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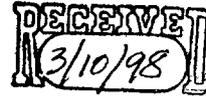
**THE WINNING
COMBINATION™**

The Informed Choice

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Henderson, Nevada 89015
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February 27, 1998



Dr. Carolyn Miles
Special Nutritionals
Center for Food Safety and Applied Nutrition
FDA
200 C Street S.W.
Washington, DC 20204

Dear Dr. Miles:

This is a 30-day notification for a dietary supplement that will be on the market within 30 days. The product name is **Fat Burning Factors**. The claims on the 30, 60, 180 and 360 count packages are identical and are:

“**FAT BURNING FACTORS** is an all natural, stimulant-free dietary supplement. It is specifically intended for use by those individuals seeking to insure optimum levels of the nutrients necessary or related to fat metabolism when they engage in a program of aerobic fat burning activity in conjunction with a low-fat diet. Like any ethical nutritional supplement, **Fat Burning Factors** is not a stand-alone weight loss product; instead, it simply supplies the nutrients established by research to help maximize your fat burning potential. **Fat Burning Factors** contains Carnitine in the form of Carnitine Fumarate because of its enhanced stability over free Carnitine-base, which can be adversely affected by moisture, thereby causing overall formula instability. Carnitine is related in structure to an amino acid and is required for the movement of all fats to a location in the cell where these fats can be burned. **Fat Burning Factors** also contains high levels of Vitamin C and the amino acid Lysine, both of which are essential for your body to create its own reserves of Carnitine. **Fat Burning Factors** supplies high levels of all the B-Complex vitamins because they are both directly and indirectly required for all fat burning to occur. **Fat Burning Factors** also contains high levels of other nutrients related to fat metabolism, such as Chromium Polynicotinate and several key amino acids.”

Respectfully Submitted,

Robert Maltas
V.P. Product Development

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