

Bluebonnet



November 17, 2004

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Food and Drug Administration
Office of Nutritional Products, Labeling and Dietary Supplements
(HFS-810)
Center for Food Safety and Applied Nutrition
5100 Paint Branch Pkwy
College Park, MD 20740

Dear Sir/Madam:

Notice is hereby given pursuant to the requirements of Section 403(r)(6) (21 U.S.C. 343(r)(6) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that Bluebonnet Nutrition Corporation, 12915 Dairy Ashford, Sugar Land, Texas 77478 within the past 30 days commenced marketing a dietary supplement bearing the following statement(s) on the label and/or in the labeling:

TEXT OF CLAIM(S)

1. Offering powerful antioxidant protection to help support cardiovascular health (Soy Isoflavones, Fruit Polyphenols and Oat Beta-Glucans)
2. Serving as phytoestrogens to help support the health of menopausal women and men's prostate health (Soy Isoflavones, Soy Saponins and Flax Lignans)
3. Helping to support bone health (Soy Protein, Soy Isoflavones and Flax Lignans)

NAME OF INGREDIENT(S) THAT IS SUBJECT OF CLAIM

Soy Protein, Soy Isoflavones, Soy Saponins, Oat Beta-Glucans, Fruit Polyphenols, Flax Lignans

NAME OF SUPPLEMENT

Bluebonnet Super Earth Phytonutrient Soy Protein Dietary Supplement Powder

The undersigned certifies that the information contained in this notice is complete and accurate and that Bluebonnet Nutrition Corporation has substantiation that the statements are truthful and not misleading.

Sincerely,

Gary Barrows
GARY BARROWS
President

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