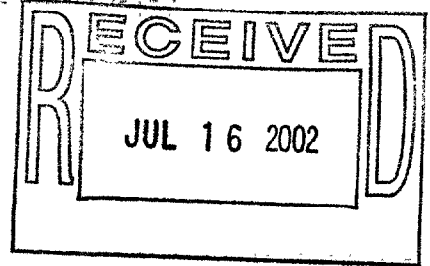


July 5, 2002

3592 02 JUL 22 P2 04

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



RE: Dietary Supplement Statement of Support Notification

To: Whom It May Concern:

Nutritional Specialties, Inc., 1456 E. Katella Ave. Anaheim, CA 92805, the distributor of the following dietary supplement products, intends to make the following statement of support: "Formulated to nourish hair and scalp."

This claim is being made for Vitamin B1 (Thiamine Mononitrate), Vitamin B2 (Riboflavin), Vitamin B6 (Pyridoxine HCl), L-Cysteine (L-Cysteine HCl), Horsetail Silica and MSM (Methyl-Sulfonyl-Methane).

Which is contained in LifeTime® Supreme Vital Hair Capsules. This submission is being made in compliance with the requirements of 21 CFR 101.93.

The undersigned is an authorized representative of Nutritional Specialties, Inc. and certifies that the information contained in this notice is complete and accurate, and that Nutritional Specialties, Inc. has substantiation that the above statement is truthful and not misleading.

Harry G. Shippy
Signature
HARRY AUGUST SHIPPY

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Yeast Free with MSM

Life

Supreme

Vital Hair

Formulated to nourish hair and scalp

Dietary Supplement

120 Capsules

Supplement Facts
Serving Size 4 Capsules

Amount Per Serving	% Daily Value
Vitamin A (Palmitate)	10,000 I.U. 200%
Vitamin C (Ascorbic Acid)	600 mg. 1000%
Vitamin B1 (Thiamine Mononitrate)	30 mg. 2000%
Vitamin B2 (Riboflavin)	30 mg. 1765%
Niacinamide	30 mg. 150%
Vitamin B6 (Pyridoxine HCl)	30 mg. 1500%
Folic Acid	800 mcg. 200%
Biotin	2000 mcg. 667%
Pantothenic Acid (Calcium d-Pantothenate)	500 mg. 5000%
Zinc (Glucuronate)	5 mg. 33%
Inositol	600 mg.
Choline (Bitartrate)	300 mg.
para-Aminobenzoic Acid (PABA)	200 mg.
L-Cysteine (L-Cysteine HCl)	200 mg.
Horsetail Silica	100 mg.
MSM (Methyl-Sulfonyl-Methane)	200 mg.

*Daily Value not established.

Other Ingredients: Rice Powder, PABA, Magnesium Stearate, Gelatin, Water. Contains no sugar, yeast, starch, artificial coloring, artificial flavoring or preservatives. Not a low calorie food.

This statement has not been evaluated by the Food & Drug Administration (FDA). This product is not intended to diagnose, cure or prevent any disease.

LifeTime® products are manufactured to meet strict quality control standards and formulated using only quality industry acceptable materials. An environmentally concerned company.

Formulated and Distributed by: LifeTime®, Nutritional Specialties, Inc. Anaheim, CA 92805 www.lifetimevitamins.com