



January 10, 2005

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 Parkway  
 College Park, MD 20740

JAN 24 2005

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 21CFR 101.93, Advocare provides notification for statements on dietary supplement labels as follows:

**The name and address of the manufacturer, packer or distributor of the dietary supplement that bears the statements:**

AdvoCare International, L.P.  
 2727 Realty Road, Suite 134  
 Carrollton, TX 75006

**Product Name:** KickStart SPARK Smart Energy drink, (Grape)

<b><u>Statement</u></b>	<b><u>Basis for Statement</u></b>
Provides support for long lasting energy	L-Carnitine (as tartrate)    L-Phenylalanine Caffeine    Taurine Thiamine    Riboflavin Choline Chromium (as polynicotinate) Coenzyme Q-10 Niacin (as niacinamide and niacin) Vitamin B-6 (as pyridoxine HCl) Vitamin B-12 (as cyanocobalamin)
Supports mental energy and focus	L-Carnitine (as tartrate)    L-Phenylalanine Caffeine    Taurine Thiamine    Riboflavin Choline Chromium (as polynicotinate) Coenzyme Q-10    Glycine Choline (as citrate and bitartrate) Vitamin B-6 (as pyridoxine HCl) Vitamin B-12 (as cyanocobalamin) Gamma-aminobutyric acid (GABA)
Has antioxidant activity	Vitamin A (as vitamin A palmitate) Vitamin C (as ascorbic acid) Vitamin E (as d-alpha tocopheryl acetate) Coenzyme Q-10

97S 0162    LET 15539

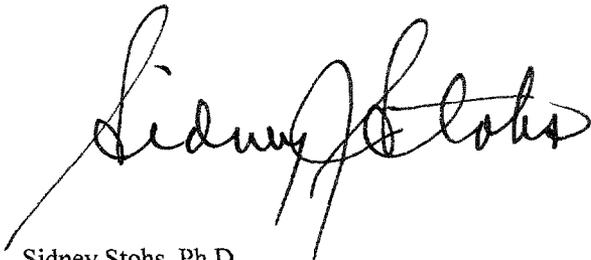
Helps fight occasional drowsiness

L-Carnitine (as tartrate)    L-Phenylalanine  
Caffeine                            Taurine  
Chromium (as polynicotinate)  
Coenzyme Q-10

**Certification**

The undersigned certifies that the information contained in this notice is complete and accurate and that Advocare International, L.P. has substantiation that the statements are truthful and not misleading.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Sidney Stohs". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

Sidney Stohs, Ph.D.  
Senior Vice President, Research and Development  
AdvoCare International, L.P.