

September 25, 1995



Linda S. Kahl, Ph.D.
Office of Special Nutritionals
Center for Foods Safety and Applied Nutrition
Food and Drug Administration
200 "C" Street, S.W. (HFS-455)
Washington, D.C. 20204

Dear Dr. Kahl:

Pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994, Kaire International, Inc. wishes to notify the Food and Drug Administration that it has, within the past 30 days, commenced marketing a dietary supplement which bears a statement of nutritional support.

The dietary ingredient for which the statement is made is Guarana (Paullinia Cupana). The statement of nutritional support reads as follows:

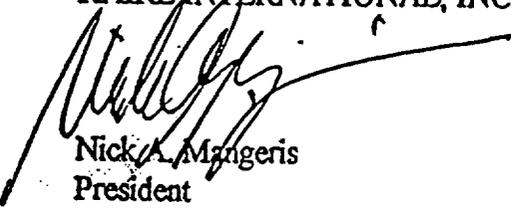
The guaranine content of (Momentum™) provides a mild, long-acting lift, while, the compounds in the formula help support long-term mental alertness and energy production.

This statement is accompanied by the required disclaimer which is prominently displayed in boldfaced type.

The name of the dietary supplement, Momentum™, has been placed in brackets to identify it as proprietary and confidential information. We request that this information be treated as confidential by the agency and not released under the Freedom of Information Act.

This statement of nutritional support is based on a large body of data which, in our judgment, renders these statements substantiated, truthful and nonmisleading.

Sincerely,
KAIRE INTERNATIONAL, INC.


Nick A. Mangeris
President

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RECEIVED BY THE
OFFICE OF SPECIAL
NUTRITIONALS, HFS-450

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