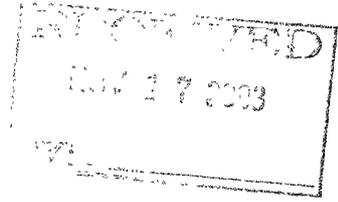




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November 01, 2003

Director  
Special Nutritionals  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street S.W.  
Washington, DC 20204

**SENT VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED**  
**ARTICLE #: 7099 3400 0016 4139 9751**

**RE: PROCAPS MAXIMUM COMPLETE PLUS**

Dear Sir / Madam:

This is a 30-day notification of a statement of nutritional support for a dietary supplement. The product name is **ProCaps Maximum Complete Plus**. The structure / function claims on all sizes and configurations of this product are identical. They are as follows:

CoQ10 is a powerful anti-oxidant, which also plays a critical role in all cellular energy production. CoQ10 is present at its highest concentrations in the "hardest working" organs in the body (heart, brain, liver and kidneys) and adequate levels of CoQ10 are essential for keeping these vital organs functioning at their very best - particularly the heart. Alpha Lipoic Acid (ALA) is often referred to as the Universal Anti-Oxidant, because of its unique ability to be both water and fat soluble, making it one of the few anti-oxidants that can go virtually anywhere in your body. No modern anti-oxidant regimen is complete without the addition of both CoEnzyme Q10 and Alpha Lipoic Acid (ALA), as well as one of ALA's closest functional relatives, N-Acetyl Cysteine (NAC). NAC is an extremely powerful anti-oxidant, but even more importantly, it provides the fundamental building block for your body to produce one of its most powerful and protective internal anti-oxidants - Glutathione.

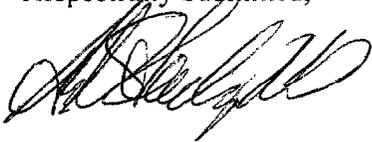
**ProCaps Gamma Vitamin E.** Each packet contains our exclusive **ProCaps Gamma Vitamin E**, a totally unique 100% natural Vitamin E formula that provides 415 mg of all four naturally occurring forms of Vitamin E, which many experts now agree is the most powerful and protective anti-oxidant vitamin that anyone could consume. It supplies the greatest amount of the two most important and predominant forms of vitamin E in nature - Gamma and Alpha Tocopherol. It appears that once again, Mother Nature knows best and it is most beneficial to consume a balanced combination of Alpha and Gamma just as one would get from the healthiest diet. Our naturally balanced **ProCaps Gamma Vitamin E** offers all the natural anti-oxidant protection of 200 mgs of Gamma Tocopherol and 200 IU of Alpha Tocopherol.

975 0162 LET 13319

**YOUR VITAMINS**  
FROM ANDREW LESSMAN

Most of us do not realize that just like vitamins, there are certain fatty acids your body cannot produce, and must therefore be obtained through your diet or supplementation. Research shows that diets high in Omega-3 oils are associated with overall cardiovascular and circulatory health, but the average Western diet is way out of balance supplying approximately twenty times more of the Omega-6 oils than the vital Omega-3 oils. These Essential Oils support the healthy function of all cell membranes and several body systems, including the cardiovascular, nervous, immune and endocrine systems.

Respectfully Submitted,



Dr Nancy Steely, ND  
Director of Research