



Apex Fitness Group™
100 Camino Ruiz
Camarillo, CA 93012

GEN TEL FAX
800 805 805
656 449 449
2739 1330 1370

0112 5 SEP 22 P2:18

July 29, 2005

AUG - 9 2005

Food and Drug Administration
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
200 C Street SW
Washington, DC 20204

Dear Sirs:

Notice is hereby given pursuant to Section 403 (r)(6)(21 U.S.C. 343(r)(6)) of the Federal Food Drug and Cosmetic Act that Apex Fitness Group, 100 Camino Ruiz, Camarillo, CA 93012 has marketed a dietary supplement under Apex Fitness Group "Lean" bearing the following statement(s) on the label and/or in the labeling:

- (Statement 1) Goal: lose weight
- (Statement 2) Metabolic Fat Loss Drink
- (Statement 3) Lipotropics: may help to metabolize fat in liver – (lipotropics work to prevent accumulation of fats in the liver, which may in turn support fat metabolism
- (Statement 4) Caffeine + Green Tea Extract: to increase energy metabolism for workout

The undersigned certifies that the information contained in this notice is complete and accurate and that Apex Fitness Group has substantiation that the statement(s) is truthful and not misleading. Pursuant to 101.93 (a)(1), two copies of this notification are enclosed.

Jim Starr
Director Product Development

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