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July 25, 1996

Elizabeth Yetley
U.S. Food and Drug Administration
Office of Special Nutritionals
200 C Street, S.W.
Washington, D.C. 20204

Dear Ms. Yetley:

The following dietary supplement statements of nutritional support are submitted for your review.

A. Product Name: Co-Q10 10 mg

"Coenzyme Q10 (Ubiquinone) is a carrier found in all cells that assist in the process of generating energy from food. It also functions as an antioxidant by protecting cell membranes from free radical damage." *

B. Product Name: Goldenseal Root 125 mg

"Goldenseal Root contains a group of alkaloids that is used for enhancing overall health and promoting resistance." *

C. Product Name: Saw Palmetto 160 mg

"The extract of saw palmetto berries is a natural supplement that is used for the maintenance of prostate health in men over age 50." *

D. Product Name: Bilberry 40 mg

"Bilberries contain powerful antioxidants called anthocyanosides. These work to inhibit free radical activity in the body. Free radicals, caused by lifestyle and environmental stresses, attack healthy cells. Bilberry has been used traditionally as an aid to good vision." *

E. Product Name: Ginkgo Biloba 60 mg

"Ginkgo Biloba extract has been used to increase circulation to the brain and is also noted for its ability to function as an antioxidant. Antioxidants help combat the effects of free radical damage to cells and tissues." *

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Page Two

F. Product Name: Echinacea 125 mg

"Echinacea, also known as the Purple Coneflower, has been used historically more than any other herb as a natural defense during the cold weather season." *

G. Product Name: Evening Primrose Oil 500 mg

"Evening Primrose Oil is a natural source of Gamma-Linolenic Acid and Linoleic Acid. These polyunsaturated fatty acids are necessary components of all body cells and are required for human nutrition." *

H. Product Name: Shark Cartilage 500 mg

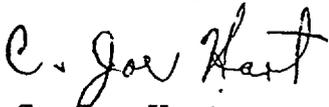
Sharks are known for their powerful resistance to disease. The cartilage tissue has been used to promote healthy cells." *

I. Product Name: Valerian Root 200 mg

"Valerian Root has been used historically as a natural aid for relaxation and to help promote restful sleep." *

*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.

Sincerely,



C. Joe Hart
Technical Director