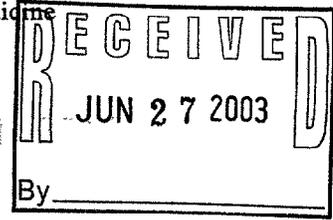


P . A . L . M

Preventive And Longevity Medicine

Gary A. Gallo , M.D.
BOARD CERTIFIED
ORTHOPEDIC SURGERY
DIPLOMATE
ANTI-AGING MEDICINE

84890



June 18, 2003

Office of Nutritional Products, Labeling and Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, D.C. 20204

RE: Marketing of Dietary Supplements

Dear Sirs:

Enclosed please find copies of the labels of the dietary supplements that our office sells.

Western Research Labs, 21602 North 21st Avenue, Phoenix, AZ 85027
623-879-8537 contact person Som Sok,

manufactured :

- 1)5-HTP Plus
- 2) Prostate Formula
- 3)Memory Formula
- 4)Potency Formula
- 5)MetabaTherm1
- 6)MetabaTherm2
- 7)Joint Formula

Medical Horizons, 6567 South Cottonwood Street, Salt Lake City, UT 84107
801-288-9110 contact person, Ryan Bonnett

manufactured:

- 1)Optimus One
- 2)Bone

Please contact us if you have any further questions.

Sincerely,

Susan B Gallo
Susan B. Gallo, Office Manager

975 0162

LET

12362



Choose a Longer, Healthier Life...Maximize Your Vitality and Longevity

5440 Park Central Court . Suite Two . Naples . Florida . 34109

☎ 239.593.7766 . ☏ 239.593.2166 . 866.493.7766

Dr.Gallo@PalmInstitute.Org

PalmInstitute.Org

P . A . L . M

Preventive and Longevity Medicine

SUGGESTED USE: As a dietary supplement, adults take 1 capsule daily or as directed by a physician. Best if taken with food.

Store in a cool dry place.
Keep out of reach of children.

Exclusively Formulated and Manufactured by

Palm Institute
5440 Park Central Court Suite #2
Naples, FL 34109
239-593-7766
www.palm-inst.com



**5-HTP
Plus**
Dietary Supplement
100 Capsules

Supplement Facts

Serving Size 1 capsule	
Amount Per Serving	% Daily Value
5-HTP (5-Hydroxytryptophan)	75 mg †
Pyridoxal-5-Phosphate	7.5 mg †
Proprietary Blend	50 mg †
L-Tyrosine	
L-Glutamine	

† Daily value not established

OTHER INGREDIENTS: Cellulose and Silica in Gelatin Capsules.

This product does not contain any sugar, yeast, wheat gluten, soy protein, corn, sodium, starch, preservatives, artificial colors.

P . A . L . M

Preventive and Longevity Medicine

SUGGESTED USE: As a dietary supplement, adults take 1 capsule three times daily or as directed by a physician.

Does not contain any fillers or excipients, dairy, egg, sugar, yeast, rice, gluten, artificial colors, flavors or preservatives.

Store in a cool, dry place. Keep out of reach of children.

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**Prostate
Formula**
Dietary Supplement
90 Capsules

Supplement Facts

Serving Size 3 Capsules	
Servings per Container 30	
Amount Per Serving	% Daily Value
Saw Palmetto (<i>Serenoa repens</i>) Berry Powdered Extract (standardized for 85-95% Free Fatty Acids and Active Sterols)	600 mg †
Nettle (<i>Urtica dioica</i>) Root Powdered Extract (20:1)	300 mg †
Pumpkin (<i>Cucurbita pepo</i>) Seed Powdered Extract (concentrated 4:1)	250 mg †
Pygeum africanum Bark Powdered Extract (standardized for 4% Active Phytosterols)	250 mg †
Tomato (<i>Lycopersicon esculentum</i>) Fruit Powdered Extract (standardized for 8% Lycopene)	250 mg †
L-Alanine	100 mg †
L-Glycine	100 mg †
L-Glutamine	100 mg †

† Daily Value not established

OTHER INGREDIENTS: Vegetarian Capsules.

P . A . L . M
Preventive and Longevity Medicine

SUGGESTED USE: As a dietary supplement, 1 Capsule three times daily or as directed by a physician.

OTHER INGREDIENTS Vegetable Capsules

Store in a cool, dry place. Keep out of reach of children.

Does not contain any fillers or excipients, dairy, egg, sugar, yeast, rice, gluten, artificial colors, flavors or preservatives

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Memory Formula

Dietary Supplement
90 Capsules

Supplement Facts

Serving Size 3 Capsules Servings per Container 30		
Amount Per Serving		% Daily Value
Folic Acid	800 mcg	200%
Vitamin B12 (as Cyanocobalamin)	1,000 mcg	16667%
Acetyl L-Carnitine	500 mg	†
Water Hyssop (<i>Bacopa monnieri</i>) Leaf Powdered Extract (standardized for 20% Bacosides)	200 mg	†
DMGAE	200 mg	†
Graino bilobe Leaf Powdered Extract (standardized for 24% Flavonoglycosides)	120 mg	†
Gotu Kola (<i>Centella asiatica</i>) Herb Powder	100 mg	†
Ashwagandha (<i>Withania somnifera</i>) Root Powdered Extract (standardized for 1.6% Withanolides)	100 mg	†
Panax ginseng Root Powder	100 mg	†
CoEnzyme Q-10	100 mg	†
Phosphatidylserine (from soy)	100 mg	†
Phosphatidylcholine (from soy)	100 mg	†
Alpha Lipoic Acid	100 mg	†
Uridenone	50 mg	†
Phosphatidylcholine	30 mg	†
Vinpocetine	10 mg	†
NADH	10 mg	†
Huperzine A	100 mcg	†

† Daily Value Not Established

P . A . L . M
Preventive and Longevity Medicine

SUGGESTED USE: As a dietary supplement, male adults 3 capsules daily, preferably with a meal, or as directed by a health professional. For more immediate results, take 4 to 6 capsules approximately 90 minutes before activity. This product is not intended for persons under 18 years of age.

WARNING: This product contains yohimbe bark extract which contains yohimbine. Do not use this product if you are at risk or are being treated for high blood pressure, heart, kidney, thyroid or psychiatric disease, anxiety, depression, seizure disorder or stroke. Consult a health professional before use if you are taking antidepressants, MAO inhibitor or any other prescription drug. Not for use by geriatric patients. Discontinue use and consult your health professional if dizziness, sleeplessness, tremors, nervousness, headache or heart palpitations occur. This product also contains androstenedione and should not be taken by any persons who is under 18 years of age. Not for use by children or women. Do not use this product if you have or are at risk for prostate cancer or prostate problems. Individuals who wish to avoid caffeine should not take this product. Consult your physician before using this product.

Store in a cool, dry place. Keep out of reach of children.

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239-593-7766
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**Potency
Formula**

Dietary Supplement
90 Capsules

Supplement Facts

Serving Size 3 Capsules Servings per Container 30		
Amount Per Serving		% Daily Value
Yohimbe (<i>Pausanystalis yohimbe</i>) Bark Powdered Extract (standardized for 2% Yohimbine)	500 mg	†
Guarana (<i>Pipturus guianensis</i>) Seed Powdered Extract (standardized for 22% Caffeine)	300 mg	†
Cacao (<i>Theobroma cacao</i>) Bark Powder	300 mg	†
Adrenal Tissue (from Bovine)	250 mg	†
Wild Cat (<i>Ayenia sativa</i>) Seed Powdered Extract (concentrated 10:1 extract)	150 mg	†
Korean Ginseng (<i>Panax ginseng</i>) Root Powdered Extract (standardized for 20% Ginsenosides)	150 mg	†
Maca (<i>Lepidium meyenii</i>) Root Powdered Extract (concentrated 4:1 extract)	120 mg	†
Horny Goat (<i>Epidendrum sagittatum</i>) Weed Powdered Extract (concentrated 8:1 extract)	100 mg	†
Saw Palmetto (<i>Serenoa repens</i>) Berry Powdered Extract (concentrated 2:1 extract)	100 mg	†
Ginkgo biloba Leaf Powdered Extract (standardized for 24% Flavonoglycosides)	100 mg	†
Androstenedione	50 mg	†
Catnip (<i>Nepeta tatarica</i>) Fruit Powdered Extract (standardized for 40% Steroid Saponins)	50 mg	†
Beta-Sitosterol	30 mg	†
† Daily Value not established		

OTHER INGREDIENTS Vegetarian Capsules

Does not contain any fillers or excipients, dairy, egg, sugar, yeast, rice, gluten, artificial colors, flavors or preservatives.

P . A . L . M
Preventive and Longevity Medicine

SUGGESTED USE: As a dietary supplement, adults take 1 capsule before meals or as directed by a health care professional. Do not exceed 6 capsules daily. For best results, use as a part of calorie-controlled diet and exercise program. Begin use with 1/2 the recommended dose to assess your tolerance. This product is not intended for persons under 18 years of age.

Warning: Do not use if nursing or pregnant. Consult your Physician before using this product if you have, or have a family history of heart, kidney, liver or thyroid disease, high blood pressure, stroke, recurrent headaches, depression or other psychiatric condition, glaucoma, difficulty in urinating, prostate enlargement, or severe disorder, if you are using a monoamine oxidase inhibitor (MAOI) or any other dietary supplement, prescription drug or over-the-counter drug containing ephedrine, pseudo-ephedrine or phenylpropranolamine (ingredients found in certain allergy, asthma, cough/cold, and weight control products). Exceeding recommended servings may cause serious adverse effects including, heart attack and stroke. Discontinue use and call a physician immediately if you experience rapid heartbeat, dizziness, severe headache, shortness of breath, or other similar symptoms. Individuals who consume caffeine with this product may experience serious adverse effects. The maximum recommended dose of ephedrine for a healthy adult is no more than 100 mg in a 24 hour period for not more than 12 weeks.

Store in a cool, dry place. Keep out of reach of children.

Exclusively Formulated and Manufactured by

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**Metaba
Therm1**
Dietary Supplement
100 Capsules

Supplements Facts

Serving Size 1 Capsule	
Amount Per Capsule	%Daily Value
Chromium (as chromium picolinate)	100 mcg 1,667%
Ma huang Powdered Extract (Standardized for 6% (20 mg) ephedra alkaloids)	167 mg †
Guarana Seed Powdered Extract (Standardized for 22% (260 mg) caffeine)	455 mg †
White Willow Bark Extract (Standardized for 15% (20% mg) Salicin)	67 mg †
L-Methionine	50 mg †
Proprietary Thermogenic and Enzymatic Blend (Ginger Root, Cayenne Fruit, Siberian Ginseng Root, Golden Seal Root, Bromelain and Papain)	15 mg †

†Daily Value not established

OTHER INGREDIENTS: Magnesium Stearate and Silica in Gelatin Capsules.

This product does not contain any yeast derivative, wheat, soy, dairy, sugar, starch, artificial colors, flavors or preservatives.

P . A . L . M
Preventive and Longevity Medicine

SUGGESTED USE: As a dietary supplement, adults take 1 capsule before meals, or as directed by a health care professional.

For best results, use as a part of calorie-controlled diet and exercise program. Begin use with 1/2 the recommended dose to assess your tolerance. This product is not intended for persons under 18 years of age.

Warning: Do not use if pregnant or nursing.

Citrin® is a registered trademark of the Sabinsa Corp.

This product does not contain any yeast derivative, wheat, soy, dairy, sugar, starch, or preservatives

Store in a cool, dry place. Keep out of reach of children.

Exclusively Formulated and Manufactured by

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**Metaba
Therm2**
Dietary Supplement
100 Capsules

Supplements Facts

Serving Size 2 Capsules

Amount Per Capsule	%Daily Value
Citrin® (Providing 200 mg HCA)	200 mg †
Pyruvate (from calcium pyruvate)	100 mg †
Gum Guggul Extract (Standardized for 10% (15 mg) guggulsterone)	75 mg †
L-Methionine	50 mg †
L-Tyrosine	50 mg †
Inositol	25 mg †
Coleus forskohlii Powdered Extract (Standardized for 18% (3.6 mg) forskohlin)	10 mg †
Vanadyl Sulfate	5 mg †
Proprietary Herbal and Enzymatic Blend (Kelp Herb, Gotu Kola Herb, Bladderwreck Herb, Dandelion Root, Bromelain and Papain.)	88 mg †

†Daily Value not established

OTHER INGREDIENTS: Magnesium Stearate and Silica in Gelatin Capsules.

P . A . L . M
Preventive and Longevity Medicine

SUGGESTED USE: As a dietary supplement, 5 capsules daily (3 in the morning & 2 in the evening) or as directed by a physician.

• These statements have not been regulated by the FDA. This product is not intended to diagnose, treat, cure or prevent any disease

Store in a cool, dry place.
Keep out of reach of children.

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Joint Formula

150 Capsules
Dietary Supplement

Supplement Facts

Serving Size 5 Capsules
Servings per Container: 30

Amount Per Serving	% Daily Value	
Vitamin C (as Ascorbic Acid)	750 mg	1250%
Manganese (as Manganese Amino Acid Chelate)	1 mg	50%
Glucosamine Sulfate	1,000 mg	†
MSM (MethylSulfonylMethane)	1,000 mg	†
Chondroitin Sulfate	750 mg	†
CMC Complex (Providing Cetyl Myristoleate, Cetyl Oleate & Cetyl Myristate)	470 mg	†
Horselail Herb Powdered Extract (Standardized for 7% Silica)	150 mg	†

† Daily Value not established

OTHER INGREDIENTS: Magnesium Stearate and Silica in Vegetable Capsules

Does not contain any dairy, egg, sugar, yeast, soy, glutens, artificial colors, flavors or preservatives.

Lot# 013131

Exp. 01/05

P . A . L . M
Preventive And Longevity Medicine

TESTED USE:

Primary supplement, take two packets daily, or
as directed by physician.

Statements have not been evaluated by the
FDA or Drug Administration. This product is not
intended to diagnose, treat, cure, or prevent any

Keep in a COOL, DRY PLACE. TAMPER EVIDENT.
DO NOT USE IF SEAL IS BROKEN. KEEP OUT OF
REACH OF CHILDREN.

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OPTIMUS ONE

THE ALL IN ONE DIETARY SUPPLEMENT 60 PACKETS

Advanced Multivitamin and Minerals
Energy Production Enhancement
Fat Metabolism Enhancement
Glucose Metabolism Enhancement
Immune System Assist
Brain Protection Assist

Supplement Facts

Serving Size Two Packets Daily

Amount Per Serving	%Daily Value	Amount Per Serving	%Daily Value
Vitamin A (as natural carotenoids)	15,000 IU. 300%	Chromium(as chromium picolinate)	200 mcg 167%
Vitamin C (as ascorbic acid)	1,500 mg 2,500%	Molybdenum	100 mcg 133%
Vitamin D (as cholecalciferol)	500 IU. 125%	Copper	1 mg 50%
Vitamin E (as d-alpha tocopherol succinate)	400 IU. 1333%	Vitamin K	2.5 mcg 3%
Vitamin B1 (as thiamin hcl)	175 mg 11,738%	Iodine(as kelp)	150 mcg 100%
Vitamin B2 (as riboflavin)	50 mg 2941%	Phosphorus(as di-calcium phosphate)	320 mg 32%
Vitamin B3 (as niacinamide)	150 mg 750%	Boron	3 mg *
Vitamin B6 (pyridoxine hcl)	100 mg 5,000%	Vanadium	100 mcg *
Folic Acid	800 mcg 200%	Choline(as choline bitartrate)	100 mg *
Vitamin B12 (as cyanocobalamin)	500 mcg 8,333%	Inositol	225 mg *
Vitamin B9 (as d-calcium pantothenate)	300 mg 3,000%	Co Enzyme Q10	100 mg *
Biotin	500 mcg 167%	N-Acetyl Cysteine	500 mg *
Calcium (as calcium ascorbate)	1000 mg 100%	Alpha Liposic Acid	300 mg *
Potassium (as potassium citrate)	150 mg 4.3%	Quercetin	200 mg *
Magnesium (as magnesium oxide)	400 mg 100%	Curcumin	250 mg *
Zinc (as zinc citrate)	30 mg 200%	L-Carnitine(as L-Carnitine tartrate)	500 mg *
Selenium (as L-selenomethionine)	200 mcg 286%	Pyrogallol	50 mg *
Manganese (as manganese gluconate)	2.5 mg 125%		

*Daily Value not established.

Other Ingredients: Gelatin, Magnesium Stearate, and Cellulose.

Lot # 20620

exp. 03/05

Manufactured for: P . A . L . M
5440 Park Central Court, Two, Naples, Florida, 34109

P . A . L . M
Preventive And Longevity Medicine

SUGGESTED USE:

As a dietary supplement, take one packet daily, or as directed by physician.

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

STORE IN A COOL, DRY PLACE. TAMPER EVIDENT. DO NOT USE IF SEAL IS BROKEN. KEEP OUT OF REACH OF CHILDREN.

To reorder or to activate autoshipment
call 1-866-493-7766
www.palm-inst.com

Lot # 20621 exp. 03/05



BONE
with Coral Calcium
DIETARY SUPPLEMENT
30 PACKETS

Supplement Facts
Serving Size One Packet

Amount Per Serving	%Daily Value	
Calcium (from coral calcium)	1000 mg	100%
Magnesium (from coral calcium)	500 mg	125%
Vitamin D (as cholecalciferol)	200 IU	50%
Zinc Citrate	20 mg	133%
Copper Gluconate	1 mg	50%
Manganese Gluconate	1 mg	50%
Vitamin K	10 mcg	12.5%
Boron Citrate	500 mcg	*

*Daily Value not established.

Other Ingredients: Gelatin, Magnesium Stearate, and Cellulose

Manufactured for: P . A . L . M
5440 Park Central Court, Two Naples, Florida 34109