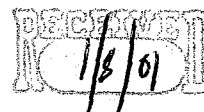


Source Naturals, Inc.
Scotts Valley, CA 95066

December 5, 2000

3355 01 MAR 16 17:00



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

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 Niacinamide (B-3) a dietary supplement. Source Naturals® is the manufacturer of Niacinamide.

Statements being made in the labeling of Niacinamide:

- (1) Niacinamide, also known as vitamin B-3, functions in over 50 metabolic reactions, most of which are enzymatic. Its bioactive forms – NAD+, NADH, NADP, and NADPH – play important roles as catalysts in the energy production process in the cells, the breakdown of proteins and fatty acids, the synthesis of fatty acids, and the formation of steroid hormones and red blood cells. Source Naturals Niacinamide is prepared to provide a gradual release over a prolonged period of time.

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.

975 0162

LET 7136