

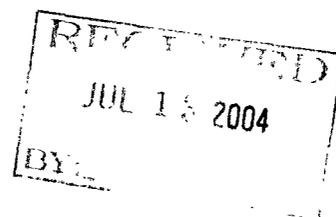


July 2, 2004

Office of Special Nutritional Products, Labeling and Dietary Supplements (HFS – 810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Re: Notification of Product Claims

Dear Sir or Madam:



This letter serves as thirty day notification, pursuant to 21 U.S.C. 343 (r) (6) (section 403 (r) (6) of the Federal Food, Drug and Cosmetic Act), of the nutritional support label statements being made by Nikken, Inc., located at 52 Discovery, Irvine, CA 92618, in connection with the marketing of its dietary supplement product line. A list of the products and their ingredients and nutritional support statements is set forth in the attached Exhibit "A."

The undersigned certifies that the information contained in this notice is complete and accurate and that the company maintains documentation to substantiate that its product claims are truthful and not misleading.

If you have any questions, please feel free to contact the undersigned.

Sincerely,


Kendall Cho, President
Nikken, Inc.

CC: Babener & Associates

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EXHIBIT "A"

1. **Product: Jade GreenZymes**

A dietary supplement containing vitamin A, vitamin C, thiamin, riboflavin, chlorophyll, galactomannan (as guar gum, cyamopsis, tetragonolobus), kombu extract and pearl barley seed extract.

Statements of Nutritional Support:

- Detoxifiers: For circulatory and colon health.
- Support for skin elasticity: To help prevent the appearance of aging and wrinkles.
- Natural pH regulation: To influence the body's acid/alkaline stability.
- Enzymes are necessary to a number of body functions. Enzymes oxidize fatty acids. They improve digestion. Enzymes aid in ridding the body of waste, in breaking down substances for easy absorption, and in maintaining healthy bones and tissues.

2. **Product: Kenzen Wellness: Dannsei Men**

A dietary supplement containing all vitamins and minerals for which an RDI has been established except iron, phosphorus, molybdenum, chloride, sodium and potassium. The formula also contains beet root, broccoli plant, cabbage plant, carrot root, celery seed, parsley leaf, spinach leaf, tomato fruit, apple pectin, papaya leaf, digestive enzymes (as amylase, protease and lipase), green tea leaf extract, saw palmetto berry extract, alpha lipoic acid, taurine, glycine, grape seed extract, glutamine, pygeum bark extract, turmeric root, glutathione (reduced), marine fish oil, high lignan flax seed oil, borage seed oil, choline, bromelain, n-acetyl-cysteine, alpha lipoic acid, lycopene and lutein.

Statement of Nutritional Support:

- Free-radical-fighting compounds to help the body resist aging.

3. **Product: Kenzen Wellness: Josei Women**

A dietary supplement containing all vitamins and minerals for which an RDI has been established except iron, phosphorus, molybdenum, chloride, sodium and potassium. The formula also contains beet root, broccoli plant, cabbage plant, carrot root, celery seed, parsley leaf, spinach leaf, tomato fruit, apple pectin, papaya leaf, digestive enzymes (as amylase, protease and lipase), green tea leaf extract, cranberry, fenugreek seed, doug quai root, n-acetyl-cysteine, soy

isoflavens, red clover extract, alpha lipoic acid, grape seed extract, glutathione (reduced), marine fish oil, high lignan flax seed oil, borage seed oil, choline, bromelain, n-acetylcysteine, alpha lipoic acid, lycopene and lutein.

Statements of Nutritional Support:

- [Propriety blend] offers soy isoflavones, natural herbs and other ingredients associated with maintaining stable levels of vitamins and antioxidants.
- Free-radical-fighting compounds to help the body resist aging.

4. **Product: Kenzen Wellness Fiber Plus**

A dietary supplement containing oat fiber, fructooligosaccharide, guar gum, acacia gum, soy fiber, barley bran, marshmallow root, oat bran, bromelian, prune powder, apple fiber and orange fiber.

Statements of Nutritional Support:

- Assists in promoting regularity and preventing occasional constipation.
- Helps regulate appetite.
- Helps maintain blood pressure and cholesterol levels that are already in the normal range.
- Increases intestinal flora.
- Can reduce occasional gas and bloating.
- Helps remove toxins.

5. **Product: Kenzen Wellness Crave Control**

A dietary supplement containing vitamin B6, manganese, chromium, choline, betaine, artichoke leaf extract, turmeric root, ginger root and banaba leaf.

Statement of Nutritional Support:

- Helps suppress appetite.
- Helps maintain blood sugar levels that already in the normal range.
- Provides basic liver support.
- Combats occasional indigestion, gastrointestinal upset.
- Supports healthy digestion and stimulates the liver to produce enzymes.
- Promotes energy, immune support, mood.
- Can delay fatigue and support memory.

6. **Product: Kenzen Wellness Calcium Plus**

A dietary supplement containing vitamin D, vitamin K, vitamin B6, folic acid, vitamin B12, calcium, phosphorus, magnesium, valerian root, lemon balm, boron and strontium.

Statements of Nutritional Support:

- Regular intake of calcium and related vitamins and minerals is an effective way to support the bones and the skeletal system.
- For healthy strong bones.
- Helps maintain healthy teeth.
- Assists the body in absorbing and metabolizing calcium.