

NOTIFICATION PURSUANT TO
SECTION 6 OF DSHEA
AND RULE 21 CFR §101.93

DECEMBER
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This notification is being filed on behalf of **Market America, Inc.** which is the distributor of the product bearing the statements identified in this notification. Its business address is **1302 Pleasant Ridge Road, Greensboro, NC 27409**. This notification is being made pursuant to Section 6 of DSHEA and Rule 21 CFR §101.93. The dietary supplement product on whose label or labeling the statements appear is **Prime Factor for Men™** and **Prime Factor for Women™**.

The text of each structure-function statement for which notification is now being given is:

Statement 1: "In order to maintain a more youthful metabolic rate, Prime Factor™ packs a powerful blend of vitamins, minerals, pro-hormones (chemical messengers that stimulate metabolic activity) and herbs that help stimulate the production of cytokines and create a balanced intracellular environment." –Brochure

Statement 2: "This unique formulation provides a potent set of Human Growth Factors™ providing cytokinetic anti-aging properties with the objective of replacing what the aging process takes away." –Brochure

Statement 3: "As an added benefit, the sophisticated formula in Prime Factor, when taken with Ultra Prime, serves to promote the natural release of HGH – the "master hormone" that governs the body's growth and maintains its health." –Brochure

Statement 4: "By supplementing your body's metabolism with Prime Factor, you can gently push your body to stimulate cell repair, growth and rejuvenation." –Brochure

Statement 5: "Prime Factor maximizes Ultra Prime's results while stimulating the natural release of youth-related hormones and growth factors known as cytokines, which are proteins that signal cells for a cellular change in physiological activity." –Brochure

The following summary identifies the dietary ingredients or supplements for which a statement has been made:

Statement Number(s)	Identity of Dietary Ingredient or Supplement That Is the Subject of the Statement
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1.-5. Prime Factor for Men™ is composed of the following ingredients: pantothenic acid (as D-calcium pantothenate), iodine (from kelp), chromium (as chromium dinicotinate), zinc (as zinc arginate), silymarin, *Coleus forskohlii* tuber extract,

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fo ti root extract, ashwagandha root extract, astragalus root extract, *Panax ginseng* root, L-alpha-glycerolphosphorylcholine hydrate, lycium berry extract, schizandra berry extract, gamma-aminobutyric acid (GABA), ornithine-alpha-ketoglutarate, pregnenolone, dehydroepiandrosterone (DHEA), red date fruit extract, DNA/RNA (from brewer's yeast); other ingredients include: dicalcium phosphate, guar gum, calcium carbonate, microcrystalline cellulose, stearic acid, vegetable stearin, citrus pectin, magnesium stearate, silica, and natural tan film coat (water, propylene glycol, titanium dioxide, riboflavin, and sodium citrate).

- 1.-5. Prime Factor for Women™ is composed of the following ingredients: pantothenic acid (as D-calcium pantothenate), iodine (from kelp), chromium (as chromium dinicotinate), zinc (as zinc arginate), L-alpha-glycerolphosphorylcholine hydrate, silymarin, gamma-aminobutyric acid (GABA), fo ti root extract, *Coleus forskohlii* tuber extract, ornithine-alpha-ketoglutarate, dong quai root, ashwagandha root extract, eleuthero root extract, astragalus root extract, wild yam root extract, lycium berry extract, red date fruit extract, DNA/RNA (from brewer's yeast), *Tribulus terrestris* extract, pregnenolone, dehydroepiandrosterone (DHEA); other ingredients include: dicalcium phosphate, guar gum, calcium carbonate, microcrystalline cellulose, stearic acid, vegetable stearin, citrus pectin, magnesium stearate, silica, and natural yellow film coat (water, propylene glycol, titanium dioxide, riboflavin, and sodium citrate).

The following identifies the brand name of each supplement for which a statement is made:

<u>Statement Number(s)</u>	<u>Brand Name</u>	<u>Label or Labeling</u>
1.-5.	Prime Factor for Men™	Brochure
1.-5.	Prime Factor for Women™	Brochure

I, James L. Wilmer, am authorized to certify this Notification on behalf of Market America, Inc. I certify that the information presented and contained in this Notification is complete and accurate, and that Market America, Inc. has substantiation that each structure-function statement is truthful and not misleading.

Date Signed: August 26, 2003

By: James L. Wilmer

James L. Wilmer, Ph. D.
 Director, Scientific Affairs
 Market America, Inc.