

1302 Pleasant Ridge Road
Greensboro, North Carolina 27409
Voice: 336.605.0040

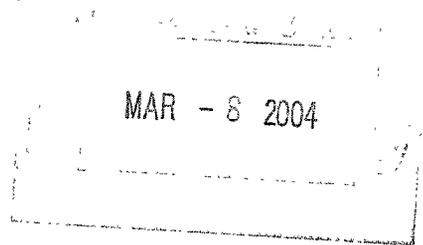


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January 30, 2004

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



Dear Sir/Madam:

I have enclosed notification forms that are intended to comply with Section 6 of the Dietary Supplement Health and Education Act of 1994 and Rule 21 C.F.R. §101.93. A dietary supplement called Isotonix® Maximum ORAC Formula is discussed. I have listed the structure-function statements found on the product label and associated support literature, and have identified the product ingredients that are the subject of the statements.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "James L. Wilmer".

James L. Wilmer, Ph. D.
Director, Scientific Affairs

Enclosures: 1 original and 2 copies

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**NOTIFICATION PURSUANT TO
SECTION 6 OF DSHEA
AND RULE 21 CFR §101.93**

This notification is being filed on behalf of **Market America, Inc.** which is the **distributor** of the product bearing the statements identified in this notification. Its business address is **1302 Pleasant Ridge Road, Greensboro, NC 27409**. This notification is being made pursuant to Section 6 of DSHEA and Rule 21 CFR §101.93. The dietary supplement product on whose label or labeling the statements appear is **Isotonix® Maximum ORAC Formula**.

The text of each structure-function statement for which notification is now being given is:

Statement 1: "One study done by the research center at Tufts showed that blueberry extract, the same as found in Isotonix® Maximum ORAC Formula, has a positive effect on balance, coordination and short-term memory (Tufts University, *Journal of Nutrition*: Sept. 15, 1999)." –Brochure

Statement 2: "One of the most unique products of its kind, Market America's Isotonix® Maximum ORAC Formula is a singular antioxidant nutraceutical that can build a comprehensive antioxidant network to defend your body's cells against the ravages of cellular damage from oxygen and nitrogen radicals." – Brochure

The following summary identifies the dietary ingredients or supplements for which a statement has been made:

Statement Number(s)	Identity of Dietary Ingredient or Supplement That Is the Subject of the Statement
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1.-2.	Isotonix® Maximum ORAC Formula is composed of the following ingredients: potassium (bicarbonate), vitamin C (ascorbic acid), cranberry, blueberry, grape, raspberry, elderberry, black currant, pomegranate, plum, choke cherry, natural tocopherol (d-gamma 70%, d-delta 21%, d-alpha 7%, d-beta 2%), tocotrienols (mixed isomers), Bioperine® (black pepper extract); other ingredients include: fructose, citric acid, maltodextrin, glucose and silica
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The following identifies the brand name of each supplement for which a statement is made:

<u>Statement Number(s)</u>	<u>Brand Name</u>	<u>Label or Labeling</u>
1.-2.	Isotonix [®] Maximum ORAC Formula	Brochure

I, **James L. Wilmer**, am authorized to certify this Notification on behalf of **Market America, Inc.** I certify that the information presented and contained in this Notification is complete and accurate, and that **Market America, Inc.** has substantiation that each structure-function statement is truthful and not misleading.

Date Signed: January 30, 2004

By: James L. Wilmer
James L. Wilmer, Ph. D.
Director, Scientific Affairs
Market America, Inc.