RKS Inc. 6305 - 215th St. Southwest Mountlake Terrace, Washington 98043

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

March 14, 2002



Greetings:

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 RKS Inc. located at 6306 215th Street Southwest, Mountlake Terrace, Washington, 98043 intends to market dietary supplements under the following brand names, and bearing the following statements on the labels and/or in the labeling:

Brand Name: Premium Nutrition:

A. Product Names: Multi-Life, EssentiaLife, and Multi 2.

<u>Ingredients that are subject of statements:</u>

Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Thiamine, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Iodine, Magnesium, Zinc, PABA, Inositol, Choline, Bioflavonoids, Hesperedin and Rutin, Vitamin K, Chromium, Manganese, Potassium, Dunaliella Algae, Selenium, L-Carnitine, L-Cysteine, L-Glutamine, L-Glutathione, L-Ornithine, Bromelain, Betaine HCl, Papain, and Glutamic acid HCl.

Statements:

- 1. Helps to maintain healthy nutritional levels.
- 2. Contributes to preservation of a sound immune system.
- 3. Supports a normal experience of pregnancy and childbirth.

B. Brand Name: Premium Nutrition.

Product Name: TotaLife Plus.

Ingredients that are subject of statement:

Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Thiamine, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Iodine, Magnesium, Zinc, PABA, Inositol, Choline, Bioflavonoids, Hesperedin and Rutin, Chromium, Manganese, Selenium, Bromelain, Alfalfa, Algae (Dunaliella Salina), Astragalus, Atractylodes, Bee Pollen, California Spikenard, Carrot (flakes), Chinese Licorice, Chlorella, Codonopsis, Fennel, Fo-Ti, Ginger, Irish Moss, Milk Thistle, Octocosanol, Peppermint, Reishi (mushroom), Rose Hips, Royal Jelly, Sesame, and Slippery Elm.

Statements:

- 1. Helps to maintain healthy nutritional levels.
- 2. Contributes to preservation of a sound immune system.

The undersigned certifies that the information contained in this notice is complete and accurate and that R.K.S. Inc. has substantiation that the statements are truthful and not misleading. Pursuant to § 101.93 (a)(1), two copies of this notification are enclosed.

Sincerely,

Kevin Smith

President, RKS Inc.

Kerra R. Smith, Pres.

Enclosure