

Food and Drug Administration
Center for Food Safety and Applied Nutrition
Office of Special Nutritionals

ARMS#

13336



2 - LABEL SAMPLE

000001

Food and Drug Administration Office of Regulatory Affairs
Collection Report

For Sample Number: 40892

Flag	Flag Remarks				
Complaint Sample 301(k) Sample					
Episode Number	Origin	Basis	Sample Type	FIS Smpl Num	Status
	Domestic	Compliance	Official	99919146	Completed
FEI	Date Collected	Product Code	Responsible Firm	PAC	Hours
3002614262	19-FEB-99	60CBE21	Shipper	58R800	4.5
Related Smpl Num	Position Class	Sampling District	NDC Number	Permit Number	Storage Rqrmnt.
40893	INV	DEN-DO			Ambient
Dealer is Consumer	Crx/DEA Schedule	Recall Num	Consumer Compl. Num	Brand Name	
Yes			DEN-3865	Total Control	

Product Description

Product is white plastic bottle with a screw-top lid containing 90 capsules.

Product Label

See continuation.

Reason for Collection

Analyze for ephedrine alkaloids. Sample collected per consumer complaint #DEN-3865 per memo dated 2/17/99 from Chief, Domestic Programs Branch, HFS-636, Division of Enforcement and Programs regarding CFSAN Project # 13336. Request for f/u on AE report involving Total Control. Copy of assignment memo is attached to this CR.

MFG Codes

Lot # 2693

Expiration Date

2-01

Firm Legal Name

WesCa Naturals

Address

4452 Park Blvd. , Suite #106 San Diego, CA
92116 US

Type of Firm

Shipper

Firm FEI

3002614262

FCE

Size of Lot

Capsules collected in original container from 42 capsules in consumer's possession.

Est. Value

\$0

Rcpt Type

FDA484

Date Shipped & Doc. Ref.

11/30/1998

Description of Sample

Sample consists of one opened bottle (consumer's portion) of Total Control Lot # 2693 EXP 2-01 containing 25 capsules.

Method of Collection

Sample collected at consumer's. All capsules collected had been stored in the original container which was also collected.

How Prepared

Sample officially sealed on 2/19/99. Seal broken by Margaret M. Annes and attached to CR. Sample ID'd as in "Collector's ID On Package"; placed in whirlpak bag; bag placed in clear plastic bag and officially sealed; bag placed in box for shipment.

Collector's Identification on Package and/or Label

"40892 2/19/99 MMA"

Collector's Identification on Seal

"40892 2/24/99 Margaret M. Annes"

Sample Delivered To

Fed-Ex, [REDACTED]

Date Delivered

02/26/1999

Orig C/R & Records To

DEN-DO

Lab w/Split Sample

0

Lab

SEA-LAB

Document Number

Document Date

Document Type

Document Remarks

02/19/1999

Affidavit

Affidavit signed by [REDACTED] (consumer).

07/07/1998

Invoice

Hand-written invoice dated 7/7/98 from [REDACTED],

[REDACTED] showing the purchase by [REDACTED] of 3 bottles of Total Control (TC) for a total

Food and Drug Administration Office of Regulatory Affairs

Collection Report

For Sample Number: 40892

741	09/08/1998	Invoice	of \$101.81. (Please refer to Affidavit.) Copy of invoice [redacted] showing the purchase by [redacted] of 3 bottles of Total Control for \$96.81 on 9/8/98.
2413	11/30/1998	Invoice	Copy of invoice [redacted] showing the purchase of 3 bottles of Total Control by [redacted] on 11/30/98 from WesCa Naturals, San Diego, CA. The product was shipped via US Mail and is the shipment in which the sample collected was received
		Other	Copies of labeling on Total Control bottle.
		Other	Copies of information received with each order by the consumer from WesCa Naturals. Includes an order form and product information. Copies provided by the consumer.
		Other	Copies of information obtained from WesCa Naturals internet site (www.wesca.com) regarding the Total Control product and an order form. Apparently the product is only available via mail order.

Remarks

Consumer: [redacted] The manufacturer could not be determined via the method of sample collection. Per the label on the product, it is manufactured for the shipper listed below.

Payment Amount	Payment Method	704(d) Sample	702(b) Portion	Collector's Name
\$0.00	No Charge	No	No	Margaret M Annes
Name of Signer			Date & Time of Signature	Meaning
Margaret M Annes			02/26/1999 06:59 PM ET	Collector

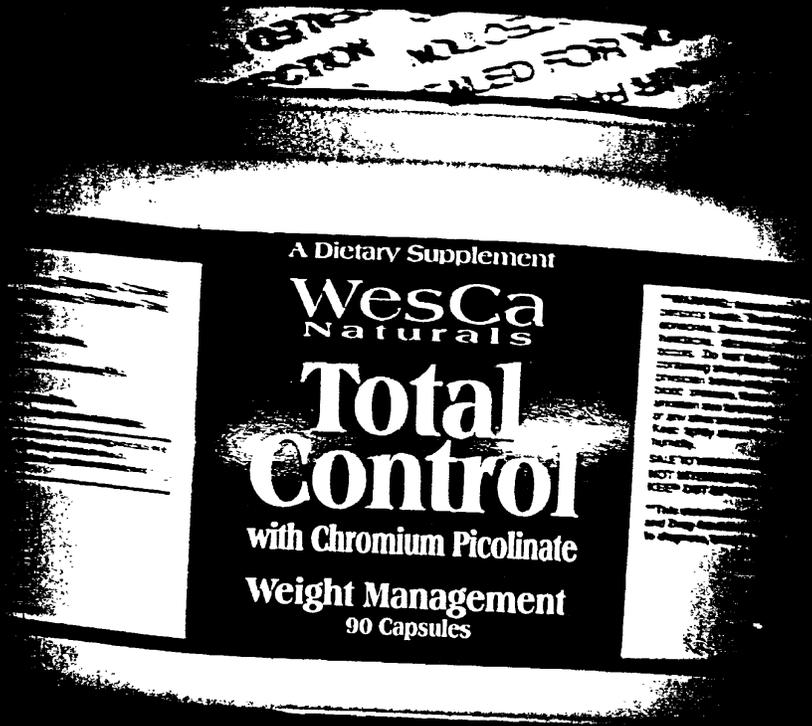
RECEIVED
 CLINICAL RESEARCH
 & REVIEW/OSH # 5-4
 '99 MAY 25 11 8:27

Continuation:

Product Label

Product is labeled in part: "**** A Dietary Supplement *** WesCa Naturals *** Total Control with Chromium Picolinate *** Weight Management 90 Capsules *** WARNING *** This dietary supplement contains natural forms of ephedrine. *** Manufactured for WesCa Naturals 4452 Park Blvd. Suite #106 San Diego, CA 92116 888-462-DIET *** INGREDIENTS: Chromium Picolinate, Spirulina, Ma Huang Extract, Citrus Aurantium, Kola Nut Extract, Yohimbe Extract, Green Tea Extract, Ginseng Extract, Colloidal Minerals. *** Each capsule contains 22 mg. Ephedrine Alkaloids. *** Take (1) one capsule 1-4 times a day. Do not exceed (4) four capsules in a 24 hour period. *** Use by Expiration Date LOT#/EXP. 2693/2-01 ****".

Best Quality
FDA



A Dietary Supplement

WesCa
Naturals

**Total
Control**

with Chromium Picolinate

Weight Management
90 Capsules

Directions: ...
Warnings: ...
Precautions: ...
Interactions: ...
Side Effects: ...
Keep out of reach of children.
Do not use if you are pregnant or nursing.
Do not use if you are taking any other medications.
Do not use if you have any medical conditions.
Do not use if you are taking any other supplements.
Do not use if you are taking any other drugs.
Do not use if you are taking any other herbs.
Do not use if you are taking any other vitamins.
Do not use if you are taking any other minerals.
Do not use if you are taking any other nutrients.
Do not use if you are taking any other supplements.
Do not use if you are taking any other drugs.
Do not use if you are taking any other herbs.
Do not use if you are taking any other vitamins.
Do not use if you are taking any other minerals.
Do not use if you are taking any other nutrients.

000005

40892
2/19/99
mma
ATTACHMENT# 7.1

Best Quality
100%

PROTECTION SEAL
SEALS

WARNING: Improper use of this product may be hazardous to a person's health. This dietary supplement contains natural forms of ephedrine. Discontinue or reduce use if nervousness, headache, dizziness, palpitations, nausea, or sleeplessness occurs. Do not take if you are presently taking a medication containing phenylpropanolamine, caffeine, or ephedrine. Consult a physician before using, if you are pregnant, lactating, have high blood pressure, heart or thyroid disease, diabetes, or suffer in any way from prostate enlargement or if taking a MAO inhibitor or any other prescription drug.
Keep lightly closed in a cool, dry place. Avoid excess heat and humidity.

**SALE TO THOSE UNDER 18 YEARS YEARS OF AGE PROHIBITED
NOT INTENDED FOR CHILDREN.
KEEP OUT OF REACH OF CHILDREN.**

This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

Manufactured for
WesCa Naturals
4452 Park Blvd.
Suite #106
San Diego, CA 92116
888-462-DIET

INGREDIENTS:
Chromium Picolinate
Aurantium, Kava Kava
Extract, Green Tea

Each capsule contains

Take (1) one capsule

four capsules daily

This Product Contains

Do not use if tampered

Accidents involving

of fatal poisoning

reach of children. Keep

poison containers

Date by expiration

40892
2/19/99

MYA

ATTACHMENT# 7.2

000006



FOR YOUR PROTECTION
PLEASE

INGREDIENTS:

Chromium Picolinate, Spirulina, Ma Huang Extract, Cassia Aurantium, Kola Nut Extract, Yohimbe Extract, Green Tea Extract, Ginseng Extract, Colloidal Minerals.

Each capsule contains 22 mg. Ephedrine HCL.

Take (1) one capsule 1-4 times a day. Do not exceed (4) four capsules in a 24 hour period.

This Product has two tamper resistant seals.

Do not use if tamper evident seal is broken or missing.

Each 22 mg. capsule of iron contains 10 mg. of iron. Keep out of reach of children. In case of accidental overdose, call a doctor or poison control center immediately.

Use by Expiration Date LOT#/EXP. 26932-01

40892

2/19/99

MMA

ATTACHMENT# 7.4

000008



FOR YOUR PROTECTION
SEAL

...to a
...of
...not
...of
...ness
...ing
...action
...Consult
...a
...high
...efficacy
...in
...and

INGREDIENTS:
Chromium Picolinate, Spirulina, Moringa Extract, Chromium
Aurantium, Kola Nut Extract, Yohimbin Extract, Green Tea
Extract, Ginseng Extract, Colloidal Minerals.

Each capsule contains 22 mg of Ephedrine HCl.
Take (1) one capsule 1-4 times a day. Do not exceed (4)
four capsules in a 24 hour period.

This Product has two tamper resistant seals.
Do not use if tamper evident seal is broken or missing.

Accidental overdose of iron containing products is a leading cause
of fatal poisoning in children under 6. Keep this product out of
reach of children. In case of accidental overdose, call a doctor or
poison control center immediately.

Use by Expiration Date LOT#EXP. 2693-2-01

40892
2/19/99
mmk
ATTACHMENT# 9.5

000009



MADE FOR THE
YOUR PRO
SELECTED

INGREDIENTS:
 Ginseng, Ma Huang Extract, Citrus
 Aurantium, Yohimbe Extract, Green Tea
 Extract, Guarana Extract, Cocoa Minerals.
 Ephedrine Alkaloids.
 Take 1-2 capsules 3-4 times a day. Do not exceed (4)
 capsules in a 24-hour period.
 Product has two tamper resistant seals.
 If either tamper resistant seal is broken or missing,
 do not use. If you suspect the product is a leading cause
 of death, please report this product out of
 control. In case of an overdose, call a doctor or
 poison control center immediately.

Lot #/Expiration Date: L078/EXP. 2693/2-01

A Diet
We
 Nat
To
COI
 with Chre
 Weight

40892
 2/19/99
 MMA
 ATTACHMENT# 7.6

000010

Food and Drug Administration Office of Regulatory Affairs
Collection Report

For Sample Number: 40893

Flag	Flag Remarks				
Complaint Sample 301(k) Sample					
Episode Number	Origin	Basis	Sample Type	FIS Smpl Num	Status
	Domestic	Compliance	Official	99919147	Completed
FEI	Date Collected	Product Code	Responsible Firm	PAC	Hours
3002614262	19-FEB-99	60CBE21	Shipper	58R800	2.5
Related Smpl Num	Position Class	Sampling District	NDC Number	Permit Number	Storage Rqrmnt.
40892	INV	DEN-DO			Ambient
Dealer is Consumer	Crx/DEA Schedule	Recall Num	Consumer Compl. Num	Brand Name	
Yes			DEN-3865	Total Control	

Product Description

Product is white plastic bottle with a screw-top lid containing 100 capsules.

Product Label

See continuation.

Reason for Collection

Analyze for ephedrine alkaloids. Sample collected per consumer complaint #DEN-3865 per memo dated 2/17/99 from Chief, Domestic Programs Branch, HFS-636, Division of Enforcement and Programs regarding CFSAN Project # 13336. Request for f/u on AE report involving Total Control. Copy of assignment memo is attached to this CR.

MFG Codes

Lot # 3154

Expiration Date

7-01

Firm Legal Name

WesCa Naturals

Address

4452 Park Blvd. , Suite #106 San Diego, CA
92116 US

Type of Firm

Shipper

Firm FEI

3002614262

FCE

Size of Lot

Container collected from (1) one unopened container in consumer's possession.

Est. Value

\$0

Rept Type

FDA484

Date Shipped & Doc. Ref.

09/08/1998

Description of Sample

Sample consists of (1) one unopened bottle in consumer's possession of Total Control Lot # 3154 EXP 7-01 containing 100 capsules.

Method of Collection

Sample collected at consumer's from (1) one remaining container.

How Prepared

Sample officially sealed on 2/19/99. Seal broken by Margaret M. Annes and attached to CR. Sample ID'd as in "Collector's ID on Package"; sample placed in clear plastic bag and officially sealed; bag placed in box for shipment.

Collector's Identification on Package and/or Label

"40893 2/19/99 MMA"

Collector's Identification on Seal

"40893 2/24/99 Margaret M. Annes"

Sample Delivered To

Fed-Ex, [REDACTED]

Date Delivered

02/26/1999

Orig C/R & Records To

DEN-DO

Lab w/Split Sample

0

Lab

SEA-LAB

Document Number

Document Date

02/19/1999

Document Type

Affidavit

Document Remarks

Copy of affidavit signed by [REDACTED] (consumer). Original is attached to sample # 40892.
Hand-written invoice dated 7/7/98 from [REDACTED]

Food and Drug Administration Office of Regulatory Affairs
Collection Report

For Sample Number: 40893

741	09/08/1998	Invoice	<p>_____ showing the purchase by _____ of 3 bottles of Total Control (TC) for a total of \$101.81. (Please refer to Affidavit.) Copy of invoice #741 showing the purchase from WesCa Naturals, San Diego, CA by _____ of 3 bottles of Total Control for \$96.81 on 9/8/98. The product was shipped via US Mail.</p>
2413	11/30/1998	Invoice	<p>Copy of invoice #2413 showing the purchase of 3 bottles of Total Control by _____ on 11/30/98 from WesCa Naturals, San Diego, CA. The product was shipped via US Mail.</p>
		Other	<p>Copies of labeling on Total Control bottle.</p>
		Other	<p>Copies of information received with each order by the consumer from WesCa Naturals. Includes an order form and product information. Copies provided by the consumer.</p>
		Other	<p>Copies of information obtained from WesCa Naturals internet site (www.wesca.com) regarding the Total Control product and an order form. Apparently the product is only available via mail order.</p>

Remarks

Consumer: _____ The manufacturer could not be determined via the method of sample collection. Per the label on the product, it is manufactured for the shipper listed in this CR.

Payment Amount	Payment Method	704(d) Sample	702(b) Portion	Collector's Name
\$0.00	No Charge	No	No	Margaret M Annes
Name of Signer			Date & Time of Signature	Meaning
Margaret M Annes			02/26/1999 07:04 PM ET	Collector

RECEIVED
 CLINICAL RESEARCH
 & REVIEW/OSN IFS-40893
 '99 MAY 25 18:27

Food and Drug Administration Office of Regulatory Affairs
Collection Report

For Sample Number: 40893

Continuation:

Product Label

Product is labeled in part: "**** A Dietary Supplement *** WesCa Naturals *** Total Control *** Weight Management 100 Capsules *** WARNING *** This dietary supplement contains natural forms of ephedrine. *** Manufactured for WesCa Naturals 4452 Park Boulevard #106 San Diego, CA 92116 1-888-462-DIET (3438) *** INGREDIENTS: MaHuang Extract, Citrus Aurantium, Kola Nut, Yohimbe, Green Tea Extract, Ginseng, 77 Colloidal Minerals (Each capsule contains 22 mg Ephedrine Alkaloids.) *** SUGGESTED USE: Take (1) one capsule 1-4 times a day. Do not exceed (4) four capsules in any 24 hour period. *** Use by Expiration Date LOT#/EXP. 3154/7-01 ****".

Best Quality
Ginseng

A Dietary Supplement

WesCa
Naturals

Total Control

Weight Management
100 Capsules

WARNING: Improper use of this product may be hazardous to a person's health. This dietary supplement contains natural forms of ephedrine. Discontinue use if you experience dizziness, palpitations, nausea, loss of appetite or sleep, or if a headache, rapid pulse, headache, or nervousness occurs. Do not take if you are presently taking a medication containing phenylpropanolamine, caffeine, or ephedrine. Consult a physician before taking if you are pregnant, lactating, have high blood pressure, heart or thyroid disease, diabetes, calcium intoxication due to other prescription drug, or if taking a MAOI. **KEEP OUT OF REACH OF CHILDREN. NOT INTENDED FOR CHILDREN. KEEP OUT OF REACH OF CHILDREN.**

Manufactured for

4452 Park Boulevard Suite #106
San Diego, CA 92116
1-888-462-9227

INGREDIENTS:
Ma Huang Extract, Citrus Aurantium, Yohimbe, Green Tea Extract, Colloidal Moringa, Each capsule contains Ephedrine Alkaloids.

SUGGESTED USE: Take (1) one capsule 3 times a day. Do not exceed (1) one capsule in a 24-hour period.

This product has not been evaluated by the FDA. Do not use if tamper evident seal is missing.

Accidental overdose of iron-containing product is a leading cause of fatal poisoning in children. Keep this product out of reach of children. In case of accidental overdose, call a doctor or poison control center immediately.



40893
2/19/99

mm#

ATTACHMENT# 8.1

000014

Best Quality
GMA

INGREDIENTS: Ma Huang Extract, Citrus Aurantium, Kola Nut, Yohimbe, Green Tea Extract, Ginseng, Colloidal Minerals (Each capsule contains 22 mg Ephedrine Alkaloids).

SUGGESTED USE: Take (1) one capsule, 4 times a day. Do not exceed (4) four capsules in any 24 hour period.

Warnings:
This product contains natural stimulants. Do not take if pregnant, nursing, or taking insulin.

Accidental Overdose: If containing product is accidentally ingested, call your doctor or poison control center. Keep this product out of reach of children. In case of accidental overdose, call a doctor or poison control center immediately.



7720-35051

A Dietary Supplement

Total Control

Weight Control

100 Capsules

40893
2/19/99
mma
ATTACHMENT# 8.2

000015

WesCa Naturals

Products for you

May 98

New Products for the new you!

The people here at WesCa Naturals would like to extend our thanks to the many people that put their trust in our company. Because of the recent growth we are experiencing, we will be moving to a new office. If you have any questions or if you are looking for a particular product please let us know.

Buddie Boosters Mans best friend!

Yohimbe's energizing effects stem from it's ability to increase blood flow to the genitals, both male and female. It is thought to stimulate the pelvic nerve ganglia and thus is helpful for men with erection problems. In fact a prescription drug, yohimbine hydrochloride, is in fact a prescription drug, yohimbine hydrochloride, is the only FDA approved drug for impotence. Effects can include increased libido, increased sensation and increased stamina. Women have also reported similar effects and general pleasant sensations

100 Capsules.....\$19.95

Vital Nutrients

Vital Nutrients is a special blend of synergistic nutrients designed to supply you with the essential cell building nutrients your body needs to maintain optimal health. Each specially formulated tablet contains only the finest quality ingredients including 30 vitamins and minerals (in forms that are readily absorbed by the body), combined with whole food concentrates, herbs and selected botanical. Vital Nutrients contains

only the finest natural and organic ingredients with no artificial flavors, colors, preservatives or common allergens such as com, yeast, wheat, lactose, or egg products.

120 Tablets.....\$25.00

C & G Cartilage Repair

More than 50 million people suffer from one or more kinds of arthritis related diseases in America today. Arthritis is inflammation of one or more joints characterized by diminished range of motion, mild to severe pain, swelling, redness, deformity of the joints and stiffness. Many people are turning to all natural remedies for arthritis and arthritis related health problems. The combination of Glucosamine Sulfate and Chondroitin Sulfate are helping many who once thought they would suffer the rest of their lives. Glucosamine Sulfate and Chondroitin Sulfate work together to diminish and/or eliminate signs of arthritis and arthritis related health problems.

180 Capsules.....\$41.00

Renovate

Methylsulfonylmethane combined with Vitamin C reported a greater benefit in correcting leg cramps, as athletes experience during sports activities. Migraine sufferers also have obtained substantial relief. Arthritic patients report relief from pain and stiffness as well as reduced swelling and inflammation.

100 Capsules.....\$27.00

Evening Primrose Oil

Evening Primrose Oil is important because it supplies, firstly, the biologically active cis Linoleic Acid for normal metabolism and, secondly, it provides a dietary source of GLA.

GLA is the last stable precursor to a group of hormone-like compounds called prostaglandin, that control cell growth, cell regeneration, skin condition, the menstrual cycle, and blood pressure.

Soft Gel-100.....\$16.00

Shark Cartilage

Alternative cancer therapy as seen on CBS News program 60 Minutes. It was found that it relieves pain and inflammation of arthritis.

50 Capsules.....\$18.30

All prices above include tax

WesCa Naturals

4452 Park BLVD.
Suite 106
San Diego, CA 92116-4039
(888)462-3438

40892
2/19/99
mna

ATTACHMENT# 8.1

000017

Total Control

Total Control should be taken on an empty stomach one hour before eating. Start by taking one capsule in the morning and one capsule in the afternoon. Remember each person is different and dosage may vary. You may adjust your dosage accordingly but do not exceed the maximum dosage indicated on the bottle label. Total Control is not indicated for use by persons under 18 years of age without the supervision of a parent.

In about one hour after taking Total Control you should feel an increase in energy and a curbing of appetite. If you do not feel it, wait until the following day to increase dosage. Continue gradual increase until you experience the increased energy and curbing of appetite.

Do not skip meals. Total Control will work better if you eat. However you will notice that you eat less and have more energy. You will feel the need to drink more fluids. This is normal due to the diuretic nature of some of the herbs.

Do not lose more than 7-12 pounds per month. If you are losing weight at a faster rate, reduce the dosage or eat more.

Sleeping: Because of the nature of the herbs you may experience difficulty in sleeping if Total Control is taken too late in the afternoon. You may choose to take Safe Alternative which has Chromium Picolinate to regulate blood sugar and CitraMax that keeps fat from storing in your body and will allow you to sleep at night if taken 3-4 hours before bedtime.

40892
2/19/99
mra

ATTACHMENT# 8.2

000018

Total Control: the strongest product in our "Choose To Lose" series. It is an all natural product and it contains no chemicals or synthetics. It is designed to enhance the energy production and weight loss for those who require that extra, extra boost of energy and weight reduction.

Nu Choice: Nu Choice is a precise blend of herbs that decrease your appetite and help burn fat. It was designed for those who didn't want that extra boost in Total Control but wanted more energy than Safe Alternative.

Safe Alternative: is a special blend of all natural lab tested herbs. They are combined to curb your appetite and help you burn fat. There are no chemicals, synthetics or ephedrine products (such as Ma Huang). The active ingredient in Safe Alternative is CitraMax™. CitraMax™ is a relatively new diet aid. It decreases your appetite and keeps fat from storing in your body.

Renovate: joint compound is a blend of bioavailable sulfur and synergist ingredients formulated to help maintain healthy joints and to help repair damaged connective and soft tissues.

C&G: Glucosamine and Chondroitin works together to eliminate signs of arthritis. It improves joint function and relieves pain.

Buddy Booster: increases the circulatory system. It's great for diabetics and leg cramps due to poor circulation.

ORDER FORM

Name _____ **Phone** _____

Address _____ **City** _____ **State** _____ **Zip** _____

Credit Card Number _____ **Exp.** / / _____

CALL FOR ORDERS WITH 12 OR MORE BOTTLES FOR A PRICE DISCOUNT.

— Total Control.....	\$32.27	—
— Nu Choice.....	\$29.95	—
— Safe Alternative.....	\$16.13	—
— Renovate.....	\$27.00	—
— C&G Cartilage repair.....	\$41.00	—
— Buddy Booster.....	\$14.95	—
	S/H \$5.00	—
	TOTAL	—

40892
2/19/99
mmA

ATTACHMENT# 8.4

WesCa Naturals
4452 Park BLVD. #106
San Diego CA 92116
Phone (888)462-3438 Fax (619)718-7098

000019

You Choose To Lose

Safe Alternative

Safe Alternative is a special blend of all natural lab tested herbs. They are combined to curb your appetite and help you burn fat. There are no chemicals, synthetics or ephedrine products (such as Ma Huang). The active ingredient in Safe Alternative is CitraMax. CitraMax is a relatively new diet aid. It decreases your appetite and keeps fat from storing in your body.

Nu Choice

Nu Choice was designed for those who want and like more energy than Safe Alternative. It is made of the same fine all natural herbs, vitamins, minerals and chromium Picolinate as the product "Safe Alternative". The difference being the addition of 12 mg. of Ma Huang (Ephedra). Nu Choice will burn fat not muscle tissue. It will raise your metabolism and increase your energy. Some people experience a shaky feeling with Ma Huang. This can sometimes be averted by eating a little something or cutting back on the dosage.

Total Control

Weight Management

The third and strongest product in our "Choose To Lose" series. It is an all natural product and like Safe Alternative and Nu Choice it contains no Chemicals or synthetics. It is designed to enhance the energy production and weight loss for those who require that extra, extra boost of energy and weight reduction.

Ma Huang: In China, Ma Huang has been used as an antiasthmatic for at least 5,000 years. The alkaloid ephedrine, extracted from the plant, was first identified by Chinese scientists in 1942. Two years later the pharmaceutical company Merck produced a synthetic version, still used to treat asthma. The Indian variety, E. Gerardiana, is thought to have been the prime ingredient of soma, a potent tonic and elixir of youth.

Ma Huang has been known to relieve bronchial spasms in asthma, and also seems to have anti-allergenic properties, useful in hay fever and nettle rash. In China, they are used for colds, especially those characterized by chills, headaches, and chesty coughs.

40892

2/19/99

mmf

000020

ATTACHMENT# 8.3

Total Control: the third and strongest weight loss product . It contains added metabolism, appetite loss and energy enhancers. Truly for the big and the bold.

Nu Choice: the same ingredients as Safe Alternative with the addition of 12 mg. of Ma Huang.

Safe Alternative: is a precise blend of herbs that decrease your appetite and help burn fat.

Renovate : joint compound is a blend of bioavailable sulfur and synergistic ingredients formulated to help maintain healthy joints and to help repair damaged connective and soft tissue.

C&G: Glucosamine and Chondroitin works together to eliminate signs of arthritis. It improves joint function and relieves pain.

Evening Primrose Oil: it has been known to control cell growth, skin conditions, PMS, blood pressure, Eczema, strengthening the immune system and lowering cholesterol.

Shark Cartilage: alternative cancer therapy as seen on CBS News program 60 minutes. It was found that it relieves pain and inflammation of arthritis.

Vital Nutrients: a superb vitamin and mineral. It contains 56 vitamins and minerals including DHA, MSM, Copper, Selenium, Bilberry, Ginkgo Extract, Grape seed extract, Wild Yam, Ginseng, Barley Grass and Suma.

Silent Nites: one out of every three people snore. If you or the person you sleep with has this problem, **Silent Nites** is your answer.

Buddy Booster: increases the circulatory system. It's good for diabetics or poor circulation problems. It also has been used as a sexual enhancement due to increased blood flow.

FAX/MAIL ORDER FORM

NAME _____

ADDRESS _____

CITY _____

STATE _____

ZIP _____

TELEPHONE _____

CREDIT CARD NUMBER _____

Exp. / / _____

American Express, Master Card, Visa, Discover, Check

Send me _____ Bottles of Nu Choice	(\$32.27)	_____
Send me _____ Bottles of Safe Alternative	(\$16.13)	_____
Send me _____ Bottles of Total Control	(\$32.27)	32. _____
Send Me _____ Bottles of Renovate	(\$27.00)	_____
Send Me _____ Bottles of C&G	(\$41.00)	_____
Send Me _____ Bottles of Evening Primrose Oil	(\$16.00)	_____
Send Me _____ Bottles of Shark Cartilage	(\$18.30)	_____
Send Me _____ Bottles of Vital Nutrients	(\$25.95)	_____
Send Me _____ Bottles of Silent Nites	(\$15.95)	_____
Send Me _____ Bottles of Buddie Booster	(\$14.95)	_____

Tax included INC
S/H \$5.00
Total _____

Checks: mail check with drivers license and phone number to:

4452 Park Blvd. #106

San Diego, CA 92116

Phone: (888)462-DIET

FAX: (619)718-7095

40892

2/19/99

MMA

ATTACHMENT# 8.5

3

000021