

Weaver & Amin
Attorneys at Law

150 N. Wacker Drive
Suite 2020
Chicago, IL 60606
312.701.0844
Fax 312.701.9044
firm@weaveramin.com

Karen A. Weaver, J.D., R.Ph.
Rakesh M. Amin, J.D., R.Ph.
Charles A. Rego, J.D.

Michael L. Clerkin, J.D., L.L.M.
Of Counsel

June 30, 2000

Mr. John Gronvall
Longevity Nutraceutical Labs
237 East Front Street
Youngstown, OH 44503

Re: **FDA Claims Notification**

Dear Mr. Gronvall:

We have completed review of Longevity Nutraceutical Labs' TurboGenics web site and have identified claims which meet the definition of statements of nutritional support as defined by the U.S. Food and Drug Administration.

Please sign the enclosed document, with a copy to your files. A copy should also be forwarded to our office in one of the enclosed envelopes. The original, plus two copies with my original signed cover letter, is to be forwarded in an additionally enclosed envelope addressed to the Office of Special Nutritionals, Food and Drug Administration.

Please call should you have any questions.

Very truly yours,



Karen A. Weaver

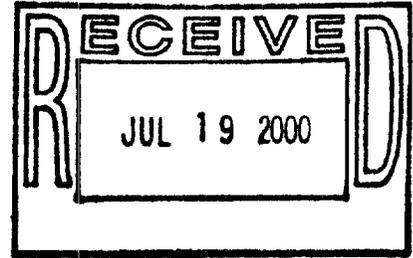
KAW:kts

Enclosures

LET 5656

979-0162

Office of Special Nutritionals (HFS-450)
Center for Food and Safety and
Applied Nutrition
Food and Drug Administration
200 C Street, SW
Washington, DC 20204



Re: Statements of Nutritional Support

Dear Sir:

Consider the following as notification of Statements of Nutritional Support as required under Section 403(r)(6) (21 U.S.C. 343(r)(6)) of the Federal Food, Drug and Cosmetic Act and in accordance with Section 101.93 of 21 Code of Federal Regulations.

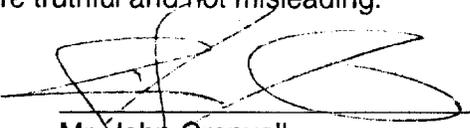
Distributor Name & Address: Longevity Nutraceutical Labs
237 East Front Street
Youngstown, OH 44503

<u>Statement Text</u>	<u>Name of Subject Dietary Ingredient(s)</u>	<u>Brand Name</u>
"Can help you enhance your vigor health, looks and sexuality"; rejuvenate the skin, supports the liver, lungs and kidneys"; "Assists in the revitalization of the immune system"; "Helps stimulate your body's natural production and release of human growth factors"; "May result in decline in body fat; increased lean muscle mass; deeper, better sleep pattern; higher energy level; improved skin elasticity; support heart, liver, spleen, kidneys and other organs; stronger bones, elimination of cellulite, enhanced sexual performance"; May help build proteins, enhance memory, add calcium to bones, strengthen	Chromium Chelate, Chromium Polynicotinate, Alpha Glycerol Phosphocholine, Boron Chelate, Chrysin, Coleus Forskohlii Root, Colostrum, DHEA, GABA, L-Glutamine, Griffonia Simplicifolia Bean Ext., L-Arginine, L-Carnitine, L-Glycine, L-Lysine, L-Ornithine, Alpha Keto Glutarate Acid, Panax Ginseng, St. John's Wort, Tribulus Terrestris, CoQ10, Pregnenolone, Folic Acid, Magnesium Oxide, RNA, DNA, Alpha Lipoic Acid, D-Cal-Pantothenic Acid, Iodine Kelp, Vitamin B-12	Super Secretagogue

<u>Statement Text</u>	<u>Name of Subject Dietary Ingredient(s)</u>	<u>Brand Name</u>
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muscles, and redistribute fat";
"You may feel stronger, decrease
your skin wrinkles, think clearer,
and have more stamina"; and
"Functions as a HGH stimulant
and releasing compound".

The information contained in this notice is complete and accurate. The above distributor possesses substantiation that the statements are truthful and not misleading.



Mr. John Gronvall
CEO
Longevity Nutraceutical Labs