

NOTIFICATION PURSUANT TO
SECTION 6 OF DSHEA
AND 21 CFR §101.93

RECEIVED
11/12/97

This notification is being filed on behalf of Irwin Naturals which is the Distributor of the product (s) which bear the statements identified in this notification. Its business address is 10549 W. Jefferson Blvd., Culver City, CA 90232. This notification is being made pursuant to Section 6 of DSHEA and Rule 21 C.F.R. §101.93. The dietary supplement product on whose label or labeling the statements appears is SUPER CALCIUM.

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The text of each structure-function statement for which notification is now being given is:

- Statement 1: Adding to the benefit of calcium, we have included an advanced and patented form of Vitamin C called Ester-C, which has superior absorption compared to ordinary Vitamin C.
- Statement 2: And to increase your body's absorption of calcium, we have added Vitamin D, Magnesium and Zinc.

The following summary identifies the dietary ingredient(s) or supplement(s) for which a statement has been made:

Statement Number	Identity of Dietary Ingredient(s) or Supplement that is the Subject of the Statement
1.	Calcium Carbonate; Calcium Citrate; Calcium Orotate; Ester C
2.	Calcium Carbonate; Calcium Citrate; Calcium Orotate; Ester C; Magnesium; Zinc; Vitamin D

The following identifies the brand name of each supplement for which a statement is made:

Statement Number	Brand Name	Label or Labeling
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I, Klee M. Irwin, am authorized to certify this Notification on behalf of Irwin Naturals. I certify that the information presented and contained in this Notification is complete and accurate, and that SUPER CALCIUM has substantiation that each structure-function statement is truthful and not misleading.

Date Signed: November 5, 1997 By:


Klee M. Irwin
President

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