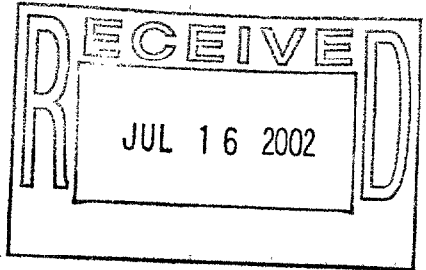


July 5, 2002

3 587 02 JUL 22 P 2 04

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



RE: Dietary Supplement Statement of Support Notification

To: Whom It May Concern:

Nutritional Specialties, Inc., 1456 E. Katella Ave. Anaheim, CA 92805, the distributor of the following dietary supplement products, intends to make the following statement of support: "LifeTime COX-2 inhibitor Nexrutine is a dietary supplement to help support normal healthy, pain free muscle recovery and joint flexibility after exercise or other strenuous physical exertion."

This claim is being made for Nexrutine (Phellodendron Amurense Bark Extract). Which is contained in LifeTime® Natural Relief COX-2 Inhibitor Nextutine Capsules. This submission in being made in compliance with the requirements of 21 CFR 101.93.

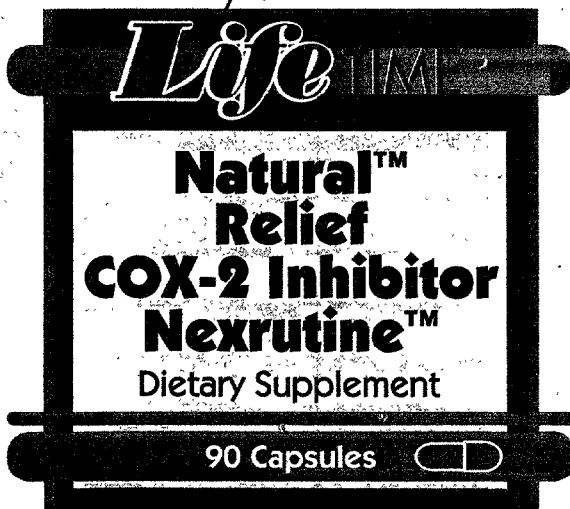
The undersigned is an authorized representative of Nutritional Specialties, Inc. and certifies that the information contained in this notice is complete and accurate, and that Nutritional Specialties, Inc. has substantiation that the above statement is truthful and not misleading.

Harry G. Shippy
Signature
Full Name HARRY AUGUST SHIPPY
PRES.

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Supplement Facts

Serving Size: 1 Capsule	
Servings Per Container: 90	
Amount Per Serving	%Daily Value
Nexrutine (Phellodendron Amurense Bark Extract)	250 mg.
* Daily Value not established.	
Other Ingredients: Rice Powder, Magnesium Stearate, Gelatin and Water.	

SUGGESTED USE: Take 2 to 3 capsules daily, one hour before meals, or 2 hours after meals. Do not take if currently taking any prescription medication or receiving medical treatment without consulting your health care professional. Keep out of reach of children.

Nexrutine™† is a patent pending plant extract, derived from the phellodendron tree. A member of the Rutaceae plant family.

LifeTime COX-2 inhibitor Nexrutine is a dietary supplement to help support normal healthy, pain free muscle recovery and joint flexibility after exercise or other strenuous physical exertion.

This product has not been evaluated by the Food & Drug Administration (FDA). This product is not intended to diagnose, cure or prevent any disease.

† Nexrutine is a trademark of Next Pharmaceutical, Inc.

LifeTime products are manufactured to meet strict quality control standards and formulated with natural ingredients. An environmentally conscious company. Formulated and Distributed by: LifeTime, Nutritional Specialties, Inc. 1456 E. Katella Ave. Anaheim, CA 92805. www.lifetimefoods.com