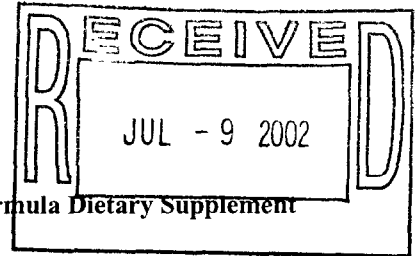


July 3, 2002

Office of Nutritional Products,
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition,
Food and Drug Administration
200 C St. SW
Washington, DC 20204



Re: **Notification of Statements for VistaVitamins™ Chewable Wellness Formula Dietary Supplement**

Dear Sirs/Madame;

Pursuant to 21 CFR 101.93 (a) (1), Vista Medical Technologies hereby submits three copies of this notification for the statements of nutritional support for the dietary supplement marketed as VistaVitamins™ Chewable Wellness Formula Dietary Supplement. Vista Medical Technologies believes these statements represent permitted structure/function statements as defined in 21 CFR Section 101.93 (f).

Attached to this notification are the Supplement Facts listed on the product labeling.

Required Information

Name and Address of Distributor:

Vista Medical Technologies
5451 Avenida Encinas, Suite A
Carlsbad, CA 92009-4413

Text of Statement(s) being Made:

“Specifically formulated to meet the unique nutritional requirements of the Gastric Bypass Patient.”

“Replenish your system and optimize your absorption of vital micronutrients.”

“Designed to meet the needs of the pre and immediate post-operative gastric bypass surgery patient.”

“The chewable wafers are great tasting, easy to digest, and easy to absorb.”

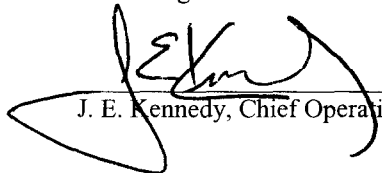
“Help your body get the nutrients it needs to maintain your health.”

Name of Dietary Supplement:

VistaVitamins™ Chewable Wellness Formula

Certification:

I certify that the information contained in this notice is complete and accurate and substantiation that these statements are truthful and not misleading are on file at Vista Medical Technologies.



J. E. Kennedy, Chief Operating Officer

7-3-2002
Date

Vista Medical Technologies

134 Flanders Road
Westborough MA 01581

Ph 508 366-3668
Fx 508 366-1543

975 0162 LET 10389

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July 3, 2002

Notification of Statements for VistaVitamins™ Chewable Wellness Formula Dietary Supplement

Vista Medical Technologies believes that the **VistaVitamins** dietary supplements are exempt from Section 201 (g) (1) (C) of The Federal Food, Drug, and Cosmetic Act (the Act) by compliance with Section 403 (r) (6) of the Act. The following disclaimer statement text (per 21 CFR 101.93 (a) (3) (2)) appears on the product labeling where ever the above statements appear in the labeling: "These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease".

If you have any questions about this notification, please contact me at (508) 366-3668, extension 8273.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Nichols". The signature is fluid and cursive, with the first name "Christine" written in a larger, more prominent script than the last name "Nichols".

Christine Nichols, RAC
Regulatory Affairs
Vista Medical Technologies

Attachment: Supplement Facts from product labeling

VistaVitamins

Chewable Wellness Formula

Supplement Facts

Serving Size: 5 chewables wafers

Amount Per Serving	% Daily Value	
Vitamin A (as retinyl palmitate)	10000 IU	200%
Vitamin A (as beta carotene)	5000 IU	*
Vitamin C (as ascorbic acid)	200 mg	333%
Vitamin D (as cholecalciferol)	400 IU	100%
Vitamin E (as d-alpha tocopheryl succinate)	100 IU	333%
Thiamin (as thiamin hydrochloride)	10 mg	667%
Riboflavin	10 mg	588%
Niacin (as niacinamide)	32 mg	160%
Vitamin B6 (as pyridoxine hydrochloride)	10 mg	500%
Folic Acid	800 mcg	200%
Vitamin B12 (as methylcobalamin)	150 mcg	2500%
Biotin	300 mcg	100%
Pantothenic Acid (as d-calcium pantothenate)	20 mg	200%
Calcium (as buffered amino acid chelate)†	300 mg	30%
Iron (as ferrous bis-glycinate)†	18 mg	100%
Iodine (as potassium iodide)	150 mcg	100%
Magnesium (as buffered amino acid chelate)†	200 mg	50%
Zinc (as amino acid chelate)†	15 mg	100%
Selenium (as amino acid complex)†	50 mcg	71%
Copper (as amino acid chelate)†	0.90 mg	45%
Manganese (as amino acid chelate)†	2 mg	100%
Chromium (as amino acid chelate)†	100 mcg	83%
Molybdenum (as amino acid chelate)†	45 mcg	60%
Potassium (as potassium chloride)	99 mg	2%
Boron (as amino acid complex)†	1.5 mg	*

*Daily Value not established.

Other Ingredients: Xylitol, sorbitol powder, citric acid, stearic acid, citrus punch flavor, ethocel, silicon dioxide, stevia and magnesium stearate.

†All amino acid chelates and complexes supplied by Albion Advanced Nutrition, under the tradenames Albical®, Chelavite®, Chelazome®, and Ferrochel®, and covered by Albion International, Inc. U.S. Patents 4,830,716, 4,863,898, and 5,614,553. Albical, Chelavite, Chelazome, Ferrochel, and the Albion Medallion design are registered trademarks of Albion Laboratories, Inc.