



Apex Fitness Group™
100 Camino Ruiz
Camarillo, CA 93012

GEN TEL FAX

800 800 1800
656 440 440
2739 1330 1370

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July 29, 2005

AUG - 9 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 Max "Creatine" bearing the following statement(s) on the label and/or in the labeling:

- (Statement 1) Increase your body's natural supply of Creatine
- (Statement 2) Helps increase available energy to muscles for better performance
- (Statement 3) Effective energy for short-term high intensity exercises
- (Statement 4) Replenishes the body's natural stores of Creatine, which may help buffer lactic acid build-up in muscles (during resistance training)
- (Statement 5) Can increase muscle growth with resistance training
- (Statement 6) Glutamine:
 - May aid in recovery
 - Peptide form for good absorption

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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