eddleman (signature below),

The beginning date of marketing these products was the first date of our existence March 2, 1998. The first shipment of products will go out April 3, 1998.

Product 1: St. John's Wort Herb

Copy: St. John's Wort

Right Mood - This is one of the most popular herbs in the world due to its natural capacity to better one's mood. For many St. John's Wort is a natural way to gain a positive outlook on life. Results vary from person to person and are usually seen after 4 weeks of regular use.

This product and these statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

RightLife is a licensed manufacturer of Food Products in the State of Texas.

Guarantee: If for some reason you are not completely satisfied with this product please return the unused portion within 30 days for a full refund.

Also see docket 97S-0163 for products 3+4

97 S-0162

RIGHTLIFE INCORPORATED

P.O. box 782 Humble, Texas 77347 (281) 812-7217 (800) 630-3438

*LET 1491
58095*

Product 2: Ginko Biloba Herb

Right Mind - Ginko **Biloba** seems to fight aging and increase blood and oxygen flow to the brain and improve mental powers, improve memory and clarity of thought, improve peripheral blood circulation, improve energy and stamina, and improve mood and sense of well being.

This product and these statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease. RightLife is a licensed manufacturer of Food Products in the State of Texas.

Guarantee: If for some reason you are not completely satisfied with this product please return the unused portion within 30 days for a **full** refund.

Product 3: Echinacea Herb

Right Defense - Echinacea has been shown to boost the immune system. This amazing herb increases the activity of immune system cells so they can more quickly eliminate invading organisms and foreign particles. It provides the right defense against common illness. If taken at first sign of a cold it is said to curb it, even totally eliminate symptoms in 24hrs.

This product and these statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease. RightLife is a licensed manufacturer of Food Products in the State of Texas.

Contains -90 capsules, 400mg of **Echinacea**.

Guarantee: If for some reason you are not completely satisfied with this product please return the unused portion within 30 days for a full refund.

Product 4: Grape Seed Extract

Right Heart - This is a most potent and powerful antioxidant found in **free** radical scavengers (antioxidants). It can help reduce the risk of heart attack. It seems to alleviate inflammatory conditions like arthritis. This amazing extract has vast effects on the entire body. Many have claimed improved hearing and eyesight.

This product and these statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease. RightLife is a licensed manufacturer of Food Products in the State of Texas.

Contains -30 capsules, 25mg of Grape Seed Extract each.

Guarantee: If for some reason you are not completely satisfied with this product please return the unused portion within 30 days for a full **refund**.

Submitted by Keith Eddleman of RIGHTLIFE INCORPORATED on March 27, 1998. **Certifying** that we have on hand **adeqate** substantiation that these statements are accurate.



Keith Eddleman

President, RightLife, Inc.

3/27/98
Date