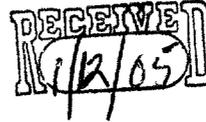


Basic Naturals™, LLC

5742 WEST HAROLD GATTY DRIVE
SALT LAKE CITY, UT 84116
Phone 801-517-7000 Fax 801-517-7003

December 29, 2004



VIA: Certified Mail

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 Zantrex™-3. This notification is on behalf of Basic Naturals™, 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,

A handwritten signature in black ink that reads "Heather Sprik". The signature is written in a cursive style.

Heather Sprik
Legal Assistant

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 Basic Naturals™, 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 **Zantrex™-3**.

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

- (Statement 1): "Rapid Weight Loss"
- (Statement 2): "Incredible Energy"
- (Statement 3): "Zantrex™-3 is serious weight loss... we're talking about rapid, sustained weight loss and extreme energy, finally together in one power-packed Super Pill... 5 times more weight loss than the leading ephedrine-based diet pill and all the energy you'll ever want or need... day or night."

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	Zantrex™-3 – 84ct. Bottle
2	Zantrex™-3 – 84ct. Bottle
3	Zantrex™-3 – 84ct. 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	Basic Naturals™, LLC	both
2	Basic Naturals™, LLC	both
3	Basic Naturals™, LLC	both

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

Dated this 27th day of December, 2004.

By: 
Daniel B. Mowrey, Ph.D.
Consultant to Basic Naturals™, LLC



DIRECTIONS: For maximum weight loss, take two capsules with a full glass of water, 15-30 minutes before main meals. Not to exceed 2 servings in any 8-hour period. Remember, the calorie-reducing properties of Zantrex™-3 are activated by food. For a significant energy boost, take 2 capsules anytime as needed.

DO NOT EXCEED 6 CAPSULES PER DAY.

NOTE: For persons sensitive to the effects of xanthines (i.e., caffeine and caffeine-like stimulants), start by taking only 1 capsule as directed above and do not exceed a total of 2 capsules per day. Limit the use of caffeine-containing medications, foods or beverages while taking this product because too much caffeine may cause nervousness, irritability, sleeplessness and occasionally, rapid heart beat.

WARNING: This product contains a significantly potent xanthine (i.e., caffeine and caffeine-like stimulants) mixture, in excess of 100 mg per regular 2-capsule serving. Therefore, Zantrex-3 is not intended for use by pregnant or lactating women. Consult your physician before use especially if you are sensitive to stimulants. For occasional use only. Niacin (vitamin B3) may cause temporary skin flushing, redness or itching in those persons who are sensitive to niacin. If they occur, these temporary side effects will subside in a matter of minutes. If your health-care provider has any questions, ask him or her to call **1-800-898-5153**.

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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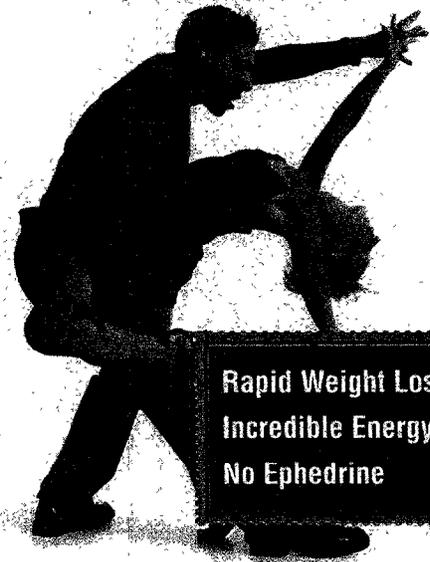


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ZANTREX-3

MANUFACTURED IN THE USA



**Rapid Weight Loss
Incredible Energy
No Ephedrine**

**THIS PRODUCT CONTAINS CAFFEINE
DIETARY SUPPLEMENT | 84 COUNT**

Supplement Facts

Serving Size: 2 capsules
Servings Per Container: 42

	Amount Per Serving	% Daily Value†
Niacin	30 mg	150%
Zantrex™-3	1010 mg	
A Proprietary Blend Containing:		
Yerba Maté (leaf) SE		†
Caffeine	100mg	†
Guarana (seed) SE		†
Damiana (leaf, stem) SE		†
Green Tea (leaf) SE		†
Kola Nut SE		†
Schizonepeta (spica) SE		†
Piper Nigrum (fruit) SE		†
Tibetan Ginseng (root) SE		†
Panax Ginseng (root) SE		†
Maca Root SE		†
Cocoa Nut SE		†
Thea Sinensis Complex (leaf) SE		†

† Percent Daily Values are based on a 2,000 calorie diet

† Daily Value not established

Other Ingredients: Rice Flour

Distributed by: Customer Service Distribution Center
Salt Lake City, UT 84116 • 1-800-898-5153

Weight Loss Components: Yerba Maté, Guarana, Damiana
Protected by US Patent No. 5,945,107

Energy Component: Xanthines

This product is manufactured to be within all acceptable industry variances.

Standardized Extract (SE) means an extraction process providing the highest quality compound manufactured to acceptable industry variances.

WWW.BASICNATURALS.COM

For additional information on this or any other Basic Naturals™ product, please call our experienced customer service representatives at 1-800-898-5153.

International distribution not authorized without prior written approval. Product resale allowed only through authorized representatives.

Under License, U.S. Patent #5,536,506



IT'S ZANTREX™-3. AMERICA'S HOTTEST SELLING NEW "SUPER PILL"!

Finally, rapid weight loss and incredible energy in one new, power-packed "Super Pill." Zantrex-3... the kind of intense, non-stop energy kick you want from a diet pill... and more. Much more!

NEW ZANTREX™-3... 546% MORE WEIGHT LOSS* THAN THE LEADING ephedrine-based diet pill!... and that's a fact. Here's another fact: Zantrex-3 is way beyond ephedrine, way beyond fat-burners, way beyond everything... Zantrex-3 is a new category of bifurcated weight-loss compounds providing both rapid weight loss and incredible energy combined into a single power-packed Super Pill. New Zantrex-3 is so powerful you won't find it in any supermarket next to some "Flintrock" vitamin for kiddies.

ZANTREX™-3 IS SERIOUS WEIGHT LOSS...

we're talking about rapid, sustained weight loss and extreme energy, finally together in one power-packed Super Pill... 5 times more weight loss than the leading ephedrine-based diet pill and all the energy you'll ever want or need... day or night.

SO IF YOU'RE FINALLY READY to look great, feel great, and have energy to burn... Zantrex-3 is the one formula you've got to experience. Hurry and get your Zantrex-3 today! Supplies are extremely limited.

**The "546% more weight loss" claim is based solely on Zantrex-3's active weight-loss component. However, Zantrex-3's non-ephedrine, xanthine-based Super Stimulant™ has been shown to produce additional weight loss in some studies.

††For full study details visit www.BasicNaturals.com