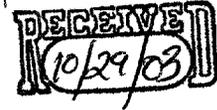




Body Wise International, Inc.  
2802 Dow Avenue  
Tustin, California 92780

Tel: 714-505-6121  
Fax: 714-832-5315

2701 100 100-1 0151



Office of Nutritional Products  
Labeling and Dietary Supplements (HFS-810)  
Center for Food Safety and Applied Nutrition  
U.S. Food and Drug Administration  
5100 Paint Branch Pkwy.  
College Park, MD 20740

RE: Notification of statements on a dietary supplement known as, Super Cell™.

October 20, 2003

Dear Ladies/Gentlemen;

Pursuant of 21 C.F.R. Subpart F, section 101.93, Body Wise International, Inc. ("Body Wise" the distributor, which is located at 2802 Dow Avenue, Tustin, CA 92780) wishes to notify the Food and Drug Administration that it has commenced marketing a dietary supplement known as Super Cell™ which includes statements of nutritional support in it's labeling.

The following statements are being made for the dietary supplement known as Super Cell™.

- **Super Cell™** Super charge your cells. (Addressed by the ingredients: Beta Carotene, Vitamin C, Vitamin E, Pantothenic Acid, Selenium, Glucosamine Sulfate, Cytochrome C Oxidase, Ornithine-Alpha-Ketoglutarate, Tomato Fruit, Echinacea Purpurea Root, Polyphenol Extract, Green Tea Leaf Extract, L-Glutathione, Ginkgo Biloba Leaf, Silymarin, Grape Skin Extract, Ascorbyl Palmitate, Evening Primrose Oil, Magnesium Aspartate, Potassium Aspartate, L-Tyrosine, Gamma Oryzanol, Capsicum Fruit, Pycnogenol® (Patent #4,698,360), Grape Seed Extract, Uña De Gato, and Citrus Peel Bioflavonoids.)
- **Ornithine Alpha Ketoglutarate** Believed to increase stamina and maintains healthy muscle mass.
- **Procyanidolic Oligomers (PCOs), including Pycnogenol** Powerful antioxidant! Increases intracellular vitamin C levels; supports collagen structure. Supports capillary health. (Addressed by the ingredients: Beta Carotene, Vitamin C, Vitamin E, Pycnogenol, and Grape Seed Extract.)
- **Uña De Gato** Supports immune system health and helps support digestive-system function.
- **L-Selenomethionine** Beneficial to cardiac health and may support muscle health. May help maintain immune health.

8/5 0162

LET

13263

1

- **Phosphatidyl Choline** A member of the phospholipid family, may help support heart health and physical performance.

The above statements are accompanied by the required disclaimer, which is prominently displayed in a box in boldfaced type.

The information contained in this notice is complete and accurate. Body Wise maintains on file substantiation that these statements are truthful and non-misleading.

An original and two copies of this notification are being submitted.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan E. Huffington", followed by a horizontal line extending to the right.

Alan E. Huffington  
Director of Regulatory Affairs

dw/AEH

Enclosures: Two copies of this two-page letter.