



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

July 24, 2002

Mr. Robert Moore  
Food and Drug Administration  
200 C. Street SW  
Washington, DC 20204

RECEIVED  
AUG 05 2002

BY:.....

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,

Cindy Nydell

Enclosures

975 0162 LET 10721

81430

**Tabak's**  
**HEALTH PRODUCTS**  
A Corporation

**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.

---

Lawrence Tabak,  
President

# Free 30-Day Trial

[KEY CODE]  
[CUSTOMER#]

[DATE]

[FINDER#]

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

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

[Tear Here and Mail Today!]

From The Home of:

*Jim Williams*

(Age 82)

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

[Date]

Dear [Firstname],

Are you like me? Do you want more energy? Sharper memory? Is keeping yourself healthy more important than anything else you can think of?

If so, read my story. I'll take 3 minutes. But you'll be well rewarded. I promise:

I worked hard all my life. I was born in 1920 in Mississippi. I left school in the 10th grade to go to work, as we were in the vise-grips of the Great Depression. I served in the Army during World War II, and I worked for nearly 36 years at the big General Motors plant in Flint, Michigan, where I still live.

It's been a good life - and I'm not one to complain - but all those years in the factory took their toll. This ol' body's seen a lot of wear and tear.

Now that I'm retired and have the time, I want to be able to do the things I love. Like bowling - bowling is big here in Michigan - and working in my garden.

The problem was, for a while I was just too darned tired to do much of anything.

Then, a couple of years ago, I decided to try MegaWellness™ - an all-natural "super supplement."

I wasn't real sure what to expect, but when I got my package I found that it came in convenient easy-to-take daily packets. I started taking it every day with breakfast.

Now, I have to tell you that I've tried a lot of natural products over the years, so "skeptical" is my middle name. After all, at my age, I've seen and heard just about every trick in the book.

Can you imagine how really surprised - and happy - I was to start feeling a big difference in less than two weeks? MegaWellness™ really makes me feel energetic!

And the reason, I found out, is quite simple. It's because MegaWellness™ is

(Please turn over)

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 more energy. Better memory. And... I want to be as healthy as possible. Please rush my **FREE 30-DAY TRIAL** of all-natural MegaWellness™ - the "super supplement."

If I don't want MegaWellness™ for any reason, I'll return the unused portion or empty container 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.

P.S. You'll also enclose my **ABSOLUTELY FREE** bottle of 20/20 Caps™ for healthy eyesight - mine to keep no matter what.

Mail To:

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

Mail Free Trial Coupon Today!

X

Sign name here

- 2 -

loaded with special antioxidants and other natural ingredients.

Soon I had the energy to work in my garden again - and even go bowling three or four days a week!

And that's not all. You'll love this part. I have three sons, and they were so impressed when they saw how healthy and full of life their dad was - they began to take MegaWellness™ too.

MegaWellness™ really works. I recommend it to everyone. . .

Young or old.

If you want more energy. Sharper mental focus. A better, healthier feeling all the way around - just try it. MegaWellness™ does the job for me, and I'll bet it can do the same for you.

And here's the best part: You can find out for yourself - without risking a penny.

Here's how: Do what I did.

Send for your own free 30-Day trial.

"Test drive" it for a full month - before you pay a dime. Then decide. If you're as satisfied as I was, pay the bill that comes with it. If not, for any reason, simply return the unused portion. Or even the empty container. No questions will be asked and you won't owe a cent!

Take your Free Trial Coupon. Sign it. Mail it today.

Sincerely,

Jim Williams

P.S. Want more energy? Sharper memory? More pep to get through your day? Do you just plain want to stay healthy? Send for your free 30-Day Trial of MegaWellness™. You have everything to gain. Nothing to lose.

P.P.S. Remember, send no money now. Just mail the enclosed voucher.

Last Minute P.S. If that's not enough, the company will also send you a bottle of 20/20 Caps™ - their all-natural blend of ingredients proven to help keep your eyes healthy and your vision strong - absolutely **FREE** - just for trying MegaWellness™. But you have to act now to get it. Mail your Free Trial Coupon today!

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Tabak's Health Products

Superior, Science-Based Nutritional Supplements

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www.tabaks.com

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# Free 30-Day Trial

394-02  
(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!]

Finally - a Natural Product that Cuts Off Starch  
and Carbs - Before They Turn to Fat!

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

[MONTH] [DAY], [YEAR]

Dear [Firstname],

I'd like to tell you a story. I promise to keep it short.  
And make it well worth your while.

In the 1940s researchers made an exciting discovery in the  
laboratory. They found that certain plants, like wheat and beans,  
contain properties that somehow inhibit starch from turning into  
sugar. And from there, into fat.

Years later, in the '70s, scientists isolated an inhibitor  
from kidney beans that worked - in the laboratory anyway - to  
minimize the effects of eating a starchy meal.

It wasn't long before a number of commercial "starch blockers"  
appeared on the market. Alas, what had seemed so promising in the  
laboratory proved ineffective in human clinical trials.<sup>1</sup> Simply  
put, the products just plain didn't work. Consumers were -  
understandably - disappointed.

Fortunately, that wasn't the end of the story. Scientists  
kept working behind the scenes, and finally a study at the famed  
Mayo Clinic got to the bottom of the problem. They concluded that  
"commercial amylase inhibitors failed to decrease starch digestion  
in vivo (within the body) mainly because they have insufficient  
anti-amylase activity."<sup>1</sup>

What does all that mean? Simply this: Scientists had really  
been on the right track, but. . .

## They Just Hadn't Dug Deeply Enough.

To make a long story short, they refined their efforts and  
finally found the solution. But with one big difference: This  
time, no one rushed to market. Instead? Double-blind, placebo-  
controlled studies of human subjects came first.

The results? Dramatic[, Firstname]. In the first two human  
studies. . .

(Please turn over)

May I Send You a FREE Bundle of Natural  
Energy - A \$29.97 Value - As My Gift to You?

[CUSTOMER#]

[KEY CODE]  
[FINDER#]

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

[MONTH] [DAY], [YEAR]

Dear [Firstname],

If you'll be kind enough to give me three minutes of your time, I'll repay you with a free gift that will give you increased energy. More stamina. Greater alertness. And...

**A "Perk-Up" that's Completely Natural and Safe.**

You get all that from Dynergy™ - one of our most popular supplements. Like thousands of our customers, you'll find it makes you feel more "alive" - even when you're stressed or running on low. It gives you the "oomph" to work, to play, to exercise - to be as active as you want. The best part of all this? While the regular price is \$25.97 plus \$4.00 shipping, I'd like to send you this bottle of all natural Dynergy™...

**At No Charge to You!**

Even the shipping and handling is FREE! Why am I doing this [Firstname]? Simple. I want to introduce you to some of our natural health products.

Our challenge is matching each product with the right person. So we're trying something really different - that can be of great benefit to you.

If you'll help us, by sharing what health issues matter most to you, we'll send you some of our products to "try" from time to time, on a free trial basis. You're never obligated to buy anything you don't want. Pay only if you decide to keep it. And you can return anything you wish with our postage-paid label. Therefore, there's absolutely...

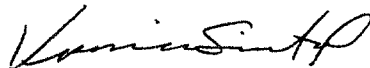
**No Risk to You!**

Just indicate your preferences on the back. Sign your name. Pop this letter in the envelope. Remember to enclose your gift check.

That's how easy and simple it is to get your free bottle of Dynergy™ - a \$30 value. And to "preview" some of our products without risk.

Check the boxes that apply to you on the back. Return this letter today.

All the best,



Veronica Simental

P.S. We've built our company on one premise: That you have to earn a customer's trust before you ask for their business - that's why we offer you a free gift. And ask for NO money up front!

P.P.S. May I send you a 30-day supply of Dynergy™ - a \$30 value - FREE? Just check the boxes. Mail this letter today. There's no risk to you.

(Turn Over Please)

# 30-DAY FREE TRIAL

**YES!** I, too, want to lose 6.45 lbs. and 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 -

## Starch Absorption was Reduced by 79 Percent.<sup>2</sup>

Bottom line: A September, 2001 study of 60 human subjects found those taking this natural substance lost an average of 6.45 pounds in 30 days, and in addition lost, on average, over 10 percent of body fat mass. . . .

## With No Loss of Muscle.<sup>3</sup>

And that's why I'm so excited. Because now you can put this wonderful new science to work - with no risk. 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™. Just take 2 capsules half an hour before eating, and see the results for yourself.

If you're satisfied - as I'm sure you will be - pay the bill that comes with it. If not, for any reason, simply return the unused portion - or even the empty container - and pay nothing. What could be fairer than that?

Don't wait a minute longer. See for yourself how CarbEater™ can help you to slim down. Remember, losing 6.45 lbs. and 10 percent of body fat mass in 30 days is achievable. You can do it!! And if you combine it with sensible diet and exercise, you could lose more!

Send now money now. Just mail your free trial coupon today.

Sincerely,

*Kimberly Penttila*

Kimberly Penttila  
For CarbEater™

P.S. Try new CarbEater™ yourself today - risk free! It contains no drugs, chemicals or stimulants. It cuts starch and carbs off at the pass - before they turn into fat!

P.P.S. Remember, the special ingredient in CarbEater™ is clinically proven to help you lose 6.45 pounds and 10% body fat in 30 days. Send for it today - there's absolutely no risk!

### Supporting References

- 1 "Investigation of the efficacy of Phase 2™, a purified bean extract from Pharmachem Laboratories" Joe A. Vinson, Ph.D., Dept. of Chemistry, University of Scranton
- 2 "In vivo effectiveness of a starch absorption blocker in a double-blind placebo-controlled study with normal college-age subjects" Joe A. Vinson, Ph.D. and Donna M. Schaub, BS, Department of Chemistry, University of Scranton.
- 3 "Summary of clinical study evaluating effectiveness of Phase2™." Dr. R. Ballerini, Managing Director of Pharmaceutical Development and Service srl, Milan

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. Loss of 6.45 lbs. and 10% body fat mass in 30 days was an average for study participants. Your results may vary. Most dieters regain weight unless they follow a sensible diet and exercise plan.

**Tabak's Health Products**  
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10301

Read this only  
if you've  
decided NOT to  
send for your  
FREE TRIAL of  
CarbEater™.

10301

Read this only  
if you've  
decided NOT to  
send for your  
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CarbEater™.

10301

Read this only  
if you've  
decided NOT to  
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FREE TRIAL of  
CarbEater™.



Dear friend,

The special ingredient in CarbEater™ is clinically proven to help you lose 6.45 pounds and 10% body fat mass in 30 days.

So why not send for it?

Either you're already as slim as you want to be. Or you're still a little skeptical CarbEater™ actually works like we say it does.

Are you skeptical? I understand completely. That's why you "test" CarbEater™ yourself. Free for 30 days. Before you decide to buy it.

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

Grab your free trial coupon. Pop it in the mail. It's the best way to start losing those stubborn pounds and inches.

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# Finally - a Natural Product that Cuts Starch and Carbs Off at the Pass - Before They Turn to Fat!

Dear Friend,

Here's an exciting opportunity to lose weight a whole new way, with all-natural CarbEater™.

The ingredients in CarbEater™ contain no drugs. No chemicals. And no stimulants! Instead, they help keep the carbohydrates you eat from turning into fat!

## Proven in Clinical Trials

CarbEater™ is the result of research dating back to the 1940s. Exhaustive work in the laboratory finally isolated a special ingredient that blocked the conversion of carbohydrates into glucose - and from there into body fat. This was proven both in the test tube and more importantly in human, clinical trials.

The results of those trials were dramatic! In the first two human studies, starch absorption was reduced by 79 percent.<sup>1,2</sup> And a September, 2001 study of 60 human subjects found those taking this ingredient lost an average of 6.45 pounds in 30 days, and in addition lost, on average, over 10 percent of body fat mass, with no loss of muscle.<sup>3</sup>

## Very Important: How to Use For Best Results

CarbEater™ works very differently than other diet products, and the way you take it is different too.

Unlike conventional diet aids, you do not take the same number of capsules at a regular time every day.

Instead, for best results, take 2 capsules half an hour before eating a starch/carb-rich meal. Here's why (this may sound a little technical, but when you know why CarbEater™ keeps starch and carbs from turning into body fat, you'll be able to use it to your best advantage):

CarbEater™ inhibits the activity of amylase, the digestive tract enzyme that breaks starch and carbohydrates down into small units capable of being degraded to glucose, which in turn becomes body fat if not "burned" up. When amylase is thus inhibited, the starch and carbs pass through your digestive system unconverted and are eliminated in the normal manner, much as fiber does.

It's the timing that's critical. If you take CarbEater™ too soon, the inhibiting effect will have come and gone before you eat. If you take it after you eat, the effect will happen too late -



Friendly, knowledgeable customer service is a top priority at Tabak's Health Products.

after the amylase has already done its job.

About half an hour before you eat, on the other hand, is just right. You'll eat the foods you love - the pastas, breads, even desserts (in moderation, of course!) - but keep them from piling on the pounds.

So if you're going to have a light lunch, don't take it then. Instead, save it for a heavier meal. Yes, this requires a little planning ahead, but you'll find by doing so you're optimizing your entire weight-loss plan!

## Use With Other Diet Products? No Problem

Of course, CarbEater™ works best when used as part of a healthy diet and exercise plan. You can also use it with confidence with other diet products. Since CarbEater™ is not an appetite suppressant and contains no stimulants, it's the perfect complement to conventional diet products - together, they work even more effectively.

## Supporting References

- 1 "Investigation of the efficacy of Phase 2™, a purified bean extract from Pharmachem Laboratories" Joe A. Vinson, Ph.D., Dept. of Chemistry, University of Scranton.
- 2 "In vivo effectiveness of a starch absorption blocker in a double-blind placebo-controlled study with normal college-age subjects" Joe A. Vinson, Ph.D. and Donna M. Schuta, BS, Department of Chemistry, University of Scranton
- 3 "Summary of clinical study evaluating effectiveness of Phase2™" Dr. R. Ballerini, Managing Director of Pharmaceutical Development and Service s.r.l., Milan

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# Superior, Science-Based Nutritional Supplements

Some people wonder how Tabak's Health Products - which started just eight years ago - became a *leading* direct marketer of nutritional supplements.

Actually, the answer is quite simple. It's because of our core belief that, above all else, we must provide **superior, science-based nutritional supplements, that improve the quality of your life.**

Take Grape Seed Extract, a prime ingredient in our VitalOne™ antioxidant product, as an example.

Studies suggest that Grape Seed Extract, standardized to contain no less than 95% Proanthocyanidins, has a powerful anti-oxidant effect. It works by fighting free radicals and helps protect cells from damage.

Why's this important to you? Because non-standardized Grape Seed Extract will not have the same effect.

**What we do in our research department is select ingredients for our formulas that are based on science.**

This means we search for clinical studies that show how an ingredient actually affects the structure or function of your body in a beneficial way.

We dig further to

see what daily dose was used in the study.

We look at the specification or standardization of the ingredient.

Then, when we order our raw materials, we insist on receiving a Certificate of Analysis to verify it meets our standards. (See the example.)

More importantly, the ingredients we select are *not* based on cost alone! (In the case of Grape Seed Extract, non-standardized material is 70% cheaper than what we use.)

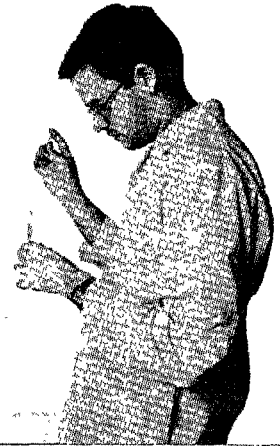
When it comes to your body and your health, believe us, *you want the best.*

**Our pledge to you** You get superior, science-based formulas.

Plus, the ingredients are supported by clinical trials proving how they affect the

structure and function of your body in a positive way.

The bottom line? Our formulas can *actually* enhance your health and impact your quality of life, like never before! Therefore, they are worth *far more* than the small amount we ask for them! You have our word on it!



Supplement Facts		
Amount Per Serving		% Daily Value
Vitamin E (d-α-tocopherol)	200 IU	40%
Vitamin C (ascorbic acid)	250 mg	50%
Vitamin B1 (thiamine)	50 mg	100%
Vitamin B2 (riboflavin)	2 mg	40%
Vitamin B3 (niacin)	15 mg	30%
Vitamin B6 (pyridoxine)	200 mcg	40%
Vitamin B12 (cyanocobalamin)	2.5 mcg	50%
<b>Grape Seed Extract (Vitis vinifera) (95% proanthocyanidins)</b>	<b>200 mg</b>	<b>100%</b>
Other ingredients		

Certificate of Analysis			
Product: Grape Seed Extract	Date: January 8, 2001		
Batch Number: 20010103			
ITEMS	CONTRACTED SPECIFICATIONS	RESULTS	
1% in water (25°C)	Insoluble ≤ 5.0%	2.9%	
2g in 100ml			
5% alcoholic solution		Transparent	
pH (4% in water)	2.5 - 4.5	3.7	
Loss on drying	≤ 5.0%	3.5%	
Sulphated ash	≤ 0.5%	0.1%	
Iron	≤ 10 ppm	< 10 ppm	
Arsenic	≤ 1 ppm	< 0.5 ppm	
Heavy metals	≤ 10 ppm	< 10 ppm	
Powder size		Pass 100 mesh	
N Max		280 nm	
N Min		220 nm	
Content (proanthocyanidin) ≥ 95.05 (UV)		<b>99.8%</b>	
Organochlorine		N.D.	
Organophosphate		N.D.	
Organonitrogen		N.D.	
Carbamate Pesticides		N.D.	
Solvents			
ITEMS	RESULTS	ITEMS	RESULTS
Ethyl acetate	Negative	Acetone	Negative
N-Butyl Cl	Negative	Chloroform	Negative
Toluene	Negative	Ethanol	< 100 ppm
Microbial Characteristics			
Total Aerobic	< 10 CFU/g	Yeast & Mold	< 10 CFU/g
Salmonella	Negative	E. Coli	Negative

*In the example above, note how the certificate of analysis confirms the ingredient meets our standards.*

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# Free Gift Plus No-Risk Preview

**Yes**, please send my free gift. I've completed your survey below. Based on my answers, send me products to try, from time to time, on a 30-Day Free Trial basis.

If I don't want any product, I'll simply return it and *owe nothing*. No questions asked.

However, if satisfied, I'll gladly pay the bill that comes with it and continue to receive a fresh supply each month with a bill.

I may cancel future shipments at any time. I understand that I can return anything I don't want with your "postage-paid" label at no cost to me. Since there's no risk, I'm going ahead.

## Check Only the Boxes that Apply to You

- |   |   |
|---|---|
| <p style="text-align: right; margin-right: 10px;">Interested<br/>Very Interested</p> <p>1 <input type="checkbox"/> <input type="checkbox"/> Menopause/PMS</p> <p>3 <input type="checkbox"/> <input type="checkbox"/> Maintain cholesterol levels (that are already in the normal range, as part of a healthy diet)</p> <p>4 <input type="checkbox"/> <input type="checkbox"/> Reduce wrinkles/age spot visibility</p> <p>5 <input type="checkbox"/> <input type="checkbox"/> Multi-vitamin for overall health</p> <p>7 <input type="checkbox"/> <input type="checkbox"/> Maintain bowel regularity</p> <p>8 <input type="checkbox"/> <input type="checkbox"/> Joint discomfort (age related)</p> <p>10 <input type="checkbox"/> <input type="checkbox"/> Keep prostate healthy</p> <p>11 <input type="checkbox"/> <input type="checkbox"/> Lose weight</p> <p>12 <input type="checkbox"/> <input type="checkbox"/> Healthy glowing skin with natural mask &amp; cleanser</p> <p>13 <input type="checkbox"/> <input type="checkbox"/> Increase energy</p> <p>14 <input type="checkbox"/> <input type="checkbox"/> Maintain bone density</p> <p>15 <input type="checkbox"/> <input type="checkbox"/> Enhance memory/brain function</p> <p>17 <input type="checkbox"/> <input type="checkbox"/> Blood sugar support (to be used as part of your diet, not intended to affect abnormal blood glucose)</p> | <p style="text-align: right; margin-right: 10px;">Interested<br/>Very Interested</p> <p>18 <input type="checkbox"/> <input type="checkbox"/> Increase sexual energy (age related)</p> <p>19 <input type="checkbox"/> <input type="checkbox"/> Maintain healthy eyesight</p> <p>20 <input type="checkbox"/> <input type="checkbox"/> Keep immune system healthy</p> <p>21 <input type="checkbox"/> <input type="checkbox"/> Serious athlete/improve performance</p> <p>22 <input type="checkbox"/> <input type="checkbox"/> A "lift" from blues/sadness</p> <p>23 <input type="checkbox"/> <input type="checkbox"/> Maintain a healthy heart</p> <p>24 <input type="checkbox"/> <input type="checkbox"/> Leg cramps (night time)</p> <p>25 <input type="checkbox"/> <input type="checkbox"/> Get a good night's sleep</p> <p>26 <input type="checkbox"/> <input type="checkbox"/> Maintain healthy gums</p> <p>27 <input type="checkbox"/> <input type="checkbox"/> Maintain healthy lungs</p> <p>28 <input type="checkbox"/> <input type="checkbox"/> Anti-aging, antioxidant formula</p> <p>29 <input type="checkbox"/> <input type="checkbox"/> Maintain hair fullness/hair health</p> <p>30 <input type="checkbox"/> <input type="checkbox"/> Back and vertebrae health</p> <p>Sex: <input type="checkbox"/> Male <input type="checkbox"/> Female</p> <p>Date of Birth: _____ / _____ / _____<br/> <small>Month Day Year</small></p> |
|---|---|

**X**

\_\_\_\_\_  
Sign name here

\_\_\_\_\_  
Your email address (optional)

mail to:

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 Costa Mesa, CA 92626-3407