



Apex Fitness Group™
100 Camino Ruiz
Camarillo, CA 93012

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2739	1330	1370

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apexfitness.com

AUG - 9 2005
July 29, 2005

Food and Drug Administration
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
200 C Street SW
Washington, DC 20204

Dear Sirs:

Notice is hereby given pursuant to Section 403 (r)(6)(21 U.S.C. 343(r)(6)) of the Federal Food Drug and Cosmetic Act that Apex Fitness Group, 100 Camino Ruiz, Camarillo, CA 93012 has marketed a dietary supplement under Apex Fitness Group Fat Burn 1 "Metabolizer Plus" bearing the following statement(s) on the label and/or in the labeling:

- (Statement 1) Helps promote healthy metabolic liver function (with lipotropics)
- (Statement 2) "Who" those who are 20% or more above ideal weight
- (Statement 3) "Lipotropics" help reduce fat accumulation in liver
- (Statement 4) "Betaine" helps prevent liver fat accumulation and promotes liver health
- (Statement 5) Milk Thistle" aids liver protection and support

The undersigned certifies that the information contained in this notice is complete and accurate and that Apex Fitness Group has substantiation that the statement(s) is truthful and not misleading. Pursuant to 101.93 (a)(1), two copies of this notification are enclosed.

Jim Starr
Director Product Development

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