



VIA EXPRESS MAIL

March 3, 2005

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

Re: Structure Function Claims/FDA Notification

Dear Sir or Madam:

Enclosed please find an original and two copies of the above referenced document prepared in accordance with the proposed regulation 21 C.F.R. Section 101.93.

Please feel free to contact me with any questions or comments.

Sincerely,

Susan Y. Campbell
General Counsel

Enclosures

SC: hr

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Notice is hereby given pursuant to the requirements of section 403(r)(6)(21 U.S. C. 343(r)(6) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that Metagenics, Inc. with its principal place of business at 100 Avenida la Pata, San Clemente, California 92673, (949) 369-3372, has commenced marketing the following dietary supplements bearing the following statement(s) on the label and/or in the labeling:

METAGENICS BRAND

Name of Supplement	Name of Ingredient or Supplement that is Subject to the Claim	Text of Claim
Ultra Flora IB™	<i>Lactobacillus acidophilus</i> NCFM® Strain, <i>Bifidobacterium lactis</i> BI-07 Strain	Ultra Flora IB™ is an enhanced potency probiotic formula designed to help relieve bowel irritation and related functional discomforts. Through promotion of an optimal bacterial balance, this formula may help support normal intestinal motility and address abdominal discomfort, bloating, and cramping.

THE UNDERSIGNED CERTIFIES THAT THE INFORMATION CONTAINED IN THIS NOTICE IS COMPLETE AND ACCURATE AND THAT METAGENICS, INC. HAS SUBSTANTIATION THAT THE STATEMENTS CONTAINED HEREIN ARE TRUTHFUL AND NOT MISLEADING.

Date 3-4-05

Metagenics, Inc.

BY: Susan Y. Campbell
 Susan Y. Campbell
 General Counsel