

**NOTIFICATION PURSUANT TO
SECTION 6 OF DSHEA
AND 21 C.F.R. §101.93**

SEP 13 2005

This notification is being filed on behalf of New Chapter, Inc. which is the manufacturer of the product(s) which bear the statements identified in this notification. Its business address is: 22 High St. PO Box 1947, Brattleboro, VT 05302. 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 **Immune Support-Echinacea Ginger Tonic**

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

(Statement 1): Because ginger contains 180 times the protein digesting power of papaya, and stimulates fat digesting bile as well as the growth of healthy intestinal flora, ginger restores balance and potentates proper digestive function.

(Statement 2): Additionally ginger contains at least 12 antioxidant compounds and recent research in India, Denmark and Japan suggests that ginger modulates prostaglandins thereby promoting circulatory health and balancing the inflammatory process.

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.	Ginger
2.	Ginger

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.	Immune Support-Echinacea Ginger Tonic	Label and Labeling
2.	Immune Support-Echinacea Ginger Tonic	Label and Labeling

I, Kristin Foster am authorized to certify this Notification on behalf of New Chapter, Inc. I certify that the information presented and contained in this Notification is complete and accurate, and that New Chapter, Inc. has substantiation that each structure-function statement is truthful and not misleading

Date Signed: Sept 9, 2005 By: Kristin Foster, QA Administrator
 [Name]
 [Title]

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

(Statement 1): Your immune system's most trusted and now most delicious friend.

(Statement 2): Immunoactive effects enhanced by ginger's synergistic phytonutrients.

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.	Honey, Ginger Juice, Echinacea, Lemon Oil, Ginger
2.	Honey, Ginger Juice, Echinacea, Lemon Oil, Ginger

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.	Immune Support-Echinacea Ginger Tonic	Labeling
2.	Immune Support-Echinacea Ginger Tonic	Labeling

I, Kristin Foster am authorized to certify this Notification on behalf of New Chapter, Inc. I certify that the information presented and contained in this Notification is complete and accurate, and that New Chapter, Inc. has substantiation that each structure-function statement is truthful and not misleading.

Date Signed: Sept 9, 2005 By: Kristin Foster, PA Administrator
[Name]
[Title]

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