

6203 Woodlake Center • San Antonio, Texas 78244

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January 27, 2003

Office of Nutritional Products, Labeling and Dietary Supplements (HFS-810) Center for Food and Safety and Applied Nutrition Food and Drug Administration 5100 Point Branch Pkwy College Park, MD 20740

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Re:

21 U.S.C. Section 343(r)(6),

Notification of Statements on Dietary Supplements

Dear Sir/Madam:

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. §343(r)(6), and in accordance with the provisions of 21 CFR §101.93(a), your Agency is hereby notified that Michael's Naturopathic Programs has made statements of nutritional support for its dietary supplement(s) as follows:

Product Name

Label Statement(s)

Michael's Naturopathic Programs Q-Absorb

Supports Heart Function

Michael's Naturopathic Programs Q-Absorb

Q-Absorb is a completely natural proliposome lipid soluble delivery system clinically shown in humans to increase Co-Q10 levels 150 % over baseline and at least 28% higher than dry capsules.

Michael's Naturopathic Programs Q-Absorb

Co-Q10 supports heart function as a component of the electron transport system, and as an antioxidant protects mitochondrial membranes and cholesterol from oxidation.

To the best of my knowledge and based upon information and belief present at the time of the execution of this notice, I certify that the above information is accurate and complete and that Michael's Naturopathic Programs possesses substantiation that the statements are truthful and not misleading.

President

Michael's Naturopathic Programs

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