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May 03, 2005

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

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. 343 r (6) and in accordance with the authorized provisions of 21CFR 101.93, ADVOCARE provides notification for statements on dietary supplement labels as follows:

The name and address of the manufacturer, packer or distributor of the dietary supplement that bears the statements:

ADVOCARE International, L.P.
2727 Realty Road
Carrollton, TX 75006

Product Name: ActoTherm

Statement(s)

Basis for Statement

Supports increased energy levels

Guarana extract (Paullina cupana)
Green tea extract (Camellia sinensis)
Niacin
Potassium (as phosphate)
Magnesium (as phosphate)

Helps stimulate and support lipolysis

Guarana extract (Paullina cupana)
Green tea extract (Camellia sinensis)
Vitamin A (as beta-carotene)
Potassium (as phosphate)
Magnesium (as phosphate)
Niacin
Capsicum extract (Capsicum annum)
ThermoGen-HC™ (Gotu kola leaf, chamomile flower,
Chinese licorice root, lemon verbena leaf, sweet orange peel,
chicory root, cinnamon bark, ginger root, peppermint leaf)

Provides antioxidant activity

Vitamin A (as beta-carotene)
Green tea extract (Camellia sinensis)
Guarana extract (Paullina cupana)
Resveratrol
ThermoGen-HC™ (Gotu kola leaf, chamomile flower,
Chinese licorice root, lemon verbena leaf, sweet orange peel,
chicory root, cinnamon bark, ginger root, peppermint leaf)

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Provides vitamin and mineral support
for metabolic processes

Vitamin A (as beta-carotene)
Magnesium (as phosphate)
Potassium (as phosphate)
Niacin

Helps manage appetite

Guarana extract (Paullina cupana)
Green tea extract (Camellia sinensis)
Capsicum extract (Capsicum annum)
ThermoGen-HC™ (Gotu kola leaf, chamomile flower,
Chinese licorice root, lemon verbena leaf, sweet orange peel,
chicory root, cinnamon bark, ginger root, peppermint leaf)

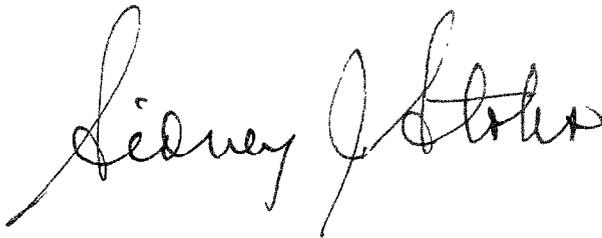
Supports and stimulates digestive processes

Green tea extract (Camellia sinensis)
Capsicum extract (Capsicum annum)
ThermoGen-HC™ (Gotu kola leaf, chamomile flower,
Chinese licorice root, lemon verbena leaf, sweet orange peel,
chicory root, cinnamon bark, ginger root, peppermint leaf)

Certification

The undersigned certifies that the information contained in this notice is complete and accurate and that
ADVOCARE International, L.P. has substantiation that the statements are truthful and not misleading.

Respectfully yours,



Sidney Stohs, Ph.D.
Senior Vice President, Research and Development
ADVOCARE International, L.P.