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Source Naturals, Inc. Scotts Valley, CA 95066

December 29, 2000

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Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 c St. SW.,
Washington, D.C. 20204

JAN - 8 2001

RE: Notification of Nutritional Support Statements

Dear Sir or Madam:

I hereby notify the Food and Drug Administration (FDA) of the use of statements of nutritional support in the labeling of Elan Vital™, a dietary supplement. It contains, Pro-Vitamin A (Beta Carotene), Vitamin A (Palmitate), Vitamin B-I, Vitamin B-2, Vitamin B-3, Vitamin B-5, Vitamin B-6, Vitamin B-12, Biotin, Folic acid, Vitamin C, Fat Soluble Vitamin C, vitamin D-3, Vitamin E, Boron, Calcium, Chromium, Copper, Iodine, Magnesium, Manganese, Potassium, and Selenium. Source Naturals[®] is the manufacturer of Elan Vital™.

Statements being made in the labeling of Elan Vital:

(1) Elan Vital™ contains significant potencies of nutrients for antioxidant protection, cellular energy metabolism, neurotransmitter production and support of the **liver**, the key organ of nutrient activation

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. Source Naturals possesses substantiation that the statements are truthful and not misleading.

Ira L. Goldberg

President, Source Naturals, Inc.

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