



IdeaSphere™
inc.

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October 4, 2005

Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

OCT - 5 2005

Dear Sir or Madam;

This letter will serve as a 30-day notification, pursuant to 403 (r) (6) of the Federal Food, Drug & Cosmetic Act and regulations promulgated thereunder.

Product Manufacturer: IdeaSphere Inc.
150 Motor Parkway
Hauppauge, NY 11788

Text of statement being made: "promotes energy & stamina" "support health & wellness"
"clinically proven to promote prostate health" "...support a healthy prostate"

Dietary supplement ingredients: Vitamin A, Vitamin C, Vitamin D, Vitamin E, Thiamine, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Boron, Vanadium, Choline, Inositol, PABA, Lipoic Acid, Trace Mineral Complex, Nettle, Pygeum, Saw Palmetto Berry Extract, Lycopene, Extracts of: Eleutherococcus senticosus, Ginkgo Biloba, Astragalus, Panax Ginseng, Schizandra chinensis, Polygonum multiflorum, Eucommiae ulmoides, Polygonatum sibirica, Gynostemma pentaphylla, Sargassum Fusiforme, Ganoderma lucidum, Zizyphus jujuba, Lycium barbarum, Momordica grosvenori.

Dietary supplement brand and name: Twinlab MEN'S ULTRA DAILY CAPSULES

As required, enclosed are two photocopies of this notification.

The signee certifies that the information contained in this notice is complete and accurate, and that IdeaSphere Inc., has substantiation that the statements being made are truthful and not misleading.

Sincerely,

Richard H. Neuwirth
General Counsel
IdeaSphere Inc.
150 Motor Parkway
Hauppauge, N.Y. 11788

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Enclosures