



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
College Park, MD 20740

AUG 31 2004

Rick Liva, Rph, ND
CEO & President
Vital Nutrients
50 Silver Street
Middletown, Connecticut 06457

Dear Dr. Liva:

This is in response to your letter of August 2, 2004 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)).

Your submission states that Vital Nutrients is making the claim "Regular exercise and a healthy diet with enough calcium helps teen and young adult white and Asian women maintain good bone health and may reduce their high risk of osteoporosis later in life. For people with a family history of osteoporosis, menopausal women and elderly men and women, adequate calcium intake is linked to reduced risk of osteoporosis through the mechanism of slowing the rate of bone loss. Adequate calcium intake is important, but daily intakes above about 2000 mg are not likely to provide additional benefit" for the products "Calcium (Citrate/Malate)," "Calcium/Magnesium," "Osteo Nutrients," and "Osteo Nutrients II."

Your submission states that you are making the claim "[F]olic acid may reduce the risk of neural tube birth defects" for the product Vitamin B12/Folate."

These statements are not claims subject to 21 U.S.C. 343(r)(6), but claims subject to 21 U.S.C. 343(r)(1)(B). FDA has authorized a health claim on the relationship between calcium and osteoporosis (see 21 CFR 101.72) and between folate and neural tube defects (see 21 CFR 101.79). A dietary supplement that meets the eligibility and message requirements set forth in these regulations may bear a claim for the relationship between calcium and osteoporosis or folate and neural tube defects. A health claim on the label or in the labeling of a food or dietary supplement that is not in accordance with the requirements in 21 CFR 101.72 or 21 CFR 101.79 would misbrand the food or dietary supplement under 21 U.S.C. 343(r)(1)(B). Moreover, failure to make a claim in accordance with the requirements in 21 CFR 101.72 or 21 CFR 101.79 subjects the product to regulation as a drug under 21 U.S.C. 321(g)(1)(B) because the product is intended to treat, cure, prevent, or mitigate a disease, osteoporosis or neural tube defects, respectively.

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Your submission states that you are also making the following claims, among others, for the following products:

Aller-C “[M]oderate the inflammatory response” and “[P]romotes decreased production of histamine....”

Joint Ease “Moderate levels of inflammation...joint function.”

21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statements that you are making for these products, including the derived name Aller-C, suggest that they are intended to treat, prevent, or mitigate diseases such as allergies and inflammatory joint diseases such as arthritis. These claims do not meet the requirements of 21 U.S.C. 343(r)(6). These claims suggest that these products are intended for use as drugs within the meaning of 21 U.S.C. 321(g)(1)(B), and that they are subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA's Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, Montrose Metro II, 11919 Rockville Pike, Rockville, Maryland 20852.

Please contact us if you require further assistance.

Sincerely yours,



Susan J. Walker, M.D.
Director
Division of Dietary Supplement Programs
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

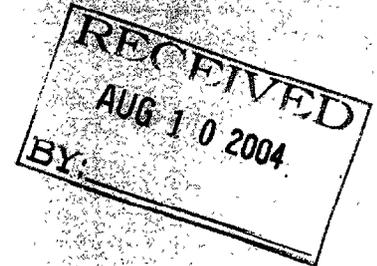
Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-300
FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of Enforcement, HFC-200
FDA, New England District Compliance, HFR-NE240

VITALNUTRIENTS

8-2-04

Office of Nutritional Products Labeling
and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Pkwy
College Park, MD 20740



Re: Notification for Statement on Dietary Supplement Labels

Dear Sir/Madam:

This notification is being submitted on behalf of Vital Nutrients, Middletown, Connecticut, a distributor of dietary supplement products.

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. § 343(r)(6), and in accordance with the authorized provisions of 21 CFR § 101.93(a), your Agency is hereby notified that Vital Nutrients has made statements of "nutritional support", as described in 21 U.S.C. § 343(r)(6)(A), for its dietary supplement(s) as follows:

[SEE ATTACHED LIST OF EACH SUPPLEMENT NAME AND
TEXT OF EACH STATEMENT BEING MADE]

As required, enclosed are two photocopies of this notification.

The undersigned certifies on behalf of Vital Nutrients that the information presented and contained in this correspondence is complete and accurate.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Rick Liva".

Rick Liva RPh, ND
CEO & President
rickliva@vitalnutrients.net

VitalNutrients ♦ 860-638-3675 ♦ FAX 860-638-3651
50 Silver St., Middletown, CT 06457

89217

5HTP (5-Hydroxytryptophan)

Supports healthy serotonin levels

*5HTP (5-Hydroxytryptophan) promotes serotonin levels in the brain which help create healthy functioning of the sleep/wake/sleep cycle. Emotional well being and appetite control may also be affected in a positive manner.

Acetyl L-Carnitine Powder

Supports normal brain function

*ACETYL L-CARNITINE POWDER may increase acetylcholine levels, an important neurotransmitter. It crosses the blood-brain barrier and improves absentmindedness and mild memory problems associated with aging.

Acidophilus/Bifidobacter/FOS

Potent probiotic support

*ACIDOPHILUS/BIFIDOBACTER/FOS is a combination of two bacteria and FOS (fructooligosaccharides), a naturally occurring indigestible sugar that maintains the growth of normal gut flora. The product promotes healthy digestion, breakdown of food, a healthy environment in the intestines, and may also maintain normal vaginal flora.

Adrenal Support

Supports adrenal gland function

*ADRENAL SUPPORT is a combination of whole adrenal, adrenal cortex and herbs that nutritionally support the adrenal glands. Enhancing the body's ability to produce certain adrenal hormones, it helps to support the immune system and also relieves mild stress and frustration.

Aller-C

*ALLER-C is a potent combination formula used to moderate the inflammatory response. Quercitin promotes decreased production of histamine and the 60% citrus bioflavanoid complex supports the strength of capillaries. Bromelain is most effective taken away from meals.

American Ginseng

Energy support

*AMERICAN GINSENG can be used to support adrenal gland function and relieve stress and frustration. It also encourages energy production, stamina, and mental and physical performance. American ginseng may help maintain blood sugar levels that are already within the normal range.

Anti-Oxidant Caps

Specially balanced antioxidant formula to help neutralize free radicals

*Anti-Oxidant Caps are an exceptional blend of antioxidants that work synergistically to protect against free radicals. Free radicals are highly reactive compounds that are created in the body during normal metabolic functions or introduced from the environment. Free radicals if left unchecked can cause tissue damage. Antioxidants work in several ways: they may reduce the damaging potential of the free radical, stop the free radical from forming in the first place, or interrupt an oxidizing chain reaction that minimize cell tissue damage.

Astragalus Root Extract

Herbal support for the immune system

*ASTRAGALUS ROOT EXTRACT is a superior Chinese herb used to support the immune system. Astragalus is used in Traditional Chinese Medicine to tonify the spleen, the qi (vital energy), and the blood. Astragalus is very high in trace minerals and micronutrients.

B6 + B Complex

Balanced B vitamin formula with extra B6

*B6 + B Complex has a high dose vitamin B6 and is combined with the rest of the B vitamins to make this an excellent choice for female support, and relieving common symptoms associated with the menstrual cycle. Essential for tonifying the nervous system, B complex vitamins play a role in the metabolism of protein and fats, and help convert carbohydrates into energy. B complex helps promote the conversion of homocysteine, thus supporting heart health.

B-Complex

Balanced high potency B vitamin antioxidant complex

*B-COMPLEX is used in the metabolism of protein and fats, helps maintain muscle tone in the gastrointestinal tract and helps convert carbohydrates into energy. B-Complex also supports healthy nerve cells and helps promote the conversion of homocysteine, thus supporting heart health. B-Complex is an important tonifier in times of mild stress and fatigue.

BCQ

Herbal support for joint, sinus and digestive health

*BCQ is an herbal combination that helps support the digestive system and connective tissue. The herbal components are powerful antioxidants and reduce substance P levels in the body.

Beta Carotene (Natural)

Precursor to Vitamin A and an antioxidant

*BETA-CAROTENE (NATURAL) is a very important dietary antioxidant, which provides the body's defense system with the highest level of nutritional support. A precursor to Vitamin A, it supports visual acuity and the maintenance of healthy skin, mucous membranes, and reproductive functions. Beta-Carotene is absorbed more efficiently when consumed with fats.

Betaine HCL Pepsin & Gentian Root Extract

Powerful digestive support for the stomach

*BETAINE HCL PEPSIN & GENTIAN ROOT EXTRACT is a combination of nutrients that are beneficial for promoting healthy digestion. Gentian, a wonderful bitter herbal, combined with Betaine HCL maintains a healthy pH in the stomach, supporting protein digestion, mineral absorption, small intestine pH, and B12 absorption.

Black Cohosh Extract 2.5%

Menopause support, PMS support

*BLACK COHOSH can be used to support health and well being before, during and after menopause. It acts as a tonifier and relieves mild mood changes, cramps, and supports a normal, healthy attitude during PMS. It also has been shown to alleviate hot flashes and support a normal, healthy attitude during menopause.

Black Currant Seed Oil

Essential Omega 6 fatty acid

*BLACK CURRANT SEED OIL contains high amounts of the essential fat gamma linolenic acid (GLA), an Omega 6 fatty acid that is essential for metabolism but cannot be produced in the body. GLA moderates inflammation ??? levels, supports cartilage and joint function, dilates smooth muscle, maintains healthy nerve function and helps maintain cholesterol levels that are already within the normal range.

Borage Oil

Essential Omega 6 fatty acid

*BORAGE OIL contains high amounts of the essential fat gamma linolenic acid (GLA), an Omega 6 fatty acid that is essential for metabolism but cannot be produced in the body. GLA helps support cartilage and joint function, dilates smooth muscle, maintains healthy nerve function and helps maintain cholesterol levels that are already in the normal range. It also alleviates common symptoms associated with PMS. Borage oil has the highest content of GLA of any plant source.

Bromelain

Enhances digestion and maintains healthy tissue

*Bromelain is a proteolytic enzyme from the stem of the pineapple plant. Taken with food, bromelain aids in the proper functioning of the digestive system. Taken between meals, bromelain inhibits the production of kinins and fibrin, which promote the inflammatory process. Bromelain nutritionally supports the body's ability to digest protein and to moderate the inflammatory response at the cellular level.

Buffered C

Gentle vitamin C for sensitive individuals

*BUFFERED C is a gentle form of vitamin C for sensitive individuals that supports the body's immune system by supporting immune responses, and white blood cell function and activity. It is one of the most potent dietary antioxidants, provides nutritional support to all functions of the body, and is essential in collagen formation. Vitamin C supports iron absorption from the gastrointestinal tract.

Calcium (Citrate/Malate)

Most bioavailable form of calcium

*CALCIUM (CITRATE/MALATE) is necessary for healthy teeth and bones. Essential to many physiological functions, such as maintaining healthy heart function, normal colonic cell growth, and supporting mild mood changes associated with the menstrual cycle. Calcium citrate/malate is one of the most bioavailable forms of calcium. Regular exercise and a healthy diet with enough calcium helps teen and young adult white and Asian women maintain good bone health and may reduce their high risk of osteoporosis later in life. For people with a family history of osteoporosis, menopausal women and elderly men and women, adequate calcium intake is linked to reduced risk of osteoporosis through the mechanism of slowing the rate of bone loss. Adequate calcium intake is important, but daily intakes above about 2000mg are not likely to provide additional benefit.

Calcium/Magnesium

Cardiovascular, muscle, and bone support

*CALCIUM/MAGNESIUM work together to support a healthy cardiovascular system and calcium is necessary for healthy teeth and bones. Magnesium supports muscle and nerve function, and helps the body to metabolize and absorb calcium. Calcium also maintains healthy heart function, normal colonic cell growth, and supports mild mood changes associated with the menstrual cycle. Calcium and Magnesium have been shown to support a normal, healthy attitude during PMS. Regular exercise and a healthy diet with enough calcium helps teen and young adult white and Asian women maintain good bone health and may reduce their high risk of osteoporosis later in life. For people with a family history of osteoporosis, menopausal women and elderly men and women, adequate calcium intake is linked to reduced risk of osteoporosis through the mechanism of slowing the rate of bone loss. Adequate calcium intake is important, but daily intakes above about 2000mg are not likely to provide additional benefit.

Calcium/Magnesium (Citrate)

Cardiovascular, muscle, and bone support

*CALCIUM/MAGNESIUM (CITRATE) work together to support a healthy cardiovascular system and calcium is necessary for healthy teeth and bones. Magnesium supports muscle and nerve function, and helps the body to metabolize and absorb calcium. Calcium also maintains healthy heart function, normal colonic cell growth, and supports mild mood changes associated with the menstrual cycle. Calcium and Magnesium have been shown to support a normal, healthy attitude during PMS. Calcium/Magnesium citrate is one of the most bioavailable forms of these two minerals.

Carnitine

Cardiovascular health, supports fat metabolism

*CARNITINE is made in the body from the amino acids lysine and methionine. Carnitine is often called an amino acid because of its chemical makeup, however it is actually a vitamin-like nutrient, related in structure to the B vitamins. It plays an essential role in transporting fatty acids into the muscles for energy, and is needed to transport these substances into the heart muscle. Nearly 60 percent of the energy for the heart muscle is supplied by fatty acids.

Cellulose Fiber 375 grams

Supports normal daily bowel function

*CELLULOSE FIBER is a source of insoluble fiber used to increase stool bulk and support the normal passage of daily bowel movements. Insoluble fiber helps to dilute toxins in the colon and can aid in the elimination of toxins from the colon.

Chondroitin Sulfate 90%

As with Glucosamine Sulfate, Chondroitin Sulfate supports healthy cartilage and joint function

*CHONDROITIN SULFATE helps build and support collagen, the basic substance of cartilage and joints. It supports the body's ability to create and recreate connective tissue and helps maintain proper joint function. It is necessary for building the protein molecules responsible for giving cartilage its strength and resilience. In addition, Chondroitin sulfate supports cartilage and joint function.

Chromium (Polynicotinate)

Regulates fat, cholesterol and glucose metabolism

*CHROMIUM (POLYNICOTINATE) promotes the maintenance of cholesterol levels that are already within the normal range, as well as the metabolism of fats and sugars. Chromium is a necessary for the uptake of glucose into cells.

CoEnzyme Q10

Potent antioxidant and free radical scavenger

*COENZYME Q10 increases energy at cellular levels, and nutritionally supports the cardiovascular system to promote additional tolerance for exercise. It helps maintain and support healthy functioning of the heart muscle, arteries, and immune system. CoQ10 helps maintain blood sugar levels that are already within the normal range, it acts as an antioxidant against lipid peroxidation, and is important in proper cell metabolism.

Coleus Forskohlii

Cardiovascular support, enzyme support herb

*COLEUS FORSKOHLII is an Ayurvedic herb from India. Forskolin has been identified as the primary diterpenoid of interest in this plant. Forskolin activates an enzyme known as adenylate cyclase, which increases levels of cyclic AMP which is the most important cell-regulating compound in the body. An increased level of cAMP promotes relaxed smooth muscles in the body, maintaining cardiovascular and lung function. It supports fat breakdown, healthy metabolic function and helps maintain blood sugar levels that are already within the normal range.

Curcumin Extract

Nutritional support for normal tissue health

*CURCUMIN EXTRACT is a potent antioxidant, depletes substance P, helps maintain platelet aggregation levels that are already within normal ranges, and supports arachadonic acid metabolism.

DGL Powder

Nutritional support for the stomach and intestinal tract lining

*DGL POWDER, deglycyrrhized licorice powder provides nutritional support for the gastrointestinal tract. DGL stimulates mucus production, DGL is very soothing to the GI tract.

DHEA

Most abundant adrenal steroid hormone in the body

*DHEA is a hormone produced by the adrenal glands and is a precursor to androgens. DHEA, along with other adrenal hormones, affects metabolism, immune response, energy levels, estrogen and testosterone levels.

DMSA

Supports natural heavy metal detoxification process

*DMSA (meso-2, 3-dimercaptosuccinic acid) supports the natural mobilization of heavy metals, primarily from soft tissue, especially the blood, brain, kidney and liver. DMSA is recommended as a single oral chelating agent or in combination with other chelating agents, supporting normal detoxification of a number of heavy metals.

E Succinate

Naturally derived (soy source) alpha tocopheryl succinate

*E SUCCINATE is an anti-oxidant, affecting lipid metabolism and fatty cell walls. It maintains platelet aggregation levels that are already within the normal range, and maintains healthy cardiovascular and lung function.

Echinacea Extract 4%

Immune system support

*ECHINACEA EXTRACT provides support for the immune system. It is known to stimulate macrophages and antibody production. Echinacea is an immune tonic and used to support the body's natural defense system.

Energy Plus

Non-stimulatory herbal energy support

*ENERGY PLUS is an herbal combination that is used to reduce daily stress by supporting energy production, stamina, mental and physical performance, and helps maintain healthy adrenal glands. The combination of these herbs helps to improve stress resistance and promote longevity with long-term use.

Estrogen Balance IF (with Isoflavones)

Healthy estrogen metabolism support

*ESTROGEN BALANCE IF (with Isoflavones) is a unique formula designed to support healthy estrogen metabolism. It contains indole-3 carbinol and concentrated flax lignans, both shown to favorably promote normal estrogen metabolism by maintaining the 2/16 hydroxy estrogen ratios in both pre and post menopausal women. This formula contains those nutrients and herbs best supported by research to promote breast and prostate health. In addition, the formula contains piperine, which has been shown to dramatically increase the absorption of beneficial flavonoids. It would be prudent to use this formula in combination with the Multi-Nutrients vitamin-mineral supplement in order to assist utilization and nutritional benefits.

Evening Primrose Oil

Cold pressed, contains 45mg of GLA

*EVENING PRIMROSE OIL contains high amounts of the essential fat gamma linolenic acid (GLA), an Omega 6 fatty acid that is essential for metabolism but cannot be produced in the body. GLA helps support cartilage and joint function, dilates smooth muscle, and helps maintain nerve function and a cholesterol level that is already within the normal range. It also alleviates common mild symptoms associated with PMS. Europeans and Native Americans have used primrose oil for centuries as a preferred source of GLA.

Feverfew 0.7%

Herbal support for cranial blood vessels and general wellbeing

*FEVERFEW is used as a tonic to mucus membranes. In addition, it helps support cartilage and joint function. Feverfew should not be used during pregnancy.

Ultra Pure Fish Oil 180/120

Deep sea fish oil, cardiovascular support

*ULTRA PURE FISH OIL 180/120 provides protection and maintenance of the healthy function, fluidity and health of cell membranes. Fish oil contains the essential fats EPA and DHA, which maintain soft tissues and connective tissues. Fish oil helps promote cartilage and joint function and relieves mild mood changes and cramps associated with the menstrual cycle. Fish oil helps maintain platelet aggregation levels that are already in the normal range.

Ultra Pure Fish Oil 360/240

Hi-Potency deep-sea fish oil, cardiovascular support

*ULTRA PURE FISH OIL 360mg/240mg is formulated to provide a higher concentration of EPA and DHA in less softgels per day. provides protection and maintenance of the healthy function, fluidity and health of cell membranes. Fish oil contains the essential fats EPA and DHA, which helps maintain soft tissues and connective tissues. Fish oil helps promote cartilage and joint function and relieves mild mood changes and cramps associated with the menstrual cycle. Fish oil helps maintain platelet aggregation levels that are already in the normal range.

Ultra Pure Fish Oil Liquid

Hi-Potency deep-sea liquid fish oil

*ULTRA PURE FISH OIL in liquid form provides an extremely high concentration of EPA and DHA for people who find it difficult to take several softgels per day or for children who can't swallow large pills. Ultra Pure Fish Oil Liquid provides protection and maintenance of healthy function, fluidity and health of cell membranes. Fish oil contains the essential fats EPA and DHA which helps maintain soft tissues and connective tissues. Fish oil helps promote cartilage and joint function and relieves mild mood changes and cramps associated with the menstrual cycle. Fish oil helps maintain platelet aggregation levels that are already in the normal range. Large doses of fish oil maintain healthy neural and cardiovascular function. Ultra Pure Fish Oil has a pleasant natural lemon flavor.

Ultra Pure Fish Oil & CoEnzyme Q10

Hi-Potency deep-sea liquid fish oil with CoQ10

*ULTRA PURE FISH OIL & CoENZYME Q10 provides an extremely high concentration of EPA and DHA (5392mg /1881mg) with 300mg of CoEnzyme Q10 per tablespoon in the ease of a liquid for people who require high doses of fish oil. CoEnzyme Q10 is supportive to the cardiovascular system. Ultra Pure Fish Oil Liquid and CoEnzyme Q10 provides protection and maintenance of the healthy function, fluidity and health of cell membranes. Fish oil contains the essential fats EPA and DHA, which help maintain soft tissues and connective tissues. Fish oil helps promote cartilage and joint function and relieves mild mood changes and cramps associated with the menstrual cycle. Fish oil helps maintain platelet aggregation levels that are already in the normal range. Large doses of fish oil maintain healthy neural and cardiovascular function. Ultra Pure Fish Oil has a pleasant natural lemon flavor.

Flax Oil (Certified Organic)

Omega 3 fatty acid, cardiovascular support

*FLAX OIL is a building block for Omega 3 fatty acids and is the most powerful and highest source of the essential fatty acid alpha-linolenic acid. It has a vitamin-like activity in the body and is essential for metabolism. Flax oil helps maintain cholesterol levels that are already within the normal range. Alpha-linolenic acid (ALA) helps support platelet aggregation levels that are already within the normal range. ALA supports cartilage and joint function, and maintains heart health.

Flax/Borage Oil

Cardiovascular support

*FLAX/BORAGE OIL is a combination that provides both Omega 3 and Omega 6 fatty acids. When combined, they are easily used by the body and provide powerful health benefits. Borage oil contains high amounts of the essential fat gamma linolenic acid (GLA), an Omega 6 fatty acid that is essential for metabolism but cannot be produced in the body. GLA supports cartilage and joint function, and promotes efficient nerve transmission. Borage oil has the highest content of GLA of any plant source. Flax oil is a building block for Omega 3 fatty acids and is the most powerful and highest source of the essential fatty acid, alpha-linolenic acid. It has a vitamin-like activity in the body and is essential for metabolism. Alpha-linolenic acid helps maintain platelet aggregation levels that are already within the normal range. ALA supports cartilage and joint function, and maintains heart health.

Garlic 6000 Enteric Coated Caplets

Cardiovascular support, immune support, cholesterol level support

*GARLIC 6000 helps the body maintain healthy cardiovascular function and helps maintain cholesterol levels that are already within the normal range. It also supports the immune system. Allicin is the active ingredient in garlic.

Garlic Extract

Cardiovascular support, immune support, cholesterol level support

*GARLIC EXTRACT helps the body maintain healthy cardiovascular function and helps maintain cholesterol levels that are already within the normal range. It also supports the immune system. Allicin is the active ingredient of garlic.

GI Repair Nutrients

Supports health of the gastrointestinal lining

*GI REPAIR NUTRIENTS supports the growth and health of the gastrointestinal lining. These constituents augment the strength of the intestinal mucosal lining. It is recommended to combine this product with Acidophilus/Bifidus/FOS for extra support. If necessary, combine with higher doses of glutamine (Glutamine Powder).

Ginkgo Extract

Supports mental acuity and circulation

*GINKGO EXTRACT is a popular herb to improve absentmindedness and aid in mild memory problems associated with aging. It also maintains healthy blood circulation and helps maintain platelet aggregation levels that are already within the normal range.

Glucosamine and Chondroitin Sulfate

Support for healthy joint function

*GLUCOSAMINE + CHONDROITIN SULFATE helps build and support collagen, the basic substance of cartilage and joints. Both nutrients support the body's ability to create and recreate connective tissue and help maintain healthy joint function. Glucosamine and chondroitin sulfate are necessary for building the protein molecules responsible for giving cartilage its strength and resilience. In addition, both support healthy joint function.

Glucosamine Sulfate

Support for healthy joint function

*GLUCOSAMINE SULFATE provides the joints with the building blocks they need to maintain healthy cartilage and joint function. It provides the raw material needed by the body to manufacture a mucopolysaccharide found in cartilage. Glucosamine Sulfate is necessary for building the protein molecules responsible for giving cartilage its strength and resilience. In addition, it supports healthy joint function.

Glutamine

Gastrointestinal and immune support

*GLUTAMINE is a major fuel for the intestines and supports the functioning of the gastrointestinal tract. Glutamine aids in tissue growth and is the nutrient of choice when maintaining the intestinal mucosal lining. Glutamine also supports the growth of muscle mass. Glutamine is known to support the immune system, specifically the gut-associated lymph tissue.

Glutathione (Reduced)

Antioxidant for the liver

*GLUTATHIONE (REDUCED) encourages the normal growth of cells and is an important part of the antioxidant system of the body and helps promote normal detoxification in the liver.

Goldenseal Plus

Supports healthy immune function

***GOLDENSEAL PLUS** is a popular herbal combination that supports the body's natural defense system. It contains high amounts of berberine, well known for macrophage support.

Grape Seed Extract

Potent antioxidant, support for vein health

***GRAPE SEED EXTRACT** contains oligomeric proanthocyanidins (OPCs). They are flavonoid-rich compounds with very potent antioxidant properties. OPCs have been found to inhibit lipid peroxidation, and to affect enzyme systems including phospholipase A2, xanthine oxidase, cyclooxygenase, and lipoxygenase. OPCs help maintain capillary strength and integrity.

Green Tea Extract

Potent antioxidant, immune enhancer

***GREEN TEA EXTRACT** is an antioxidant that helps maintain healthy cells in all parts of the body. Green Tea is very effective in supporting cardiovascular health and helps to maintain cholesterol levels that are already within the normal range. The polyphenols in green tea have also been shown to support and enhance the immune system as well.

Guggul E&Z Extract 99%

Currently normal ranged cholesterol maintenance

***GUGGUL E & Z EXTRACT 99%** is an herb from India that has played a major role in traditional herbal medicine. It appears that it helps maintain cholesterol levels that are already within the normal range. The active constituents of guggul are the E & Z guggulsterones, which provide these effects. Guggul is also an antioxidant.

Gymnema 25%

Pancreatic function support

***GYMNEMA SYLVESTRE** can be used to help support pancreatic function and maintain blood sugar levels that are already within the normal range. *Gymnema sylvestre* is native to the Indian tropical forest.

Hawthorne Extract

Cardiovascular system support

***HAWTHORNE EXTRACT** is used to support the health of the cardiovascular system, including the protection and preservation of heart tissue. Hawthorne also is a tonifier of the vasculature.

Herbal Biotic

Herbal and nutritional support for the immune system

***HERBAL BIOTIC** is a powerful combination of immune enhancing herbs, bioflavonoids and vitamins that can be used to support immune function.

Horsechestnut Extract

Leg vein support

***HORSECHESTNUT EXTRACT** can be used to maintain the strength and tone of veins in the body. Topically, it has astringent actions on the skin.

Human Immune Nutrients

High Potency comprehensive immune support

***HUMAN IMMUNE NUTRIENTS** is a high potency multi-nutrient formula designed specifically for vitamin and mineral depleted people. The nutrients in this formulation address two essential needs: support of immune function and protection of mitochondrial health. Mitochondrial health is affected by some substances, and the maintenance of healthy mitochondria is essential. This product used in combination with powdered acetyl L carnitine provides these people with the most essential and effective nutrients supported by the scientific literature.

Hypericum Extract 0.3%

Promotes emotional well being

*HYPERICUM 0.3% is extracted from the popular herb commonly known as St. John's Wort. Hypericum is used to promote emotional health and maintain normal mood.

Immune Support

Herbal support for the immune system

*IMMUNE SUPPORT is a combination of herbs that support the immune system. It also maintains a healthy immune system during times of stress and frustration.

Inositol Powder

Healthy serotonin metabolism support

*INOSITOL POWDER is used to help support and encourage normal mood levels. It also helps reduce daily stress and anxiety. Inositol may be beneficial in cholesterol transport out of the liver. The powder readily dissolves in water and has a slightly sweet taste.

Ipriflavone

Isoflavone support for healthy bones

*IPRIFLAVONE is a derivative of the soy isoflavone diadzein. Ipriflavone promotes the secretion of calcitonin from the parathyroid. This maintains osteoclastic activity in the bones and calcium absorption in the intestines.

Joint Ease

Herbal support for joint discomfort

*JOINT EASE is a combination of herbs, which moderate levels of inflammation ??? , and support cartilage and joint function. This herbal combination has powerful antioxidants and reduces substance P levels in the body.

Kava Extract

Herbal support for relaxation/calming

*KAVA EXTRACT supports a sense of emotional well being and relaxation in times of mild stress without creating sleepiness. Kava-lactones, the active ingredient, may relax the mind as well as the muscles.

Licorice Root

Herbal immune support

*LICORICE ROOT helps maintain healthy lung tissue and supports smooth muscle health. Licorice promotes healing of tissue in gastric and duodenal tissues ??? . Glycyrrhizin, which is one of the main components of licorice, has been shown to support the immune system and is adaptogenic.

Lipoic Acid

Multipurpose nutrient and powerful antioxidant

*LIPOIC ACID helps to produce energy in muscles, maintains blood sugar levels that are already within the normal range, and is a necessary component of the glucose-pyruvate-ATP pathway, creating energy production from calories. It is a powerful antioxidant and plays an important role in supporting healthy vision and nerve function. Lipoic Acid is a potent liver detoxification supporter and protects the liver.

Liver Support

Herbal combination to support healthy liver function

*LIVER SUPPORT is a unique combination of herbal extracts that works synergistically to support liver function. It nutritionally supports and protects liver cells from free radical damage. Silybin, one of the primary constituents of milk thistle supports the liver's efforts to remove chemicals, drugs, alcohol, and other exogenous toxins. Curcumin is also an inhibitor of arachidonic acid metabolism and has potent antioxidant properties. This herbal combination supports healthy liver function.

Liver Support II (with Picrorhiza)

Herbal combination to support healthy liver function

*LIVER SUPPORT II (with Picrorhiza) is a combination of herbs traditionally used for liver support with the added benefit of the Ayurvedic herb Picrorhiza. Picrorhiza has been shown to increase bile production in the liver and inhibit prostaglandin formation. It is hepatoprotective and has liver cell promoting effects similar to silymarin. Silybin, one of the primary constituents of milk thistle supports the liver's efforts to remove chemicals, drugs, alcohol, and other exogenous toxins. Curcumin is also an inhibitor of arachidonic acid metabolism and has potent antioxidant properties. This herbal combination supports healthy liver function.

Lysine

Supports immune function and normal arginine levels

*LYSINE provides nutritional support to the immune system. It is helpful in keeping normal levels of arginine in the body, which is important for healthy tissue of the gums, lips, and mucous membranes.

Magnesium (Citrate)

Magnesium for enhanced absorption

*MAGNESIUM (CITRATE) activates enzymes that are essential in many functions of the body. It is also essential for the metabolism of fat, carbohydrates, amino acids, supports healthy teeth and promotes calcium absorption. Magnesium supports healthy smooth muscle tone and cardiovascular function. It also supports mild mood changes and emotional well being premenstrually.

Magnesium (Glycinate)

Magnesium for sensitive individuals

*MAGNESIUM (GLYCINATE) is a gentle form of magnesium for individuals who are sensitive to magnesium citrate. Magnesium activates enzymes that are essential in many functions of the body. It is also essential for the metabolism of fat, carbohydrates, amino acids, supports healthy teeth and promotes calcium absorption. Magnesium supports healthy smooth muscle tone and cardiovascular function. It also supports mild mood changes and emotional well being premenstrually.

Melatonin

Supports the body's natural sleep cycle and is a powerful antioxidant

*MELATONIN is a hormone secreted by the pineal gland, an endocrine gland buried deep in the brain that regulates sleep. It is responsible for regulating biological rhythms in humans. Melatonin is a powerful antioxidant and free radical scavenger. There is evidence that melatonin acts to support the immune system. As we age, the natural production of melatonin tapers off.

Menopause Support

Herbal combination formulated for support during menopause

*MENOPAUSE SUPPORT is a combination of herbs formulated specifically to support women during menopause. The combination of herbal extracts may help to alleviate hot flashes and common symptoms associated with menopause.

Milk Thistle Extract

Supports healthy liver function and acts as an antioxidant

*MILK THISTLE EXTRACT can be used to support and promote liver tissue, stimulate liver function and act as an antioxidant for the liver. Silybin, a constituent of milk thistle supports the liver's efforts to remove chemicals, drugs, alcohol, and other exogenous toxins. Milk thistle helps maintain a healthy liver and increases levels of glutathione.

Minimal and Essential

One a day multi-vitamin/mineral and antioxidant formula

*MINIMAL & ESSENTIAL is a full-spectrum one a day multi-vitamin/mineral formula that provides the minimum daily requirements of vitamins and some essential minerals. This formulation contains a potent antioxidant complex including vitamins A, C, E and the mineral selenium. It contains B-complex vitamins, which are used in the metabolism of protein and fats, and maintenance of muscle tone in the gastrointestinal tract. B-Complex also supports healthy nerve cells and maintains homocysteine levels that are already in the normal range.

MSM

Natural form of organic sulfur

*MSM (methyl sulfonyl methane) is a natural form of organic sulfur that supports normal function in tissues or body parts. MSM helps maintain healthy joint mobility and function.

Multi-Minerals (Citrate Formula)

Comprehensive multi-minerals in citrate form (no copper or iron)

*MULTI-MINERALS (CITRATE FORMULA) is a high potency mineral and trace element formula that provides the highest nutritional value for all systems of the body. It is a hypo-allergenic bioavailable gentle formula that is well tolerated by most individuals. This formula is used to maintain healthy mineral levels in the body during times of mild stress or frustration.

Multi-Nutrients no Iron or Iodine

Comprehensive multi-vitamin/mineral formula with potent antioxidants.

*MULTI-NUTRIENTS NO IRON OR IODINE is a high potency multi-vitamin/mineral and trace element formula that provides the highest nutritional value for all systems of the body. It is a hypoallergenic, bioavailable, gentle formula that is well tolerated by most individuals.

Multi-Nutrients Veg Caps no Iron or Iodine

Comprehensive multi-vitamin/mineral formula with potent antioxidants in a veg cap

*MULTI-NUTRIENTS VEG CAPS NO IRON OR IODINE is a high potency multi-vitamin/mineral and trace element formula that provides the highest nutritional value for all systems of the body. It is a hypoallergenic, bioavailable, gentle formula that is well tolerated by most individuals. It comes in easy to digest veggie caps.

Multi-Nutrients with Iron and Iodine

Comprehensive multi-vitamin/mineral formula containing iron and iodine

*MULTI-NUTRIENTS WITH IRON AND IODINE is a high potency multi-vitamin/mineral and trace element formula. This formula is identical to Multi-Nutrients with the addition of iron and iodine.

Multi-Nutrients II Citrate Formula with Copper & without Iron.

Comprehensive multi-vitamin/mineral formula with potent antioxidants in a gentle bioavailable form

*MULTI-NUTRIENTS II CITRATE FORMULA WITH COPPER & WITHOUT IRON is a high potency multi-vitamin/mineral and trace element formula that provides the highest nutritional value for all systems of the body. It is a hypoallergenic, bioavailable, gentle formula that is well tolerated by most individuals. Multi-Nutrients II contains minerals in citrate form for better absorption. This formula contains copper and does not contain iron.

Multi-Nutrients III Citrate Formula without Copper or Iron

Comprehensive multi-vitamin/mineral formula with potent antioxidants in a gentle bioavailable form

*MULTI-NUTRIENTS III CITRATE FORMULA WITHOUT COPPER OR IRON is a high potency multi-vitamin/mineral and trace element formula that provides the highest nutritional value for all systems of the body. It is a hypoallergenic, bioavailable, gentle formula that is well tolerated by most individuals. Multi-Nutrients III contains minerals in citrate form for better absorption. This formula does not contain copper or iron.

Multi-Nutrients IV Citrate Formula with Copper & Iron

Comprehensive multi-vitamin/mineral formula with potent antioxidants in a gentle bioavailable form

*MULTI-NUTRIENTS IV CITRATE FORMULA WITH COPPER & IRON is a high potency multi-vitamin/mineral and trace element formula that provides the highest nutritional value for all systems of the body. It is a hypoallergenic, bioavailable, gentle formula that is well tolerated by most individuals. Multi-Nutrients IV contains minerals in citrate form for better absorption. This formula contains copper and iron.

Multi Nutrients V no Boron, Copper, or Iron

Multi-vitamin/mineral formula with antioxidants

*MULTI-NUTRIENTS V is a high potency multi-vitamin/ mineral/antioxidant formula specifically designed with no boron, copper, or iron for general nutritional and immune support for people experiencing mild stress or daily anxiety.

NAC

Antioxidant support

*N-ACETYL CYSTEINE maintains the proper functioning of the lungs and supports the immune system and liver function. NAC is also a powerful antioxidant. It acts as a mucolytic and increases levels of glutathione in the body.

Osteo Nutrients

Bone support formula

*OSTEO-NUTRIENTS is beneficial for healthy teeth and bones and is essential to many physiological functions. It helps to maintain and build bone mass and strength before and during menopause. Calcium citrate-malate is one of the most bioavailable forms of calcium. Osteo Nutrients contains high amounts of elemental calcium and magnesium, as well as the other essential nutrients for healthy bones and teeth. Regular exercise and a healthy diet with enough calcium helps teen and young adult white and Asian women maintain good bone health and may reduce their high risk of osteoporosis later in life. For people with a family history of osteoporosis, menopausal women and elderly men and women, adequate calcium intake is linked to reduced risk of osteoporosis through the mechanism of slowing the rate of bone loss. Adequate calcium intake is important, but daily intakes above about 2000mg are not likely to provide additional benefit.

Osteo Nutrients II

Bone support formula with boron

*OSTEO NUTRIENTS II is beneficial for healthy teeth and bones and is essential to many physiological functions. It helps to maintain and build bone mass and strength before and during menopause. Osteo Nutrients II contains high amounts of elemental calcium and magnesium as well as the other essential nutrients for healthy bones and teeth. Boron has been added to this formula. Regular exercise and a healthy diet with enough calcium helps teen and young adult white and Asian women maintain good bone health and may reduce their high risk of osteoporosis later in life. For people with a family history of osteoporosis, menopausal women and elderly men and women, adequate calcium intake is linked to reduced risk of osteoporosis through the mechanism of slowing the rate of bone loss. Adequate calcium intake is important, but daily intakes above about 2000mg are not likely to provide additional benefit.

Oxi Nutrients

Nutritional and herbal antioxidant formula

*OXI NUTRIENTS is a potent antioxidant formula specifically designed with high concentrations of beta carotene and vitamin C.

Pancreatic Enzymes

Digestive support formula

*PANCREATIC ENZYMES supports healthy digestion by supplying natural enzymes that are secreted by the pancreas. These enzymes are essential to the breakdown and absorption of food and its nutrients. It supports the normal digestion of proteins, fats and carbohydrates.

Pantothenic Acid

Vitamin B5

*PANTOTHENIC ACID (Vitamin B5) is converted in our bodies to coenzyme A, which is involved in the metabolism of fats, carbohydrates, and proteins, and the synthesis of hormones, bile, and hemoglobin. Pantothenic acid is also used in nerve transmission. Pantothenic acid supports the immune system.

PMS Support

Pre-menstrual support

*PMS SUPPORT is a combination of herbal extracts formulated specifically to help women who experience common mild symptoms associated with their monthly menstrual cycle. Vitex does not contain hormones, but acts on the pituitary gland, specifically on the production of luteinizing hormone. This increases progesterone production and helps maintain a regular monthly cycle. Dong Quai, another herb in this formula, acts to relax smooth muscles, relieving minor discomforts associated with the menstrual cycle.

PreNatal Herbal

Classic nutritive herbs to support healthy pregnancy

*PRENATAL HERBAL is a specially formulated supplement for women during pregnancy. However this formula can be used by both men and women to support a wide range of body systems. All these herbs are safe for pregnant women. This formula should be taken with PreNatal Multi-Nutrients formula.

PreNatal Multi-Nutrients

Women's multi-vitamin/mineral formula with potent antioxidants

*PRENATAL MULTI-NUTRIENTS is a high potency multi-vitamin/mineral and trace element formula that was formulated for women during pregnancy. It provides the highest nutritional value for all systems of the body. It is a hypoallergenic, bioavailable, gentle formula that is well tolerated by most individuals.

Pyridoxal 5 Phosphate

Activated vitamin B6

*PYRIDOXAL 5 PHOSPHATE (P5P or Activated Vitamin B6) is required to metabolize proteins, carbohydrates, and fats and is important in the production of antibodies and red blood cells. It also helps regulate bodily fluids and helps maintain healthy nerve function and musculoskeletal function. P5P helps maintain homocysteine levels that are already in the normal range, and may relieve mild mood changes, cramps, and edema associated with the menstrual cycle.

Quercetin

Inhibits histamine release and degranulation

*Quercetin has been shown to be one of the most pharmacologically active flavonoids. Quercetin inhibits the synthesis of enzymes necessary for the release and degranulation of histamine.

R-Form Alpha Lipoic Acid

Multi Purpose nutrient and powerful antioxidant

*R-FORM ALPHA LIPOIC ACID, a mitochondrial coenzyme, is the naturally occurring active form of lipoic acid. It is an antioxidant that supports normal metabolism and energy production. Recent research suggests the R-Form may be the more effective form of Lipoic acid. Lipoic acid plays an important role in maintaining healthy vision, nerve function and blood sugar levels that are already in the normal range. Lipoic acid is a potent liver detoxifier and protector.

Reishi Extract

Supports healthy immune function

*REISHI EXTRACT can be used to promote healthy immune function and enzyme action in the body. Reishi mushroom may help support platelet aggregation levels that are already in the normal range. It is also a powerful immune adaptogen.

Saw Palmetto Pygeum Nettle Root
Supports healthy prostate function

SAW PALMETTO PYGEUM NETTLE ROOT helps maintain healthy prostate gland function and supports healthy urinary function. The fatty acids in saw palmetto act as a urinary tonic. Pygeum and nettle root also support healthy prostate function and healthy urinary function.

Schisandra Extract 30:1

Supports liver, immune, energy/stamina support

Schisandra has been used for over 2,000 years in Chinese and Japanese medicine. It supports liver protective functions due to its lignan content, helps to support liver function, and supports the immune and nervous systems. Schisandra is considered adaptogenic and helps to improve energy, endurance, and stress response.

Selenium

Powerful antioxidant

SELENIUM (SELENOMETHIONINE) helps cells to function normally by supporting the body's immune system. It is also a powerful antioxidant.

Slippery Elm Bark Powder

Herbal demulcent

SLIPPERY ELM BARK POWDER is rich in mucilage and it helps stimulate the production of mucous, a component of the gastrointestinal tract's protective lining. Its beneficial properties help support mucous membrane surfaces in all areas of the body, particularly of the gastrointestinal tract.

Soy Isoflavones

Natural soy extract

SOY ISOFLAVONES are extracts from soybeans. Isoflavones are weak plant phytoestrogens. Isoflavones are thought to have antioxidant properties. Soy isoflavones can be used to support health and well being before, during and after menopause.

Taurine

Supports healthy heart function

TAURINE helps support healthy cardiac rhythm, contraction, and helps support platelet aggregation levels that are already in the normal range by modulating cAMP activity. Taurine is the most abundant amino acid in the heart. Taurine provides greater support when it is added to other nutritional programs that support cardiac performance.

Triple Magnesium

Magnesium for enhanced absorption

TRIPLE MAGNESIUM activates enzymes that are essential in many functions of the body. It is also essential for the metabolism of fat, carbohydrates, amino acids, supports healthy teeth and maintains bone density. Magnesium helps maintain blood pressure levels that are already in the normal range. It also supports mild mood changes and emotional well being associated with the menstrual cycle.

Tyrosine and B-Vitamins

Thyroid and nerve support formula

TYROSINE & B-VITAMINS is a combination which supports healthy adrenal and thyroid function. It affects neurotransmitters and may promote healthy emotional well being. This combination helps build and support epinephrine, norepinephrine, and thyroid hormones. It also supports the body's immune system.

Valerian Extract

Natural support for relaxation and restful nights

VALERIAN EXTRACT can be used as a relaxant, a nerve tonic, and may help relax smooth muscles.

ViraCon

Herbal combination to support the immune system

*VIRACON is a powerful combination of immune enhancing herbal extracts that support the immune system. This popular supplement is a must for everyone's home.

Vitamin A (Fish Oil)

Supports immune function and vision

*VITAMIN A (FISH OIL) is a vitamin that is helpful to support the proper functioning of the body's immune system. It supports the maintenance of skin, mucous membranes, vision and reproductive functions. Its antioxidative properties support healthy night vision. (High doses of Vitamin A should be used with physician supervision).

Vitamin B6

Vitamin B6 support

*VITAMIN B6 is required to metabolize proteins, carbohydrates and fats and is important in the production of antibodies and red blood cells. It also helps regulate bodily fluids and helps support the nervous and musculoskeletal systems. Vitamin B6 helps maintain homocysteine levels that are already in the normal range, and relieves common mild symptoms of the menstrual cycle.

Vitamin B-12 (Hydroxocobalamin)

Supports red blood cell formation

*VITAMIN B12 (HYDROXOCOBALAMIN) supports the body in the conversion of carbohydrates into energy and in the metabolism of protein and fats. B12 also promotes the health of the gastrointestinal tract, nervous system and blood. B12 helps maintain homocysteine levels that are already in the normal range.

Vitamin B12/Folate

Vitamin B12 and Folic Acid

*VITAMIN B12 / FOLATE work together to help maintain the health of the gastrointestinal tract, nervous system and the metabolism of protein and fats. Both maintain homocysteine levels that are already in the normal range and folic acid may reduce the risk of neural tube birth defects.

Vitamin C

Potent antioxidant support

*VITAMIN C (100% PURE ASCORBIC ACID) helps the body's immune system by supporting antibody responses, white blood cell function and activity and helps maintain normal interferon levels. It is one of the most potent dietary antioxidants and provides nutritional support to all functions of the body. Vitamin C supports iron absorption from the gastrointestinal tract and is an important component of collagen synthesis. Vitamin C assists in tissue formation.

Vitamin C Veg Caps

Potent antioxidant support in a vegetarian capsule

*VITAMIN C (100% PURE ASCORBIC ACID) helps the body's immune system by supporting antibody responses, white blood cell function and activity and helps maintain normal interferon levels. It is one of the most potent dietary antioxidants and provides nutritional support to all functions of the body. Vitamin C supports iron absorption from the gastrointestinal tract and is an important component of collagen synthesis. Vitamin C assists in tissue formation. Vegetarian capsule.

Vitamin C (with Bioflavonoids)

Vitamin C and bioflavonoids formula

*VITAMIN C (with BIOFLAVONOIDS) combines two powerful synergistic nutrients to enhance immune function and antioxidant activity. This formula contains a 60% citrus bioflavonoid complex. It supports healthy vein function and strength of capillaries. It also helps to support stable mast cells.

Vitamin D

Supports calcium absorption

***VITAMIN D** helps to increase absorption of calcium from food, to keep bones and teeth healthy and strong, and reduces the loss of calcium through the urine. Vitamin D supports the building of bone and calcium resorption. It also helps maintain healthy cell growth in breast, prostate and colon tissue.

Natural E 400

Potent antioxidant that supports the cardiovascular system

***VITAMIN E** (d-alpha tocopherol – natural source) is a powerful antioxidant and free radical scavenger. Vitamin E is a powerful antioxidant and free radical scavenger. Vitamin E promotes healthy cardiovascular and blood vessel function and supports many physiological functions.

Natural Vitamin E 400 (with Mixed Tocopherols)

Potent antioxidant that supports the cardiovascular system

*** d-alpha, beta, gamma and delta tocopherols** are naturally occurring tocopherols. They are the most biologically active forms of vitamin E. Vitamin E (mixed tocopherols) is a powerful antioxidant and free radical scavenger. Vitamin E promotes healthy cardiovascular and blood vessel function and supports many physiological functions.

Zinc (Citrate)

Highly absorbable immune support

***ZINC (CITRATE)** supports the body's immune system. Zinc citrate is a highly absorbable form of this mineral. Zinc promotes a healthy immune system and assists in tissue formation.