

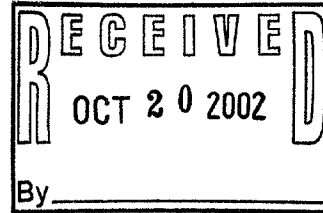
Tabak's
HEALTH PRODUCTS
A Corporation

Our Guiding Philosophy:
**Superior, Science-Based
Nutritional Supplements**

0540 10 10-1 1155

October 17, 2002

Mr. Robert Moore
Food and Drug Administration
5100 Paint Branch Pkwy
Room 4C083
College Park, MD 20740



Dear Mr. Moore,

In compliance with the final ruling for Dietary Supplements dated January 6, 2000
here are copies of our offers for your files:

Sincerely,


Lawrence Tabak

Enclosures

97S 0162 LET 11135

812282



**Our Guiding Philosophy:
Superior, *Science-Based*
Nutritional Supplements**

I, Lawrence Tabak, certify the accuracy of the information presented and contained in the notice is complete and accurate, and that we have substantiation that the statements are truthful and not misleading.

To the best of my knowledge and belief, I believe the above is true.

A handwritten signature in black ink, appearing to be "Lawrence Tabak", is written above a horizontal line.

Lawrence Tabak,
President

Tabak's Health Products

MEMO

- ◆ TO: Mr. Robert Moore
- ◆ FROM: Cindy Nydell
- ◆ DATE: October 17, 2002
- ◆ RE: Tabak's health products

The attached wording for our products will be included in a letter that has the standard FDA statement at the bottom. Our standard wording is as follows:
These statements have not been evaluated by the Food and Drug Administration.
This product is not intended to diagnose, treat, cure, or prevent any disease.

Are you concerned about your bones, as you age?

If not, you really should be.

Remember, your bones are "living tissue" that need proper nutrition as you grow older. One of the best ways to give your bones what they need is with BoneKeeper™ - a highly compatible, usable and absorbable supplement.

Its proven nutrients have been demonstrated to support healthy bones and help maintain bone density.

BoneKeeper™ gives you 600mg of ipriflavone AND 1,000mg of calcium carbonate per day. Plus you get boron, zinc, copper, magnesium, and phosphorus - all working synergistically to promote bone health.

Remember, you need your bones. Especially as you get older. They get you around. So keep them strong and healthy - now and for the future!

Have you reached the weight-loss goals you set for yourself? If not, I'd like to send you CarbEater™, one of our most popular supplements, to help.

Listen to this: In the first two double-blind, placebo-controlled studies of human subjects, the special ingredient found in CarbEater™ reduced starch and carb absorption by as much as 79 percent!

That's not all: A September 2001 sixty human study found those taking this special ingredient lost an average of 6.45 pounds in 30 days and, in addition, lost over 10 percent of their body fat mass - with no loss of muscle.

How does CarbEater™ work? The answer is simple. It inhibits the enzyme that converts starch and carbohydrates into fat. So they mostly pass through your digestive system unconverted to fat and are eliminated in the normal manner, much as fiber is.

Would you like to keep your cholesterol levels under control? 100% naturally?

Take CholestLo™ - an herbal supplement.

The ingredients in CholestLo™ are proven to help maintain cholesterol levels already within the normal range. Safely.

In fact, they can be of "effective significance," especially when combined with a healthy diet and regular exercise.

On top of that, CholestLo™ contains no harsh chemicals. No drugs. Nothing artificial. The benefit for you? No bad side effects. Nothing dangerous. In fact, thousands of our customers use it every day.

Want another compelling reason to keep taking CholestLo™? It helps to support a healthy heart and circulatory system.

Not only will you feel more at ease knowing you are keeping your cholesterol levels in the healthy range - completely naturally - but, in essence, you will be staying active and getting more "living" out of life.

Are you the kind of person who likes to stay active and enjoy the outdoors? Ever wondered how to keep your essential blood sugar levels healthy? If so, I'd like to send you BetiPlus™ to try.

BetiPlus™ contains special ingredients for advanced nutritional support. More importantly, they can help you maintain blood sugar levels in a healthy range, assuming they're already normal.

Bitter Melon Fruit Extract is known to help maintain healthy blood glucose levels. *Alpha-lipoic Acid* has been shown to help support healthy blood sugar levels. *Vanadyl Sulfate* helps keep blood sugar levels within the normal range. *Fenugreek Seed* has been shown to help maintain a healthy balance between critical blood components. *Biotin* is renowned for its positive effect on blood.

Two BetiPlus™ tablets per day, taken as part of your healthy diet and exercise plan, provide meaningful nutritional support to help maintain the quality of your life. (Not intended to have an effect on abnormal blood glucose.)

Are you happy with your sleeping pattern? If you're like most people in today's stressed-out world, you're probably not getting enough sleep.

Not getting proper rest at night can impair your mental and physical health. Sap your energy. Blow your concentration. Intensify pain. Even increase the severity of age-related chronic disorders.

Plus, there's solid evidence that those who sleep about eight hours, on average. . . live longer!

DreamCaps™ is an herbal approach to occasional sleep difficulty that really works. . . has no side effects. . . and is not addictive.

This unique and safe formulation contains: Valerian root extract - used for centuries in Europe to promote enhanced sleep. It safely and gently relaxes your central nervous system and helps you wind down at night. It calms anxiety. Naturally.

Would you like to have a higher energy level? More stamina on the job? More zing at play? Extra enthusiasm with your family?

Dynergy™ contains special "energy-enhancing nutrients" scientifically proven to give you a lift. More importantly, it gives you a completely natural boost. No artificial stimulants. No drugs. No chemicals. Nothing dangerous.

The all-natural, potent energizers in Dynergy™ free you from fatigue. Increase your mental alertness. Unleash your inner energy.

Dynergy™ gives you increased vigor. It helps improve your attention span and performance, even in stressful times. It lets you feel more alert and awake even when you're running on "low."

What else does Dynergy™ help improve? Your mental focus and concentration.

Are you bothered by age-related joint discomfort? Do your joints just not move the way they used to? Let the ingredients in GluChon 1500™ nourish your joints. Safely and naturally.

Glucosamine Sulfate and Chondroitin Sulfate are proven to support normal cartilage formation while maintaining healthy joint fluid and tissue.

In a long term, double-blind study, 106 patients experienced real improvement in how they felt when using Glucosamine.

Another study found that Chondroitin gives a significant benefit to joints - with no serious side-effects.

GluChon 1500™ supports healthy cartilage formation - cushioning your joints properly - so your joints move more freely and comfortably. . . and your bones rub less. Knees, elbows, back, fingers, knuckles, hips and shoulders - all benefit from it. Best of all, you will be able to do more of those things you enjoy, that bring quality to your life.

Did you know that every day, you lose at least 100 hairs on your head?

If you're lucky, they replace themselves. If not, you go bald.

The good news is Here-We-Grow™ is specially formulated to empower your natural hair-growing mechanism.

It works by providing a steady supply of nutrients - *Biotin, MSM, Zinc, Fo-ti, Collagen* - all of which support the building blocks of Keratin, a key component of your hair.

Here-We-Grow™ promotes hair that looks thicker, shinier, fuller and healthier. Hair you can be proud of. This nourishing formula goes directly to the root - literally speaking - to energize and enhance your hair growth system

Best of all. it contains no chemicals or drugs and is completely

Would you like to keep your heart beating strong and powerfully? After all, it's the key to good health and a longer life.

HeartShield™ - an all-natural supplement - helps you maintain a healthy cardiovascular system. It sustains optimum blood pressure levels. Promotes proper arterial flow.

It's one of the best comprehensive supplements I've ever seen to support and maintain a healthy heart. It contains special nutrients that. . .

- * help promote a healthy circulatory system.
- * help protect red blood cells and other cell membranes.
- * help maintain healthy artery walls.
- * maintain a healthy heart muscle.

Best of all, you can do all of this safely and naturally.

Would you like to keep your eyes as strong and healthy as possible? Then it's really important to take 20/20 Caps™. It's specially formulated to help nourish your eyes by supplying the nutrients you need to support vision and eye health, as you age.

20/20 Caps™ contain vitamin A, vitamin C, zinc, selenium, bilberry, mixed carotenoids, and lutein.

Lutein is a key component of your eye's retina. Studies show that lutein supplements play an important role in keeping your eyes, and especially your macula, healthy. It filters out harmful blue light, and serves as a potent scavenger of dangerous free radicals that can wreak havoc with your eyes.

Vitamin A has been shown to enhance night vision.

Carotenoids in your diet each day increase your chances of keeping your eyes healthy and your vision strong.

Evidence has also been found that carotenoids and vitamin C and E help support your retinal pigment.

Are you bothered by night-time leg cramps? Do they seem to come and go without pattern? Do you find yourself jolted upright some nights, grabbing your lower extremities? If so, you owe it to yourself to give Legulax™ a try.

Why? Because Legulax™ is uniquely formulated to help relieve your night-time leg cramps.

It helps support and stimulate healthy blood circulation to your extremities and throughout your body. And it enhances your body's natural ability to deal with muscle fatigue while it helps relieve stress.

The result? Your muscles remain relaxed so you can sleep comfortably through the night.

Legulax™ is all-natural. Safe. Contains no harsh chemicals. And no drugs. Best of all, it works to banish leg cramps.

As you've gotten older, do your joints bend as freely and easily as they should? Are you satisfied with the way all your joints move - and feel? If not, try Mega JointWellness™ - a 100% natural supplement.

Mega JointWellness™ helps your body produce more collagen - the building blocks of your joint cartilage. Without sufficient collagen, your cartilage simply dries out and wears down. Then, when you move, your bones "grind" together causing discomfort.

But the important thing is this: with sufficient cartilage your joints can function normally, without rubbing together.

In addition, Mega JointWellness™ supports tissue, ligament, and muscle health as well as enhances the elasticity of your cartilage. It truly is excellent in helping to give your joints a full range of motion.

Mega JointWellness™ is drug free. Chemical free. It works safely and naturally, without side effects.

Want to supercharge your energy? Stay healthy? Add life to your years? If so, I'd like to send you the MegaWellness™ anti-aging, anti-oxidant supplement to try.

Why? Because it gives you loads of extra energy. Enhances your immune system. Keeps you healthier and feeling younger.

You'll have a sharper mental focus. Surging energy. Undreamed-of endurance and stamina. Find it prolongs vigor and strength. Feel healthier and stay healthier.

In addition, the MegaWellness™ System eliminates "mixing and matching" different vitamins. By taking just one specially balanced supply a day, it gives you a full complement of vitamins, minerals, antioxidants, enzymes, and herbs.

The result? You get maximum health with minimum hassles. The MegaWellness™ System is excellent at keeping you healthy and strong.

What's more difficult than losing weight? Losing it and keeping it off? That's where Nature's Shape™ can help you.

The ingredients in this amazing herbal formula reduce your desire to eat. Increase thermogenesis. Lessen cravings for sweets and snacks. Maintain healthy muscle-mass - while you lose weight.

They have been proven to decrease your appetite while increasing your energy levels at the same time. This is an undisputable fact.

Plus, Nature's Shape™ is ideal to take if you like to snack between meals or tend to overeat at lunch or dinner. Why? Because its ingredients are formulated to make you feel really full so you won't eat nearly as much!

Want to consume a whole lot less food? Achieve your weight loss goals? And have extra energy to boot? Try Nature's Shape™. You'll be surprised at just how quickly it begins to work.

I'm not trying to scare you, but facts are facts: If you're a male over 40, odds are your prostate's going to go on the fritz.

What can you do about this? The answer is simple. As part of your healthy diet and exercise plan you should take ProstLo™. That's because it contains these incredible ingredients:

- * *Selenium*: improves your odds of keeping your prostate healthy.
- * *Zinc*: aids in prostate health by promoting proper function of your prostaglandins.
- * *Saw Palmetto*: proven in numerous studies to keep your prostate healthy.
- * *Stinging Nettle Herb*: supports a healthy urine flow and is widely used throughout Europe.
- * *Pygeum Africanum*: promotes prostate wellness by lowering prolactin levels.

In short, you have a prostate wellness formula grounded in science. Put the odds on your side. Take it!

Is your love life all it could be?

PotencyPlus™ helps increase male vigor and sexual energy. It contains. . .

- * *Yohimbine*, which helps increase blood flow to your erotic zone.
- * *Avena sativa* helps your body free up testosterone, which stimulates desires of intimacy.
- * *Saw palmetto extract* helps your body maintain a healthy prostate with helpful sterols and fatty acids.

While each of these ingredients alone are excellent for promoting male virility - where it has declined with age - together, they work even more effectively!

PotencyPlus™ helps you enjoy a happier, more fulfilling, and satisfying life. Plus, it helps heighten intimacy and pleasure with your partner.

Would you like to stay regular? The natural way?

ReguCleanse™ is fantastic because it contains these ideal ingredients to help maintain bowel and colon regularity:

- * *Rhubarb*, a purgative, can sensitize the bowel movement reflex nerve of the colon.
- * *Coptis* helps digestion by promoting the secretion of saliva, gastric juices and pancreatic juice.
- * *Scute* supports the healthy secretion of gallbladder bile, which helps your digestion.

ReguCleanse™ helps keep you regular, and there's no embarrassing rush to the bathroom.

ReguCleanse™ is a traditional herbal formula that has been used and refined for over 1,000 years. It contains the perfect ratio of ideal ingredients to help keep your colon healthy and clean. Easily. Gently. Quickly.

Are you concerned about maintaining normal breathing? Consider this:

The air you breathe - unless you live on a mountaintop in Switzerland - is a mess. Every day - with every breath you take - you're exposing your lungs to the airborne debris of our industrial society. You're breathing in the residue of fossil fuels from highway and even air traffic. Then, to that, add a host of microscopic poisons, second-hand smoke and other pollutants.

And that's just outdoors. According to the EPA, indoor air can be much worse.

Respir8™ is an all-natural formulation of nutrients scientifically selected to maintain healthy lung function. Together they help to relax your airways and promote the natural process of respiration, while providing the nutritional support your lungs need every day.

Respir8™ contains special herbs that nourish, feed and support your mucous membranes. In addition, it contains antioxidants that act as powerful scavengers of dangerous free radicals, supporting your lungs' ability to breathe more easily.

Have you ever experienced a sag in sexual energy? If so, do you sometimes feel inadequate? Unworthy? A little embarrassed?

Try SuperAmoré™ - a 100% all-natural supplement with ingredients proven to increase sexual prowess. Enhance pleasure. Heighten sensitivity. Boost performance.

What's more, SuperAmoré™ is completely safe. Drug free. Chemical free.

Both men and women can use it to "jump-start" their sexual energy. Just take two small tablets a day. What could be simpler than that? Your product will arrive in a confidential non-descript, plain brown package, to ensure your privacy.

Don't let a sag in your sexual performance affect your relationship. Use SuperAmoré™ today to increase your desire, excitement and lust for life. It's guaranteed to "firm up" your love life.

Are you ever bothered by back discomfort? The kind you get just because you're getting older? Or just because you stood too long? If so, I'd like to send SatisBaction™ for you to try.

This unique formula contains special nutrients that enhance the comfort and healthy functioning of your back. Plus, they support wellness in your spine and shoulders, too.

In fact, they are proven to help: Lessen tension. Relax back muscles. Enhance vertebral health. Keep your back and neck functioning normally.

The bottom line? With SatisBaction™, you can minimize "normal aging" back discomfort.

It's perfect to take if you stand or sit for extended periods. Wear high heels. Are overweight. Or just feel your back muscles need that extra "helping hand" to stay relaxed and comfortable.

Best of all, it's all-natural. Drug free. Chemical free. And safe.

Is "comfort food" sabotaging your weight-loss plan?

Simple as it seems, overeating definitely causes weight gain. Why do most people overeat then? Mostly, it's a nervous reaction. Subconsciously, you want to relax, slow down and feel comforted, so you eat more.

That's where natural Slimming Tea™ can really help you. It helps to take away your urge to eat because of anxiety.

Slimming Tea™ is a delicious herbal tea that you actually enjoy drinking, as part of your overall healthy weight-loss program.

It helps to relax you, so you won't be as tempted to overeat. Plus, it supports proper colon and elimination function, to help you achieve and maintain your normal body weight.

And it does so. . . safely, and quickly!!!

What could be easier than sipping a delicious herbal tea?

Want to shed those unwanted pounds and inches? Naturally. Safely. Quickly. Without dangerous drugs. And no chemicals.

Try ThermAway™, an amazing supplement that can help you lose weight by converting stored body fat into thermogenic energy.

Here's what it does for you:

Increases Energy: The ingredients in ThermAway™ help turn stored body fat into thermogenic energy, so you'll have more get-up-and-go.

Maintains Muscle: Helps preserve muscle mass (lean tissue) even as it accelerates fat loss.

Improves Digestion: Helps your digestive system work more efficiently. That helps convert more of the food you eat into energy. Not fat.

Works Throughout the Day: Even when you're not thinking about it, the ingredients in ThermAway™ are hard at work helping to burn off body fat. (Use as part of your healthy diet and exercise program.)

Do you find it hard to remember where you put your keys? Where you put your glasses? Or. . . what was that person's name? And when was her birthday?

Unfortunately, our memory and other vital mental processes diminish as we grow older. It's a scientific fact.

The main reason is that we experience a gradual reduction of blood flow to the brain. With that comes a decline in the metabolic activities of our brain cells. Memory comes and goes. We just don't think as clearly as we used to.

Sound like you? If so, you'll want to do everything you can to keep your brain and memory sharp. And as part of your plan you should try all-natural ThinkCaps™.

ThinkCaps™ helps you fight back. It's a unique, scientifically developed formula designed to energize your brain. Sharpen your memory. Speed up your mental processes. And enhance recall response.

Do you feel you are aging faster than you should?

Are you plagued by low energy? Do you often feel worn out? Do you have age-related absentmindedness? Do you feel not quite your old self anymore?

If you answered "yes" to any of these questions, VitalOne™ - a 100% natural supplement can really help you. Here's why:

Just the process of breathing oxygen creates a nasty by-product in your body: Free Radicals.

Free radicals are atoms that are highly reactive and tend to eat away at your blood vessels and organs. The result? They can make you age and look much older than you should!

The good news is VitalOne™ supplies "cell-protecting," "anti-aging" nutrients to help keep you looking and feeling younger, naturally.

Plus, VitalOne™ gives you added cell strength, extra energy and a defense against the ravages caused by free radicals.

Are you ready to put the "Whoopie" back into "Making Whoopie?" To recharge that intense sexual desire and vitality you had when you were younger? If so, read on.

Now you can take charge of your love life and actually turn your partner's groans into moans.

How is this possible? The answer is simple. The powerful ingredients found in new WhoopieCaps™ - an all-natural supplement - are proven to help overcome sexual frustration. They promote virility. Libido. Male potency that tends to decrease with age.

How? First, by elevating your testosterone level - completely naturally of course. Second, by regulating blood flow to critical areas and transmitting cellular level sexual signals.

The result? They help "fire up" your sexual desire. Enhance your performance. And intensify your pleasure.

Dear Friend,

The special ingredient in CarbEater™ is clinically proven to help you lose more than 10% body fat mass in 30 days.

So why not send for it?

The truth is there are only two real reasons people don't: Either they're already as slim as they want to be. Or they're still a little skeptical CarbEater™ actually works like we say it does.

Are you skeptical? I understand completely. That's why you can "test" CarbEater™ yourself. For 30 days. Before you decide.

If CarbEater™ works for you, pay the bill that comes with it. If not, send it back. Pay nothing. Owe nothing. We'll even pony up the return postage! You have nothing to lose.

Start taking off those stubborn pounds and inches now. Grab your free trial coupon. Pop it in the mail. Do it today!

Dear Friend,

The special ingredient in CarbEater™ is clinically proven to help you lose more than 10% body fat mass in 30 days.

So why not send for it?

The truth is there are only two real reasons people don't: Either they're already as slim as they want to be. Or they're still a little skeptical CarbEater™ actually works like we say it does.

Are you skeptical? I understand completely. That's why you can "test" CarbEater™ yourself. For 30 days. Before you decide.

If CarbEater™ works for you, pay the bill that comes with it. If not, send it back. Pay nothing. Owe nothing. We'll even pony up the return postage! You have nothing to lose.

Start taking off those stubborn pounds and inches now. Grab your free trial coupon. Pop it in the mail. Do it today!

Dear Friend,

The special ingredient in CarbEater™ is clinically proven to help you lose more than 10% body fat mass in 30 days.

So why not send for it?

The truth is there are only two real reasons people don't: Either they're already as slim as they want to be. Or they're still a little skeptical CarbEater™ actually works like we say it does.

Are you skeptical? I understand completely. That's why you can "test" CarbEater™ yourself. For 30 days. Before you decide.

If CarbEater™ works for you, pay the bill that comes with it. If not, send it back. Pay nothing. Owe nothing. We'll even pony up the return postage! You have nothing to lose.

Start taking off those stubborn pounds and inches now. Grab your free trial coupon. Pop it in the mail. Do it today!

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

30-DAY FREE TRIAL

YES! I want to lose 10% body fat mass in 30 days. Please rush my **FREE 30-DAY TRIAL** of all-natural CarbEater™.

If I don't want CarbEater™ for any reason, I'll return the unused portion or empty container to you and owe nothing - no questions asked. But if I decide to keep it, I'll gladly pay the bill of only \$29.97 plus shipping and continue to receive a fresh supply each month with a bill. I may cancel future shipments at any time.

Mail To:

Tabak's Health Products
3198 Airport Loop Drive, Suite G
Costa Mesa, CA 92626-3407

X _____

Sign name here

Mail Free Trial Coupon Today!

- 2 -

Laboratory tests demonstrate that a single gram - the amount in two small capsules of CarbEater™ - of this natural ingredient "nukes" more than 560 grams of dietary starch. CarbEater™ is truly worth its weight in gold because its effectiveness is multiplied by 560!

The bottom line: You'll eat the foods you love - the pastas, breads, even ice cream (in moderation, of course), without blowing your diet. And you'll lose weight!

Lose 10.45% fat body mass

Participants in another study - at the University of Scranton - lost an average 10.45% of fat body mass in just 30 days^{2,3}.

But the best part about CarbEater™? You don't have to spend a penny to try it. Use it, risk-free, for a full month - before you decide.

It's easy to get started. Just tear off your special free trial coupon. Sign it. Pop it in the mail.

We'll rush you a free 30-day trial of safe, all-natural CarbEater™. Take it as directed for a full month. Then step on your scale. Look in your mirror. If you love what you see, pay the bill that comes with it. If not, simply return the unused portion.

Free 30-Day Trial

990-52
[CUSTOMER#]

No Risk To You
If at any time you would like
postage to respond to this offer or
return product, call 1-800-749-3937
for a postage paid reply label.

[DATE]

[FINDER#]

[Firstname Lastname]
[Street Address]
[City, ST Zipcode]
[Barcode]

[Firstname, sign the back. Correct address if needed.]

[Tear Here and Mail Today!]

Want a Slim New Body? Proven, Natural Ingredient is Guaranteed to Give
You Weight-Loss Results in 30 Days - Or it's Free

[Firstname] [Lastname]
[Street Address]
[City], [State] [Zipcode]

[MONTH] [DAY], [YEAR]

Dear [Firstname],

You can have fantastic weight-loss results in just 30 days.
Guaranteed - or you don't pay a dime.

Have you ever wondered what the real secret to losing weight is?

Truth be told, there's only four real ways to lose weight. You may
not like the first three. But here they are:

- #1. Simply eat less, so you consume fewer calories.
This requires willpower.
- #2. Exercise vigorously. So you burn stored calories.
This requires "super" stamina.