



Distributors of Quality Natural Foods and Vitamins  
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April 18, 1996

Ms. Peggy Binzer  
CFSAN  
Food & Drug Administration  
200 C Street SW, HFS-456  
Washington, DC 20204

Dear Ms. Binzer:

We are notifying you pursuant to the Dietary Supplement Health and Education Act of 1994 of the following "structure and function" claims that have been made.

<u>Product</u>	<u>Claim</u>
Bilberry Complex	Bilberry contains high levels of proanthocyanidin flavonoid compounds. These substances...help to maintain collagen, connective tissue, blood vessel integrity, and visual purple (necessary for proper night vision). They also possess strong antioxidant activity in " <u>in vitro</u> " studies.
L-Carnitine (powder & tablets)	Carnitine aids the transport and burning of fatty acids in the heart and muscle cells.
L-Tyrosine	L-Tyrosine is...a precursor of the neurotransmitters dopamine, norepinephrine, and epinephrine (adrenaline), the thyroid hormones, and the human pigment, melanin.
Siberian Ginseng	Siberian Ginseng (Eleutherococcus Senticosus) is known as an adaptogen, meaning it helps protect against the effects of physical and mental stress.

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<u>Product</u>	<u>Claim</u>
Sea Mussel Extract	Green Lipped Sea Mussel Extract typically contains 14% mucopolysaccharides, including chondroitin sulphate A, a naturally occurring component of connective tissue and joint structures in humans and animals.
Phosphatidylserine	Phosphatidylserine is a phospholipid compound derived from soy lecithin and also a normal component of the brain. Phosphatidyl Serine powder is more stable and more cost effective than liquid softgel forms and also contains two times more Phosphatidyl Choline. Research has demonstrated that Phosphatidyl Serine may aid brain and nerve cell functions.
Joint Support ✓	Formulated to provide maximum nutritional support for joints. A
Glucosamine Sulfate	primary ingredient, Glucosamine, is a vital structural component of healthy joints, ligaments, bones, and synovial fluid.
Creatine	Creatine is a naturally occurring compound in muscle tissue and functions as an energy reservoir to maintain optimal levels of ATP production during intense exercise.
Ginkgo Biloba	Ginkgo Biloba Extract has antioxidant activity in " <u>in vitro</u> " studies.
Silymarin (Milk Thistle Extract)	Silymarin nutritionally supports healthy liver function, safely.
Sea Cucumber	A good source of chondroitin sulfate A, sea cucumber may be helpful in maintaining joint structures.
Nutra Flora™ FOS	Nutra Flora™ FOS is a non-digestible carbohydrate which aids the growth of beneficial intestinal bacteria such as bifidus and

Product

Claim

8 Billion Acidophilus &  
Bifidus

acidophilus. These probiotic organisms predominate in healthy breast-fed infants and adults.

NAC  
(N-Acetyl-Cysteine)

Regular intake of beneficial probiotics can aid in maintaining healthy intestinal flora.

NAC is...involved in the detoxification process. It also helps to form the tripeptide glutathione, a powerful antioxidant and detoxifying agent. Molybdenum and selenium are essential trace minerals which facilitate several key detoxification enzymes.

Sincerely,



Al Powers  
Vice President