

Source Naturals®
23 Janis Way
Scotts Valley, CA 95066

April 21, 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, D.C. 20204

MAY 30 2003

RE: Notification of Nutritional Support Statements

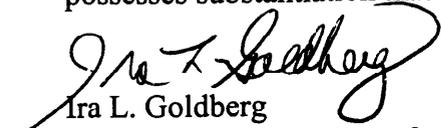
Dear Sir or Ma'am:

I hereby notify the Food and Drug Administration (FDA) of the use of statements of nutritional support in the labeling of R-Lipoic Acid 50mg a dietary supplement. Source Naturals® is the manufacturer of R-Lipoic Acid 50mg.

Statements being made in the labeling of R-Lipoic Acid 50mg:

- 1) Source Naturals R-Lipoic acid is a natural form of lipoic acid that your body can synthesize and safely metabolize.
- 2) It may be better absorbed and more effective as an antioxidant than *alpha* lipoic acid.
- 3) R-lipoic acid by itself may be 10 times more effective than other forms of lipoic acid and has been called the "mitochondrial antioxidant" because it is a key component of mitochondrial dehydrogenase complexes, which may help to slow the natural aging process in animals.
- 4) Also, animal research has shown that R-lipoic acid can increase or maintain levels of other antioxidants including CoQ10, vitamin C, vitamin E and glutathione, which may decline with age, more efficiently than other forms of lipoic acid.

To the best of my knowledge and belief, and based upon information available at the time of the execution of this notice, I certify that the above information is accurate and complete. Source Naturals possesses substantiation that the statements are truthful and not misleading.


Ira L. Goldberg
President, Source Naturals®

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