



THOMPSON MEDICAL COMPANY, INC.

777 SOUTH FLAGLER DRIVE, WEST TOWER, SUITE 1500, WEST PALM BEACH, FL 33401

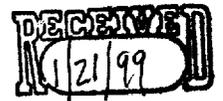
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BARBARA E. WAITMAN
General Counsel

LEGAL DEPARTMENT
767 THIRD AVENUE
NEW YORK, N.Y. 10017
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January 15, 1999



Elizabeth A. Yetley, Ph.D.
Director
Office of Special Nutritionals (HFS - 450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, SW
Washington, D.C. 20204

Dear Dr. Yetley:

Pursuant to Section 403(r) (6) of the Dietary Supplement Health and Education Act of 1994, 21 CFR 101.93, and 63 FR 23633, Thompson Medical Company, Inc., 777 South Flagler Drive West, Suite 1500, West Palm Beach, Florida 33401, wishes to notify the Food and Drug Administration that it has commenced marketing a dietary supplement product, within the past 30 days, which bears statements of nutritional support.

The dietary supplement product will be distributed under the trade name Nature's Reward Prime Of Life and will make the following statements of nutritional support:

- For A Woman's Nutritional Need During And After Menopause;
- Multi-Herbal Formula Plus Vitamins & Minerals Combined To Meet A Woman's Nutritional Needs;
- **Isoflavones** – a good source of soy that may help maintain a natural hormone balance;
- **Black Cohosh Extract** – important nutrient for women of menopausal age; and

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- **Calcium** – helps maintain strong and healthy bones.

Please be advised that these statements are based on a large body of data, which, in our judgment, renders these statements substantiated, complete, accurate, truthful and not misleading. This product does not present a significant or unreasonable risk of illness or injury under the conditions of use recommended or suggested in the labeling. In addition, they are accompanied by the required disclaimer (*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*) which is prominently displayed on the package in bold-faced type.

A copy of the label is annexed for your review.

Should you have any questions please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Barbara E. Waitman". The signature is written in a cursive style with a large, prominent initial "B".

Barbara E. Waitman
General Counsel

Supplement Facts

Serving Size 2 Caplets

	Amount Per Serving	% Daily Value
Vitamin D (as cholecalciferol)	200 IU	50%
Vitamin E (as dl-alpha tocopheryl acetate)	30 IU	100%
Vitamin K (as phyloquinone)	80 mcg	100%
Thiamin (as thiamin mononitrate)	1.5 mg	100%
Riboflavin	1.7 mg	100%
Niacin (as niacinamide)	20 mg	100%
Vitamin B-6 (as pyridoxine hydrochloride)	2 mg	100%
Folic Acid	400 mcg	100%
Vitamin B-12 (as cyanocobalamin)	6 mcg	100%
Pantothenic Acid (as calcium pantothenate)	10 mg	100%
Calcium (as calcium carbonate)	400 mg	40%
Magnesium (as magnesium oxide and magnesium carbonate)	200 mg	50%
Zinc (as zinc citrate)	10 mg	65%
Manganese (as manganese gluconate)	2 mg	100%
Panax ginseng root standardized extract (4% ginsenosides)	200 mg	†
Soybean tolu and kudzu root standardized concentrate (20% daidzein and genistein isoflavones)	100 mg	†
Dong quai root (<i>Angelica sinensis</i>)	100 mg	†
Chaste berry (<i>Vitex agnus-castus</i>)	50 mg	†
Black cohosh root standardized extract (5% triterpene glycosides, as 27-deoxyactein) (<i>Cimicifuga racemosa</i>)	20 mg	†
Boron (as boron chelate)	1 mg	†

†Daily value not established.

OTHER INGREDIENTS: Cellulose, fractionated vegetable oil, silica, polysorbate 80.

Nature's Reward™

Prime Of Life™

- **ISOFLAVONES** - a good source of soy that may help maintain a natural hormone balance*
- **BLACK COHOSH EXTRACT** - Important nutrient for women of menopausal age*
- **CALCIUM** - helps maintain strong and healthy bones*

*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.

SUGGESTED USE: As a dietary supplement, take two Prime Of Life caplets daily, preferably with a meal.

IMPORTANT: This product is not intended for children. Do not take this product if you are pregnant or nursing a baby. If you have a medical condition or are taking any prescription medication, consult your doctor before using this product.

Store at controlled room temperature 15-30°C (59-86°F). Protect from heat, light and moisture.

BLISTER PACKED FOR YOUR PROTECTION
Do not use if individual seals are broken.

MONEY BACK GUARANTEE: You must be completely satisfied with the results of this product, or you may return package with unused product to Thompson Medical Company for a full refund of your purchase price. Limit one money back guarantee per family or address.

THOMPSON MEDICAL CO., INC.
P.O. Box 024408, West Palm Beach, FL 33402-4408

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Made in U.S.A.

PROOF OF PURCHASE
PRIME OF LIFE

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ITEM NO.
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NEW! For A Woman's Nutritional Needs During And After Menopause*

Nature's Reward™

Prime Of Life™

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- **BLACK COHOSH EXTRACT** - Important nutrient for women of menopausal age*
- **CALCIUM** - helps maintain strong and healthy bones*

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Nature's Reward™

Multi-Herbal Formula Plus
Vitamins & Minerals Combined To
Meet A Woman's Nutritional Needs*

Prime Of Life™

Nature's Reward™

Prime Of Life™

•CALCIUM •GINSENG •VITAMINS B-6, B-12, D & E
•MAGNESIUM •FOLIC ACID •ISOFLAVONES

DIETARY SUPPLEMENT

30 CAPLETS

Nature's Reward™

Prime Of Life™