

PHILIP SCOTT POLISKY

Attorney at Law

79924

450 West 24th Street
Suite 2F
New York, New York 10011
Tel. 212-206-7283
Fax. 212-206-7284

Chicago Office:
30 East Huron Street
Suite 2808
Chicago, Illinois 60611
Tel. 312-266-9056
Fax. 312-266-9144

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March 8, 2002

Division of Compliance and Enforcement
Center for Food Safety and Applied Nutrition
Food and Drug Administration
HFS-810
5100 Paint Branch Parkway
College Park, MD 20740

RECEIVED
APR 01 2002
BY: _____

Ladies and Gentlemen:

I represent ZeaVision, LLC. Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, we hereby notify you that the firm is using the following statements on its dietary supplement labels (enclosed herein):

1. Name and address of manufacturer:

ZeaVision, LLC, 400 S. Woodsmill Commons Road, Suite 220, St. Louis, MO 63017

2. Text of the statement(s):

“Essential nutrition for healthy eye function.” (3 mg. capsule)

“Zeaxanthin, a critical nutrient... Research has demonstrated that appropriate levels of Zeaxanthin can help maintain critical nutrients in the eye and protect the eye from damaging light. ZeaVision is the only product containing Zeaxanthin – a naturally occurring substance – in levels shown to help achieve these benefits.” (3 mg. capsule)

“Essential support shown to provide critical nutrients in the eye.” (10 mg. capsule)

“Zeaxanthin, a critical nutrient... Research has demonstrated that appropriate levels of Zeaxanthin provide critical nutrients in the eye and protect the eye from damaging light. ZeaVision is the only product containing Zeaxanthin – a naturally occurring substance – in levels shown to achieve these benefits.” (10 mg. capsule)

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Philip Scott Polisky
Attorney at Law

Letter to CFSAN (FDA) re: ZeaVision's Statements for Zeaxanthin Supplements
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3. Name of the dietary ingredient(s) if not provided in the text of the statement:

Zeaxanthin (name is provided).

4. Name of the dietary supplement(s):

Zeaxanthin Supplement (3 mg, 60 capsules)
Zeaxanthin Supplement (10 mg, 60 capsules)

5. The following disclaimer appears on the label in bold:

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

These statements are the result of what we believe to be a substantial body of scientific evidence supporting the functional role of these nutrients. A compendium of relative published research substantiating the above statements is on file at the corporate office.

Yours truly,



Scott Polisky

Enclosures

ZeaVision™

(Zeaxanthin Supplement)

3mg

For daily defense.

Essential nutrition for
healthy eye function*



60 Capsules
A Dietary Supplement

ZeaVision, LLC 400 S. Woodsmill Commons Road, Suite 220 St. Louis, Missouri 63017 1.888.875.3937(EYES) or www.zeavision.com

Supplement Facts

Serving Size 1 Capsule
Servings Per Container 60

Amount Per Serving	%DV
Zeaxanthin	3 mg **

**Daily Value not established.

Other ingredients: Gelatin (capsule), sodium lauryl sulfate, cellulose, vegetable stearate, sucrose, corn starch, sodium ascorbate, ascorbyl palmitate, dl-alpha tocopherol, and titanium dioxide.

This product contains NO yeast, wheat gluten, soy protein, milk/dairy, preservatives or flavoring.

Suggested Usage: As a dietary supplement, adults take 1 capsule daily or as directed by physician.

Zeaxanthin, a critical nutrient...

Research has demonstrated that appropriate levels of Zeaxanthin can help maintain critical nutrients in the eye and protect the eye from damaging light. ZeaVision is the only product containing Zeaxanthin - a naturally occurring substance - in levels shown to help achieve these benefits.*

To find out more about ZeaVision visit our website at www.zeavision.com or call 1.888.875.3937(EYES) to speak with a health specialist.

*These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

KEEP OUT OF REACH OF CHILDREN.

For optimal storage conditions, store in a cool, dry place. Tamper resistant package, do not use if outer seal is missing.

Patent #5747544
Patent #5827652



Formula #
98565 / 2263005

ZeaVision™

(Zeaxanthin Supplement)

10mg

A better way to look at life.

Essential support shown to
provide critical nutrients in the eye*



60 Capsules
A Dietary Supplement

Supplement Facts

Serving Size 1 Capsule
Servings Per Container 60

Amount Per Serving	%DV
Zeaxanthin	10 mg **

**Daily Value not established.

Other ingredients: Gelatin (capsule), sodium lauryl sulfate, cellulose, vegetable stearate, sucrose, corn starch, sodium ascorbate, ascorbyl palmitate, dl-alpha tocopherol, titanium dioxide, FD&C Yellow #6 and FD&C Red #3.

This product contains NO yeast, wheat gluten, soy protein, milk/dairy, preservatives or flavoring.

Suggested Usage: As a dietary supplement, adults take 1 capsule daily or as directed by physician.

Zeaxanthin, a critical nutrient...

Research has demonstrated that appropriate levels of Zeaxanthin provide critical nutrients in the eye and protect the eye from damaging light. ZeaVision is the only product containing Zeaxanthin - a naturally occurring substance - in levels shown to help achieve these benefits.*

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