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January 6, 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

FEB - 6 2004

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 Ultra Prime™ 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 **Ultra Prime™**.

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

Statement 1: “Ultra Prime™ functions as a secretagogue (nutritional substances that stimulate the natural release of HGH) to naturally increase the secretion of HGH and is an advanced amino acid supplement that helps build muscle.” – Brochure

Statement 2: “The product (Ultra Prime™) is designed to safely and effectively raise your HGH levels.” –Brochure

Statement 3: “Ultra Prime™ works with your body to help naturally stimulate the pituitary gland, resulting in increased human growth hormone (HGH) secretion and release.” –Label

Statement 4: “Ultra Prime™ is an advanced amino acid supplement that functions as an anabolic to build muscle and as a secretagogue to naturally increase the secretion of human growth hormone (HGH), the “master hormone” produced naturally by the brain’s pituitary gland that governs the body’s growth, aging and health maintenance.” –Website

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
1.-4.	Ultra Prime™ is composed of the following ingredients: folate (as folic acid), magnesium (as magnesium citrate), L-arginine aspartate, glycine, L-arginine; proprietary blend: L-glutamine, colostrum, L-lysine (as L-lysine HCl), taurine, DNA/RNA (from brewer’s yeast); other ingredients

include: citric acid, malic acid, natural flavors, beet juice powder, silica, glucose polymers, acesulfame potassium and sucralose

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.-4.	Ultra Prime™	Brochure, Label and Website

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 6, 2004

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