Nutriment Innovations Inc. PO Box 5261 Huntington, IN 46750 260-359-1546 February 3, 2003

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Food and Drug Administration 5600 Fishers Lane Rockville, Maryland 20857

FEB 2 1 2003

To whom it may concern:

This letter is a follow-up to our recent submission to the FDA as required by 21 CFR 101.93(a).

I certify that our firm is in compliance with all product labeling guidelines established by the FDA and that all the materials in our submission are complete and accurate. All structure/function claims made for the products on our web site are followed by the disclaimer:

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.

Though no structure/function claims are made on any of our product labels, three of our products (Creaky Old Bones Joint Formula, Pyrogenic and Athletic Performance Nutrients) could be construed as making a structure/function claim and as such the product names are followed by an asterisk to guide the consumer to the above disclaimer on the label.

I also certify that all the structure/function claims made by us are truthful and not misleading.

If any of the materials in our previous submission to the FDA need re-submitted, please contact us. Thank you.

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Scott Eckelbarger President Nutriment Innovations Inc. www.nutrimentinnovations.com

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Nutriment Innovations Inc. PO Box 5261 Huntington, IN 46750 260-359-1546 December 17,2002

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Food and Drug Administration 5600 Fishers Lane Rockville, Maryland 20857

To whom it may concern:

We are an on-line dietary supplement marketer that is opening for nationwide business beginning next month. We are writing to notify the FDA of the Structure/Function claims we are using in our web page advertisements. Enclosed you will find copies of the product labels and the on-line ad text.

If you have any further questions or need more information, please let us know.

Scott Eckelbarger President Nutriment Innovations Inc. www.nutrimentinnovations.com

Enclosures

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Our Product Philosophy -- Nutriment Innovations

Our Product Philosophy

Nutriment Innovations has a simple, common sense approach to nutritional supplementation: offer the highest quality nutritional supplements made of scientifically proven ingredients designed to enhance overall health. We believe there is no substitute for hard, heavy consistent training. As such, we follow a simple formula as our philosophy:

Maximum Health = Maximum Training = Maximum Results

Every product we sell underscores this philosophy. We offer proven (though often overlooked or neglected) supplements that can enhance a proper diet to help you train and recuperate better and operate at peak performance day in and day out.

http://www.nutrimentinnovations.com/AboutUs/ourproduct.shtml

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Product ID: 1020 Category: Joint Support Creaky Old Bones Joint Formula Description: Nutriment Innovations Creaky Old Bones Joint Formula is a top-quality joint support formula containing Glucosamine Sulfate and Chondroitin Sulfate to help nourish sore joints. Creaky Old Bones Joint Formula can help reduce the pain

joints. Creaky Old Bones Joint Formula can help reduce the pain and inflammation of joints caused by heavy weight training and contains both Glucosamine and Chondroitin to gain the synergistic effects of both nutrients. Glucosamine and Chondroitin help to maintain joint integrity and repair damaged cartilage.*

Recommended dosage for weight range: Less than 120 lbs - 4 capsules 120 to 200 lbs - 6 capsules Over 200 lbs - 8 capsules

*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.

http://www.nutrimentinnovations.com/search_results.asp?txtsearchParamTxt=Creaky+Ol... 12/18/2002

SUPERIOR PENECHISARUE (LASS)

Natriment Amovations Superior Performance Class Wavy Protoin makes it easy for you to maintain a high protoin dist. This low cashelystate protoin formula mixes and digests seeily for rapid essimilation. \$

Directions: Nix 1 accop in 8-12 or of low fat milk or webs. Six vigoreestly for 10 accomits. Warning: This predict should not be usef if you are program of lactating, miless directed by a health care porfessional. Store in a cool, dry place. Low Sedium

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Dietary Supplement

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> Manufactured for: Nurriment Innovations, Inc. Huntington, IN 46750

Product ID: 1090 Category: Sports Nutrition Whey Protein - Chocolate

Description: Top of the line quality whey protein formulation. Low in carbohydrates. Three fantastic flavors. Nutriment innovations Whey protein offers quick absorption to help speed amino acids to recovering muscles. Whey protein helps increase levels of glutathione which is one of the top antioxidants in the body. Our protein is pure whey with no added casein. Don't be fooled by slick marketing of protein blends that attempt to sell a cheaper protein at the same cost. If you want to slow absorption with added casein than just mix with milk instead of water but don't pay for whey and casein blends. Our protein is instantized so it mixes easily with a spoon without the "clumping" of other brands. We use only the highest quality whey so you can take advantage of all the health benefits associated with whey such as better immune function.*

Suggested Use: Mix 1 scoop in 8 - 12 oz. of low-fat milk or water. Stir vigorously for 10 seconds. Consume 1 - 3 servings daily depending on your desired protein intake or as directed by a health care professional.

*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.

http://www.nutrimentinnovations.com/search_results.asp?txtsearchParamTxt=Whey+Prot... 12/18/2002



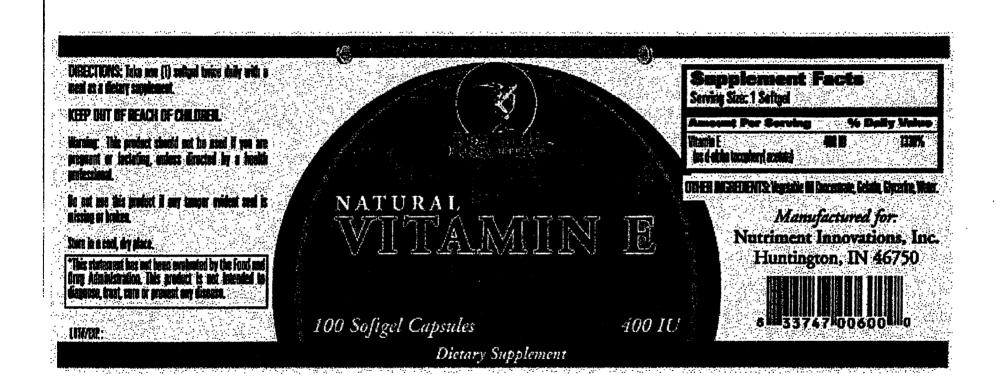
Nutriment Innovations-SF Search Engine Output Page

Product ID: 1070 Category: General Health/Nutrition Ultra QCR

Description: Nutriment Innovations Ultra QCR is our flagship product and the most potent antioxidant formula on the market today. Ultra QCR helps to reduce post-exercise inflammation, maintain a strong immune system and provide nutritional support for a strong cardiovascular system. The ingredients in Ultra QCR work synergystically to provide a powerful antioxidant formula. The green tea in Ultra QCR has been shown to have thermogenic properties.*

Suggested Use: Take 2 tablets twice daily for athletes under 200 lbs. Take 2 tablets 3 times daily for athletes over 200 lbs. DO NOT EXCEED RECOMMENDED DOSAGE.

*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.



Nutriment Innovations-StoreFront Product Detail Page

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Product ID: 1080 Category: General Health/Nutrition Vitamin E

Description: Each softgel supplies 400 IU of natural vitamin E (d-alpha tocopherol). Vitamin E is a potent, fat-soluble antioxidant to help fight the oxygen free radicals produced by intense exercise. Vitamin E is the major antioxidant in cell membranes.*

Suggested Use: Take one softgel twice daily with a meal as a dietary supplement.

*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.

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Product ID: 1060 Category: Fat Loss Pyrogenic

Description: Pyrogenic is a powerful ephedrine/caffeine based thermogenic formula. Pyrogenic helps to further maximize fat loss in conjuction with diet and exercise. It also helps to increase energy expenditure. Pyrogenic increases the loss of fat mass while retaining lean muscle tissue.*

Suggested Use: As a dietary supplement, adults may take one to two capsules twice daily. Do not exceed four capsules in any 24 hour period. The maximum recommended dosage of ephedrine for a healthy adult is 100 mg. in a 24 hour period for no more than 12 weeks.

NOT FOR USE OR SALE TO INDIVIDUALS UNDER THE AGE OF 18.

Do not use if pregnant or nursing. Consult a health care professional before using this product if you have, or have a family history of , heart disease, thyroid disease, diabetes, high blood pressure, recurrent headaches, depression or other psychiatric condition, glaucoma, difficulty in urinating, prostate enlargement or seizure disorder, if you are using a monoamine oxidase inhibitor, or any other dietary supplement, prescription drug or over the counter drug containing ephedrine, pseudoephedrine or phenylpropanolamine (ingredients found in certain allergy, asthma, cough/cold and weight control products.) Exceeding recommended serving will not improve results and may cause serious adverse health effects including heart attack and stroke. Discontinue use and call a physician or licensed qualified health care professional immediately if you experience rapid heartbeat, dizziness, severe headache, shortness of breath or similar symptoms. Individuals who consume caffeine with this product may experience serious adverse health effects. This product has 25 milligrams concentrated ephedrine group alkaloids per serving in the form of herbal extracts.

*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.

http://www.nutrimentinnovations.com/search_results.asp?txtsearchParamTxt=Pyrogenic... 12/18/2002

20 Suggested Line: As a dietary supplement, taka 1/2 Search plocanonal Lening Star 2 Count Servings Per Container: SM et fects teaspoon (2 grants) will juice or webs prior to weekent, and 1/2 paspeers (2 grams) with a postworkout protein and carbolightate drink daily, or as directed by a social care protectional. 1. < Warning II you are pregnant or incluting. and the second central a health tare professional before 2 using this product. No not exceed Waile Water wit entriklichent :: recommended decays. Store in a cool, dry place. De net ese if any fanger ownent see is missing of Indian. Accidental available of inte cantaking prod-pets is a leading coase of latel poissoning is abilities under R. Know this modest and all shiden unter 8. Karp this pretest out of mach of phildren. In case of antidental L COL 2 SICH X M This statement has not been evaluated by the front and they Atheniatical in . We product is not intended in Anguine, what came or private any firmula. Manufactured for: Nutriment Innovations, Inc. Humington, IN 46750 1000 grams lat #/ fat. Dietary Supplement

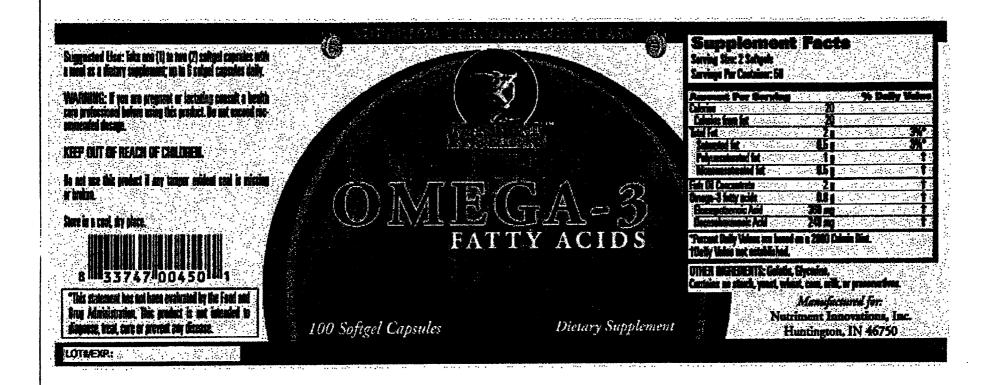
Product ID: 1040 Category: Sports Nutrition L-Glutamine Powder

Description: Nutriment Innovations L-Glutamine is a high quality, tasteless and odorless powder that mixes easily and is in singular form for rapid uptake. Glutamine is the most abundant amino acid in blood plasma and skeletal muscle. Glutamine helps aid in maintaining a positive nitrogen balance and aids in proper immune function. Stress on the body (like that from intense training) reduces glutamine stores in the body.*

Suggested use: As a dietary supplement, take 1/2 teaspoon (2 grams) with juice or water prior to workout and 1/2 teaspoon (2 grams) with a post-workout protein and carbohydrate drink daily or as directed by a health care professional.

*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.

http://www.nutrimentinnovations.com/detail.asp?product_id=1040



Product ID: 1050 Category: General Health/Nutrition Omega 3 Fatty Acids

Description: Each softgel contains 1000 mg. of fish oil concentrate containing the omega 3 fatty acids EPA (eicosapentaenoic acid 180 mg.) and DHA (docosahexaenoic acid 120 mg.). Omega 3 Fatty Acids help supply essential fatty acids which cannot be produced by the body and must be obtained from the diet. A must for all serious athletes.

Suggested Use: Take 1 to 2 softgel capsules with a meal as a dietary supplement, up to 6 capsules daily.

*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.

http://www.nutrimentinnovations.com/detail.asp?product_id=1050

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ALL DESCRIPTION

Product ID: 1010 Category: General Health/Nutrition Athletic Performance Nutrients

Description: Athletic Performance Nutrients is a premium quality multivitamin/multimineral supplement specifically formulated to meet the needs of high performance athletes. It is highly absorbable and supplies you with the nutrients you need to perform at your best. Don't be fooled by misleading advertising. Higher potencies do not always mean a higher quality product and could in some circumstances be harmful. Athletic Performance Nutrients provides a vast array of nutrients, herbs and food concentrates in the potencies most needed by athletes.*

Suggested Use: Take 2 tablets daily with a meal. Not recommended for children under 75 lbs. without the guidance of a physician.

*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.

http://www.nutrimentinnovations.com/detail.asp?product_id=1010

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> Manufactured for: Nutriment Innovations, Inc. Huntington, IN 46750

Product ID: 1030 Category: Sports Nutrition Micronized Creatine Monohydrate

Description: Creatine Monohydrate is made from the highest grade American-made creatine with quality and purity second to none. Our creatine is micronized to provide easier mixing without grit, promote quicker digestion and prevent stomach upset. Creatine helps to increase muscle mass and strength by promoting cell volumization. Creatine also helps to improve performance during maximal intensity exercise by preventing the loss of Adenosine Triphosphate (ATP), the energy source for muscular contractions, during heavy anaerobic exercise. Creatine also helps to shorten recovery time between sets.*

Suggested Use: As a dietary supplement of creatine, take one rounded teaspoon (5 grams) 1-2 times daily mixed with water, juice or a protein drink. For individuals with a bodyweight greater than 225 lbs., take 2 times daily. Use creatine for 6 weeks then take a week off before repeating. Increase water consumption to a minimum of 1/2 gallons daily while using creatine.

*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.

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Product ID: 2030-1090 Category: Product Packages Fat Loss Package - Chocolate Whey Protein Description: The Nutriment Innovations Fat Loss Package helps you to get the most out of your low fat diet and fat loss training plan by providing our potent Pyrogenic fat loss formula and nutrients like Omega 3 fatty acids and the fat soluble vitamin E which may be lacking on a low fat diet.*

The Fat Loss Package contains: Whey Protein Chocolate- 3 Athletic Performance Nutrients- 1 Omega 3 Fatty Acids - 2 Vitamin E - 1 Pyrogenic fat loss formula - 2

You save an additional \$10.00 over and above the package discounts on the Whey protein and Pyrogenic fat loss formula for a total package savings of \$16.50.

Package quantities are approximates for a 60 day supply based on average use. Heavy protein users may need to order extra protein.

*These statements have not been evaluated by the Food and Drug Administration. These products are not intended to diagnose, treat, cure or prevent any disease.

http://www.nutrimentinnovations.com/search_results.asp?txtsearchParamTxt=Fat+Loss+... 12/18/2002

Product ID: 2010-1090 Category: Product Packages Elite Athlete Training Package - Chocolate Protein

Description: The Nutriment Innovations Elite Athlete Training Package is designed to provide nutritional support for athletes at the peak of their game or for those training to reach that level. We have included the top formulations you need to help recover from brutal training sessions and improve overall health with none of the overhyped garbage included in other so called "stacks."*

The Elite Athlete Training Package contains: Whey Protein Chocolate - 3 L-Glutamine 1000 grams- 1 Creatine Monohydrate 1000 grams- 1 Athletic Performance Nutrients - 1 Omega 3 Fatty Acids - 3 Vitamin E - 1 Ultra QCR - 4

You save an additional \$14.50 over and above the quantity discounts for the Whey Protein and Ultra QCR for a total package savings of \$25.00.

Package quantities are approximates for a 60 day supply based on average use. Heavy protein users may need to order extra protein.

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Product ID: 2040-1090 Category: Product Packages Powerlifters Package - Chocolate Protein Description: The Nutriment Innovations Powerlifter's Package contains the nutritional supplements you need to help your body recover from the demands of brutal powerlifting programs. This is one of the few packages on the market specifically for top powerlifters and Olympic weightlifters.*

The Powerlifters Package contains: Whey Protein Chocolate - 3 Creaky Old Bones Joint Formula- 3 Athletic Performance Nutrients - 1 L-Glutamine 1000 grams - 1 Ultra QCR - 4

You save an additional \$14.50 over and above the package discounts on the Whey protein, Creaky Old Bones Joint Formula and the Ultra QCR for a total package savings of \$32.50.

Package quantities are approximates for a 60 day supply based on average use. Heavy protein users may need to order extra protein.

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http://www.nutrimentinnovations.com/search_results.asp?txtsearchParamTxt=Power+Lift... 12/18/2002

Nutriment Innovations-SF Search Engine Output Page

Product ID: 2050-1090 Category: Product Packages High School Athlete Package - Chocolate Protein Description: The Nutriment Innovations High School Athlete's Package contains products to

help improve the health and nutrition of high school students involved in athletics. Typically many high school students eat diets that are notoriously low in nutrients and yet high in fat and sugar. We included products designed to help correct any nutrient deficiencies that may exist to help improve overall health which will translate into improved athletic performance.*

The High School Athlete Package contains: Whey protein Chocolate - 3 Athletic Performance Nutrients - 1 Ultra QCR - 3 Vitamin E - 1

You save an additional \$10.00 over and above the package discounts on the Whey protein and the Ultra QCR for a total package savings of \$16.00.

Package quantities are approximates for a 60 day supply based on average use. Heavy protein users may need to order extra protein.

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http://www.nutrimentinnovations.com/search_results.asp?txtsearchParamTxt=High+Scho... 12/18/2002

Nutriment Innovations-SF Search Engine Output Page

Product ID: 2020-1090 Category: Product Packages Mass Training Package - Chocolate Protein Description: The Nutriment Innovations Mass Training Package contains all the products you need to get the most out of your mass training program. With this package and by following the dietary information provided on this website you can be sure your mass gaining nutritional program is up to par.*

The Mass Training Package contains: Whey Protein Chocolate - 3 Creatine Monohydrate 1000 grams- 1 L-Glutamine powder 1000 grams- 1 Ultra QCR - 4 Athletic Performance Nutrients - 1

You save an additional \$13.50 over and above the quantity discounts on the Whey Protein and the Ultra QCR for a total package savings of \$24.00.

Package quantities are approximates for a 60 day supply based on average use. Heavy protein users may need to order extra protein.

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http://www.nutrimentinnovations.com/search_results.asp?txtsearchParamTxt=Mass+Pack... 12/18/2002