GRONEK & ARMSTRONG

ATTORNEYS AT LAW

98TH FLOOR - SEARS TOWER 233 SOUTH WACKER DRIVE CHICAGO, ILLINOIS 60606

TEL: (312) 655-1800 FAX: (312) 655-1808

DENNIS M. GRONEK ROBERT E. ARMSTRONG PAUL I. WISNIEWSKI DEBORAH L. RUSS JACQUELINE P. KULER

March 27, 2002



Office of Nutritional Products Labeling and Dietary Supplements (HFS-810) Center for Food Safety and Applied Nutrition Food and Drug Administration 5100 Point Branch Pkwy College Park, MD 20740 Washington, D.C. 20204

Notification for Statements on Dietary Supplement Labels Re:

Dear Sir/Madam:

This firm represents Nature's Sunshine Products, Inc., Provo, Utah, a manufacturer and distributor of dietary supplement products (hereinafter "Nature's Sunshine"). Nature's Sunshine has requested that we notify your Agency on its behalf of the inclusion of statements of nutritional support on its dietary supplement product labels.

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 authorized provisions of 21 CFR §101.93(a), your Agency is hereby notified that Nature's Sunshine has made statements of "nutritional support", as described in 21 U.S.C. §343(r)(6)(A), for its dietary supplements as follows:

Product Name

Label Statement(s)

BLACK WALNUT (Concentrated)

Intestinal system support

BLUE COHOSH

Female glandular system support.

BLUE VERVAIN

Nervous system support.

(Liquid)

975 0162 LET 9868

CAPSICUM (Bulk)

Digestive and circulatory system support.

CoQ₁₀30

Vital co-enzyme needed for cellular energy. Promotes healthy heart and circulatory system. Support healthy gums. Circulatory system support. Co-enzyme Q10, a vitamin-like nutrient, is necessary for the essential enzyme function of inducing chemical changes within cells. CoQ10 produces adenosine triphosphate (ATP), needed to produce energy in all cells, and also acts as a powerful antioxidant.

CoQ₁₀Plus

Vital co-enzyme needed for cellular energy. Promotes healthy heart and circulatory system. Supports healthy gums. Circulatory system support.

DEVIL'S CLAW

Structural system support.

ENERG-V (Sample Packet)

Herbal energizing supplement. Optimal vitality. Maximize nutrition from food you eat.

FAT GRABBERS GRAB PAK

Designed for weight management support. Use Fat Grabers to help reduce the amount of fat available to the body from the foods you eat. Fat Grabbers utilizes specific fibers to trap fat molecules. Guar gum and psyllium have a natural trapping action with fat. The trapped fat molecules are then available for digestion and are eliminated through the intestinal system. Chickweed and lecithin are added as natural emulsifiers allowing a more efficient way to reduce the amount of fat available to the body. Fat Grabbers should be taken with every meal so the fibers can entrap the fat from the foods you have eaten.

FEN-CHI (Sample packet)

Herbal weight-loss supplement. Burns fat thermogenically. Increases energy.

LBS II (Sample Packet)

Regularity herbal intestinal support supplement. Intestinal regularity. Growth of friendly bacteria. Production of digestive enzymes. LOBELIA/ST JOHN'S WORT Nervous system support. This combination helps

to support the emotional well-being of a person

under stress.

MOOD ELEVATOR (Chinese) Nervous system support. Uplifts spirits.

Improves vitality. Support for occasional

sleeplessness.

PAU D'ARCO EXTRACT (Liquid) Immune system support.

SUPER SUPPLEMENTAL VITAMINS

AND MINERALS (Sample Packet) Natural chelated minerals for better absorption.

Antioxidants help neutralize free radicals. Helps

utilize food, support bodily functions, and

biochemical reactions.

TARGET DEFENSE Immune system support. As chelates, these

minerals are readily absorbed and targeted to specific body systems. These are necessary to immune system enzymes such as superoxide dismutase (SOD). Target Defense is a nutritional

approach to a healthier immune system.

THYMUS GLANDULAR Immune system support.

X-ACTION FOR MEN (Sample Packet) Heighten male vitality. Bring back the passion.

Help increase vitality and sensuality. Intimacy

formula.

X-ACTION FOR WOMEN

(Sample Packet) Heightened sensuality. Rekindle the passion. Increase

vitality and sensuality. Intimacy formula.

The undersigned hereby certifies on behalf of Nature's Sunshine that the information contained in this correspondence is complete and accurate.

Sincerely yours,

GRONEK & ARMSTRONG

Robert E. Armstrong

CC: Nature's Sunshine Products, Inc.