



115 Edgewood Street • Alexandria, Tennessee 37012 • 615-529-1250

**NORVELL DHA SUNLESS SPRAY SOLUTION**  
**POSITION BASED UPON SCIENTIFIC ANALYSIS**  
(With Support & Documentation included as Attachment A)

May 25, 2004

Valued Distributors, Customers, and Associates

We found over recent months that T.V. media and some journalists have totally sensationalized their reports by attacking the sunless spray industry. They misrepresent facts by distorting available data and taking sound bites from individuals out of context for the sole purpose of creating interest in their reports. Their efforts to cast doubts on the safety of sunless spray products are full of sensationalized methods. It is akin to discussing seat belts or flu shots that save millions of lives every year but reporting only some remote exception that promotes fear to the public. It is attention getting at its worst. Common sense defeats the report but the planting of fear does its damage.

Most recently, a media story in Kansas City, Kansas made direct reference to heavy metals such as iron, lead, and mercury and other trace elements like arsenic found in Dihydroxyacetone (DHA) products. Please know that we at Norvell purchase our ingredients from only the finest of manufacturers who adhere to the strictest of FDA guidelines. We require and maintain Certificates of Analysis (a quality assurance document from the manufacturer that guarantees the ingredient to be tested and to equal or exceed FDA guidelines for use in drugs or cosmetics) on every raw material we purchase. These guidelines require the raw materials we use to follow the same safe standards the EPA sets for drinking (tap) water.

The attachment to this letter is a Certificate of Analysis with information from Merck Pharmaceutical Company addressing these elements found in DHA. Their scientific analysis results in certification that these elements are present at a level of less than a collective total of 10 parts per million. The standard for these elements used for metropolitan drinking water is 15 parts per million. In other words, our products contain less than two thirds of the level accepted for drinking water. The same fear conclusion would tell a consumer that they should fear breathing the water vapors in their home shower or going to the club and sitting in a steam sauna. Is this sensational journalism at its worse or not? Does it not make common sense that interviews with the FDA would generate full press releases and stoppage of sales by the FDA if they felt there was a major threat to the general public? Sunless tanning is the hottest segment in the cosmetic world market according to the Drug and Cosmetic Industry magazine. It is on the radar screen of the media. All these ingredients discussed in the media are naturally occurring and readily found in nature (everything you touch, eat, and drink). Based on this analysis we can certainly attest that DHA products offered for sale by Norvell meets or exceed all FDA guidelines for safety.

While FDA guidelines are more than met and in fact are exceeded, we think it is only common sense for persons spraying the solution on a continuing basis to wear a simple mask available at any local store or Wal-Mart. This suggestion is based upon the prudent factor that anytime you expose yourself to particles added to natural air it makes good sense to wear a mask. The perfect analogy is that of an individual operating a lawn mower for a mowing service.

If you have questions or need additional assurances I am always personally available for your calls. All of us at Norvell have worked hard to develop a good name in this industry and will continue to do so. Thank you for your support.

Sincerely,

Richard E. Norvell,  
President

# Specification

# MERCK

World's Largest Pharmaceutical Manufacturer

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1,10150.0000 ***Dihydroxyacetone*** extra pure for all cosmetic purposes

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Manufactured under pharmaceutical guidelines

	Spec. Values	
Appearance	White to almost white fine crystalline free-flowing power. Eventually with granular parts	
Identity	Conforms	
Assay (calculated on anhydrous substance) (quality assurance test)	98.0 - 102.0 % pure	
Appearance of solution (color) 10%; water/ethanol 96%; (20/80)	less than or equal to 50	Hazen
pH value (in a 5% water solution)	4.0 - 6.0	
Heavy metals (as Lead, Mercury, etc.)	less than or equal to 0.001	%
Arsenic	less than or equal to 0.0003	%
Iron	less than or equal to 0.002	%
Protein (white)	less than or equal to 0.1 %	
TLC Test	passes test	
Sulfated ash (600° C)	less than or equal to 0.10	%
Water (according to Karl Fischer method)	less than or equal to 0.20	%
Microbiological purity	less than or equal to 100	CFU/gm

Dr. Karl-August Reilffen  
Responsible laboratory manager quality control

*This document has been produced electronically and is valid without a signature*