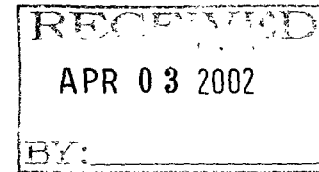




We Make Quality Affordable

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March 11, 2002

Office of Special Nutritionals (HF-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street SW  
Washington, DC 20204

Re: 21 U.S.C. Section 343(r)(6), Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of Pantethine, 300 mg, a dietary supplement.

Statements being made in the labeling of Pantethine, 300mg

- (1) Pantethine is a highly absorbable and biologically active form of pantothenic acid (Vitamin B<sub>5</sub>). Pantethine forms the reactive component of Coenzyme A (CoA) and the acyl-carrier protein (ACP). CoA and ACP are extensively involved in carbohydrate, lipid, and amino acid metabolism. In addition to possessing the metabolic activity of pantothenic acid, pantethine helps to support healthy serum lipid levels. Pantethine is also important for healthy cardiovascular function through its antioxidant activity.

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

Jim Roza  
Director, Quality Assurance  
NOW Foods  
395 S. Glen Ellyn Rd.  
Bloomington, IL 60108

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