

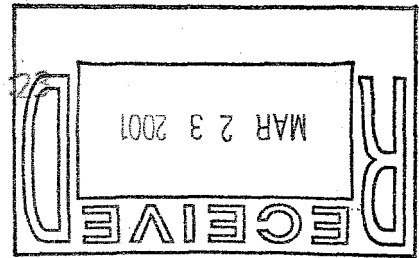


75 West Center . Provo, Utah 84601-4483
tel 801-345-9800 • fax 801-345-9899
www.pharmanex.com

By Federal Express

March 21, 2001

3913 01 MAY 10 P3 27



Office of Special Nutritional Products Labeling and Dietary Supplements
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration HFS 811
200 c St. SW
Washington, DC 20204

RE: Notification for Certain types of Statements on Dietary Supplements

Dear Sir or Madam:

As required by Section 403(r)(6)(c) of the Food, Drug and Cosmetic Act, Pharmanex, LLC, 75 West Center, Provo, Utah 84601, intends to market a dietary supplement product with the following label and marketing statements of nutritional support:

Product identified as LifePak® Prime with the following label statements:

- Provides powerful protection against the symptoms of aging to help you look and feel better longer.
- Offers unique dietary components for bone health, as well as those that support memory and circulation.
- It also contains BioGinkgo® 27/7 for memory enhancement and Co Q10 for increased heart function.
- Provides powerful anti-aging protection with alpha-lipoic acid plus 20 protective nutrients to help you look and feel better longer.
- Delivers cardiovascular support with natural vitamin E and B-vitamins, plus complete bone nutrition with calcium, magnesium, and vitamin D.
- Offers superior cell protection against damaging free radical attacks with a catechin-rich polyphenol and flavonoid blend.
- Provides full-spectrum nutritional support and comprehensive support for the immune system with vitamins A, C, E, B₆, zinc, and a carotenoid blend.
- It's been improved with the addition of specific nutrients which target and inhibit the symptoms associated with the aging process.
- More grape seed extract for added free radical neutralization.

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I certify that the information contained in this notice is complete and accurate and that Pharmanex, LLC has substantiation that these statements are truthful and not misleading.

Sincerely,

A handwritten signature in black ink, appearing to read "Win Duersch", with a long horizontal flourish extending to the right.

Win Duersch
Sr. Director of Global Technical Services