

November 2, 2004

VIA: Certified Mail

NOV 23 2004

Food and Drug Administration
200 C Street S.W.
Washington, DC 20204

Re: Notification Pursuant to Section 6 of DSHEA and 21 CFR §101.93

Dear Sir or Madam:

Enclosed please find the Notification Pursuant to Section 6 of DSHEA and 21 CFR §101.93 for the dietary supplement product Kynovar®. This notification is on behalf of Dynakor Pharmacal™, LLC.

Please review the information at your earliest convenience. Please contact me with any questions or if there is any further information I can provide regarding this matter.

Sincerely,


Heather Sprik
Legal Assistant

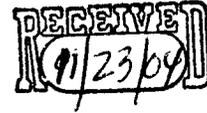
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Enclosure

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



This notification is being filed on behalf of Dynakor Pharmacal™, LLC that is the Distributor of the product(s) which bear the statements identified in this notification. Its business address is: 5742 W Harold Gatty Dr. Salt Lake City, Utah 84116. This notification is being made pursuant to Section 6 of DSHEA and Rule 21 C.F.R. § 101.93. The dietary supplement product on whose label or labeling the statements appear is **Kynovar®**.

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

- (Statement 1): Non-Steroidal Muscle Building Compound
- (Statement 2): Increased Muscle Mass
- (Statement 3): Decreased Body Fat Percentage
- (Statement 4): Improved Performance
- (Statement 5): Enhanced Muscle Strength

The following summary identifies the dietary ingredient(s) or supplement(s) for which a statement has been made:

<u>Statement Number</u>	<u>Identity of Dietary Ingredient(s) or Supplement(s) that is the Subject of the Statement:</u>
1	Kynovar® – 15.2 Fl. Oz. Bottle
2	Kynovar® – 15.2 Fl. Oz. Bottle
3	Kynovar® – 15.2 Fl. Oz. Bottle
4	Kynovar® – 15.2 Fl. Oz. Bottle
5	Kynovar® – 15.2 Fl. Oz. Bottle

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

<u>Statement Number</u>	<u>Brand Name</u>	<u>Label or Labeling?</u>
1	Dynakor Pharmacal™, LLC	both
2	Dynakor Pharmacal™, LLC	both
3	Dynakor Pharmacal™, LLC	both
4	Dynakor Pharmacal™, LLC	both
5	Dynakor Pharmacal™, LLC	both

I, Daniel B. Mowrey, Ph.D., am authorized to certify this Notification on behalf of Dynakor Pharmacal™, LLC. I certify that the information presented and contained in this Notification is complete and accurate, and that Dynakor Pharmacal™, LLC has substantiation that each structure-function statement is truthful and not misleading.

Dated this 2 day of November, 2004.

By: 

Daniel B. Mowrey, Ph.D.

Consultant for Dynakor Pharmacal™, LLC

Most of the so-called "bodybuilding supplements" you see advertised in muscle magazines were not developed for you. Look at the pictures in the ads. Who are those guys? They're professional bodybuilders, "fitness models," and paid endorsers whose job it is to spend 8 hours a day, 7 days a week pumping up and attempting to get as huge and out-of-proportion as a human being can get.

Unlike them, we average guys have real jobs and a life outside the gym. That's why we need KynoVar—a bodybuilding compound designed specifically for the average guy who wants to maximize every minute he spends in the gym... a fatty-acid polymer that significantly decreases body fat (you get better definition) without reducing muscle mass (you look bigger, faster and keep every ounce of muscle you've struggled to build).

Use only as directed.

Store at controlled room temperature
15°-30°C / 59°-86°F.

Keep out of reach of children.

*These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

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KYNOVAR

Dietary Supplement
NET WT 15.2 FL OZ
(450 ML)

Supplement Facts

Serving Size: 21 ml
Servings Per Container: 21

	Amount Per Serving	% Daily Value†
Calories	35	†
Calories from fat	35	†
Total Fat	4000mg	8%
Polyunsaturated fat	4000mg	†
Niacin	50mg	250%
Vitamin B12 (as cyanocobalamin)	10mcg	170%
Magnesium (as magnesium aspartate)	14mg	4%
Selenium Amino Acid Complex	22mcg	30%
Chromium chelavite	25mcg	20%
Potassium (as potassium aspartate)	40mg	2%
KynoVar™ GL-3 a proprietary blend of:	4206mg	
Positional and Geometric Isomers of Octadecadienoate		†
Caffeine	200mg	†
IMP (Inosine 5'-monophosphate)		†
AMP (Adenosine monophosphate)		†

†Percent Daily Values are based on a 2,000 calorie diet
† Daily Value not established

Other Ingredients: Purified Water, Lactin, Citric Acid, Carageenan, Teriox, Sodium Benzoate, Sucralose, Natural and Artificial Flavors.

DYNAKOR PHARMACAL® products are distributed throughout the USA exclusively by:

Basic Research® LLC • Salt Lake City, Utah 84116
www.KynoVar.com
call toll free: 1-800-898-3153

Directions: SHAKE WELL. Take one and one-half (1.5) tablespoons once a day, preferably in the morning or before workout. For maximum effectiveness, try to take KynoVar at approximately the same time every day.

Note: The recommended dose of this product contains about as much caffeine as approximately one to two cups of coffee. Limit the use of caffeine-containing supplements, foods, or beverages while taking this product because too much caffeine may cause nervousness, irritability, sleeplessness, and, occasionally, rapid heart beat.