



Apex Fitness Group™  
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Camarillo, CA 93012

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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 Resist 1 "For Carb Lovers" bearing the following statement(s) on the label and/or in the labeling:

(Statement 1) HCA has been shown to reduce the conversion of carbohydrate calories into fat. By supporting the body's own appetite control mechanisms. This formula is designed to effectively promote and accompany a fat loss diet and exercise program. By supporting the body's own appetite control mechanisms. HCA may help dieters with proper food intake.

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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