



MANUFACTURERS & DISTRIBUTORS  
OF NUTRITIONAL PRODUCTS

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September 28, 1998

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

Dear Sirs:

Notice is hereby given pursuant to the requirements of section 403(r)(6) (21 U.S.C. 343(r)(6)) of the Federal Food, Drug and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that Naturade, Inc., located at 7110 Jackson Street, Paramount, CA 90723, within the past 30 days commenced marketing a dietary supplement bearing the following statement(s) on the label and/or in the labeling:

**TEXT OF CLAIM**

“Boosts the immune system to help your natural defenses”

“Promotes upper respiratory health”

“The Chinese Way’s Stay Well Formula is an all natural formulation designed to promote healthy immune function all year-round, including the cold winter months. A strong immune system promotes upper respiratory health. Clinical studies have shown the Chinese herb *Andrographis paniculata*—the key herb in our Stay Well formula—to be an effective immune booster if you are feeling well or under the weather.”

**NAME OF INGREDIENT OR SUPPLEMENT THAT IS SUBJECT OF CLAIM**

*Andrographis paniculata* (98% andrographolide)

Arabinogalactan extract from Western Larch (*Larix occidentalis*)

**NAME OF SUPPLEMENT**

The Chinese Way™

Stay Well Formula

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

Sincerely,

Marwan Zreik, MS, CCN  
Director of Research

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