

NOTIFICATION PURSUANT TO
SECTION 6 OF DSHEA 31-2372
AND 21 C.F.R. § 101.93

This notification is being filed on behalf of Neways, Inc., 2089 Neways Drive, Springville, UT 84663, which is the manufacturer of the product, which bears the statements identified in the Notification. This Notification is being made pursuant to Section 6 of DSHEA and Rule 21 C.F.R. § 101.93. The dietary supplement product on whose label or labeling statements appears is Orachel-kids™.

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

- Statement 1: *Supports anti-aging processes.*
- Statement 2: *Supports antioxidant capacity.*
- Statement 3: *Supports body stamina.*
- Statement 4: *Supports bone health.*
- Statement 5: *Supports circulatory system health.*
- Statement 6: *Supports gastrointestinal health.*
- Statement 7: *Supports healthy arteries.*
- Statement 8: *Supports healthy skin.*
- Statement 9: *Supports hormonal health.*
- Statement 10: *Supports immune system health.*
- Statement 11: *Supports joint health.*
- Statement 12: *Supports muscular health.*
- Statement 13: *Supports normal biochemical processes.*
- Statement 14: *Supports normal body and overall well-being.*
- Statement 15: *Supports normal growth.*
- Statement 16: *Supports normal absorption during digestion.*

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Statement 17: *Supports normal mental clarity and alertness.*

Statement 18: *Supports physical recovery after exercise.*

Statement 19: *Supports respiratory health.*

Statement 20: *Supports kidney health*

Statement 21: *Minerals are enzymatic cofactors in the body.*

Statement 22: *Supports metabolism of carbohydrates, fats, and proteins.*

The following summary identifies the dietary ingredient(s) for which a statement has been made:

<u>Statement Number</u>	<u>Identity of Dietary Ingredient(s) or Supplement that is the Subject of the Statement</u>
1.	<i>Calcium Ascorbate Dihydrate D-Alpha Tocopheryl Acid Succinate Zinc Amino Acid Chelate</i>
2.	<i>Calcium Ascorbate Dihydrate D-Alpha Tocopheryl Acid Succinate Manganese Amino Acid Chelate Zinc Amino Acid Chelate Cupric Sulfate Pentahydrate</i>
3.	<i>Riboflavin Pyridoxine Hydrochloride Magnesium Oxide Heavy</i>
4.	<i>Cholecalciferol</i>
5.	<i>D-Alpha Tocopheryl Acid Succinate Cyanocobalamin</i>
6.	<i>Calcium Ascorbate Dihydrate Zinc Amino Acid Chelate</i>
7.	<i>Cyanocobalamin Folic Acid</i>
8.	<i>Calcium Ascorbate Dihydrate D-Alpha Tocopheryl Acid Succinate</i>

Beta Carotene

9. *Calcium Ascorbate Dihydrate
Pyridoxine Hydrochloride*
10. *Calcium Ascorbate Dihydrate
Zinc Amino Acid Chelate*
11. *D-Alpha Tocopheryl Acid Succinate
Pyridoxine Hydrochloride*
12. *Zinc Amino Acid Chelate
Magnesium Oxide Heavy*
13. *Zinc Amino Acid Chelate*
14. *Zinc Amino Acid Chelate
Potassium Sulfate*
15. *Calcium Ascorbate Dihydrate
D-Alpha Tocopheryl Acid Succinate
Thiamine Nitrate
Riboflavin
Pyridoxine Hydrochloride
Cyanocobalamin
Beta Carotene
Folic Acid
Cholecalciferol
Calcium Amino Acid Chelate
Manganese Amino Acid Chelate
Zinc Amino Acid Chelate
Cupric Sulfate Pentahydrate
Potassium Sulfate
Magnesium Oxide Heavy*
16. *Calcium Ascorbate Dihydrate
Cholecalciferol*
17. *Thiamine Nitrate
Pyridoxine Hydrochloride*
18. *Pyridoxine Hydrochloride*
19. *Zinc Amino Acid Chelate*
20. *D-Alpha Tocopheryl Acid Succinate*

NOTIFICATION PURSUANT TO SECTION 6 OF DSHEA AND 21 C.F.R. § 101.93
Orachel-kids™

21. *Calcium Ascorbate Dihydrate*
D-Alpha Tocopheryl Acid Succinate
Thiamine Nitrate
Riboflavin
Pyridoxine Hydrochloride
Cyanocobalamin
Beta Carotene
Folic Acid
Cholecalciferol
Calcium Amino Acid Chelate
Manganese Amino Acid Chelate
Zinc Amino Acid Chelate
Cupric Sulfate Pentahydrate
Potassium Sulfate
Magnesium Oxide Heavy
22. *Riboflavin*
Pyridoxine Hydrochloride
Magnesium Oxide Heavy

The following identifies the brand name of each supplement for which a statement is made:

<u>Statement Number</u>	<u>Brand Name</u>	<u>Label or Labeling</u>
1.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each</i> <i>Label-120 Tablets</i>
2.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each</i> <i>Label-120 Tablets</i>
3.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each</i> <i>Label-120 Tablets</i>
4.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each</i> <i>Label-120 Tablets</i>
5.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each</i> <i>Label-120 Tablets</i>
6.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each</i> <i>Label-120 Tablets</i>
7.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each</i> <i>Label-120 Tablets</i>

NOTIFICATION PURSUANT TO SECTION 6 OF DSHEA AND 21 C.F.R. § 101.93
Orachel-kids™

8.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
9.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
10.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
11.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
12.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
13.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
14.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
15.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
16.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
17.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
18.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
19.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
20.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
21.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>
22.	<i>Orachel-kids™</i>	<i>Label-850 Mg Each Label-120 Tablets</i>

Page 6

NOTIFICATION PURSUANT TO SECTION 6 OF DSHEA AND 21 C.F.R. § 101.93
Orachel-kids™

I, Michael Cunningham, am authorized to certify this Notification on behalf of Neways, Inc. I certify that the information presented and contained in this Notification is complete and accurate, and that Neways, Inc. has substantiation that each structure-function statement is truthful and not misleading.

Date Signed: 22/01/04

By: 

Title: CEO