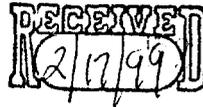


Metagenics[®]
Genetic Potential Through Nutrition



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5 '99 FEB 19 P3:04

February 8, 1999

Office of Special Nutritionals
Center for Food Safety And Applied Nutrition
Food and Drug Administration
200 C Street, SW
Washington, DC 20204

Certified Mail
Return Receipt
P 268 918 957

Re: Structure Function Claims/FDA Notification

Dear Sir or Madam:

Enclosed please find the above document prepared in accordance with the proposed regulation 21 C.F.R. Section 101.93.

Should you have any questions or comments, please do not hesitate to contact Beverly Chin or me at the above number.

Sincerely,

Gloria S. Donovan
Legal Assistant

Enclosure

cc: Beverly Chin, Esq.

97S-0162

LET3142

Also see docket 97S-0163

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 Metagenics, Inc. with its principal place of business at 971 Calle Negocio, San Clemente, California 92673, (714) 366-0818, has commenced marketing the following dietary supplements bearing the following statement(s) on the label and/or in the labeling:

METAGENICS BRAND

Name of Supplement	Name of Ingredient or Supplement that is Subject to the Claim	Text of Claim
BIO – SCORB™	Vitamin C; Bioflavonoids	In addition to its well-known function as an antioxidant, Vitamin C is essential for collagen production and plays an important role in immune function. Bioflavonoids function as an antioxidant and may help support healthy capillary permeability.
CAL APATITE® with Magnesium	Magnesium	Magnesium plays important roles in bone metabolism, with over one-half of the total body stores of magnesium found in bone tissue.
CAL-APATITE® with Boron	Boron	Boron may play a role in maintaining healthy calcium balance possibly through involvement in estrogen and vitamin D metabolism.
CAL MATRIX™	Calcium; Microcrystalline Hydroxyapatite Concentrate; Vitamin D; Glucosamine Sulfate; Vitamin C; Phosphorus; Manganese; Magnesium; zinc; copper; boron; chromium	Provides nutritional support for healthy bones and joint tissue. Offers comprehensive bone nourishment with vitamin D and calcium-rich microcrystalline hydroxyapatite concentrate.

		Also features glucosamine sulfate, targeted minerals, and vitamin C for collagen, bone matrix, and joint support.
CARDIOGENICS™	Magnesium; Potassium; Calcium; Hawthorn berry	<p>Nutritional Support for Cardiovascular Function.</p> <p>Magnesium, potassium and calcium play important roles through heart muscle function through their involvement in nerve conduction and contraction and relaxation of the heart muscle.</p> <p>Magnesium also supports coronary vessel function.</p> <p>Hawthorn berry is traditionally used as herbal support of coronary circulation.</p>
CHROMIUM PICOLINATE	Chromium	Chromium is an essential component of glucose tolerance factor (GTF), assisting insulin in the biochemical regulation of fat, carbohydrate, and protein metabolism and supporting health glucose metabolism.
CHROMIUM PICOLINATE With Boron	Chromium; Boron	<p>Chromium is an essential component of glucose tolerance factor (GTF) and serves to assisting insulin as a component in the biochemical regulation of fat, carbohydrate, and protein metabolism.</p> <p>The trace element, boron, is found in numerous tissues throughout the body and may play a role in sex hormone metabolism.</p>

COLLAGENICS® INTENSIVE CARE FORMULA	D-Glucosamine Sulfate; Proanthocyanidin; Vitamin E; Vitamin C; Zinc Glycinate; Copper Glycinate; Manganese Glycinate	Nutritional support for soft and connective tissue. The formula also supplies patented mineral amino acid chelates that provide precursors for the production of intracellular superoxide dismutase (SOD).
CoQ-10 ST	Coenzyme Q10	Coenzyme Q10 plays an important role in the body's production of energy and also has antioxidant properties.
CORDEPHRINE PRO™	Cordyceps Mycelia	Cordyceps also contains chemical components such as Adenosine. Adenosine is the Nucleoside backbone for ATP - the energy molecule for human life.
FEM OSTEO™	Calcium	Calcium, along with exercise and a healthy diet, can play a significant role in reducing the rate of bone loss or bone thinning and protecting bone strength. Magnesium plays important roles in bone metabolism and muscle relaxation, helping transport calcium into bone and soft tissues.
FEM PROTECT™	Vitamin A; Vitamin E; Folic acid; Salvia root; Ginger rhizome; White Peony root; Licorice root; Calcium d- glucarate; Tumeric rhizome	Designed to provide antioxidant protection for women. Features a unique blend of essential nutrients such as vitamins A, C, and E for antioxidant and immune system support, folic acid and vitamin E to support cardiovascular health, and select Asian herbal extracts traditionally used to support healthy blood circulation. These are combined with the novel components, calcium d- glucarate to support breast tissue health and curcumin C3 complex, which provides the

		antioxidant benefits of curcuminoids from tumeric rhizome.
FIBROPLEX™	Vitamin B1; Vitamin B6; Magnesium; Malic acid	Provides nutritional support for energy metabolism and neuromuscular function with chelated magnesium, malic acid and B vitamins.
500-C METHOXYFLAVONE™	Vitamin C; Bioflavonoid Complex.	In addition to their roles as antioxidants, bioflavonoids may also support the body's ability to maintain healthy capillary integrity. Vitamin C is essential for collagen production, the main component of connective tissue, and plays an important role in immune function.
INFLAVANOID INTENSIVE CARE™	Lemon Bioflavonoid complex 50; Vitamin C; Turmeric Rhizome, Ginger Rhizome Extract	Boswellia, tumeric, and ginger are used to support healthy, balanced eicosanoid synthesis. Features a variety of nutrients with antioxidant properties, including citrus bioflavonoid complex, cayenne pepper, quercetin, and vitamin C.
MYOPLEX P.M.™	Kava kava; Hops	Kava kava and hops have been traditionally used to support relaxation.
OXYGENICS™	Beta-Carotene; Vitamin C; Vitamin E; Zinc Glycinate; Copper Lysinate; Manganese Glycinate	Comprehensive antioxidant formula and free radical quencher. A formula comprised of a comprehensive blend of antioxidants and precursor nutrients to support antioxidant systems within the body. It may help protect against most categories of free radicals. Provides specialized, balanced antioxidant protection. Features patented mineral

		amino acid chelates that are cofactors for the activity of intracellular superoxide dismutase.
ULTRA FLORA PLUS® CAPSULES	Lactobacillus acidophilus; Bifidobacterium Infantis; Globulin Proteins	<p>Features Lactobacillus acidophilus and Bifidobacterium Infantis – friendly flora that help support a healthy intestinal environment.</p> <p>Features a concentrate of globulin proteins which help promote a healthy intestinal environment.</p> <p>Provides excellent gastrointestinal support.</p> <p>Provides excellent natural gastrointestinal probiotic nutrition.</p>
ULTRA FLORA PLUS® DF CAPSULES	Lactobacillus acidophilus; Bifidobacterium Infantis; Globulin Proteins	<p>Features Lactobacillus acidophilus and Bifidobacterium Infantis – friendly flora that help support a healthy intestinal environment.</p> <p>Provides excellent natural gastrointestinal probiotic nutrition.</p>
ZINC DRINK™	Zinc	<p>Zinc is an essential trace element that is needed for the activity of more than 100 enzymes associated with carbohydrate and energy metabolism, protein degradation and synthesis, heme biosynthesis, carbon dioxide transport and many other reactions. It plays a role in the metabolism, function, and maintenance of skin, the pancreas, and male reproductive organs.</p> <p>Zinc is especially important for immune support, tissue synthesis, and for the production and function of</p>

		RNA and DNA.
ZN PICOLINATE	Zinc	<p>Zinc plays an essential role in the healthy function and maintenance of skin and other tissues, the pancreas, and males reproductive organs, and is especially important for immune support.</p> <p>Zinc plays a role in the metabolism, function, and maintenance of skin, the pancreas and male reproductive organs,</p> <p>Zinc is especially important for immune support, tissue synthesis, and for the production and function of RNA and DNA.</p>

ETHICAL NUTRIENTS BRAND

Name of Supplement	Name of Ingredient or Supplement that is Subject to the Claim	Text of Claim
BONE BUILDER™	Calcium; Magnesium; Boron; Vitamin D	<p>Excellent, comprehensive bone support.</p> <p>MCHC (microcrystalline hydroxyapatite concentrate), a calcium-rich bone food that may support bone mineralization, density, and strength.</p> <p>Magnesium plays important roles in bone metabolism and muscle relaxation.</p> <p>Boron, a trace mineral important for bone health. Boron may play a role in maintaining healthy calcium balance through involvement in estrogen metabolism.</p> <p>Vitamin D, an essential nutrient for the maintenance of healthy bones. Vitamin D stimulates intestinal calcium absorption and helps to regulate calcium and phosphorus in the body.</p>
INTESTINAL CARE™	Lactobacillus acidophilus; Bifidobacterium Infantis Culture; Fructooligosaccharides; Immunoglobulin protein concentrate	<p>Supports intestinal health in three ways: 1. With a highly viable strain of L. Acidophilus and Bifidobacteria; 2. FOS to feed and promote the growth of friendly bacteria; 3. Immunoglobulin protein concentrate to assist the friendly bacteria in their normal competition with unfriendly organisms.</p>
SUPER FLAVONOID-C™	Bioflavonoids; Vitamin C	<p>Bioflavonoids, like vitamin C, possess antioxidant properties and support healthy capillary integrity.</p>

ZINC PICO PLUS™	Zinc	Zinc plays an important role in all cells of the body, but is most recognized for its role in the metabolism, function, and maintenance of skin and reproductive organs, and for its involvement in tissue health, cell replication and the immune system.
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UNIPRO BRAND

Name of Supplement	Name of Ingredient or Supplement that is Subject to the Claim	Text of Claim
CARBOPLEX®	Glucose polymers; fructose	<p>Sustained energy drink.</p> <p>May support muscle glycogen levels by providing a source of carbohydrates for carbohydrate loading.</p> <p>Carbohydrates are the premium fuel for athletic performance. High carbohydrate intake may provide a significant positive effect on athletic performance. When compared to a normal or high fat diet, a high carbohydrate diet supports increased muscle glycogen storage and significantly greater endurance. (Glycogen is the major storage form of fuel in muscle.)</p> <p>Carboplex provides a quick source of energy.</p>
CORDEPHRINE XC™	Cordyceps sinensis	<p>Adaptogen formula.</p> <p>May support ATP formation.</p> <p>Adaptogens have phytonutrients that provide support to multiple biological pathways.</p> <p>Features a unique combination of phytonutrients, which may help your body adapt to stress under a wide variety of conditions by supporting adaptogenic function.</p>
ENDURA®	Magnesium	<p>High magnesium energy and rehydration drink</p> <p>Endura's exclusive formula</p>

		<p>features high concentrations of magnesium – essential for cellular energy metabolism.</p> <p>Endura supplies important electrolytes, including high levels of magnesium, in a formula designed to enhance absorption of fluids and electrolytes, to help prevent dehydration.</p> <p>Provides high concentrations of magnesium – essential for cellular energy metabolism.</p> <p>Supplies carbohydrates in the form of glucose polymers and fructose, delivered in a special, balanced ratio designed to help delay the onset of fatigue during strenuous activity. This glucose polymer and fructose blend is excellent for rehydration.</p>
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METABOTANICA BRAND

Name of Supplement	Name of Ingredient or Supplement that is Subject to the Claim	Text of Claim
Andrographis Plus™	Andrographis Leaf Extract; Amla fruit extract; Echinacea Aerial parts; Lemon Balm Aerial parts; Slippery Elm bark; Cinnamon Bark; Fritillaria bulb	<p>A select blend of herbs from around the world in a formula designed to support immune function.</p> <p>Andrographis is an herb traditionally used throughout Asia for its multiple health promoting properties and support of the body's natural resistance.</p> <p>Other herbs include amla, a popular fruit cultivated in India recognized for its antioxidant properties, echinacea, a Native American herb that may help support the immune system, along with lemon balm, slippery elm, cinnamon, and fritillaria.</p>
Echinacea-Synergy™	Echinacea Root; Goldenseal Root; Irish Moss; Burdock Root; Peony Root; Red Clover Blossom; Licorice Root; Ginger Root; Centaury Flowering Tops; L-Lysine; Pantothenic acid; Vitamin A	<p>Herbal support for immune function.</p> <p>A unique, synergistic formula that combines wild-crafted echinacea with goldenseal and other specially selected herbs and nutrients that help support general immunity.</p> <p>Additional herbs in the formula are traditionally used to support digestion and assimilation with the goal of more fully nourishing the immune system.</p> <p>Lysine and vitamin A help maintain the integrity of mucous membranes, and</p>

		pantothenic acid helps support adrenal function.
Feverfew Plus™	Feverfew	Feverfew, a highly valued herb used since ancient times and especially popular today in Europe, may help maintain healthy cerebral blood vessel tone.
Ginkgo-RoseOx™	Rosemary Leaf Extract; Ginkgo Leaf Extract	<p>A formula designed to support healthy mental function by combining Ginkgo biloba with a unique extract of rosemary leaf known as RoseOx®.</p> <p>Ginkgo biloba may increase cerebral blood circulation and help support mental alertness and memory, especially in older individuals.</p> <p>Ginkgo is then combined with rosemary leaf for enhanced antioxidant support to help maintain healthy cell membranes.</p> <p>Carnosic acid is the primary compound responsible for rosemary's antioxidant activity.</p>
Kava Plus™	Kava Root Stock; Poria Sclerotium; Chinese Senega Root; Licorice Root	<p>A unique formula designed to promote a sense of calm and well-being by combining the South Pacific herb kava with Chinese herbs such as poria and polygala.</p> <p>Modern science has confirmed kava's ability to promote physical and mental relaxation.</p> <p>This herb is then combined with a decoction of Chinese herbs traditionally used to maintain a "calm spirit" such as poria and polygala, to reinforce the effects of kava.</p>
St. John's Wort	St. John's Wort; Folic Acid; Vitamin B12	St. John's Wort contains 450 mg of a premium extract of St.

		<p>John's Wort standardized to 0.3% total hypericin, the amount associated with the support of a calm, positive mood and emotional well-being.</p> <p>This herb is then combined with folic acid and vitamin B12, nutrients that are postulated to play a role in the synthesis of serotonin, a neurotransmitter involved in the regulation of mood, sleep, memory and learning.</p>
St. John's Wort Plus™	St. John's Wort; California Poppy Whole Plant; Red Sage Root; Hawthorn Berry	<p>A unique formula designed to support healthy emotional balance and well-being by drawing from the herbal traditions of Asian, North American and European cultures.</p> <p>This herbal blend combines a premium standardized extract of St. John's wort with California poppy, herbs known for promoting a positive, calm mood.</p> <p>These botanicals are then blended with other prized herbs traditionally used to support the nervous and circulatory systems such as sour jujube seed and hawthorn berry, which reinforce the targeted focus of St. John's wort.</p>
Exhilarin™	Amla Fruit; Ashwagandha Root; Gotu Kola Leaf; Indian Gall Fruit; Ginger Rhizome; Beleric Myrobalan Fruit; Mineral Pitch; Brahmi Leaf; Cowhage Seed; Heart-leaved Moonseed Stern; Shatavari Root; Country Mallow Aerial Parts; Licorice Root; Frankincense Gum Resin ; Nutmeg Seed; Long Pepper Fruit; Basil Leaf; Cardamom	<p>An Ayurvedic decoction of 20 herbs that are traditionally used for their adaptogenic properties and to help maintain mental acuity and support overall well-being.</p>

	Fruit; Clove Fruit Giant Potato Root	
Mentalin™	Bacopa Whole Plant; Gotu Kola Leaf; Trailing Eclipta Leaf; Indian Gall Fruit; Ashwagandha Root; Amla Fruit; Beleric Myrobalan Fruit; Heart-leaved Moonseed Leaf and Stem; Convolvulus Whole Plant; Indian Valerian Leaf; Nutmeg Fruit; Asparagus Root; Cardamom seed; Ginger Root; Indian Spikenard Root-stem; Giant Potato Root	Combines herbs traditionally used within the ancient system of Ayurveda to nourish the brain and to help support mental function, alertness, and memory. This unique decoction also contains herbs traditionally used to maintain a positive mood and promote a sense of calm.
Microbicin™	Indian Lilac Leaf; Myrrh Gum Resin; Guggulu Gum; Boswellia Gum Resin; Heart-leaved Moonseed Stem; Indian Madder Root; Amla Fruit; Mineral Pitch; Ginger Rhizome; Long Pepper Fruit	An herbal decoction formulated from select indigenous Ayurvedic herbs traditionally used to support the body's defense system.
Primalin™	Cowhage Seed Pod Extract; Ashwagandha Root Extract; Shatavari Root Extract; Country Mallow Root 10:1 Extract; Tribulus Fruit Extract	Combines premium standardized extracts traditionally used within the system of Ayurveda to support male vitality.
TCB 15™	Bupleurum & Peony	Neuromuscular support. Helps facilitate the smooth movement of liver ch'i, which is associated in the ancient Chinese literature with nervous system and muscle function.

METAPHARMA BRAND

Name of Supplement	Name of Ingredient of Supplement that is Subject to the Claim	Text of Claim
ANDROGRAPHIS SELECT™	Andrographis Leaf Extract; Amla Fruit Extract; Echinacea Areal Parts; Lemon Balm Aerial Parts; Slippery Elm Bark; Cinnamon Bark; Fritillaria Bulb	<p>A unique blend of herbs from around the world in a formula designed to support immune function.</p> <p>Andrographis is an herb traditionally used throughout Asia for its multiple health promoting properties and support of the body's health promoting properties and support of the body's natural resistance.</p> <p>Other herbs include amla, a popular fruit cultivated in India recognized for its antioxidant properties, echinacea, a Native American herb that may help support the immune system, along with lemon balm, slippery elm cinnamon and fritillaria.</p>
ANTIOX-SELECT™	Beta-Carotene; Vitamin C; Vitamin E	<p>Comprehensive Antioxidant formula & free radical quencher.</p> <p>An exquisite formula comprised of a comprehensive blend of antioxidants and precursor nutrients to support antioxidant systems within the body. It may help protect against most categories of cell-damaging free radicals.</p> <p>Provides specialized, balanced antioxidant protection, and patented mineral amino acid chelates that are cofactors for the activity of intracellular superoxide dismutase.</p>
BALANCED EFA'S™	Eicosapentaenoic Acid; Docohexaenoic Acid; Gamma-Linolenic Acid; Vitamin E	<p>Essential fatty acids are precursors of eicosanoids, a group of hormone-like compounds produced in the body.</p> <p>A healthy balance of eicosanoids helps to support proper cardiovascular, nervous, and immune system function.</p>
BIFIDUS-SELECT DF™	Bifidobacterium infantis culture	Bifidus-Select DF can be used

		routinely by people of all ages (infants to seniors) as a supplement to help maintain a healthy balance of intestinal flora.
BOSWELLIA SELECT™	Lemon Bioflavonoid Complex; Vitamin C; Quercetin; Boswellia Gum Extract; Turmeric Rhizome Extract; Ginger Rhizome Extract; Cayenne Pepper Fruit	Supports healthy, balanced eicosanoid synthesis. Features a variety of nutrients with antioxidant properties.
CARDIO FACTORS™	L-Taurine, Magnesium, Potassium; Calcium; Raw Heart Concentrate; Selenium; Chromium; Hawthorn Berry; Gentian Root; Green Pea Root	Provides nutritional support for cardiovascular health. Magnesium, potassium, and calcium play important roles in heart function, through their involvement in nerve conduction and contraction and relaxation of the heart muscle. Hawthorn berry is traditionally used as herbal support for cardiovascular circulation. Magnesium also supports coronary vessel function.
COLLAPLEX™	L-Proline; L-Lysine; L-Cystine; Glycine; Alpha-Ketoglutaric Acid; Copper; Vitamin C; Magnesium; Zinc; Manganese; L-Glutamine; D-Xylose; Iron; Taurine; Vitamin B6; Pantothenic; Methylsulfonylmethane; Horsetail herb	Nutritional support for connective tissue. Supports the growth and construction of connective tissue.
DOPHILUS –SELECT DFT™	Lactobacillus acidophilus culture	L. acidophilus is used worldwide to help maintain a healthy balance of intestinal flora and a healthy intestinal environment. The NCFM™ Superstrain is selected for its many beneficial properties including the ability to colonize intestinal cells and help maintain a healthy balance of intestinal flora.
ECHINACEA COMPLEX™	L-Lysine; Pantothenic Acid; Vitamin A; Echinacea Root; Goldenseal Root; Irish Moss; Burdock Root; Peony Root; Red Clover Blossom; Licorice Root; Ginger Root; Centaury Flowering Tops	Herbal support for immune function. A unique, synergistic formula that combines wild-crafted echinacea with goldenseal and other specially selected herbs and nutrients that help support general immunity. Additional herbs in the formula

		<p>are traditionally used to support digestion and assimilation with the goal of more fully nourishing the immune system.</p> <p>Lysine and vitamin A help maintain the integrity of mucous membranes, and pantothenic acid helps support adrenal function.</p>
ENZYBLEND™	Protease; Amylase; Lipase	<p>A comprehensive enzyme complex that provides support for digestive function.</p> <p>The raw pancreatic enzyme concentrate supplies proteases that break down protein, amylases that break down carbohydrate, and lipases that break down fat.</p>
ENZYBLEND MAXIMUM™	Protease; Amylase; Lipase	<p>A comprehensive enzyme complex that provides support for digestive function.</p> <p>The raw pancreatic enzyme concentrate supplies proteases that break down protein, amylases that break down carbohydrate, and lipases that break down fat.</p>
FEM DEFENSE™	Curcumin C3 Complex®; Vitamin C; Vitamin A; Calcium D-Glucarate; Vitamin E; Folic Acid; Salvia Root; Licorice Root	<p>Cell antioxidant formula;</p> <p>Designed to provide antioxidant protection for women.</p> <p>Features a strategic blend of essential nutrients such as vitamins, A, C, and E for antioxidant and immune system support, folic acid and vitamin E to support cardiovascular health, and select Asian herbal extract traditionally used to support healthy blood circulation. These are combined with the novel components, calcium d-glucarate to support breast tissue health and curcumin C3 complex, which provides the antioxidant benefits of curcuminoids from turmeric.</p>
FEM RENEW™	Dong Quai; Licorice Root	<p>Herbal menstrual support.</p> <p>A classical combination of Chinese herbal extracts such as dong quai, codonopsis, and licorice, which are traditionally</p>

		used to support women's reproductive health.
FLORAPLEX-SELECT DF™	Bifidobacterium infantis culture; Lactobacillus acidophilus culture; Fructooligosaccharides	<p>A patented, dairy-free probiotic supplement featuring highly viable, pure strains of Lactobacillus acidophilus and Bifidobacterium infantis- important "friendly" flora that help to support a healthy intestinal environment.</p> <p>Features the valuable Probio-Saccharide® factor, fructooligosaccharides, which are an excellent food source for the beneficial bacteria and help to promote their growth in the intestines.</p> <p>Provides a source of excellent natural gastrointestinal probiotic nutrition.</p>
FLOW BALANCE™	Vitamin C; Vitamin A; Iron; Vitamin B6; Vitamin B12; Folic Acid	<p>Support for menstrual flow.</p> <p>A specialized formula designed to help balance menstrual flow by combining the nourishing properties of select Eurasian and Native American herbal extracts, such as cramp bark and dong quai, with a comprehensive blend of nutrients that support the tissues involved in healthy menstruation.</p>
FLUID FACTORS™	Vitamin E; Citric Acid; Malic Acid; Taurine; Potassium; Magnesium; Chloride; Vitamin C; Sodium; Phosphorus; Calcium; Pantothenic Acid; Carnosine; Niacin; Vitamin B6; Chromium	<p>Energy and hydration drink.</p> <p>Features high concentrations of magnesium-essential for cellular energy metabolism.</p> <p>Supplies carbohydrates in the form of glucose polymers and fructose, delivered in a special, balanced blend designed to help delay the onset of fatigue during strenuous activity.</p> <p>Fluid factors supplies important electrolytes, including high levels of magnesium, in a formula designed to enhance absorption of electrolytes and fluids to help prevent dehydration.</p>
GAR-EXCELLENCE™	Raw Garlic Concentrate	Garlic, traditionally known for its antioxidant properties, helps support healthy cholesterol levels and provides support for the

		cardiovascular system and the immune system.
MALIC SYNERGY™	Vitamin B1; Vitamin B6; Magnesium; Manganese; Malic Acid.	Nutritional support for neuromuscular function. A highly specialized formula that provides nutritional support for energy metabolism and neuromuscular functions, with chelated magnesium, malic acid, and B vitamins.
MENTAHERB COMPLEX™	Bacopa Whole Plant; Gotu Kola Leaf; Trailing Eclipta Leaf; Indian Gall Fruit; Ashwagandha Root; Amla Fruit; Beleric Myrobalan Fruit; Heart-leaved Moonseed Leaf and Stem; Convolvulus Whole Plant; Indian Valerian Leaf; Nutmeg Fruit; Asparagus Root; Cardamom Seed; Ginger Root; Indian Spikenard Root-stem; Giant Potato Root	Combines herbs traditionally used within the ancient system of Ayurveda to nourish the brain and to help support mental function, alertness, and memory. This unique formula also contains herbs traditionally used to maintain a positive mood and promote a sense of calm.
MINERAL SELECT™	Calcium; Magnesium	Provides the extra calcium you may need while significantly boosting your magnesium intake, minerals that are both essential for good bone health and muscle function.
MYO NUTRIENTS™	Magnesium; Calcium	A specialized formula that supplies bioavailable forms of calcium and magnesium, which play a role in muscle contraction and relaxation.
MYO NUTRIENTS-PM™	Magnesium; Calcium; Passion Flower; Valerian Root; Hop Flower; Kava Kava Root	A specialized formula that supplies bioavailable forms of calcium and magnesium, which play a role in muscle contraction and relaxation These minerals are blended with valerian, hops, and kava kava, herbs traditionally used to relax the mind and body. Kava Kava and hops are traditionally used to support relaxation.
OSTEO ESSENTIALS™	Microcrystalline hydroxyapatite concentrate; Calcium	Bone support formula. Calcium, along with regular exercise and a healthy diet, can play a significant role in reducing the rate of bone loss or bone thinning and in protecting bone strength.

		Designed to help and maintain strong healthy bones.
OSTEO ESSENTIALS-MG™	Microcrystalline Hydroxyapatite Concentrate; Calcium; Magnesium	<p>Designed to help women build and maintain strong, healthy bones and support muscles.</p> <p>Calcium, along with exercise and a healthy diet, can play a significant role in reducing the rate of bone loss or bone thinning and in protecting bone strength.</p> <p>Magnesium plays important roles in bone metabolism and muscle relaxation, helping to transport calcium into bone and soft tissue.</p>
OSTEO FIRM™	Calcium; Phosphorus; Glucosamine Sulfate; Vitamin C; Manganese; Vitamin D; Magnesium; Zinc; Copper; Boron; Chromium	<p>Nutritional bone support.</p> <p>Provides nutritional support for healthy bones and joint tissue.</p> <p>Features glucosamine sulfate, targeted minerals, and vitamin C for collagen, bone matrix, and joint support.</p>
OSTEO FIRM PLUS™	Calcium; Phosphorus; Vitamin A; Vitamin E; Vitamin D; Vitamin C; Magnesium; Niacinamide; Pantothenic Acid; Vitamin B6; Riboflavin; Vitamin B1; Zinc; Copper; Manganese; Folic Acid; Quercetin; Alpha-Carotene; Cryptoxanthin; Zeaxanthin; Lutein	<p>Special nutritional support for women over 50.</p> <p>An excellent formulation providing calcium, vitamins, and minerals specially designed to provide nutritional support for menopausal and post-menopausal women.</p> <p>Provides comprehensive nutritional bone support featuring calcium-rich microcrystalline hydroxyapatite concentrate, trace minerals, and vitamin D.</p> <p>Calcium, along with exercise and a healthy diet can play a significant role in reducing the rate of bone loss or bone thinning and in protecting bone strength.</p>
PREMENSTRUAL HERBS™	Bupleurum Root; Peony Root; Dong Quai Root; Atractylodes Rhizome; Poria Fungus; Ginger Rhizome; Licorice Root; Peppermint Herb	<p>Herbal premenstrual support.</p> <p>An ancient chinese botanical formula traditionally used to nourish the liver and promote the flow of liver ch'i (vital force).</p>
PREMENSTRUAL NUTRIENTS™	Taurine; Vitamin C; Choline; Magnesium; Pantothenic Acid; Vitamin B6; Chasteberry Fruit;	<p>Premenstrual support formula.</p> <p>Designed to provide support to</p>

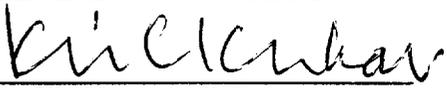
	Ginger Root; Salvia Root; Wild Lettuce Leaf; Licorice Root	<p>metabolic pathways involved in hormone metabolism and muscular contraction and relaxation.</p> <p>The formula features nutrients to support liver involvement in hormone metabolism and balance, and to support the adrenal glands' adaptive response.</p> <p>Selected herbal extracts in the formula, including chasteberry and cramp bark, have been traditionally used to support health and well-being throughout the menstrual cycle.</p>
SEPTIHERB COMPLEX™	Indian Lilac Leaf; Myrrh Gum Resin; Guggulu Gum; Boswellia Gum Resin; Heart-Leaved Moonseed Stem; Indian Madder root; Amla Fruit; Mineral Pitch; Ginger Rhizome; Long Pepper Fruit	An herbal concentrate formulated from select indigenous Ayurvedic herbs traditionally used to support the body's defense system.
ST. JOHN'S WORT	St. John's Wort	<p>Contains 450 mg of premium extract of St. John's wort standardized to 0.3% total hypericin, the amount associated with the support of a calm, positive mood and emotional well-being.</p> <p>This herb is then combined with folic acid and vitamin B12, nutrients that support healthy brain and nervous system function.</p>
ST. JOHN'S WORT SELECT	St. John's Wort; California Poppy; Sour Jujube Seed; Hawthorn Berry	<p>Designed to support healthy emotional balance and well being.</p> <p>St. John's wort and California poppy are herbs known for promoting a positive, calm mood.</p> <p>These herbs are then blended with other prized herbs traditionally used to support the nervous and circulatory systems, such as sour jujube seed and hawthorn berry, which reinforces the targeted focus of St. John's wort.</p>
SURE-COQ10™	Coenzyme Q10; Vitamin E	Coenzyme Q10 plays an important role in the body's

		production of energy and also has antioxidant properties.
VITAMIN E/SE	Vitamin E; Selenium	<p>Antioxidant formula.</p> <p>Features selenium and natural source vitamin E, which work closely together to help protect the heart and other tissues against damage caused by free radicals.</p> <p>Vitamin E is a fat-soluble antioxidant that helps protect against free radical damage to fatty substances within the body and may help modulate balanced prostaglandin synthesis.</p>

ESSENTIALS BY ETHICAL NUTRIENTS BRAND

Name of Supplement	Name of Ingredient or Supplement that is Subject to the Claim	Text of Claim
GINKGO BILOBA STANDARDIZED EXTRACT	Ginkgo Leaf Biloba	Ginkgo Biloba may promote blood circulation to the brain and support mental alertness and memory, especially in older individuals.

THE UNDERSIGNED CERTIFIES THAT THE INFORMATION CONTAINED IN THIS NOTICE IS COMPLETE AND ACCURATE AND THAT METAGENICS, INC. HAS SUBSTANTIATION THAT THE STATEMENTS CONTAINED HEREIN ARE TRUTHFUL AND NOT MISLEADING.

BY: 
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Its Director of Research and Development