Source Naturals, Inc. Scotts Valley, CA 95066

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February 25, 2002

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

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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 Skin Eternal™ a dietary supplement. Source Naturals® is the manufacturer of Skin Eternal™.

Statements being made in the labeling of Skin EternalTM:

- (1) Skin Eternal[™] contains five key ingredients that together protect the skin and support healthy skin tissue.
- (2) Ascorbyl Palmitate, the cornerstone ingredient, is a fat-soluble vitamin C ester.
- (3) According to *in-vitro* research, ascorbyl palmitate may be more effective than water-soluble vitamin C in providing antioxidant protection to the lipids in cell membranes.
- (4) DMAE is an immediate precursor of choline, an important component of skin cell membranes.
- (5) Alpha-Lipoic Acid is a powerful fat and water-soluble antioxidant that recycles the antioxidant vitamins C and E.
- (6) Grape seed extract scavenges lipid and water-soluble free radicals, and supports the integrity of elastin and collagen.

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, Inc.