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RECEIVED
12/13/05

November 30, 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 Nikken, Inc., located at 52 Discovery, Irvine, CA 92618, in connection with the marketing of its Ciaga, Kenzen Vegetable and Kenzen Fruit & Berry formulas. 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,

Kendall Cho, CEO
Nikken, Inc.

Correspondence/Nikken.061

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EXHIBIT "A"

Product: Ciaga

A dietary supplement containing vitamin C, a proprietary blend of juice concentrates made from pomegranate juice, pear juice, noni juice, cherry juice, blueberry juice, white grape juice and aloe vera juice, and a proprietary phytonutrient blend made from brown rice extract, red yeast rice extract, mandarin orange crystal extract, orange crystal extract, raspberry crystal extract, beta sitosterol, herbal green tea (leaf) extract, hibiscus (flower) extract, jujube (fruit) extract, stevia (leaf) extract, gogi berry (fruit) extract, Asian ginseng (root) extract, rhodiola (root) extract.

Statements of Nutritional Support:

- High bioavailability for better absorption.
- Cardiovascular - ingredients that support heart and cardiovascular system health.
- Immune- can help in maintaining a strong immune system.
- Antioxidant - known to protect against free radical damage and support the body's natural defenses.
- Gastrointestinal - a healthy GI tract improves nutrient absorption and also sustains many other physiological functions.
- Adoptagenic - nutrients and herbs that can assist the natural physical response to managing stress.
- Promotes healthy heart and immune system function.
- Natural components for cardio/immune maintenance.

Product: Kenzen Vegetable

A dietary supplement containing a proprietary blend of vegetable juice powders made from parsley, kale, spinach, brussel sprouts, asparagus, broccoli, cauliflower, beet, tomato, carrot, cabbage and garlic.

Statements of Nutritional Support:

- High bioavailability for better absorption.
- Offers natural antioxidant ingredients.
- Supports circulation and cardiovascular health.
- Supports the immune system by maintaining strong cellular health.
- Helps protect cell, membrane and vascular walls from harmful free radical damage.
- Supports circulation and aids cardiovascular health.

Product: Kenzen Fruit & Berry

A dietary supplement containing a proprietary blend of fruit juice powders made from cranberry, papaya, pineapple, blueberry, strawberry, blackberry, bilberry, grape, cherry, raspberry, orange, mandarin orange, apricot and plum.

Statements of Nutritional Support:

- High bio availability for better absorption.
- Offers natural antioxidant ingredients.
- Supports circulation and cardiovascular health.
- Supports the immune system by maintaining strong cellular health.
- Helps protect cell, membrane and vascular walls from harmful free radical damage.
- Supports circulation and aids cardiovascular health.