



MANUFACTURERS & DISTRIBUTORS  
OF NUTRITIONAL PRODUCTS

2697 '99 AUG -3 P3:09

RECEIVED  
7/15/99

June 23, 1999

Food and Drug Administration  
Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
200 C Street, SW  
Washington, DC 20204

Dear Sirs:

Notice is hereby given pursuant to the requirements of section 403(r)(6) (21 U.S.C. 343(r)(6)) of the Federal Food, Drug and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that Naturade, Inc., located at 14370 Myford Road, Irvine, CA 92606, within the past 30, days commenced marketing a dietary supplement bearing the following statement(s) on the label and/or in the labeling:

**TEXT OF CLAIM**

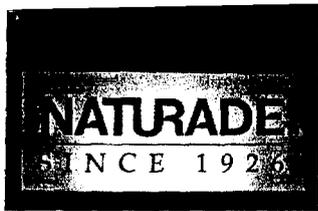
“Huperzia serrata and Ginkgo biloba promote proper cognitive and memory function”  
“Support from Green Tea and RoseOx® Antioxidants”  
“With *Chinequalize*™ herbal base to help maintain your natural balance”  
“The Chinese Way’s Memory Last Formula is an all natural supplement that helps maintain healthy cognitive and memory function. The Huperzia serrata in the product is a powerful herb that helps maintain acetylcholine, the main neurotransmitter involved in memory. Ginkgo biloba has been included to promote blood flow to the brain. The antioxidants in the formulation help support the brain structurally.”

**NAME OF INGREDIENT OR SUPPLEMENT THAT IS SUBJECT OF CLAIM**

Calcium (as calcium carbonate)  
Green Tea Leaf 4: 1 Extract (Camellia sinensis)  
Ginkgo biloba Leaf 4: 1 Extract  
Rosemary Leaf Extract  
Huperzine A (as Huperzia serrata plant Extract)  
Proprietary Blend:  
Schizandra chinensis (berry powder), Astragalus membranaceus (root powder),  
Codonopsis tangshen (root powder), Lycium chinensis (fruit powder), Rehmannia  
glutinose (root powder)

97S-0162

660886  
LET 3912 rec'd  
7/6/99



MANUFACTURERS & DISTRIBUTORS  
OF NUTRITIONAL PRODUCTS

**NAME OF SUPPLEMENT**

The Chinese Way™  
Memory Last Formula

The undersigned certifies that the information contained in this notice is complete and accurate and that Naturade, Inc. has substantiation that these statements are truthful and not misleading.

Sincerely,

Marwan Zfelk, MS, CCN  
Director of Research & Development