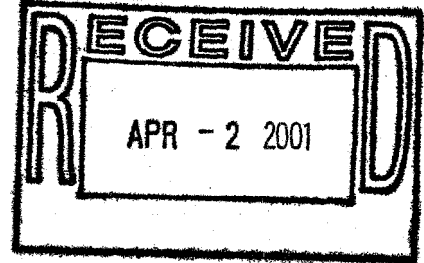


RAND Marketing
4221 W. Eisenhower Blvd., Suite 1
Loveland, CO 80537

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February 23, 2001

Office of Special Nutritionals,
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 c St. SW
Washington, DC 20204

Re: Structure Function Claim - Super Shield

Dear Sir or Madam:

This is notification, in compliance with the CFR 21, 101.93, that RAND Marketing, LLC has included a statement on a product label that may fall under the Federal Food, Drug, and Cosmetic Act section 403(r)(6).

The statement listed below appears on Super Shield and refers to the ingredients Green tea leaf extract, Grape seed extract (95% proanthocyanidins) and RoseOx®, Enzogenol.

“Super Shield is a state of the art antioxidant blend that works synergistically to attack the free radicals produced by our own metabolism and from the environment. Studies have shown that antioxidants can help reduce the effects of free radical damage, which has been shown to be a factor in many health-related issues, and slow the aging process.”

Enclosed is a sample of the label for this product. RAND Marketing keeps substantiation on the premises that this statement is truthful and not misleading.

Sincerely,

A handwritten signature in cursive script that reads "Robert L. Richards".

Robert L. Richards

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SUPER SHIELD is a state of the art antioxidant blend that works synergistically to attack the free radicals produced by our own metabolism and the environment.† Studies have shown that antioxidants can help to reduce the effects of free radical damage, which has been shown to be a factor in many health-related issues, and slow the aging process.†

DIRECTIONS: Take two caplets daily or as directed by your health care professional.

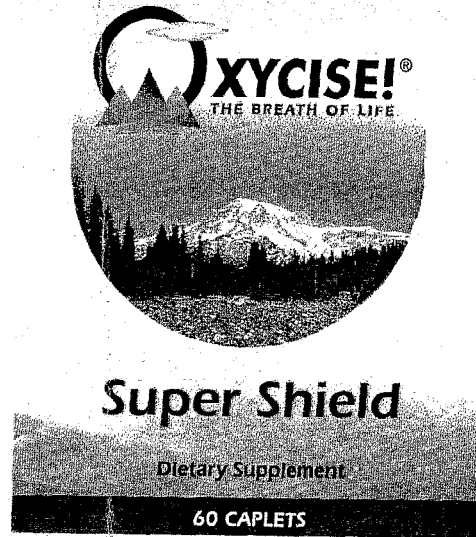
IMPORTANT NOTE: Keep out of reach of children. Protect from heat, light and moisture. Store at 15-30°C (59-86°F). Do not purchase if seal is broken.

†This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

Exclusively formulated for and distributed by:

Oxycise! International
8170 South University Ave., #110
Littleton, CO 80122
1-888-699-2473
Made in U.S.A.

RAND-SS0700.01



Supplement Facts

Serving Size 2 caplets
Servings Per Container 30

	Amount Per Serving
Global Ginsengs Standardized Extract Blend:	400 mg*
American ginseng root, Brazilian ginseng root, Chinese white ginseng root, Indian Ginseng root, Japanese ginseng root (<i>Panax japonicus</i>), Korean red ginseng root, Mexican ginseng root, Tienchi ginseng root and Yellow ginseng root.	
Green tea leaf extract (36% catechin and polyphenols)	350 mg*
Stractan (95% arabinogalactan, larch tree fiber)	70 mg*
Grape seed extract (95% proanthocyanidins)	40 mg*
RoseOx® (triple antioxidant from rosemary leaf)	30 mg*
Enzogenol® (pine bark extract)	10 mg*
Golden root (1% salidroside) (<i>Rhodiola rosea</i>)	5 mg*
Vinpocetine (derived from vocanga seeds)	2 mg*

*Daily value (DV) not established.

Other ingredients: dicalcium phosphate, microcrystalline cellulose, croscarmellose sodium, stearic acid, magnesium stearate, silica, and pharmaceutical glaze.

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