

November 26, 2002

Division of Compliance and Enforcement/ONPLDS
Center for Food Safety and Applied Nutrition
Food and Drug Administration
HFS-810
200 C Street, SW
Washington, DC 20204

Dear Sirs:

Mera Pharmaceuticals will be marketing AstaFactor[®], an astaxanthin supplement, containing a single active ingredient, astaxanthin, in new packaging with the following structure/function claims:

- 1) Reduce Muscle Soreness
- 2) Powerful Antioxidant 500X stronger than Vitamin E
- 3) Increase Endurance
- 4) Antioxidants like AstaFactor[®] work to neutralize free radicals and oxidative stress.
- 5) Oxidative stress contributes to sore muscles, back pain and a decline in energy and endurance.
- 6) A clinical study using healthy human subjects showed that astaxanthin increased strength almost three fold.

Sincerely,

Jeff Primes
President, Nutraceuticals Division
jprimes@merapharma.com

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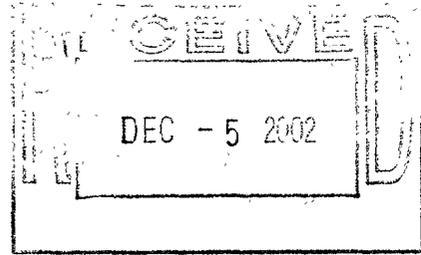
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Dear Sirs:

Mera Pharmaceuticals will be marketing AstaFactor[®], an astaxanthin supplement, containing a single active ingredient, astaxanthin, in new packaging with the following structure/function claims:

- 1) Reduce Muscle Soreness
- 2) Faster Recovery After Exercise
- 3) Powerful Antioxidant 500X stronger than Vitamin E
- 4) Increase Endurance
- 5) Feel Better During Exercise
- 6) Relieves Soreness After Exercise
- 7) Promotes Faster Recovery
- 8) Fights the free radicals and oxidative stress that damage muscles and joints.
- 9) Astaxanthin increased strength and endurance almost three fold in a clinical study using healthy human subjects.

Sincerely,

Jeff Primes
President, Nutraceuticals Division
jprimes@merapharma.com

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