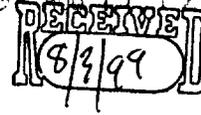




July 28, 1999

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

Dear Sir/Madam,

In accordance with the Food & Drug Cosmetic Act 21CFR Section 101.93, the statement(s) for dietary supplements listed below have been included as labeling for the following product:

Memory Advantage Formula™

Statements:

Formulated with standardized ginkgo biloba extract and B-vitamins to promote healthy brain function and memory

This formula is enhanced with vitamin B12 and other B-vitamins that are needed for healthy brain function

This formula provides a natural approach for maintaining health levels of these essential nutrients

I certify that the information contained in this notice is complete and accurate and we have substantiation that these statements are truthful and not misleading.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Brubaker".

Dave Brubaker
CEO and President

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