



August 31, 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 UniqueLife, at 280 Martin Ave, Suite 3, Santa Clara, CA 95050 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

What is MSM?

Methyl-Sulfonyl-Methane (MSM) is a naturally-occurring sulfur compound found within our bodies. MSM is essential for our body's growth and repair mechanisms. Sulfur is an element present in all living organisms and belongs to the same chemical family as oxygen. In its purified form, as found in all of UniqueLife's products, it is odorless, tasteless, white, water-soluble and crystalline solid. MSM is not a pharmaceutical drug but a dietary supplement.

Other MSM benefits include:

- MSM helps fortify collagen and connective tissue, maintaining healthy joints.
- MSM promotes soft, smooth skin, lustrous hair and strong nails.
- MSM is pure, all natural, and non-toxic.

What Effect Does MSM Have on Stiff Joints

Joints become stiff when toxins around the cell walls in the body create a leathery membrane that keeps fluid and toxins in the cell. The cell begins to swell with fluid, putting pressure on nerve endings and creating stiffness. It is believed that MSM makes cells permeable so fluids can flow freely through the cell wall, removing the toxins in the cell, thus promoting healthy joint lubrication.

Athletes have relied on MSM for strained muscles and overextended joints for many years. In preliminary studies, MSM has been shown to provide support for healthy, normal joint functions.



What are MSM's Essential Functions?

Some of the essential functions that make sulfur possible for us to live include maintaining the structure of proteins of the body, helping in the formation of keratin, which is essential for hair and nail growth, aiding in the production of immunoglobulin which maintains the normal immune system, catalyzing the chemical reactions which change food into energy and neutralizing or eliminating toxins from the body.

How Does the Body Incorporate MSM?

Experiments using MSM that contains radio labeled sulfur have shown that after ingestion, MSM gives up its sulfur to form the collagen and keratin of the hair and nails. It also forms the essential amino acids methione and cysteine, and forms serum proteins.

Name of Ingredient Subject to Claim: Methyly-Sulfonyl-Methane

Name of Supplement: UniqueLife MSM

The undersigned certifies that the information contained in this notice is complete and accurate and that UniqueLife has substantiation that the statement is truthful.

Sincerely,

A handwritten signature in black ink, appearing to read "Amir Tadayon", written over a horizontal line.

Amir Tadayon
Vice President, Marketing