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December 5, 2000

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 L-Proline L-Lysine a dietary supplement. Source Naturals® is the manufacturer of L-Proline L-Lysine.

Statements being made in the labeling of L-Proline L-Lysine:

L-Lysine is one of 9 essential amino acids that cannot by made in the body. It is the basic raw material for carnitine synthesis. L-Proline can be made in the body, but low protein/vegetarian diets may not always promote optimal L-Proline production. L-Lysine and L-Proline amino acids are the precursors of hydroxylysine (HL) and hydroxyproline (HP) two constituents of collagen. Collagen is an essential component of arterial linings. Vitamin C, a strong antioxidant, is also essential for the production of collagen. Hawthorn berry and grape seed extract are potent natural antioxidants due to their high levels of proanthocyanidins. These proanthocyanidin-esters are excellent free radical scavengers.

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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