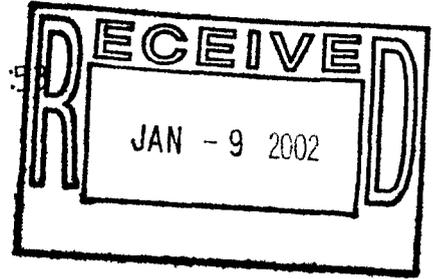




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28 December 2001

CERTIFIED MAIL

Robert Moore, Ph.D.
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Re: Food Labeling, Notification of Statements on Dietary Supplement.

Dear Dr. Moore:

Pursuant to 21 C.F.R. Subpart F, section 101.93, Chattem, Incorporated ("Chattem", the distributor, which is located at 1715 West 38th Street, Chattanooga, TN 37409) wishes to notify the Food and Drug Administration that it has, within the past 30 days, commence marketing two dietary supplement products which bear statements of nutritional support in their labeling.

The following statements are being made for the two dietary supplements: Dexatrim Results™ and Dexatrim Results™ (ephedrine free formula).

- Nutrition based weight control, Energy, Drug Free Dietary Supplement with Natural Metabolizers
- More science, nutrition and energy
- Introducing advanced science in dieting, new Dexatrim Results™ is a dietary supplement what when used in conjunction with a healthy lifestyle including diet and exercise will give you the results you've been looking for! Get off the roller coaster of hunger, fatigue and mood swing and find steady weight loss with Dexatrim Results™
- Burn Fat and Calories
- Control Appetite and Fight Cravings
- Provided Increased Natural Energy

CHATTEM, INC
1715 West 38th Street
Chattanooga, TN 37409
(423) 821-2037

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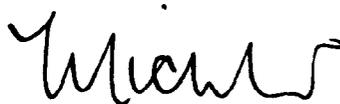
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Dr. Robert Moore
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- You can feel good about using Dexatrim Results™ as a diet aid. By taking 3 caplets a day, as recommended, Dexatrim Results™ will not only help you lose weight, it will help you gain energy and replenishing essential nutrients that you body needs
- First it has six natural sources that spark thermogenesis or increased metabolism, resulting in Fat burning, Increased Energy, Decreased Appetite
- Much like the mood enhancement benefits of a chocolate bar, Cocogen™ will help you feel good while dieting
- 2nd Your body needs certain fuels to sustain thermogenesis. Dexatrim Results™ provides the vitamins and minerals that are susceptible to being exhausted during thermogenesis. The replenishment of vitamins and minerals help: Fight Cravings, Sustain Fat Burning, Prevent Weight loss Plateauing
- 3rd The last and most overlooked component of nutritionally complete thermogenesis is eliminating Metabolic Waste.
- Accumulation of these wastes could cause Fatigue, Anxiety, Jitters, Weight Loss Plateauing
- The Anti-oxidants in Dexatrim Results™ attached to metabolic waste and are then eliminated.

These statements are accompanied by the required disclaimer, which is prominently displayed in a box in bold-faced type. I certify that the information contained in this notification is complete and accurate, and that Chattem maintains on file substantiation to attest that these statements are truthful and non-misleading. An original and two copies of this notification are being submitted.

Sincerely,



Michael Law, Ph.D.
Manager, Regulatory Affairs