

# Dietetics Pharma International, Inc

7599 Redwood Blvd., Suite 214 \* Novato, CA 94948

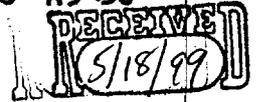
Phone: 415-892-5988 / Fax: 415-893-8159



May 12, 1999

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Certified Mail / Return Receipt Requested  
Office of Special Nutritionals (HFS-450)  
CF SAN  
U.S. Food & Drug Administration  
200 "C" Street, S.W.  
Washington, D.C. 20204

To Whom It May Concern:

This letter is to provide **notification of the structure/function statements** that appear on our nutritional supplements product labels. The product line is called *2-Phase Activated Nutrients™* and the individual products within this line are Energy Tonic, Probiotic Balance, Memory Tone, and Immun-O Guard. The general statement for the entire product line is as follows; "*2-Phase Activated Nutrients™* provides superior results compared to capsules/tablets or liquids alone. This advanced technological application (combining solids with liquids immediately before consumption) provides excellent bioavailability and better absorption resulting in faster, more effective results."

The structure/function statements for each of the four individual products within the *2-Phase Activated Nutrients™* product line are as follows...

Energy Tonic (with Ginseng & Creatine):

"To maximize performance, boost energy, and combat fatigue and stress" and "Energy Tonic is designed to maximize performance, boost energy, and combat fatigue and stress by supporting vessels and supplying energy nutrients."

\* Ingredients about which the claim is made: Panax Ginseng (root), Creatine, Carnosine, Ginkgo biloba extract, Thiamin (Vitamin B-1), Riboflavin (Vitamin B-2), Vitamin B-6, and Vitamin B-12.

Probiotic Balance (with L. acidophilus):

"Helps to maintain healthy balance of the intestinal flora" and "Probiotic Balance provides 5 billion friendly bacteria per serving. Probiotics (meaning: for life) describe a group of beneficial bacteria that are essential for proper digestion and used to promote overall good health. Friendly flora helps to support the immune system."

\* Ingredients about which the claim is made: L. sporogenes, L. bulgaricus, L. lactis, L. acidophilus, L. ramosus, B. bifidum, S. thermophilus, Thiamin (Vitamin B-1), Riboflavin (Vitamin B-2), Vitamin B-6, and Vitamin B-12.

Memory Tone (with Ginkgo biloba):

“To support memory and alertness” and “Memory Tone supports memory and alertness by helping to: increase circulation, strengthen protective barriers and deliver supportive nutrients to the brain.”

\* Ingredients about which the claim is made: DL-Phosphatidylserine, L-glutamine, Centella asiatica extract (leaf), Ginkgo biloba extract, Vitamin A (as beta-carotene), Vitamin E (as L-alpha tocopherol), Echinacea purpurea extract (root), and Red Orange Concentrate (fruit).

Immun-O Guard (with Echinacea):

“Supports healthy immune system” and “Powerful antioxidant activity from Red Orange Concentrate (ROC), along with other nutritive supports, can help increase the body’s natural defense system.”

\* Ingredients about which the claim is made: Echinacea angustifolia extract (root), Echinacea purpurea extract (root), Red Orange Concentrate (fruit), Selenium (as selenium yeast), Vitamin A, Vitamin C, and Zinc (as zinc pidolate).

The Distributor of the above-mentioned products is....

Dietetics Pharma International, Inc.  
7599 Redwood Blvd., Suite 214  
Novato, CA 94945  
Phone: 415-892-5988  
Toll Free: 800-946-3100  
Fax: 415-893-8159

The Manufacturer of the above-mentioned products is....

Dietetics Pharma s.r.l.  
Via Mecenate 84,12  
20138 Milano, Italy  
Phone: 011-39-02-50-62101  
Fax: 011-39-02-580-12471

The information contained in this notice is complete and accurate. Dietetics Pharma International, Inc. has substantiation that the statements for the products mentioned in this letter are truthful and not misleading.

Should you have any further questions or concerns, please contact us at Dietetics Pharma International, Inc., 7599 Redwood Blvd., Suite 214, Novato, CA 94945; Phone: 415-892-5988, Fax: 415-893-8159. Thank you.

Sincerely,  
*Dietetics Pharma International, Inc.*

By:   
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Thilo Koeler  
Vice President