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GNC Live Well

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March 27, 1998

3/31/98

Ms. Linda S. Kahl, Ph.D.
Office of Special Nutritional
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, S.W. (HFS-450)
Washington, DC 20204

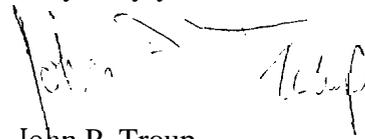
Dear Dr. Kahl:

Pursuant to section 403(r)(6) of the Dietary supplement Health and Education Act of 1994 ("DSHEA"), General Nutrition Corporation, located at 300 Sixth Avenue, Pittsburgh, Pennsylvania 15222 ("GNC"), hereby notifies the Food and Drug Administration that it is marketing dietary supplements that bear a nutritional support statement on their labels. Enclosed please find a listing of the products and their statements of nutritional support.

As required, the product labels contain the disclaimer that this statement has not been evaluated by the Food and Drug Administration and that the product is not intended to diagnose, treat, cure, or prevent any disease. Two (2) copies of this notification are enclosed for your convenience.

On behalf of GNC, I hereby certify that the information contained in this notice is complete and accurate and that GNC has substantiation that the statements are truthful and not misleading.

Very truly yours,



John P. Troup
Vice President
Scientific Affairs

JPT:mo
Enclosures

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FDA NOTIFICATION TRACKING FORM FOR STRUCTURE FUNCTION STATEMENT

<updated: 3-27-98>

DESCRIPTION	DATE FILED	STRUCTURE FUNCTION STATEMENT
ACETYL-L-CARNITINE		
Challenge Acetyl-BCAA	1/29/98	Acetyl-L-Carnitine facilitates the metabolism of long chain fatty acids.
Challenge Anabolism	3/27/98	"
Informed Nutrition Acetyl-L-Carnitine	3127198	"
NNW Acetyl-L-Carnitine		"

ALPHA LIPOIC ACID		
GNC Alpha Lipoic Acid	1129198	A dietary ingredient which supports antioxidant regeneration.
NNW Alpha Lipoic Acid Protector Antioxidant	3127198	"

AMINO ACIDS		
Pro Performance Amino 1000	3/27/98	Amino Acids are involved in protein synthesis and in maintaining nitrogen balance in the body.

B-VITAMINS		
GNC Mega Men	1/29/98	B-vitamins which are essential for carbohydrate metabolism and energy production.
GNC Chewable Solotron	3/27/98	"
GNC Teen's Multiple Vitamins Plus Minerals	1/29/98	"
GNC TR Ultra Mega AM/PM Formulas	3/27/98	"
GNC Women's 50 Plus Vita Pak	3/27/98	"
GNC B-Complex with C Plus Herbs	1 /29/98	"
NNW Vitamin B-100 with Vitamin C	1/29/98	"
NNW Vitamin B-50 Complex Form	1/29/98	"

BETA-CAROTENE		
GNC beta-Carotene	1/29198	beta-Carotene is a precursor to Vitamin A which is essential for normal vision.
GNC Mega Men	1 /29198	"
GNC Chewable Solotron	3127/98	"
GNC Teen's Multiple Vitamins Plus Minerals	1/29/98	"
GNC Ultra E 400	3127198	"
Infer. Nutr. Bioavailability Enhanced Antioxidants	3127198	"
informed Nutrition Ocular Formula	1/29/98	"

BETA-CAROTENE cont.		
NNW Ocular Formula	3/27/98	"

BIOTIN		
GNC Mesa Men	1/29/98	Biotin which functions as a coenzyme in metabolism,

CHONDROITIN		
Preventive Nutrition Cartilage Complex	3/27/98	Chondroitin is a natural substance that supports healthy joints and bones.

CHROMIUM		
GNC G.T.F. Chromium	1/29/98	Chromium is involved in normal glucose utilization.
GNC Ultra Chromium Picolinate & Zinc Chromax	3127198	"
PP Pro Chrome	1129/98	"
Optibolic Chitosan Plus	3127198	"
Optibolic Optimax	1/29/98	Chromium Picolinate is involved in normal glucose utilization.

COPPER		
GNC Mega Men	1/29/98	Copper which is required for proper nerve cell structure.
GNC PsT Program	3127198	"
NNW Zinc Picolinate w/ Copper	1129/98	"

CO Q-10		
Challenge CO Q-10	1/29/98	CO Q-10 is involved in the process that produces cellular energy.
Informed Nutrition CO Q-10	3/27/98	"
NNW Antioxidant Coenzyme Q-10	1/29/98	"

CRANBERRY		
NNW Cranberry	1/29/98	Whole dried cranberry fruit provides dietary support for normal urinary tract function.

ECHINACEA		
GNC Cel Program	3/27/98	Echinacea which helps support your body's natural resistance.

FOLIC ACID		
GNC HoC Program	1/29/98	Folic Acid may play a role in the maintenance of normal homocysteine levels.

FOS		
Informed Nutrition Colon Care	1/29/98	FOS helps acidophilus flourish in the intestines.
Informed Nutrition Nutraflora FOS	3127198	"

FRUCTOOLIGOSACCHARIDE		
GNC Co Program	3/27/98	Fructooligosaccharide is a soluble fiber which helps healthy bacteria flourish in the
		intestines

GARLIC		
GNC CS Program	3/27/98	Garlic has a positive effect on the cardiovascular system.
NNW Vitamin E with Odorless Garlic	1/29/98	Garlic provides support for normal healthy cardiovascular function.
NNW Odorless Garlic	1129/98	Garlic provides dietary support for normal, healthy cardiovascular function.

GINKGO BILOBA		
GNC IbF Program	3/27/98	Ginkgo Biloba supports increased blood flow to the brain.
Informed Nutrition Ginkgo Biloba Formula	3/27/98	Ginkgo Biloba has been shown to increase blood flow to the brain.

GLUCOSAMINE		
Preventive Nutrition Cartilage Support formula	3/27/98	Glucosamine provides an important component for joint cartilage.
GNC CM System	3/27/98	"
Preventive Nutrition Cartilage Support	3127/98	"
Preventive Nutrition Cartilage Complex	3/27/98	Glucosamine is a natural substance that supports healthy joints and bones.

GLUTAMINE		
Pro Performance L-Glutamine	3/27/98	Glutamine is a preferential amino acid for protein synthesis and plays a pivotal role in nitrogen balance in the body.

GRAPEFRUIT FIBER		
Natural Brand Grapefruit and Citrus Fiber	3127198	A natural, specially modified fiber source from grapefruit provides dietary support for healthy cholesterol levels.
Preventive Nutrition Chol-X	3127198	Grapefruit fiber (as citrus pectin) provides dietary support for healthy cholesterol levels.

GRAPE SEED		
NNW Grape Seed	1/29/98	Proanthocyanidins found in Grape Seed provide antioxidant support.
NNW Vitamin C w/ Bioflavonoids	1/29/98	Grape seed and green tea extracts provide antioxidant support.

GUARANA		
Nature's Fingerprint Guarana Seed Extract	1/29/98	Guarana contains caffeine which has invigorating properties.

IMMUN-7-KETO		
Optibolic Immun-7-Keto	3/27/98	Immun-7-Keto is a natural metabolite that is produced from DHEA. It may positively impact three key functions in the body: Immune response, nitrogen balance and thermoogenic activity.

INOSITOL		
GNC Inositol	1/29/98	Inositol is important for signal transduction between cells, including nerve impulses.

IRON		
NNW Time Released Iron	1/29/98	Iron is essential to building blood, transporting oxygen and is involved in energy utilization.
GNC Time Released Iron	3/27/98	Iron is essential to building blood and transporting oxygen.
GNC Chewable Solotron	3/27/98	"
GNC TR Ultra Mega AM/PM Formulas	3/27/98	"
GNC Teen's Multiple Vitamins Plus Minerals	1/29/98	"

L-ARGININE		
Challenge Amino Acid L-Arginine	3/27/98	L-Arginine is involved in creatine formation, and in the removal of ammonia from the body.
GNC Amino Acid L-Arginine	1/29/98	L-Arginine is involved in creatine formation. L-Arginine is one of the essential amino acids which are important for balanced nutrition.
GNC Platinum Years Protein Wafers	3127198	L-Arginine, which is involved in creatine formation.

L-CARNITINE		
GNC L-Carnitine	1/29/98	L-Carnitine facilitates the metabolism of long chain fatty acids.
GNC CS Program	3127/98	"
PP Liquid L-Carnitine	1129/98	"
Optibolic Chitosan Plus	3/27/98	"
Optibolic Optimax	1/29/98	"

LECITHIN		
GNC Triple Lecithin	3/27/98	Lecithin may help the body emulsify fat.

L-GLUTAMINE		
Challenge Acetyl-BCAA	1/29/98	L-Glutamine, the preferential amino acid, for use in skeletal muscle,
Challenge Anabolism	3127198	"
GNC Platinum Years Protein Wafers	3/27/98	L-Glutamine which plays a pivotal role in bodily nitrogen balance,

L-LYSINE		
GNC Amino Acid L-Lysine	1/29/98	L-Lysine is one of the essential amino acids which are important for balanced nutrition.
GNC Platinum Years Protein Wafers	3127/98	L-Lysine which is helpful for maintenance of nitrogen equilibrium in adults.

MILK THISTLE		
NNW Milk Thistle	1/29/98	Milk Thistle supports healthy liver function.
Optibolic Optimax	1/29/98	"

MAGNESIUM		
GNC Potassium Aspartate Magnesium Asp.	1/29/98	Magnesium is involved in nerve, skeletal muscle, heart, and cell function.
GNC Proportioned Magnesium	3127198	"
GNC Women's 50 Plus Vita-Pak	3127/98	Magnesium is essential for developing teeth and bones.
GNC Chewable Solotron	3/27/98	Calcium and Magnesium are essential for building bones and for teeth.

NIACINAMIDE		
GNC No Flush Niacinamide	1/29/98	Niacinamide functions as a coenzyme in glucose oxidation.

OAT BRAN		
GNC Co Program	3/27/98	Oat bran and wheat bran, along with a low fat diet, support colon health.

PANTOTHENIC ACID		
NNW Pantothenic Acid	3/27/98	B-Complex Factor Pantothenic Acid is essential to metabolic processes in the body.

PSYLLIUM		
GNC ChL Program	3127198	Psyllium is an important dietary fiber that may help manage normal, healthy cholesterol levels.
GNC Co Program	3127/98	Psyllium provides dietary fiber which may help maintain digestive health.

POTASSIUM		
GNC Potassium Asp. Magnesium Aspartate	1/29/98	Potassium is involved in the regulation of cellular water balance.

POTASSIUM cont.		
GNC Vitamin B-6	1/29/98	"

PROFILE		
Profile	1/29/98	Additionally Profile stimulates the protein synthesis effects of Insulin.
		Profile increases Post-exercise blood flow which helps to: restore post-exercise tissue glycogen and remove lactic acid and metabolic waste.

PYRUVATE		
Pro Performance Calcium Pyruvate	3/27/98	Pyruvate improves the availability of energy for exercise.

SAW PALMETTO		
GNC Mega Men	1/29/98	Saw Palmetto to support normal prostate function.
GNC PsT Program	3127198	"

SELENIUM		
NNW Vitamin E Plus Selenium	1/29/98	Selenium supports the antioxidant activity of Vitamin E, which protects against free radicals,
GNC ChL Proaram	3127198	"
GNC CS Program	3/27198	"
GNC PsT Program	3127198	Selenium is an essential mineral to build antioxidant enzymes in the body.
GNC Women's 50 Plus Vita-Pak	3127198	Selenium and Vitamin E which are a powerful antioxidant combination.

7-KETO		
Pro Performance Thermo-7-Keto	3/27/98	7-Keto may positively impact three key functions in the body: immune response, nitrogen balance, and thermogenic activity.
		7-Keto enhances the metabolic process and may support positive nitrogen balance in the body.
Optibolic Thermo 7-Keto	3/27/98	"

ST. JOHN'S WORT		
NNW St. John's Wort	3/27/98	St. John's Wort may help support general well being.
Challenge Trans-Neuro	3/27/98	"
Pro Performance Trans-Neuro	3/27/98	"

TRIMETHYLGLYCINE (TMG)		
GNC HoC Program	1/29/98	TMG is a methyl donor which helps convert homocysteine to the non-toxic amino acid Methionine.
NNW TMG	3/27/98	TMG helps convert homocysteine to methionine, which is a non-toxic amino acid,

TYROSINE		
Pro Performance Special Forces	3/27/98	Tyrosine is a nutrient precursor of neurotransmitters in the body.
Pro Performance Trans-Neuro	3/27/98	"
Challenge Trans-Neuro	3/27/98	"
Pro Performance L-Tyrosine	3/27/98	"

VITAMIN A		
GNC Cod Liver Oil	1/29/98	Vitamin A is essential for normal vision.
GNC TR Ultra Mega AM/PM Formulas	3/27/98	"
GNC Vitamin A & D	3/27/98	"
GNC Dry Super A & D	1/29/98	"
Infor.Nutr. Bioavailability Enhanced Antioxidants	3/27/98	"
NNW Ocular Formula	3/27/98	"
NNW Vitamin A & D	1/29/98	"

VITAMIN B-1		
GNC B-1	1/29/98	Vitamin B-1 is essential for proper nerve and muscle function.

VITAMIN B-6		
GNC Vitamin B-6	1/29/98	Vitamin B-6 is essential for nervous system function.
GNC HoC Program	1/29/98	Vitamin B-6 plays a role in the maintenance of normal homocysteine levels.

VITAMIN B-12		
GNC HoC Program	1/29/98	Vitamin B-12 may play a role in the maintenance of normal homocysteine levels.

VITAMIN C		
GNC B-Complex with C Plus Herbs	1/29/98	Vitamin C is essential for healthy bones, teeth, blood vessels, and collagen.
GNC ChL Program	3/27/98	"
GNC CS Program	3/27/98	"
GNC Chewable Solotron	3/27/98	"

VITAMIN E cont..		
GNC Chewable Solotron	3/27/98	Vitamin E helps maintain the proper function of the cardiovascular system.
GNC ChL Program	3/27/98	"
GNC CS Program	3/27/98	"
GNC Mesa Men	1/29/98	"
GNC HoC Program	1/29/98	"
GNC Teen's Multiple Vitamins Plus Minerals	1/29/98	"
GNC TR Ultra Mega AM/PM Formulas	3/27/98	"
GNC Ultra E 400	3/27/98	"
GNC Women's Cal-Plus	1/29/98	"
Basic Nutrition Vitamin E	3/27/98	"
Infer. Nutr. Bioavailability Enhanced Antioxidants	3/27/98	"
GNC Women's 50 Plus Vita-Pak	3/27/98	Selenium and Vitamin E which are a powerful antioxidant combination,
NNW Vitamin E d-alpha Tocopheryl	1/29/98	"
NNW Vitamin E w/ odorless garlic	1/29/98	"
NNW Vitamin E plus Selenium	1/29/98	"
Preventive Nutrition Chol-X	3/27/98	Vitamin E reinforced by Selenium and alpha-Lipoic Acid helps maintain the healthy
		function of the cardiovascular system. They also collaborate to act as protective
		antioxidants.

VITAMIN K		
GNC Mega Men	1/29/98	Vitamin K which is necessary for blood clotting.
GNC Vitamin K	3/27/98	"

YERBA MATE		
Optibolic Optimax	1/29/98	Yerba Mate and Green Tea provide caffeine, which has invigorating qualities.

ZINC		
GNC Chelated Zinc	1/29/98	Zinc is also required for proper growth and normal reproductive function.
GNC Ultra Chromium Picolinate & Zinc Chromax	3/27/98	"
GNC TR Ultra Mega AM/PM Formulas	3/27/98	Zinc is required for normal reproductive function.
GNC Ultra Zinc Lozenge	1/29/98	Zinc and Echinacea help support natural resistance.
NNW Calcium & Magnesium w/ Zinc	1/29/98	Zinc is important for cellular repair,
GNC Cel Program	3/27/98	"
GNC PsT Program	3/27/98	Zinc is an essential mineral to build antioxidant enzymes in the body.