



February 7, 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):
Lipoic Acid is a powerful, vitamin-like substance. It is involved in the conversion of carbohydrates to energy and plays an important role in creating cellular energy (ATP). It is also thought to be an effective antioxidant. Its actions promote glucose metabolism, optimum antioxidant protection and a healthy nerve function.
- (3) Name of the dietary ingredient if not provided in the text of the statement:
Alpha Lipoic Acid
- (4) Name of the dietary supplement:
Alpha Lipoic Acid
50 mg

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.

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PHARMAVITE

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