



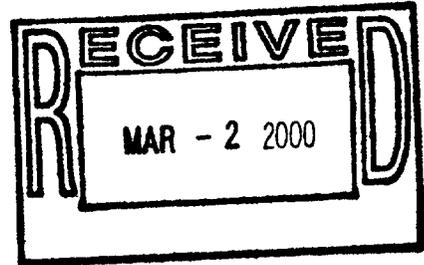
NIKKEN

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Feb 22, 2000

Dr. Elizabeth Yetley
Office of Special Nutrition (HFS-450)
Center of Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street S.W.
Washington, DC 20204



Re; Notification of Product Claims

Dear Dr. Yetley;

This letter serves as notification of the nutrition support labeling statements being made by Nikken, Inc. located at 52 Discovery Rd, Irvine CA 92618 in connection with their line of dietary nutritional supplements. A list of the products and their respective nutritional support statements are listed in the attached Exhibit "A".

Nikken certifies that the information contained in this notice is complete and accurate, and the company maintains documentation to substantiate that its product claims are truthful and not misleading.

If you have any questions, please feel free to contact me and I will do my best to answer your questions.

Sincerely;

Charles H.V. May, MD
Product Manager, Nikken Inc.

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Exhibit "A"

1) Product: FOR WOMEN

Statements of nutritional support relating to specific ingredients in this formula:

Ingredients	Description
Calcium	supports bone health
Vitamin D	helps regulate calcium
Vitamin B6	supports protein and amino acid metabolism
Folate	helps lower homocysteine
Vitamin B12	supports metabolic process
Iron	supports blood
Magnesium	supports energy conversion
Black Cohosh	natural phytoestrogen
Cranberry Fruit	supports urinary tract
Dong Quai	natural phytoestrogen
Fenugreek Fiber	soothing herbal digestive aid
Lutein	supports eye and uterine health
Melatonin	natural hormone
n-Acetyl L-Cysteine	amino acid support
Soy Isoflavones	natural phytoestrogen

2) Product: FOR MEN

Statements of nutritional support relating to specific ingredients in this formula:

Ingredients	Description
Folate	helps lower homocysteine
Vitamin B6	supports protein and amino acid metabolism
Vitamin B12	supports metabolic processes
Calcium	supports bone health
Zinc	supports prostate health
Curcumin Complex	increases digestive bioavailability
Garlic	produces phytochemicals
Taurine	amino acid
Ginkgo Biloba Extract	improves circulation
Glycine	supports muscle metabolism
L-Glutamine	provides intestinal support
Saw Palmetto Berry	supports prostate health

3) Product: LIVER SUPPORT

Statements of nutritional support relating to specific ingredients in this formula:

Ingredients	Description
Maximum Purifying Blend	
Artichoke	detoxifier
Sarsaparilla	detoxifier

4) Product: DIGESTION

Statements of nutritional support relating to specific ingredients in this formula:

Ingredients	Description
Amylase	digestive enzyme
Cellulase	digestive enzyme
Fructooligosaccharides	supports beneficial bacteria
Lactase	digestive enzyme
Protease	digestive enzyme
Lactobacillus	beneficial bacteria
Papaya Fruit Powder	digestive enzyme

5) Product: RESTFUL NIGHT

Statements of nutritional support relating to specific ingredients in this formula:

Ingredients	Description
Calcium	supports muscle relaxation
Vitamin D	helps regulate calcium
Vitamin K	supports blood calcium levels
Magnesium	supports muscle relaxation
Manganese	aids connective tissue formation
Chamomile Flower	natural herbal relaxant
Hops	natural herbal relaxant
Valerian Root	natural herbal relaxant
Melatonin	natural relaxant

6) Product: MULTI - VITAMIN/MINERAL

Statements of nutritional support relating to specific ingredients in this formula:

Ingredients	Description
Vitamin A	supports immune function
Vitamin D	helps regulate calcium
Vitamin K	supports healthy bones
Vitamin B1	aids neural function
Vitamin B2	helps fatty acid oxidation
Niacin	supports muscle health
Vitamin B6	supports protein and amino acid metabolism
Folate	helps lower homocysteine
Vitamin B12	supports metabolic processes
Biotin	aids skin, hair, nail health
Pantothenic Acid	energy system coenzyme
Iodine	supports hormone synthesis
Magnesium	supports energy conversion
Zinc	supports metabolism
Copper	supports iron absorption
Manganese	aids connective tissue formation
Chromium	aids insulin effectiveness
Choline	supports fat metabolism

7) Product: JOINT

Statements of nutritional support relating to specific ingredients in this formula:

Ingredients	Description
High Potency CM complex	natural joint lubricant
Glucosamine Hydrochloride	collagen precursor
Methyl Sulfonylmethane	promotes healthy joint function

8) Product: MENTAL CLARITY

Statements of nutritional support relating to specific ingredients in this formula:

Ingredients	Description
Cordyceps Sinesis	improves circulation
Ginkgo Biloba	improves circulation

9) Product: FAT METABOLIZER

Statements of nutritional support relating to specific ingredients in this formula:

Ingredients	Description
Vitamin C	supports metabolism
Vitamin B1	supports fat and protein metabolism
Vitamin B2	helps energy conversion
Vitamin B6	aids protein and amino acid metabolism
Folate	supports growth and development
Vitamin B12	supports folate metabolism
Chromium	aids insulin effectiveness
Bioperine	enhances bioavailable nutrients
Garcinia Cambogia	reduces hunger sensations
Inositol	supports fat breakdown

10) Product: GARLIC

Statements of nutritional support relating to specific ingredients in this formula:

Ingredients	Description
Aged Garlic Extract™ Powder	produces phytochemicals

11) Product: FOS+

Statements of nutritional support relating to specific ingredients in this formula:

Ingredients	Description
Aged Garlic Extract™ Powder	produces phytochemicals