



2098 '99 JAN -4 P3:01



Office of Special Nutritionals
Food and Drug Administration
Center for Food Safety and Nutrition
200 C Street S.W.
Washington D.C. 20204

December 10, 1998

I wish to certify that the information provided relative to the two brand name products identified below are complete and accurate, and that Optima Laboratories, Inc. has substantiation that the statements provided are truthful and not misleading.

Authorized Representative:


Paul Dube - CEO

1) Name and address of distributor of two brand name products identified below:

Optima Laboratories, Inc.
39 Dodge Street, Suite 108
Beverly, MA 01915

2a) Brand Name: Optima Fiber Plus

b) Structure/ Function Claim Statement:

i) "Selectively promotes the growth of friendly bacteria and reduces harmful bacteria for well-balanced intestinal flora"

c) Ingredient subject to claim: fructooligosaccharides

3a) Brand name: Optima Calcium Plus

b) Structure/ Function Claim Statement:

i) "Selectively promotes the growth of friendly bacteria and reduces harmful bacteria for well-balanced intestinal flora and enhanced calcium absorption"

c) Ingredient subject to claim: fructooligosaccharides

4a) Brand name: Optima Calcium Plus

b) Structure/ Function Claim Statement

" Provides the recommended daily allowance of Calcium, Vitamin D & Magnesium for maintaining strong bones & healthy nervous system"

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Also see docket 97S-0163

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- 4c) Ingredients subject to claim:
- i) Calcium as calcium carbonate, calcium citrate, and patented Citrimal® citrate, malate, glycinate
 - ii) Magnesium as magnesium oxide, magnesium citrate, and patented Chelazome® glycinate
 - iii) Vitamin D as Cholecalciferol