



THE CENTER FOR LIFESTYLE DISEASE

P.O. Box 1487 • Surprise, AZ 85378

July 18, 2006

Administrator
Office of Nutritional Products,
Labeling, and Dietary Supplements (HFS-800)
Food & Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

To Whom It May Concern:

We respectfully request permission to use an alternative means of compliance to the labeling rules. This request is for a dietary ingredient made by our company called Absolbotani. Absolbotani is a Trade Secret Protected formulation and listing the actual plant extracts used to obtain our final extract would disclose our trade secret.

We would like to suggest that you allow this ingredient to be listed on final product labels as indicated by its given name, Absolbotani, rather than being required to list the plants from which it was derived. Only those companies with a legal license issued from the Center for Lifestyle Disease can use this ingredient or purchase it from our exclusive manufacturing licensee. Therefore, we would require each company to list this ingredient on the label as, Absolbotani, and indicate its presence is <.2% in the dietary supplement or food. This ingredient will never be more prevalent in any given dietary supplement or food in amounts greater than .2% and most commonly will be in amounts =<.05%. We ask that this method of indicating this ingredient in any dietary supplement or food be used instead of listing the plant extracts from which it is derived.

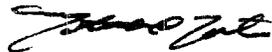
Example: Absolbotani (proprietary botanical extract) <.2%

Although each of the plants used to derive our formulation were dietary ingredients prior to October 15, 1994, we have elected to submit a Pre Market Notification for Absolbotani as a new dietary ingredient. We have provided evidence as a part of that notification, that Absolbotani can be reasonably expected to be safe. This evidence includes a mass balance test which indicates the chemical structure of the Absolbotani extract, with CAS numbers. Due to the fact that there has not yet been an established chemical name for this extract, and due to the fact that once there is one it would be extremely lengthy, and since no company can use it as an ingredient unless legally licensed to do so by

our company, we are asking permission to have all of our licensees use the term "Absolbotani" as the descriptive of this extract on the labels, along with the percentage symbol of <.2%, indicating its prevalence in the final market product. The toxicity studies submitted with our Pre Market Notification indicate that Absolbotani is safe up to and including dilutions of 1:200 or .5% prevalence.

Please allow this alternative means of compliance for the listing of this ingredient, Absolbotani so that we can maintain our Trade Secret Protection. My contact information is PO Box 1487, Surprise, AZ 85378. My direct phone/fax number is 623-776-3285 and my email is mitchelltate@cox.net.

Sincerely,



Mitchell L. Tate
CEO