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July 11, 2002

Director
Special Nutritionals
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street S.W.
Washington, DC 20204

SENT VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED
ARTICLE #: 7099 3400 0016 4140 2871

RE: PROCAPS PC PHOSPHATIDYL CHOLINE

Dear Sir / Madam:

This is a 30-day notification of a statement of nutritional support for a dietary supplement. The product name is **Andrew Lessman's ProCaps PC Phosphatidyl Choline**. The structure / function claims on all sizes and configurations of this product are identical. They are as follows:

Andrew Lessman's ProCaps® PC provides a concentrated, stable source of Phosphatidyl Choline, which is the most abundant phospholipid in the body. It also provides an excellent source of Choline, which is related to the B-Complex vitamins. Although the body can produce Choline, our dietary contribution of this nutrient has decreased, so the U.S. Food and Drug Administration now recognizes Choline as essential, and has assigned it an Adequate Intake value. Choline plays a vital role in a multitude of processes throughout the body, including the health of the nervous and cardiovascular systems, the integrity of cell membranes, as well as the growth of healthy hair. Phosphatidyl Choline is a precursor and necessary raw material for the production of two vital components of the nervous system, acetylcholine (a vital neurotransmitter) and sphingomyelin (required for nerve cell protection). Both are absolutely essential for the normal, healthy functioning of the nervous system and brain. Given this role, it is not surprising that Phosphatidyl Choline has been observed to help with the mild memory problems associated with aging. Phosphatidyl Choline also supports the health of the liver in its processing and excretion of chemical waste products within the body. Moreover, it is required for the transport and metabolism of fats and cholesterol within the body, which is important for the healthy support of the endocrine, cardiovascular and hepatic systems.

Respectfully Submitted,

Dr Nancy Steely, ND
Research & Development Coordinator

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