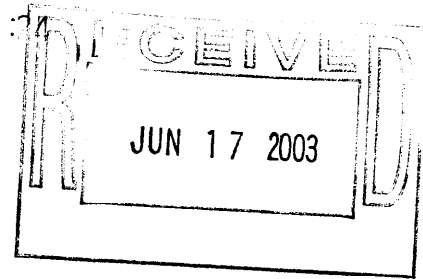




PHARMAVITE

May 20, 2003

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

JointAction was designed combining two of today's most popular choices for joint health. SAM-e and Glucosamine have each been extensively studied and recommended in Europe and the U.S.

In JointAction, these two ingredients have been clinically shown to:
Promote Joint Comfort
Maintain Joint Cartilage

Cartilage rebuilding and regeneration are normal functions of the body. During your lifetime, joint cartilage begins to break down due to physical stress and aging, making even everyday activities like walking difficult to perform. That's why it's essential to maintain healthy levels of nutrients that promote joint health and mobility. Through supplementation, JointAction helps maintain cartilage to promote joint comfort.

SAM-e: A naturally occurring compound found in all living organisms, SAM-e is critical in the manufacture and maintenance of cartilage.

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Office of Special Nutritionals (HFS-450)
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Glucosamine: A natural building block of healthy cartilage, Glucosamine may help maintain cartilage as well as stimulate cartilage growth. Short and long term clinical studies show that SAM-e and Glucosamine are both safe products.

- (3) Name of the dietary ingredient(s) if not provided in the text of the statement:
SAM-e and Glucosamine
- (4) Name of the dietary supplement:
JointAction

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

DK:ak\legal\SAM-e Letter 6