



Apex Fitness Group™  
100 Camino Ruiz  
Camarillo, CA 93012

GEN TEL FAX  
800 805 805  
656 449 449  
2739 1330 1370

apexfitness.com

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AUG - 9 2005 July 29, 2005

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

Dear Sirs:

Notice is hereby given pursuant to Section 403 (r)(6)(21 U.S.C. 343(r)(6)) of the Federal Food Drug and Cosmetic Act that Apex Fitness Group, 100 Camino Ruiz, Camarillo, CA 93012 has marketed a dietary supplement under Apex Fitness Group Fit "Joint Support" bearing the following statement(s) on the label and/or in the labeling:

(Statement 1) Maintain healthy joints (with glucosamine and chondroitin)

(Statement 2) This formula contains glucosamine and chondroitin sulfate. These amino saccharides are natural compounds that are present in joint cartilage. They have been shown to play an integral role in maintaining healthy connective tissue and cartilage.

The undersigned certifies that the information contained in this notice is complete and accurate and that Apex Fitness Group has substantiation that the statement(s) is truthful and not misleading. Pursuant to 101.93 (a)(1), two copies of this notification are enclosed.

Jim Starr  
Director Product Development

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