



Dr. Elizabeth Yetley
Acting Director of Office of Special Nutritionals
Center for Food safety and Applied Nutrition
Food and Drug Administration
200 C Street SW (HSS-450)
Washington D.C., 20204

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NUTRITIONALS, HSS-450

Dear Dr. Yetley,

The following is a list of nutritional supplements and the structure/function claims Weider Nutrition Group is making for each. We have sufficient substantiation for these claims and these products either have been or will be marketed within 30 days of this notification. The proper disclaimer is attached to each claim.

Product: Victory Fat Burner Mega-Paks

Claim: Every pak contains amino acids, vitamins, minerals, lipotropics, and herbs that factor into the body's own natural pathways to fat metabolism. Combined with your aerobic or weight-training workouts, Victory Fat Burner Mega-Packs support you all the way to a lean, hard body.

Product: Performance Anti-Catabolic

Claims: L-leucine taken before and after workouts supplements muscle stores of BCAA's providing energy and protecting muscle proteins during the workout. MCT's are directly absorbed into the bloodstream where they increase leucine's potential to decrease muscle degradation. KIC helps raise the energy charge of the liver affecting a decrease in serum protein degradation and free amino acid catabolism. This promotes nitrogen balance allowing more nitrogen to be available when and where it is needed to instigate a positive growth curve.

Product: American Body Building Products Carnitine

Claims: Through the process known as glycolysis, L-Carnitine transports stored fatty acids into cells to be oxidized (burned) and converted into energy. L-Carnitine is an amino acid that is vital to performing this fat metabolizing function.

Product: American Body Building Products Ripped Force Capsules

Claims: Quercetin allows for a better lipolytic effect of Ma Huang and Caffeine increasing thermogenic activity for better fat burning.

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Product: Schiff Goldenseal
Claims: Powerful Anti-Microbial

Product: Schiff Ginseng
Claims: Ginseng is a plant root with world-wide appeal as a catalyst for optimal physical and mental functioning. China's master herbalists believe it to have natural stimulatory effects as well as stress-fighting and memory boosting properties.

Product: Schiff Ginkgo Biloba
Claims: Ginkgo Biloba extract was shown in recent studies to have particular health benefits including potent free-radical scavenging (antioxidant) properties.

Product: Schiff Flush-Free Niacin
Claims: Benefits circulation and fat metabolism

Product: Schiff NutraFlora® FOS Powder
Claims: Schiff FOS Powder is a natural carbohydrate that effectively promotes the growth of beneficial bacteria such as lactobacillus acidophilus and bifidobacteria in the lower intestine.

Product: Schiff Sustained Release Chromium Picolinate
Claims: Chromium is an essential trace element which works with insulin in the body to help maintain normal blood sugar (glucose) levels.

Product: Great American Nutrition Citrimax
Claims: Studies suggest that HCA, as part of a complete weight loss program, may help curb appetite through production and storage of glycogen. Unlike other diet aids and diet pills, the fruit-based HCA works directly in blocking the conversion of carbohydrates to fat, promoting weight loss without the side effects of stimulant-based supplements. The Citrimax Diet Plan, which includes healthy eating habits, regular exercise and nutritional supplementation: Naturally curbs appetite, speeds up calorie burning, burns fat, no unwanted side effects.

Product: Great American Nutrition PrimeTime Ultra Energy Formula
Claims: Boosts the cardiovascular system, enhances alertness, stimulates the body's general metabolism.

Product: Great American Nutrition PrimeTime Hair Nutrient Formula

Claims: Healthy hair is the result of healthy nutrition. Vitamins, minerals, amino acids, and trace elements help protect hair and its follicles.

Product: Great American Nutrition PrimeTime Bio-cleansing Formula

Claims: Blend of herbs and fibers to cleanse the digestive and circulation systems and support a cholesterol lowering diet. Milk thistle contains silymarin which promotes healthy liver function.

Sincerely,

Greg Anderson
Manager- Regulatory Affairs