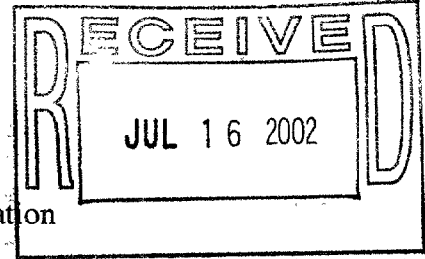


July 5, 2002

3693 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:

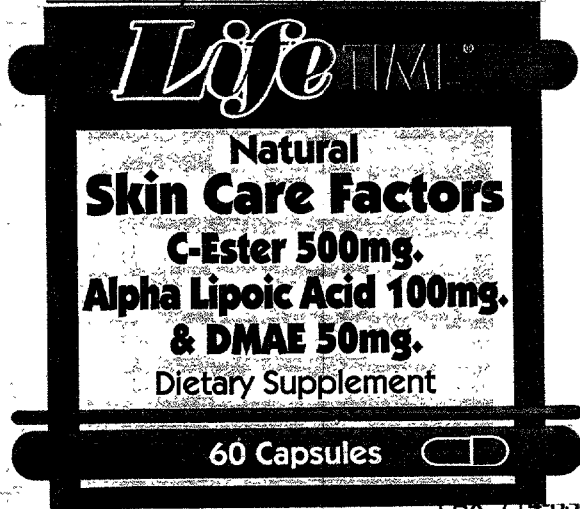
Nutritional Specialties, Inc., 1456 E. Katella Ave. Anaheim, CA 92805, the distributor of the following dietary supplement products, intends to make the following statement of support: "LifeTime Skin Care Factors formula contains nutritional factors that are recommended by leading dermatologists to assist in the development of healthy radiant skin health." This claim is being made for Vitamin C (from Ascorbyl Palmitate), Pure Pharmaceutical Grade Alpha Lipoic Acid and DMAE (Bitartrate 2-Dimethylaminoethanol). Which is contained in LifeTime® Natural Skin Care Factors 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
Full Name
PRES.

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Supplement Facts	
Serving Size: 1 Capsule	
Servings Per Container: 60	
Amount Per Serving	%Daily Value
Vitamin C (from 500mg. Ascorbyl Palmitate)	214 mg. 356%
Pure Pharmaceutical Grade Alpha Lipoic Acid	100 mg
DMAE (Bitartrate 2-Dimethylaminoethanol)	50 mg
*Daily Value not established.	

Other Ingredients: Rice Powder, Magnesium Stearate, Gelatin and Water.

SUGGESTED USE: Take 1 capsule daily or as recommended by your health care professional.

LifeTime Skin Care Factors formula contains nutritional factors that are recommended by leading dermatologists to assist in the development of healthy radiant skin health. If you are pregnant, breast feeding or are taking prescription medications, consult your health care professional before using this product.

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

Contains no: sugar, salt, starch, yeast, dairy, egg, gluten, corn, soy, wheat, preservatives, artificial colors or flavors.

LifeTime products are manufactured to meet strict quality control standards and formulated using only quality ingredients and formulas. An internationally recognized company.

Formulated and Distributed by: LifeTime, Nutritional Specialties, Inc. www.lifetimefoods.com