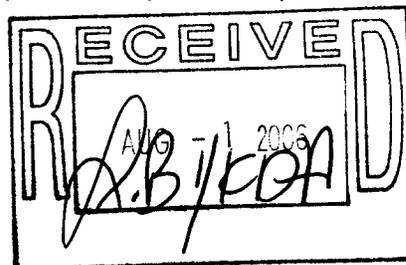


TJ Panorama Inc
P.O box 584, Fairfield, CT06824 www.tjpanorama.com
Tel(203)2595876 Fax (203)2595876 Email hliao@tjpanorama.com

July 27, 2006

Susan J. Walker M.D.
Division of Dietary Supplement Programs
Office of Nutritional Products, Labeling, and Dietary Supplements (HFS-820)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD, 20740-3835
Telephone Number: (301) 436-2371



Dear Dr. Susan J. Walker,

Thanks for your letter on May 10 2006 and the opportunity to have conference call with your team on May 22, 2006 to discuss our Pre-marketing Notification Application that TJ Panorama Inc is intent to market the Nucleic Acid Supplement product in US.

This letter contains with the three different applications.

- 1). Pre-marketing Notification Application that TJ Panorama Inc is intent to market the Nucleic Acid Supplement product in US
- 2). Letter for TJ Panorama to identify the information in the pre-marketing notification as proprietary material.
- 3). A notification to FDA that TJ panorama Inc is intent to market the dietary supplement of the Nucleic Acid Supplement that includes the text of the structure/function claims.

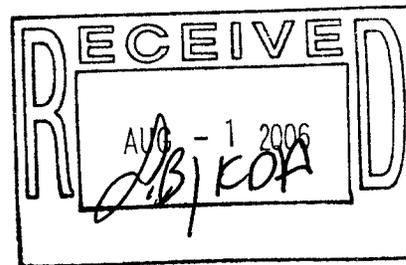
Sincerely,
Thanks for your time and considerations

Hong Liao
President

2006-6197
AIMS

July 9, 2006

Susan J. Walker M.D.
Division of Dietary Supplement Programs
Office of Nutritional Products, Labeling, and Dietary Supplements (HFS-820)
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Dear Dr. Susan J. Walker,

Thanks for your letter on May 10 2006 and the opportunity to have conference call with your team on May 22, 2006 to discuss our Pre-marketing Notification Application that TJ Panorama Inc is intent to market the Nucleic Acid Supplement product in US.

As result of that discussion, the following additional materials are included to support this application.

1. An original and two copies of the notification,
2. A description of the dietary supplement that contains our new dietary ingredients
3. Comparison of Nucleic Acid found in commonly consumed foods.

Thank you for your time and consideration.

Sincerely,

Hong Liao
President

ALLMP
2006-6197

1. The name and complete address of distributor of a dietary supplement that contains the new dietary ingredient, or of the new dietary ingredient;

TJ Panorama Inc.

P.O. Box 584, Fairfield, CT 06824

2. The name of the new dietary ingredient that is the subject of the premarket notification, including the Latin binomial name (including the author) of any herb or other botanical;

No	Name
1	Adenosine 5' monophosphatefree acid (AMP)
2	Cytidine 5' monophosphate free acid (CMP)
3	Guanosine5' monophosphate disodium salt (GMP)
4	Uridine5' monophosphate disodium salt (UMP)
5	Ribonucleic acid(RNA)

- a). A description of the dietary supplement or dietary supplements that will contain the new dietary ingredient including:

Nucleic Acid Supplement Capsules is made of the above dietary ingredients.

- b).the level of the new dietary ingredient in the dietary supplement;

No	Name	Level of new ingredients
1	Adenosine 5' monophosphate free acid (AMP)	—
2	Cytidine 5' monophosphate free acid (CMP)	—
3	Guanosine 5' monophosphate disodium salt (GMP)	—
4	Uridine 5' monophosphate disodium salt (UMP)	—
5	Ribonucleic acid (RNA)	—
6	Water	—
7	Gelatin	—

SUPPLEMENT FACTS	
Serving size 2 capsules	(700mg)
Amount per serving	
Calories 2	
Calories from Fat 0	
Nucleic Acids	480mg*
Total Fat	0
Protein	< 1g
*Daily Value not established	

OTHER INGREDIENTS: gelatin, water

b. The conditions of use recommended or suggested in the labeling of the dietary supplement, or if no conditions of use are recommended or suggested in the labeling of the dietary supplement, the ordinary conditions of use of the supplement;

SUGGESTED USE: 2 capsules take with water, twice a day. Children 1 capsule daily.

CAUTION: not suitable for people suffering from gout. Store in a cool, dry place at room temperature, tightly closed.

3. The history of use or other evidence of safety establishing that the dietary ingredient, when used under the conditions recommended or suggested in the labeling of the dietary supplement, will reasonably be expected to be safe, including any citation to published articles or other evidence that is the basis on which you have concluded that the new dietary supplement will reasonably be expected to be safe. You must submit reprints or photostatic copies of published information that you reference in support of the notification material. You must submit an accurate and complete English translation of any material you submit in a foreign language

The utility of nucleic acid as a supplement is not new to the nutrient consumer market. Since the 1950s, New York physician Benjamin Frank, M.D practiced his theory through the use of nucleic acids in the therapy of aging and chronic degenerative diseases. Dr. Frank reported the results of his research and clinical experience in the following books published during this time.

1. Frank, B. Nucleic Acid Therapy in Aging and Degenerative Disease-A Metabolic Approach with DNA, RNA and Related Metabolites. Psychological Library, New York, 1968.
2. Frank, B. Dr. Franks No Aging Diet. The Dial Press, New York, 1976.
3. Frank, B. Nucleic Acid and Anti Oxidant Therapy of Aging and Degeneration, Royal Health Books, Ltd., Long Island, NY, 1977.

Dr. Frank found that RNA had a number of profound effects:

- 1) Improve general health and retard aging (including reduced skin wrinkling and increased skin elasticity)
- 2) Energizing
- 3) Help to repair damage caused by disease and strengthens victims for the torment they must face in returning to normal life
- 4) Anti-low temperature and freezing
- 5) Permit the body to perform better with less oxygen
- 6) Cognitive enhancing.

Dr. Frank recommended dosages of 1.5 grams per day to 15 grams over period of time that depends on individual tolerance, based on serum uric acid and BUN (blood

urea nitrogen, a test of kidney function), as well as the clinical needs of the patient. We recommend that dosages of RNA intake are 960 milligrams daily (4 capsules). Each Capsule contains 239.75 mg (68.5%) of 350 mg. This daily dosage is on the low end of what Dr. Frank recommended

Foods rich in RNA include seafood (especially sardines), beans, mushrooms, beef broth and vegetable soups. Nucleic acids can also be obtained from nuts, as well as from many health foods. For dietary nucleic acids, Dr. Frank preferred sardines, claiming that therapeutic effects could be obtained by consuming one or two cans of sardines each day. Canned Sardines contains as much as 590 mg nucleic acids per 100 g, whereas red meat (muscle) contains a paltry 0.05 mg per 100 mg.

* The unit is mini-gram per 100 g

**NUCLEIC ACID
CONTENT OF FOODS**

FOODS	RNA	FOODS	RNA
ORGAN MEATS			
chicken liver	402*	lamb liver	88*
beef liver	268*	beef brain	61*
pork liver	259*	lamb heart	50
chicken heart	187	beef heart	49
beef kidney	134*		
FRESH SEAFOODS			
sardines	343	mackerel	203
anchovies	341	squid	100*
salmon	289	clams	85*
CANNED SEAFOODS			
sardines	590	salmon	26
oysters	239*	shrimp	10*
mackerel	122	anchovies	6
herring	82	tuna	5
clams	44*		
DRIED LEGUMES			
pinto beans	485	great northern beans	284
lentils	484	cranberry beans	248
garbanzo beans	356	baby lima beans	190
blackeye peas	306	split peas	173
small white beans	305	red beans	140
large lima beans	293		

* Fairly high in cholesterol, but rich in important nutrients.

The Nucleic Acid Supplement is manufactured by Zhen-Ao group in China. The nucleic acid supplement has been in the Chinese market since 1996. It has been marketed across mainland- China with 33 sales facilities, more than 300 sales agents and over 2000 franchise houses. More than 1.1 millions customers take this product yearly. The Nucleic Acid Supplement Capsules is the major food supplement product accepted in Chinese community worldwide based on Zhen-Ao' statistics. There is no accident report from marketing this product.

Country	Number of customers
China	1,050,000
Japan	13,500
South Korea	9,000
Malaysia	28,500
Southeast Asia	4,500

This Nucleic Acid Supplement is produced with the internationally recognized standard. It is manufactured using GMP- "Good Manufacturing Practices" in China. The manufacturing and sales of this product are certified by ISO9000 (registration No. 059-A) to meet with ISO standard BS EN ISO9001: 2000, it is also certified by MOODY international HACCP (Hazard Analysis Critical Control Points) with Registration No. AJA02/4337.

The following chart displays the amount of RNA in common foods consumed in the United States. It shows that the number of servings required matches the recommended daily dosage of the Nucleic Acid supplement (960 mg daily).

Foods	RNA (mg per 100 g)	Weight (Ounce) to match daily dosage of RNA recommended by this product	Serve (4 ounce)
Canned Sardines	590	5.42	1.36
Canned Oysters	239	13.39	3.35
Fresh Sardines	343	9.33	2.33
Fresh Salmon	289	11.07	2.77
Fresh Anchovies	341	9.38	2.35
Fresh Squid	100	32.00	8.00
Fresh Mackerel	203	15.76	3.94
Fresh Clams	85	37.65	9.41
Pinto Beans	485	6.60	1.65
Lentils	484	6.61	1.65
Garbanzo beans	356	8.99	2.25
Black eye peas	306	10.46	2.61
Small white beans	305	10.49	2.62
Large lima beans	293	10.92	2.73
Great northern beans	284	11.27	2.82
Cranberry beans	248	12.90	3.23
Split peas	173	18.50	4.62
red beans	140	22.86	5.71
Beef	5	640.00	160.00

* 1 ounce = 30 g

April 14, 2003, The result of human body clinical research on this product (Nucleic Acid Supplement) passed the appraisal of the experts group in Beijing which is the first clinical research on healthcare products in China.

To sum up, this Nucleic Acid supplement product is safe to be marketed in US.

Appendix

Appendix

1. Letter of authorization from ZHEN-AO to TJ Panorama Inc
2. Original Manufacture and product Profile
3. Clinical Tests Reports
4. GMP, ISO9000, HACCP
5. Certificate of Analysis
6. Copies of pages from Dr. Frank's No-aging Diet. Eat & Grow Younger, ISBN 0-440-11908-1, published by DELL Publishing CO. Inc, 1976
7. Copies of pages from Dr. Frank's Nucleic Acid Therapy In Aging and Degenerative Disease, ISBN 68-59227, published by Psychological Library Publishers, 1968.
8. Copy of FDA letter on May 10, 2006