

Source Naturals, Inc.  
Scotts Valley, CA 95066

December 20, 2001

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

RE: Notification of Nutritional Support Statements


Dear Sir or Madam:

I hereby notify the Food and Drug Administration (FDA) of the use of statements of nutritional support in the labeling of Ascorbyl Palmitate a dietary supplement. Source Naturals® is the manufacturer of Ascorbyl Palmitate

Statements being made in the labeling of Ascorbyl Palmitate:

- (1) Ascorbyl Palmitate is a fat soluble form of ascorbic acid that exerts the antioxidant activity characteristic of vitamin C in the lipid or fatty tissue of the body.
- (2) In vitro studies have shown that ascorbyl palmitate may be more effective as an antioxidant in protecting lipids from peroxidation than water soluble vitamin C.

To the best of my knowledge, and based upon information and belief present at the time of the execution of this notice, I certify that the above information is accurate and complete. Source Naturals possesses substantiation that the statements are truthful and not misleading.

  
Ira L. Goldberg  
President, Source Naturals®

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