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BY:

May 20, 2003

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 LLC, PO Box 9606, Mission Hills, CA 91346
- (2) Text of the statement(s):
Joint Comfort

Joint Comfort: Promotes joint health by helping to maintain joint cartilage which naturally deteriorates with physical activity and age.
- (3) Name of the dietary ingredient(s) if not provided in the text of the statement:
S-adenosylmethionine
- (4) Name of the dietary supplement:
SAM-e

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

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
Director, Regulatory and Consumer Affairs

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