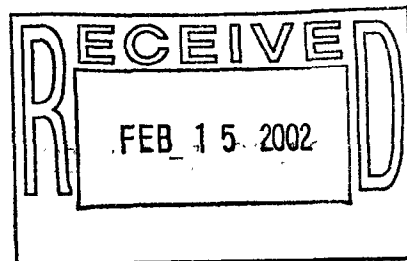




February 8, 2002



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):  
Glucosamine is a substance manufactured by the body. It stimulates one of the key structural components of cartilage and promotes the incorporation of sulfur into cartilage. In aging, we lose the ability to manufacture sufficient levels of glucosamine and therefore may benefit from supplementation. Proper levels of glucosamine will benefit in proper joint function and joint repair.
- (3) Name of the dietary ingredient if not provided in the text of the statement:  
Glucosamine (from glucosamine hydrochloride & glucosamine sulfate)
- (4) Name of the dietary supplement:  
Glucosamine 500 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