

GENERAL VITAMIN CORP

3066 01 MAY 10 03:25
PO Box 1500 Chapel Hill NC 27516

919-929-5785 fax 919-929-2458

April 10, 2001

APR 18 2001

CERTIFIED MAIL

Return Receipt Requested

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:

Zinc Gluconate	Calcium (as dicalcium phosphate)	100mg
	Zinc (as zinc gluconate)	1 Omg
	Other ingredients: Microcrystalline cellulose, stearic acid, croscarmellose sodium, magnesium stearate, silicon dioxide, pharmaceutical glaze	
DHEA	Vitamin C (as ascorbic acid)	25mg
	Calcium (as dicalcium phosphate)	105mg
	DHEA (dehydroepiandrosterone)	25mg
	Other ingredients: Microcrystalline cellulose, gelatin, magnesium stearate.	

97S 0162

LET 7584

75555

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

Zinc Gluconate

- Zinc is thought to regulate the metabolism of the male sex hormone testosterone in the prostate
- supports good bone health

DHEA

- Over 40?
- Scientific studies show that DHEA supplements can help increase muscle strength and lean body mass as well as support the immune system especially in older men and women

Sincerely,

GENERAL VITAMIN CORP.



Megan Joslin

Product Development Coordinator