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James Tanner, PhD
Acting Director, Division of Programs and Enforcement Policy
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street SW
Washington DC 20204

Re: *Submission of Structure/Function Claims*

Dear Dr Tanner:

Enclosed are the structure/function claims for the following products, as generated by Dr. Luke Bucci:

- 1) Schiff® REGENEX™ Multi Formula
 - a) B Complex Vitamins
 - b) Tocotrienols (related to Vitamin E)
- 2) Schiff® REGENEX™ Diabetic Support Formula
 - a) Gymnemic sylvestre
 - b) Ginkgo biloba
 - c) Quercetin
 - d) Momordica charatia
 - e) Magnesium
 - f) Zinc
 - g) Chromium
 - h) Bis(maltolato)oxovanadium (BMOV)
 - i) Biotin
 - j) Alpha lipoic acid
 - k) Fructooligosaccharides (FOS)
- 3) Schiff® Brewer's Yeast
- 4) Muscle Tribe™ Creatine L3
- 5) Muscle Tribe™ Androstenedione
- 6) Schiff® Desiccated Liver
- 7) Schiff® Saw Palmetto
- 8) Weider Androstene

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- 9) Schiff® REGENEX™ Cardio Formula
- a) Coenzyme Q10
 - b) Hawthorn
 - c) Pantethine
 - d) L-carnitine
 - e) Taurine
 - f) Vitamin E
 - g) Vitamin B12, folic acid and B6
 - h) Magnesium
 - i) Selenium
 - j) Garlic
 - k) Ligusticum wallichii
 - l) Alpha Lipoic Acid

We welcome the opportunity to receive feedback from your office as we continue to interpret how to write structure/function claims as allowed by the Dietary Supplement Health and Education Act. There are some areas of overlap between nutrient functions or their effects on body structure and health claims. We anticipate that we will continue to fully comply with your interpretation of health claims.

Please feel free to contact me if you have further questions or comments.

Respectfully,


De Lois L. Shelton, Regulatory Compliance

cc: Dave Mastroianni, Luke R. Bucci