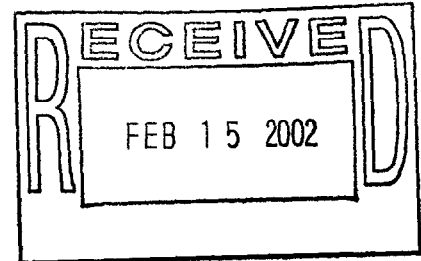




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February 8, 2002



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

Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

- (1) Name and address of manufacturer:
Pharmavite Corporation, PO Box 9606, Mission Hills, CA 91346
- (2) Text of the statement(s):
Vitamin E is an antioxidant that fights against damaging natural substances known as free radicals. It is incorporated into the fat-based tissues of the body, such as the heart, fat-carrier molecules like LDL ("bad" cholesterol), and our cell membranes, where it acts to stabilize these structures and protect them from free radical attack. Vitamin E also protects our cells from compounds such as lead, mercury and other heavy metals. Vitamin E is complimentary with Vitamin C in its function, therefore Vitamin E and Vitamin C should be taken together. There are several natural compounds, called tocopherols, that demonstrate Vitamin E activity, and dl-Alpha Tocopherol is the synthetic form of Vitamin E. Because of Vitamin E's strong antioxidant effects, supplementation exerts a protective effect in many common health conditions. Coenzyme Q-10, or CoQ-10 is an essential component of the energy production for all body processes. Research on CoQ-10 has identified its role as a powerful antioxidant and has indicated that CoQ-10 supplementation may provide benefit in certain health conditions. In particular, CoQ-10 has been used to help maintain a healthy heart and to help the body's energy processes during exercise. As an antioxidant, CoQ-10 protects against the oxidation of fats in the body, such as LDL ("bad cholesterol"), which can be damaging to our cell membranes. CoQ-10 also works very closely with Vitamin E, and seems to exert a sparing effect on Vitamin E, thereby increasing the antioxidant ability in the body.

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PHARMAVITE

- (3) Name of the dietary ingredient if not provided in the text of the statement:
Coenzyme Q-10
Vitamin E(d-Alpha Tocopherol)

- (4) Name of the dietary supplement:
Vitamin E + CoQ10

The above statement(s) may be used in one or more of the following brands of products: B.J.'s Wholesale, CVS, Duane Reade, Kirkland Signature, Joglemate, Nature Made, Nature's Resource, Optimize, Spring Valley, Walgreens.

We certify the information in this notice is complete and accurate, and we have substantiation that the above statement(s) is truthful and not misleading.

Sincerely,

David Kropp

Acting Director, Regulatory and Consumer Affairs