



Apex Fitness Group™  
 100 Camino Ruiz  
 Camarillo, CA 93012

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December 7, 2005

RECEIVED  
 12/13/05

Food and Drug Administration  
 Center for Food Safety and Applied Nutrition  
 Office of Nutritional Products, Labeling, and Dietary Supplements  
 5100 Paint Branch Parkway  
 College Park, Maryland 20740

Dear Sirs:

Notice is hereby given pursuant to Section 403 (r)(6)(21 U.S.C. 343(r)(6)) of the Federal Food Drug and Cosmetic Act that Apex Fitness Group, 100 Camino Ruiz, Camarillo, CA 93012 has marketed a dietary supplement under Apex Fitness Group Lean Resist Carbs "Appetite Control Formula" bearing the following statement(s) on the label and/or in the labeling:

- (Statement 1) Appetite Control Formula
- (Statement 2) Supports Appetite Control. May Control Carb Cravings
- (Statement 3) Who: formulated for people who tend to crave carbs
- (Statement 4) Helps support the body's own appetite control mechanism
- (Statement 5) May promote the synthesis of glycogen. Sends the brain signals that your stomach is full
- (Statement 6) May improve satiety at meals -feel full sooner
- (Statement 7) Controlled release delivery system
- (Statement 8) With Super Citrimax® HCA-SX, a natural ingredient
- (Statement 9) HCA has been shown to reduce the conversion of carbohydrate calories into fat. By supporting the body's own appetite control mechanisms, this formula is designed to effectively promote and accompany a fat loss diet and exercise program. By supporting the body's own appetite control mechanisms, HCA may help dieters with proper food intake.

The undersigned certifies that the information contained in this notice is complete and accurate and that Apex Fitness Group has substantiation that the statement(s) is truthful and not misleading. Pursuant to 101.93 (a)(1), two copies of this notification are enclosed.

  
 Jim Starr  
 Director Product Development

97S 0162 LET 17089

HCA has been shown to reduce the conversion of carbohydrate calories into fat. By supporting the body's own appetite control mechanisms, this formula is designed to effectively promote and accompany a fat-loss diet and exercise program. By supporting the body's own appetite control mechanisms, HCA may help dieters with proper food intake.\*

As with any nutritional product, to receive the desired benefits, this product should be used in conjunction with a well-balanced diet and exercise program. Please consult a physician before beginning any nutritional program. Not intended for use by people under the age of 18.

**DO NOT USE IF SAFETY SEAL UNDER CAP IS BROKEN OR MISSING.**

**KEEP OUT OF REACH OF CHILDREN.**

**Suggested Use:** Take 1 tablet 3 times daily with 8 oz of water 30-60 minutes before meals.

Does not contain sugar, salt, starch, yeast, artificial coloring, flavoring or preservatives. Keep in a cool, dry place. Do not refrigerate. Utilizes a natural protective coating.

\*These statements have not been evaluated by the FDA. This product is not intended to diagnose, treat, cure or prevent disease.



Copyright 2005  
Manufactured by Phoenix Laboratories  
Exclusively for Apex Fitness Group™  
100 Camino Ruiz, Camarillo, CA 93012  
www.apexfitness.com

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controlled release delivery system\*

with Super-Citrimax® HCA-SX, a natural ingredient

# RESIST CARBS

NEW HIGHER POTENCY

## APETITE CONTROL FORMULA\*

# apex

### LEAN

SUPPORTS APPETITE CONTROL  
MAY CONTROL CARB CRAVINGS\*

tablets

## 90

NO STIMULANTS

natural dietary supplement

#### Supplement Facts

Serving Size: 1 Tablet	
Amount Per Serving	
	% Daily Value
Super Citrimax®	1500 mg
*HCA-40000 (Chromium Chloride containing 4000 Hydroxy Citric Acid)	
**Daily Value has not been established.	
Other Ingredients: cellulose, phosphates, sorbitol, croscarmellose gum, hydroxypropyl methylcellulose, croscarmellose gum, croscarmellose gum, croscarmellose gum, croscarmellose gum, croscarmellose gum.	
†Manufactured under U.S. Patent #5,759,811	

