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# GENERAL VITAMIN CORP

PO Box 1500 Chapel Hill NC 27516  
919-929-5785 fax 919-929-2458

February 22, 2001

FEB 27 2001

**CERTIFIED MAIL**  
**Return Receipt Requested**

Office of Special Nutritionals  
H FS-450  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, SW  
Washington, D.C. 20204

To Whom it May Concern,

This letter is submitted pursuant to Section 406 (r)(6) of the Federal Food, Drug, and Cosmetic Act for the purpose of notifying the agency of statements being made in connection with the marketing of dietary supplements being distributed by this company.

The product name and the dietary ingredients for which the statement is being made is as follows:

Maca	Maca 4:1 Extract (root) (Lepidium meyenii)	500mg
	Other ingredients: Silica, magnesium stearate, gelatin	
MSM 500mg	MSM (Methyl Sulfonyl Methane)	500mg
	Other ingredients: Silica, magnesium stearate, gelatin	
MSM with Glucosamine	MSM (Methyl Sulfonyl Methane) (Providing 165 mg of Organic Sulfur)	500mg
	Glucosamine sulfate	500mg
	Other ingredients: Magnesium stearate, gelatin	

The text of the statements that are being made in regards to the above stated product are listed below:

**Maca**

- The strength, libido and virility of South America's Incas so impressed sixteenth century Spaniards that they quickly included the herb maca in their own diets.
- used for centuries to support fertility in both genders of humans and animals

97S 0162 LET 73.57'

-scientists are studying maca's ability to support healthy sexual endurance, energy and performance

MSM

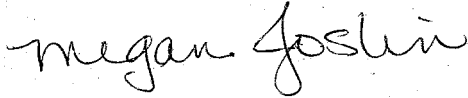
- Support healthy tissues and cells
- . . . help maintain healthy body tissue

MSM with Glucosamine

- Here's help when you need to stay active
- This formula is the perfect support
- Both glucosamine sulfate and MSM are the subject of advanced research on connective tissue and joint health

Sincerely,

GENERAL VITAMIN CORP.

A handwritten signature in cursive script that reads "megan joslin". The signature is written in black ink and is positioned below the company name.

Megan Joslin  
Product Development Coordinator