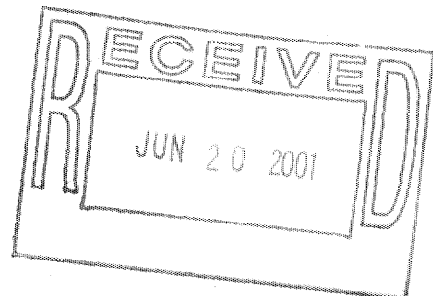


**MICHAEL'S®**  
NATUROPATHIC PROGRAMS

6203 Woodlake Center • San Antonio, Texas 78244

June 13, 2001

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



Re: 21 U.S.C. Section 343(r) (6), Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of Michael's Naturopathic Programs **Probiotic Factors**, a dietary supplement.

Statement being made in the labeling of Probiotic Factors

**Probiotic Factors: Promotes healthy intestinal flora balance.**

To the best of my knowledge, and based upon the information and belief present at the time of the executing of this notice, I certify that the above information is accurate and complete. Michael's Naturopathic Programs possesses substantiation that the statements are truthful and not misleading.

A handwritten signature in cursive script that reads "Karen Trabucco".

Karen Trabucco  
Michael's Naturopathic Programs, Manufacturer  
6203 Woodlake Center  
San Antonio, Texas 78244

97S 0162 LET 8199

PHONE: 210-661-8311 • FAX: 210-661-9145