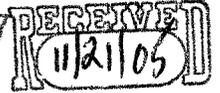


CocoaLife™

For Your Well-Being™

15301 Dallas Parkway
Suite 1110
Addison, TX 75001
(214) 442-1390

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November 8, 2005

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

Re: Notification of Product Claims

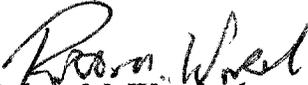
Dear Sir or Madam:

This letter serves as thirty day notification, pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug and Cosmetic Act), of the nutritional support label statements being made by CocoaLife, LP, located at 15301 Dallas Parkway, Suite 1110, Addison, TX 75001, in connection with the marketing of its CocoaSmart formula. A list of the product ingredients and nutritional support statements are set forth in the attached Exhibit "A."

The undersigned certifies that the information contained in this notice is complete and accurate and that the company maintains documentation to substantiate that its product claims are truthful and not misleading.

If you have any questions, please feel free to contact the undersigned.

Sincerely,


Robert M. Woodard
CocoaLife, LP

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EXHIBIT "A"

Product: Cocoa Smart™

A dietary supplement containing cocoa extract.

Statements of Nutritional Support:

- Offering the anti-aging and cardiovascular benefits of dark chocolate and cocoa - without the fat and calories.
- Research from major medical institutions has shown that cocoa and dark chocolate can actually benefit heart health and provide a concentrated source of antioxidants to boost the body's ability to defend against aging.
- Flavanols are powerful antioxidants also found in some fruits, vegetables, red wine and tea and are linked to a variety of heart healthy benefits.
- Consuming foods with high antioxidant values is a way to boost the body's defenses to combat free radicals.
- Free radicals can damage cells and accelerate the aging process. A diet that includes plenty of antioxidants can help the body defend itself against the harmful effects of free radicals.
- According to many recent studies, dark chocolate and cocoa - because they contain powerful antioxidants known as flavanols - can help maintain cardiovascular health.
- A diet rich in antioxidants, including those found in dark chocolate and cocoa, is one factor in maintaining good cardiovascular health.
- Flavanols have been identified by scientists and linked to heart health.
- Antioxidants neutralize oxygen "free radicals," highly reactive agents that are potentially destructive by-products of the body's process of turning food in to energy.
- Dark chocolate and cocoa are highly concentrated sources of antioxidants - a critical component in the body's ability to fight the signs of aging and boost the body's defenses.
- Scientists suggest that a diet rich in antioxidants, like those found in CocoaSmart, can help maintain already normal blood pressure rates and boost the body's ability to defend against aging.