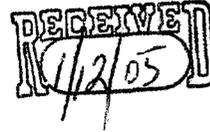


Basic Naturals™, LLC

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 Relacore™. 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, flowing 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 as **Relacore™**.

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

- (Statement 1): "Reduce Stress"
- (Statement 2): "Reduce Mild Anxiety"
- (Statement 3): "Improve Mood"
- (Statement 4): "Fight Mid-Day Fatigue"
- (Statement 5): "Increase Energy"
- (Statement 6): "Non-Sedating Formula"
- (Statement 7): "Research has shown there's a link between stress, tension, and excess belly fat...high levels of cortisol – a nasty little stress hormone – can cause pound after pound of excess body fat to accumulate around your waist and tummy... a health-threatening, figure destroying condition affecting an estimated 47 million American, mostly women."
- (Statement 8): "But now there's Relacore™ - the breakthrough all-natural, anti-anxiety, mood elevating pill that, in conjunction with a sensible diet and exercise program, helps control stress-induced cortisol production, thereby helping to reduce belly fat."
- (Statement 9): "Relacore is non-sedating, mild-anxiety mood enhancer that reduces stress-induced cortisol production by helping to minimize stress."
- (Statement 10): "In as little as a few hours, you'll be able to tell a difference to your overall stress level."
- (Statement 11): "And if you're susceptible to stress-induced belly fat retention and you use Relacore in conjunction with proper diet and exercise, you'll soon begin to see a visible reduction in your belly fat."
- (Statement 12): "Relacore also helps balance hormone levels that cause stress-induced overweight and encourage overeating."

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- (Statement 13): "Relacore is the best way to control the accumulation of stress-induced cortisol and belly fat because the formula nips the problem of stress and anxiety in the bud, so to speak."
- (Statement 14): "Relacore is the most significant advancement in more than a decade."
- (Statement 15): "Relacore's natural anti-stress, mood elevating formula can help alter the underlying stress-related causes of excess bell fat... leaving you happier, full of energy, and with that flat, youthful tummy you thought you'd never see again."

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 | Relacore™ – 90ct. Bottle |
| 2 | Relacore™ – 90ct. Bottle |
| 3 | Relacore™ – 90ct. Bottle |
| 4 | Relacore™ – 90ct. Bottle |
| 5 | Relacore™ – 90ct. Bottle |
| 6 | Relacore™ – 90ct. Bottle |
| 7 | Relacore™ – 90ct. Bottle |
| 8 | Relacore™ – 90ct. Bottle |
| 9 | Relacore™ – 90ct. Bottle |
| 10 | Relacore™ – 90ct. Bottle |
| 11 | Relacore™ – 90ct. Bottle |
| 12 | Relacore™ – 90ct. Bottle |
| 13 | Relacore™ – 90ct. Bottle |
| 14 | Relacore™ – 90ct. Bottle |
| 15 | Relacore™ – 90ct. 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 |
| 4 | Basic Naturals™, LLC | both |
| 5 | Basic Naturals™, LLC | both |
| 6 | Basic Naturals™, LLC | both |
| 7 | Basic Naturals™, LLC | both |

| | | |
|----|----------------------|------|
| 8 | Basic Naturals™, LLC | both |
| 9 | Basic Naturals™, LLC | both |
| 10 | Basic Naturals™, LLC | both |
| 11 | Basic Naturals™, LLC | both |
| 12 | Basic Naturals™, LLC | both |
| 13 | Basic Naturals™, LLC | both |
| 14 | Basic Naturals™, LLC | both |
| 15 | 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

Supplement Facts

Serving Size: 1 capsule
Servings Per Container: 90

| | Amount Per Serving | % Daily Value* |
|---|--------------------|----------------|
| Vitamin C | 333mg | 556% |
| Thiamin (Vitamin B1) | 5mg | 334% |
| Riboflavin (Vitamin B2) | 5mg | 294% |
| Vitamin B6 | 17mg | 850% |
| Vitamin B12 | 3.3mcg | 55% |
| Biotin | 50mcg | 17% |
| Pantothenic Acid (as calcium pantothenate) | 8mg | 80% |
| Calcium (as carbonate and pantothenate) | 33mg | 3% |
| Magnesium (as oxide) | 67mg | 17% |
| Relacortin® a proprietary blend of: | 265mg | |
| Passion Flower (herb) SE | | † |
| Magnolia (bark) SE | | † |
| Scutellaria (root) SE | | † |
| Nicotinamide | | † |
| DHEA | | † |
| Panax Ginseng (root) | | † |
| Poria (fungus) | | † |
| Jujube (fruit) | | † |
| Perilla Frutescens (leaf) | | † |
| Phosphatidylserine | | † |

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

Other Ingredients: Rice Flour, Magnesium Stearate, Silicon Dioxide, and Gelatin

Distributed by:

Customer Service Distribution Center
Salt Lake City, UT 84116 • 1-800-898-5153
Manufactured in the U.S.A.

www.BASICNATURALS.com

Stress Reducing and Mood Improvement Components:

Combination of Ascorbic Acid, Thiamin, Riboflavin, Nicotinamide, Pyridoxine, Cobalamin, Biotin, Pantothenic Acid, Calcium, and Magnesium

Mild Anxiety Reducing Components: Combination

of Ascorbic Acid, Thiamin, Riboflavin, Nicotinamide, Pyridoxine, Cobalamin, Biotin, Pantothenic Acid, Calcium, and Magnesium;

Combination of Magnesium and Pyridoxine, Passion Flower
Energy Component: Combination of Ascorbic Acid, Thiamin, Riboflavin, Nicotinamide, Pyridoxine, Cobalamin, Biotin, Pantothenic Acid, Calcium, and Magnesium

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



Research has shown there's a link between stress, tension, and excess belly fat... high levels of cortisol – a nasty little stress hormone – can cause pound after pound of excess body fat to accumulate around your waist and tummy... a health-threatening, figure-destroying condition affecting an estimated 47 million Americans, mostly women.*

But now there's Relacore™ – the breakthrough all-natural, anti-anxiety, mood elevating pill that, in conjunction with a sensible diet and exercise program, helps control stress-induced cortisol production, thereby helping to reduce belly fat.* You're going to love it!

RELACORE™ – THE "NATURAL FEEL-GOOD PILL" – MIGHT BE THE PERFECT ANSWER TO BELLY FAT

"Relacore is a non-sedating, mild anti-anxiety mood enhancer that reduces stress-induced cortisol production by helping to minimize stress,"* says Dr. Nathalie Chevreau, Director of Women's Health and Nutrition for www.MyFreeDiet.com. "Those who have used Relacore reported an overall feeling of well-being, less anxiety, much more energy and a greater ability to handle the problems of everyday life."

It all begins when you take the easy-to-swallow Relacore capsules three times a day. In as little as a few hours, you'll be able to tell a difference in your overall stress level.* And if you're susceptible to stress-induced belly fat retention and you use Relacore in conjunction with proper diet and exercise, you'll soon begin to see a visible reduction in your belly fat.*

But there's more! Relacore also helps balance hormone levels that cause stress-induced overweight and encourage overeating.* Relacore is the best way to control the accumulation of stress-induced cortisol and belly fat because the formula nips the problem of stress and anxiety in the bud, so to speak.*

THE MOST SIGNIFICANT ADVANCEMENT IN MORE THAN A DECADE

Relacore is the most significant advancement in more than a decade.* Relacore's natural anti-stress, mood elevating formula can help alter the underlying stress-related causes of excess belly fat... leaving you happier, full of energy, and with that flat, youthful tummy you thought you'd never see again.* You're going to love what Relacore can do for you!



WARNING: Do not exceed suggested daily dose. Consult a physician before use. Do not use if you are pregnant or lactating, have a medical condition, or are taking prescription medications. Not intended for use by persons under 40 years of age. If your health-care provider has any questions, ask him or her to call 1-800-898-5153.

KEEP OUT OF REACH OF CHILDREN.

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

Use only as directed. Store at controlled room temperature 15°-30°C/59°-86°F

RELACORE DIRECTIONS: Take one capsule with a full glass of water, three times per day: morning, noon, and early evening. You may take Relacore with or without food. Do not exceed 3 capsules per day.

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

*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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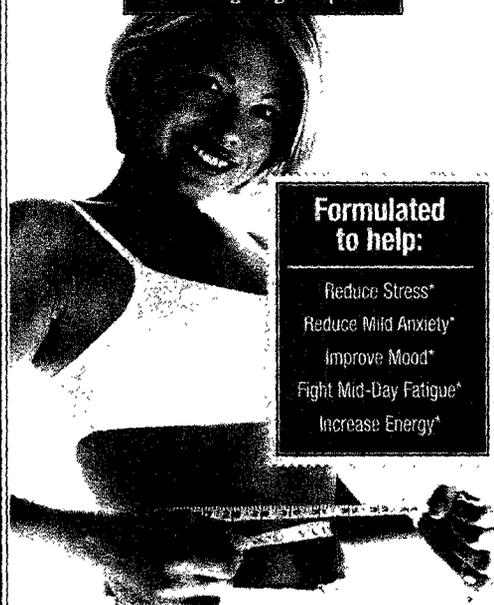


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Stress-Mitigating Compound*



Formulated to help:

- Reduce Stress*
- Reduce Mild Anxiety*
- Improve Mood*
- Fight Mid-Day Fatigue*
- Increase Energy*

DIETARY SUPPLEMENT | 90 CAPSULES

NON-SEDATING FORMULA*