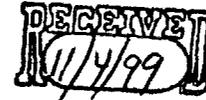


**PROVENANCE™**  
Your path to health and well-being

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October 27, 1999

Dr. Robert Moore  
Office of Special Nutritionals (HFS-450)  
Center for Food and Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street SW  
Washington, DC 20204



VIA U.S. POSTAL MAIL

RE: STATEMENTS OF NUTRITIONAL SUPPORT

Dear Dr. Moore:

Pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994, *Herbalogix, Inc. 987 North Enterprise Street, Orange, CA 92867*, wishes to notify the Food and Drug Administration that it has, within the past 30 days, commenced marketing a line of dietary supplements, which bears statements of nutritional support.

The following list notes the structure function claims for each dietary supplement product. These statements are accompanied by the required disclaimer that is prominently displayed in bold-faced type.

These statements of nutritional support are based on a large body of data, which, in our judgment renders these statements, truthful and non-misleading.

Sincerely,

  
Joel E. Rath  
Managing Director

JR:ln

Enclosures

987 N. Enterprise Street  
Orange California 92867-5472  
phone 714 765 8355  
fax 714 769 1181

975 - 0162

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# PROVENANCE™

CLAIM	Product Name
Provenance Esteem is a complete three-part weight management and nutritional system, which helps you reduce or manage your weight with these natural, premium quality, nutrient-rich products.*	ESTEEM OVERVIEW PAGE
Brain nutrient Phosphatidylserine for enhancing memory and other cognitive functions, especially as we age.*	Objectives Brain Wave™
Brain Wave™ Helps support memory and alertness*	Objectives Brain Wave™
Brain Wave™ contains our Exclusive Enhancing Blend of herbs and phytonutrients for boosting brain power and overall enhanced cognitive performance.*	Objectives Brain Wave™
Brain Wave™ is an exceptional combination of nutrients formulated to enhance brain function and improve mental sharpness.*	Objectives Brain Wave™
Ginkgo Biloba improves circulation to the brain and also helps protect the brain by its antioxidant action.*	Objectives Brain Wave™
Calm Spirit™ Supports positive well-being*	Objectives Calm Spirit™
Calm Spirit™ for a positive well-being*	Objectives Calm Spirit™
Calm Spirit™ for times of stress.*	Objectives Calm Spirit™
Calm Spirit™ provides a highly useful, readily absorbed combination of neuronutrients to help lighten and improve your mood, safely and naturally.*	Objectives Calm Spirit™
Kava Kava, Chamomile, and Passion Flower provide calming and relaxing herbs to complete this synergistic herbal blend.*	Objectives Calm Spirit™
Powerful neuronutrients, L-Glutamine, L-Tyrosine, lecithin, and calcium for mental support.*	Objectives Calm Spirit™
St. John's Wort has long been recognized as a useful and safe herb that promotes a sense of well-being and overall mood support.*	Objectives Calm Spirit™
Chamomile, Hops, and Passion Flower herbs for their soothing and calming properties.*	Objectives Dream Path™
Dream Path™ Promotes sleep and relaxation*	Objectives Dream Path™
Dream Path™ also contains Kava Kava, Chamomile, and other relaxing herbs and essential minerals to support a restful state.*	Objectives Dream Path™
Dream Path™ for enhancing sleep and relaxation*	Objectives Dream Path™
Dream Path™ is a natural formula to promote sleep and relaxation.*	Objectives Dream Path™
Kava Kava root extract to encourage relaxation and promote a sense of well-being.*	Objectives Dream Path™
Valerian, which has been widely used in folk medicine and is known to be one of the most effective herbs for promoting natural sleep.*	Objectives Dream Path™
Borage, Evening Primrose Oil and Zinc provide important roles that regulate the normal functioning of the oil glands in the skin.*	Objectives Enzyme Time™
Enzyme Time™ aids the digestive process and enhances overall digestive health and performance.*	Objectives Enzyme Time™
Enzyme Time™ Assists in the process of digestion*	Objectives Enzyme Time™
Ginger and Licorice Root are traditional digestive herbs that help stimulate and balance digestion.*	Objectives Enzyme Time™
The addition of probiotics such as FOS can enhance the activity and number of good bacteria and regulate the presence of unwanted bacteria.*	Objectives Enzyme Time™
This unique formula is enhanced with traditional digestive herbs and naturally occurring compounds that increase the amount of friendly bacteria in the intestinal tract.*	Objectives Enzyme Time™
Evermore™ contains the most effective antioxidants known in nutritional science. Acting together, this synergistic formula provides powerful antioxidant protection to your cells.*	Objectives Evermore™
Evermore™ provides a dynamic combination of vitamins, minerals, herbs, and enzyme antioxidants to help protect the body from the effects of free radicals.*	Objectives Evermore™

# PROVENANCE™

CLAIM	Product Name
Supplementing the diet with antioxidant nutrients helps protect cells from free radical damage and reduces their effects on cellular aging.*	Objectives Evermore™
There is evidence to suggest that taking antioxidant supplements helps fight the ravages of free radical damage and, thus, the effects of premature aging.*	Objectives Evermore™
Inner Workings™ is a specifically designed formula to maintain and support a healthy liver.*	Objectives Inner Workings™
Innerworkings™ for healthy liver support*	Objectives Inner Workings™
Innerworkings™ Supports a healthy liver*	Objectives Inner Workings™
Milk Thistle seed may protect the cells of the liver.*	Objectives Inner Workings™
Standardized Milk Thistle seed extract to 80% silymarin, the active bioflavonoid complex responsible for powerful liver supporting effects.*	Objectives Inner Workings™
Taurine, Dandelion leaf, and lecithin to cleanse and strengthen the liver.*	Objectives Inner Workings™
Launch™ Enhances energy levels*	Objectives Launch™
Launch™ to boost your energy levels*	Objectives Launch™
Launch™ to support your energy levels.*	Objectives Launch™
Panax Ginseng Root Extract is an adaptogen, which helps the body adapt to stress and acts as a general tonic.*	Objectives Launch™
Siberian Ginseng has been renowned since ancient times for enhancing physical endurance, immune function, and helping the body adapt to stress.*	Objectives Launch™
The treasured Russian herb, Rhodiola Rosea root extract, possesses adaptogenic properties for increased strength and energy.*	Objectives Launch™
Carnitine has been shown to decrease muscle soreness while engaging in exercising.*	Objectives Muscle Nurture™
Essential nutrients - vitamins C, and E, along with Calcium, Chromium and Selenium - are involved with minimizing muscle protein breakdown.*	Objectives Muscle Nurture™
Gamma Oryzanol, Aminogen®, Fenusterols™, and Fytosterol™ naturally support lean muscle tissue.*	Objectives Muscle Nurture™
Muscle Nurture™ Enhances muscle strength*	Objectives Muscle Nurture™
Muscle Nurture™ contains our exclusive blend of herbs and phytonutrients for maintaining muscle synthesis and support.*	Objectives Muscle Nurture™
Muscle Nurture™ is an exceptional combination of nutrients that has been shown to enhance athletic performance and foster strength and endurance.*	Objectives Muscle Nurture™
Horsetail and Boneset herbs, along with Oatstraw extract, are traditional herbs that restore and rebuild hair, skin, and nails.*	Objectives Natural Glow™
L-Methionine, N-Acetyl Cysteine, and Vitamin A are necessary for proper skin maintenance and help to strengthen the skin's integrity.*	Objectives Natural Glow™
Silica supports luxurious hair, skin, and nails and is important to the growth and function of new skin cells.*	Objectives Natural Glow™
It contains soy isoflavones that have been shown to slow bone loss.*	Objectives Natural Glow™
Osteo Divine™ contains important trace minerals and essential nutrients for the maintenance of healthy bones.*	Objectives Natural Glow™
Osteo Divine™ Helps maintain healthy bones*	Objectives Natural Glow™