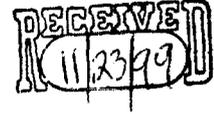




November 17, 1999



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 statements being made by Nikken, Inc. located at 52 Discovery, Irvine, CA 92618, 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".

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.

EXHIBIT "A"

1. Product: Multi-Vitamin/Mineral

A dietary supplement containing vitamin A, vitamin C, vitamin D, vitamin E, vitamin K, thiamin, riboflavin, niacin, vitamin B6, folate, vitamin B12, biotin, pantothenic acid, iodine, magnesium, zinc, selenium, copper, manganese and chromium.

Statements of Nutritional Support:

- Helps you meet all your basic nutritional requirements for good health.
- Helps combat stress and provides total nutritional support for active men and women over 35.
- Fiber is widely recognized for promoting healthy cholesterol levels and the feeling of a satisfied appetite.
- These minerals come from the only mineral source on earth that nearly matches the mineral composition found in human blood

2. Product: For Women

A dietary supplement containing vitamin C, vitamin D, vitamin E, vitamin B6, folate, vitamin B12, calcium, iron, magnesium, cranberry fruit, fenugreek, dong quai, soy isoflavones, black cohosh, grape seed extract, lutein and melatonin.

Statements of Nutritional Support:

- A special combination of nutrients to meet the complex needs of women 35 years and older.
- Targeted support for hormonal balance.
- Provides calcium, magnesium, B vitamins and antioxidants important for women's metabolism and bone health.
- A special blend of isoflavones, natural phytoestrogens and traditional herbs that support overall health for women.
- This formula utilizes bio-available forms of calcium and magnesium as well as folic acid, vitamin B6 and B12 for bone health. With herbs added for uterine health.

3. Product: Bio-Directed For Men

A dietary supplement containing saw palmetto, echinacea, purpurea, taurine, ginkgo biloba, curcumin complex, garlic bulb, green tea, glycine, l-glutamine, pygeum africanum, glutathione, alpha lipoic acid and lycopenes.

Statements of Nutritional Support:

- Targeted support for prostate health.

- Provides specific nutrients for metabolism and heart health.
- To promote prostate health.
- Significantly benefits overall nutrition.
- Offers potent ingredients vital for male health.
- Helps lower homocysteine levels, and to support prostate and cardiovascular health.

4. **Product: Bio-Directed Joint**

A dietary supplement containing glucosamine hydrochloride, methyl sulfonylmethane, cetyl myristoleate, cetyl myristate, olive oil, cetyl palmitoleate, EPA, DHA, cetyl laurate, cetyl palmitate and cetyl oleate

Statements of Nutritional Support:

- For increased mobility, skeletal joints need effective nutritional support for maintenance and to encourage injury repair.
- An advanced formula that nutritionally supports collagen, bone and connective tissue repair.
- Works to help promote normal, healthy joint function.
- Supports joint and tissue health, and to help lubricate joints and surrounding tissues.

5. **Product: Mental Clarity**

A dietary supplement containing vitamin C, vitamin E, green tea, l-glutamine, l-tyrosine, cordyceps sinensis, ginkgo biloba, alpha lipoic acid, n-acetyl l-systeine, grape seed extract and glutathione

Statements of Nutritional Support:

- Both detoxify and improve brain circulation.
- To help increase cerebral function.
- A combination of antioxidants that helps promote detoxification, plus nutrients that can increase brain metabolism.

6. **Product: Digestion**

A dietary supplement containing protease, fructooligosaccharides, amylase, cellulase, lactase, broccoli sprout powder, tomato powder, wheat grass powder, lactobacillus sporogenes and papaya fruit powder

Statements of Nutritional Support:

- Can help aid digestion, promote maximal absorption of nutrients, provide "friendly" bacteria and increase elimination of waste.
- Fructooligosaccharides (FOS) and digestive enzymes that aid intestinal health.

- Digestive enzymes, flora food to feed the friendly bacteria, and natural fruit and vegetable fiber extracts offer advance support for the intestinal tract.
- Provides the most important ingredients needed for every stage of digestion.

7. **Product: Liver Support**

A dietary supplement containing artichoke leaf extract and sarsaparilla root extract.

Statements of Nutritional Support:

- Contains ingredients that have beneficial effects on liver detoxification and metabolism.
- The body relies on the liver to eliminate toxins, and studies show that the liver may benefit from nutritional support.
- Supports a multitude of functions carried out by the liver.

8. **Product: Restful Night**

A dietary supplement containing vitamin C, calcium, vitamin D, vitamin E, vitamin K, magnesium, manganese, alpha lipoic acid, chamomile, hops, valerian root extract, grape seed extract and melatonin

Statements of Nutritional Support:

- These natural herbs and relaxants promote restful sleep.
- Combines natural herbal extracts for better rest.
- Includes increased levels of serum antioxidants for nutritional support.
- A mixture of natural herbs for improved rest and relaxation.

9. **Product: Fat Metabolism**

A dietary supplement including vitamin C, thiamin, riboflavin, vitamin B6, folate, vitamin B12, chromium, garcinia cambogia, l-carnitine, inositol and bioperine

Statements of Nutritional Support:

- Helps increase the body's use of fat for energy.
- May aid weight management, increase available aerobic energy and improve fat regulation
- Advance formula for fat breakdown and utilization.
- An extraordinary combination of metabolic enhancers, fat metabolizers and lean body support factors.