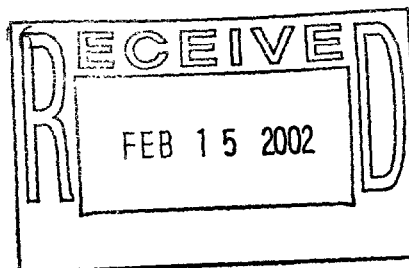




February 7, 2002

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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, DC 20204

Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

- (1) Name and address of manufacturer:
Pharmavite Corporation, PO Box 9606, Mission Hills, CA 91346
- (2) Text of the statement(s):
Lysine is an essential amino acid necessary for certain body functions and manufacturing body proteins. It aids in calcium absorption and in collagen formation. Carnitine, an important energy producing compound, is synthesized from lysine. Carnitine may improve fat utilization and therefore may be beneficial in conditions associated with impaired fat utilization and energy production. L-Lysine is recommended to be part of a daily regimen for longevity.
- (3) Name of the dietary ingredient if not provided in the text of the statement:
Lysine (from lysine monohydrochloride)
- (4) Name of the dietary supplement:
L-Lysine
500 mg

The above statement(s) may be used in one or more of the following brands of products: B.J.'s Wholesale, CVS, Duane Reade, Kirkland Signature, Jogmate, Nature Made, Nature's Resource, Optimize, Spring Valley, Walgreens.

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PHARMAVITE

We certify the information in this notice is complete and accurate, and we have substantiation that the above statement(s) is truthful and not misleading.

Sincerely,

David Kropp
Acting Director, Regulatory and Consumer Affairs