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MICHAEL'S®
NATUROPATHIC PROGRAMS

6203 Woodlake Center • San Antonio, Texas 78244

RECEIVED
SEP 16 2002
BY:

September 10, 2002

Office of Nutritional Products, Labeling
and Dietary Supplements (HFS-810)
Center for Food and Safety and Applied Nutrition
Food and Drug Administration
5100 Point Branch Pkwy
College Park, MD 20740

Re: 21 U.S.C. Section 343(r)(6),
Notification of Statements on Dietary Supplements

Dear Sir/Madam:

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. §343(r)(6), and in accordance with the provisions of 21 CFR §101.93(a), your Agency is hereby notified that Michael's has made statements of nutritional support for its dietary supplement(s) as follows:

Product Name

Label Statement(s)

Michael's Naturopathic Programs Green Tea Extract

Ephedra-Free Thermogenesis

Michael's Naturopathic Programs Green Tea Extract

Michael's Green Tea Extract has a controlled dosage of Polyphenols enhanced with 50 mg of quercetin, an important bioflavonoid, further enhancing the formula's thermogenic effects. One great benefit of this standardized 90 mg of catechin in this green tea extract is its ability to stimulate thermogenesis without the associated increase in heart rate. Green tea extract is known as an all-natural fat burner, meaning it can increase fat oxidation while sparing lean muscle mass in all body types. Additionally, the polyphenol epigallocatechin gallate (EGCG), which is found in green tea, is recognized as a powerful antioxidant, among other health benefits.

Michael's Naturopathic Programs Probiotic Factors

FOS are natural carbohydrates that enhance replication of beneficial bacteria.
6 species promote healthy intestinal flora balance.

Michael's Naturopathic Programs Probiotic Factors

Michael's Naturopathic Programs Reishi Extract

Our exclusive hot water process removes all of the naturally occurring indigestible materials found in mushrooms and mushroom mycelium bio-mass, leaving you with a potent 100% of the pure active compounds.

97S 0162 LET 11017

PHONE: 210-661-8311 • FAX: 210-661-9145

Michael's Naturopathic Programs Reishi Extract

Our Reishi Extract is made exclusively from the fruit body, the only part of Reishi that contains those compounds traditionally used for their tonic properties.

Michael's Naturopathic Programs Cordyceps Extract

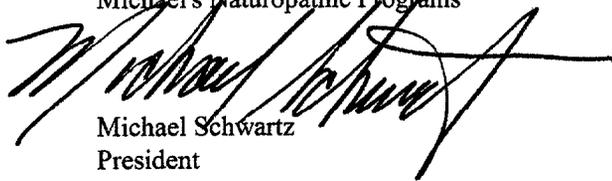
Our exclusive hot water process removes all of the naturally occurring indigestible materials found in mushrooms and mushroom mycelium bio-mass, leaving you with a potent 100% of the pure active compounds.

Michael's Naturopathic Programs Cordyceps Extract

Used to increase energy and endurance, Cordyceps is also used for supporting respiratory and immune health and as a male sexual tonic.

To the best of my knowledge and based upon information and belief present at the time of the execution of this notice, I certify that the above information is accurate and complete and that Michael's possesses substantiation that the statements are truthful and not misleading.

Sincerely,
Michael's Naturopathic Programs

A handwritten signature in black ink, appearing to read "Michael Schwartz", written over a printed name and title.

Michael Schwartz
President