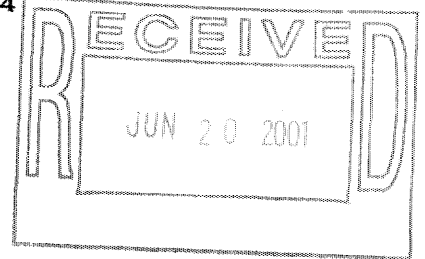


MICHAEL'S®
NATUROPATHIC PROGRAMS

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 **Adrenal Factors**, a dietary supplement.

Statement being made in the labeling of Adrenal Factors

Adrenal Factors: A gentle, daily formula to support nourishing the adrenal glands for optimal, healthy energy production.

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 8206

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