



ZIG ZIGLAR NETWORK

ZIG ZIGLAR
NETWORK INC.

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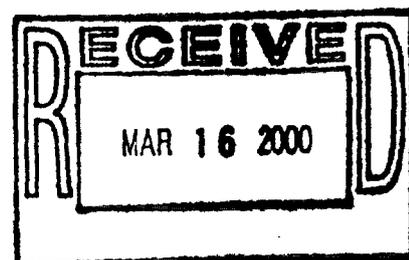
www.zigzignetwork.com

Richard Oates
Executive Vice President/COO

March 9, 2000

69797

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



Re: Notification of Product Claims

Dear Dr. Yetley:

This letter serves as notification of the nutritional support label statement being made by Zig Zigar Network located at 2009 Chenault, Carrollton, TX 75006 in connection with the marketing of its line of dietary supplements. A list of the products and their respective nutritional support statements are listed in the attached Exhibit "A."

Zig Zigar Network certifies that the information contained in this notice is complete and accurate, and that 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 the undersigned.

Sincerely,

Encl.

RO/jt

97S - 0162

LET 5077

Daily Difference

Daily Difference Ingredients:

Vitamin A (as 100% beta-carotene)
 Vitamin C (as ascorbic acid)
 Vitamin D (as cholecalciferol)
 Vitamin E (d-alpha tocopheryl succinate)
 Thiamin (Vitamin B1) USP
 Riboflavin (Vitamin B2) USP
 Niacin (as niacinamide)
 Vitamin B6 (pyridoxine hydrochloride) USP
 Folate (folic acid) USP
 Vitamin B12 (cyanocobalamin)
 Biotin
 Pantothenic Acid (as calcium pantothenate)
 Calcium (as calcium amino acid chelate)
 Iodine (as potassium iodide)
 Magnesium (as magnesium amino acid chelate)
 Zinc (as zinc amino acid chelate)
 Selenium (as L-selenomethionine)
 Copper (as copper amino acid chelate)
 Manganese (as manganese amino acid chelate)
 Chromium (as chromium niacinate)
 Molybdenum (as molybdenum amino acid chelate)
 Potassium (as potassium amino acid chelate)
 EPA (eicosapentaenoic acid) (from fish oil)
 DHA (docosahexanoic acid) (from fish oil)
 Quercetin
 Broccoli (part)
 Choline (as choline bitartrate)
 Citrus Bioflavonoids (from citrus peel)
 Garlic (clove)
 Siberian Ginseng (root)
 Inositol (vitamin B3)
 Licorice (rhizome & roots)
 Alpha Lipoic Acid
 Coenzyme Q 10
 Ginkgo Biloba Leaf 24/6
 Grape Seed Extract (95%)
 Trace Mineral Complex
 Boron (as boron amino acid complex)
 Vanadium (as vanadium sulfate)
 IDH Factor:

- Arabinogalactan, Soy Isoflavone Concentrate, CereCalese Amylase, Glucomylase, Protease, Alpha-Galactosidase, Lipase

Other ingredients: Gelatin, Magnesium stearate (veg. grade), Silicon dioxide, rice flour

Daily Difference Statements of Nutritional Support:

- Vitamin and mineral support for the body's immune, metabolic, digestive, nervous, structure and circulatory systems.
- Enzyme fortified for assimilation.

Exhibit A

Zinera Cleanse

Zinera Cleanse Ingredients:

Vitamin B (as Pyridoxine hydrochloride)

Folate (as folic acid)

Vitamin B 12 (as cyanocobalamin)

Zinera Proprietary Blend:

- Apple Pectin
- Citrus Rind
- Oat Bran, Organic
- Psyllium Husk
- Rice Bran
- Gum Arabic
- Inulin
- Cascara Sagrada Bark
- Chlorophyll

IDH Factor:

- Arabinogalactan, Soy Isoflavone Concentrate, CereCalse Amylase, Glucomylase, Protease, Alpha-galactosidase, Lipase.

Other ingredients: Cellulose, Magnesium stearate (veg. Grade)

Zinera Cleanse Statements of Nutritional Support:

- Promotes toxin elimination.
- Zinera Cleanse helps maintain an efficient digestive system.
- Zinera Cleanse, and its 12 herbs and fibers, is designed to help and support the gastrointestinal tract by:
 - Helping the body regain its digestive efficiency
 - Helping the body regain its colon efficiency
 - Aids to brush, cleanse and tone the elimination system
- Zinera Cleanse is a natural therapy for intestinal cleansing to help digestive and elimination efficiency resulting in a healthy and energetic body.

Zinera C-D

Zinera C-D Ingredients:

Vitamin C (as ascorbic acid)

Thiamine (as thiamin mononitrate)

Riboflavin

Niacin (as niacinamide)

Vitamin B6 (as pyridoxine hydrochloride)

Folate (as folic acid)

Vitamin B12 (as cyanocobalamin)

Pantothenic Acid (as calcium pantothenate)

Iodine (from kelp)

Magnesium (as magnesium amino acid chelate)

Selenium (as L-selenomethionine)

Manganese (as manganese amino acid chelate)

Molybdenum (as molybdenum amino acid chelate)

N-Acetyl-Cysteine

Exhibit A

Zinera Proprietary Blend

Ginger root, Milk thistle root extract (80%), Dandelion root, Cascara sagrada bark, Yellowdock root, Sarsaparilla root (Mexican), Golden seal herb, Parsley leaves and stems, Aloe vera extract (200:1), Echinacea pupurea herb extract (4%), Licorice root, Oregon grape root, Apple pectin, Burdock root, Fructooligosaccharides, Citrus rind, Oat bran, Blonde psyllium seed husk, Rice Bran, Guar gum, Slippery elm bark and Chlorophyll.

IDH Factor:

- Arabinogalactan, Soy Isoflavone Concentrate, CereCalese Amylase, Glucomylase, Protease, Alpha-Galactosidase, Lipase

Other ingredients: Cellulose, Magnesium stearate and Silicon dioxide

Zinera C-D Statements of Nutritional Support:

- Zinera C-D is designed to support the healthy role of our body's digestive, detoxification and elimination systems. This formula is designed to release trapped toxins in the body's system and eliminate them through a simultaneous cleansing.
- Zinera CD Herbal Cleanse and Detox system supports your body's elimination process of unwanted toxins and wastes. It contains ingredients that act on the lymphatic system, kidneys, blood, liver, intestine and skin to support the proper function of these body systems. This special formula of herbs, amino acids, vitamins, minerals and antioxidants is combined with the ZZN patented IDH factors to enhance nutrient delivery and ingredient assimilation.
- This unique formula will help maintain natural tone and health to the colon, improve absorption of vital nutrients, provide renewed energy, and help to reestablish balance and a healthy intestinal system.
- The fiber was carefully chosen to lubricate the colon and facilitate elimination.
- The ZZN "system" has the advantage of linking the cleansing with the detoxification, a necessity to prevent or shorten the effects that newly released toxins will have on the body should they not be expelled quickly by cleansing.
- Natural herbs are added to encourage the cleansing of the lymph glands, liver, kidney, colon and skin.
- Intended for Detoxification and Cleansing.
- This 41-ingredient "system" is a 14-day program that can be repeated every 3 months and results in improved elimination, more complete digestion, radiant eyes and skin, and an increase in vitality.
- Zinera CD is designed to support the healthy function of our body's digestive and detoxification systems with simultaneous support of the elimination system.
- The CD formula contains vitamins, minerals, soluble and insoluble fibers as well as antioxidants to support the body's defense system.

Exhibit A

Z-Radical

Z-Radical Ingredients:

Vitamin A (as palmitate)
Vitamin A (as mixed carotenoids)
Vitamin C (as ascorbic acid)
Vitamin E (as d-alpha tocopherol succinate)
Vitamin B 6 (pyridoxine hydrochloride)
Folate (as folic acid)
Vitamin B 12 (as cyanocobalamin)
Pantothenic Acid (as calcium pantothenate)
Zinc (as amino acid chelate)
Selenium (as L-selenomethionine)
Copper (as amino acid chelate)
Manganese (as amino acid chelate)
Coenzyme Q 10
Alpha Lipoic Acid
L-Cysteine HCl
Tocotrienols concentrate (7.5%)
Quercetin
L-Methionine

Botanical Antioxidant Blend:

- (Grape Seed Extract (*Vitis vinifera*) (95%), Bilberry fruit extract (4:1), Milk thistle root extract, 80%, Ginkgo leaf extract, 50% (*Camellia sinensis* [L.] Kuntze), Grape skin extract, 20% (*Vitis vinifera*), and Rosemary leaf.

IDH Factor:

- Arabinogalactan, Soy Isoflavone Concentrate, CereCalse Amylase, Glucomylase, Protease, Alpha-Galactosidase, Lipase.

Other ingredients: Gelatin, Magnesium stearate (veg. Grade), Silicon dioxide

Z-Radical Statements of Nutritional Support:

- Antioxidant complex designed to support the healthy functioning of the immune system.
- Z-Radical is a blended antioxidant system which serves as a powerful protective network of free radical scavengers that form a comprehensive cell defense.
- To fight free radical damage and aging.
- 4 Minerals that assist the body in forming its own antioxidant enzymes (in chelate form).
- The Zinera IDH Factor for support of the Immune System; Digestive System and Heart Health.
- Z-Radical provides comprehensive nutritional protection against free radical oxidant damage to the cells and tissues of the body.
- Studies on aging indicate that destructive molecules called free radicals act as electronic terrorists wreaking havoc on our bodies. If they go unchecked, free radicals can damage cells, organ tissues, and the lining of our arteries, as well as accelerate the aging process throughout our bodies.

Exhibit A

Z-Zymes

Z-Zymes Ingredients:

Zinera n-zimes™ Blend

- Glucoamylase
- Amylase
- Cellulase
- Malt Disatase
- CereCalese™
- Protease 6.0
- Invertase
- Pectinase
- Protease 4.5
- Lipase
- Lactase
- Alpha Galactosidase
- Peptidase FP
- Bromelain

Botanical Zinera Blend

- Arabinogalactan
- Ginger Rhizome
- Spearmint Leaf (herb powder)
- Gamma Oryzanol

Other Ingredients: Gelatin and water, Soy Lecithin Blend is used as a processing aid. Enzyme activity is determined and reported according to Standard Food Chemical Codex procedures accepted by the Food and Drug Administration.

Z-Zymes Statements of Nutritional Support:

- Plant enzyme digestive complex.
- Supplemental enzyme of plant origin can improve digestion and help ensure the maximum level of nutrient absorption. Additional herbs and nutrients aid in soothing the stomach and stimulating digestion.
- Z-Zymes™ is a proprietary formulation of enzymes, chemical complexes that occur in both raw foods and the pancreas to help the body break down foods into easily digestible nutrients.
- Processed foods and even cooked fruits and vegetables are virtually empty of the enzymes needed to help the body repair tissues and maintain good health.
- This formula not only supports the body's natural digestion processes, this special enzyme complex is combined with phyto-therapeutic herbs and probiotics to support optimal digestion and assimilation of food and nutrients.
- Created to support essential digestion and assimilation of foods and nutrients.
- Enzymes break down fats, carbohydrates and proteins into digestible parts to assure that the nutrients in the food are assimilated into the body's cells to keep them active and healthy.
- By formulating plant digestive enzymes in each product, Zinera assures you that the body's cells receive the nutrients that otherwise would remain locked in our food or supplements.

Exhibit A

- ZZN has also added CereCalase™, a multi-enzyme complex that now addresses the buildup of phytic acids from wheat, oats, and soybeans that inhibit the absorption of iron, calcium, magnesium, and zinc.
- Addition of CereCelese, a licensed blend of 3 additional enzymes that improve mineral absorption.
- Three additional herbs to soothe the stomach and aid digestion.

Zinergize

Zinergize Ingredients:

Vitamin B6 (as pyridoxine hydrochloride)

Folate (as folic acid)

Vitamin B12 (as cyanocobalamin)

Pantothenic Acid (as calcium pantothenate)

Chromium (as chromium polynicotinate)

DL-Phenylalanine

Garcinia Fruit Extract Garcinia Cambogia (50% (-) hydroxycitric acid)

Guarana Seed Extract (22% caffeine)

Ginger Root

IDH Factor:

- Arabinogalactan, Soy Isoflavone Concentrate, CereCalase Amylase, Glucomylase, Protease, Alpha-Galactosidase, Lipase

Other ingredients: Cellulose, Magnesium stearate (veg. Grade), Stearic acid and Silicon dioxide.

Zinergize Statements of Nutritional Support:

- A unique weight-management formula that combines an anti-craving complex, and an herbal nutrient that increases fat breakdown and aids in appetite suppression.
- Zinergize acts as a precursor to overcome the possible genetic flow and increase dopamine levels to reduce the carbohydrate and sugar binging that leads to being overweight.
- The Chromium – DLP complex serves as a precursor to dopamine and reduces the craving for carbohydrates and sugar. Garcinia Cambogia aids in appetite suppression and fat breakdown.
- Supported by the enzyme/soy/cardio/immune complex IDH Factors™; to enhance nutrient delivery and ensure assimilation.
- Weight management is a process that can take many months depending on the amount of weight that should be lost. Zinergize and its reduction of carbohydrate craving can take 4 to 5 weeks for the neurotransmitter benefits to result.
- The Zinergize DL-Phenylalanine-Chromium Complex helps regulate the reward sites in your brain by restoring normal levels of dopamine neurotransmitters.
- The herbal nutrient Garcinia Cambogia at 1500mg per day helps support fat breakdown and aids in appetite control.
- B Complex and Guarana give energy support.

Exhibit A

General Claims – Zinera

Statements of Nutritional Support:

- Zinera addresses overall health with a carefully integrated approach to individual wellness. Zinera accentuates the delivery of bioavailable nutrients to nourish and support individual health by targeting the body's systems at a cellular level by emphasizing "optimal health" as opposed to treating specific deficiencies. Targeted support of the immune, circulatory, metabolic, nervous, endocrine, structure, and digestive systems enhances and strengthens the body's optimal health while at the same time fortifying and protecting the body.
- While the presence of enzymes in each of the products enhances the absorption and assimilation of that product.
- Arabinogalactan (AG) is formulated in every Zinera product incorporating two very distinct advantages:
 - AG Is a natural prebiotic (a food source for the growth of friendly bacteria in the gastrointestinal tract).
 - AG is an immune enhancer, stimulating beneficial cell populations that play an active role in the body's immune system.
- All Zinera formulas include a Cardio/Heart Health Complex of Vitamin B-12, Folic Acid, and Vitamin B-6. This formula alleviates the build-up of homocysteine in the body.
- All Zinera formulas include a Soy Concentrate that supplies isoflavones, the remarkable nutrients that include genistein, daidzein and saponins that support and strengthen the immune system to provide very specific benefits to women and men in very different ways.