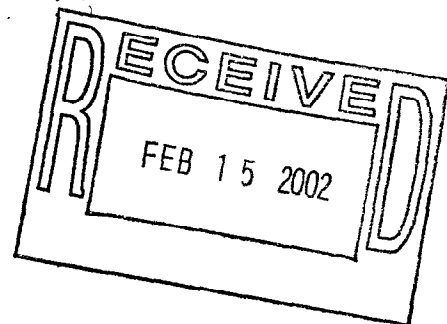




PHARMAVITE

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):
Ginkgo Biloba is a dry extract from the leaves of the Ginkgo Biloba tree, which is the longest living species of tree. Ginkgo is used primarily for age-related decline in mental function (short-term memory loss, poor concentration, possibly dementia) amongst other problems relating to poor circulation. Ginkgo acts as an antioxidant, which is a result of the antioxidant components in Ginkgo, such as the flavone glycosides. It actually increases blood flow (to carry oxygen) and circulation to the brain and extremities in the body. Ginkgo's antioxidant activity in the BRAIN is of particular interest, because the brain and central nervous system are particularly susceptible to free radical attack, and free radical damage in the brain is widely accepted as being a contributing factor in many disorders associated with aging. Ginkgo appears to make membranes of red blood cells more pliable, or "elastic," allowing them to squeeze more easily through capillaries and small arteries. This is the primary function of the terpene lactones, an active component in Ginkgo biloba.
- (3) Name of the dietary ingredient if not provided in the text of the statement:
Ginkgo Biloba (leaf, powdered extract)
- (4) Name of the dietary supplement:
Ginkgo Biloba

97S 0162

LET 9419

79279



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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, Jogmate, 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