

# GENERAL VITAMIN CORP

PO Box 1500 Chapel Hill NC 27516  
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April 10, 2001

**CERTIFIED MAIL**  
**Return Receipt Requested**

APR 18 2001

Office of Nutritional Products, Labeling and Dietary Supplements  
HFS-810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, SW  
Washington, D.C. 20204

To Whom it May Concern,

This letter is submitted pursuant to Section 406 (r)(6) of the Federal Food, Drug, and Cosmetic Act for the purpose of notifying the agency of statements being made in connection with the marketing of dietary supplements being distributed by this company.

The product name and the dietary ingredients for which the statement is being made is as follows:

Megabolic	Vitamin C (as ascorbic acid)	100mg
	Niacin (as niacinamide)	100mg
	Folate (as folic acid)	100mcg
	Pantothenic acid (as d-calcium Pantothenate)	100mg
	Potassium Caseinate	100mg
	Betaine HCl	10mg
	L-arginine	200mg
	L-ornitine hydrochloride	200mg
	dl-methionine	50mg
	Soy isolated protein	165mg
	Saw palmetto (fruit)	100mg
	Other ingredients: Microcrystalline cellulose, stearic acid, silicon dioxide, magnesium stearate, croscarmellose sodium, magnesium gluconate, pharmaceutical glaze	

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The text of the statements that are being made in regards to the above stated product are listed below:

- nutritional support
- help a man be his best
- supports the prostate
- support overall good health, especially during peak activity
- supports key body functions
- is important in male potency

Sincerely,

GENERAL VITAMIN CORP.

A handwritten signature in cursive script that reads "Megan Joslin".

Megan Joslin  
Product Development Coordinator