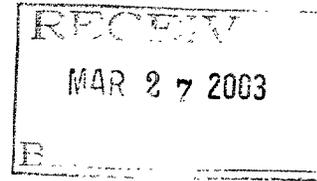


Source Naturals®
23 Janis Way
Scotts Valley, CA 95066

1960 '03 APR 15 P1 54

March 7, 2003

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



RE: Notification of Nutritional Support Statements

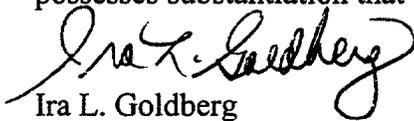
Dear Sir or Ma'am:

I hereby notify the Food and Drug Administration (FDA) of the use of statements of nutritional support in the labeling of R-Lipoic Acid 100 MG a dietary supplement. Source Naturals® is the manufacturer of R-Lipoic Acid 100 MG.

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

- (1) R-Lipoic Acid (R-LA) is 10 times more effective than other forms of Lipoic Acid in mitochondrial ATP production. Commercially available Alpha-Lipoic acid is a 50% mixture of natural R-LA and synthetic S-Lipoic Acid (S-LA).
- (2) R-LA is a form of lipoic acid that your body synthesizes and can safely metabolize.
- (3) Alpha-Lipoic Acid is a combination of natural and synthetic lipoic acid where as R-LA is a natural form found in the body.
- (4) In-vitro testing showed 40% better absorption than S-LA, as measured by plasma concentration levels.
- (5) When racemic mixtures (alpha-lipoic acid) of lipoic acid are used, S-LA competes with and may block the functions of R-Lipoic Acid (R-LA). Animal research has shown they each compete for binding sites and the less active S-LA prevents binding of the more active R-LA.
- (6) R-LA has been shown in animal studies to increase mitochondrial activity for preventing mitochondrial decay, which may help weaken the reported increase in oxidative stress.
- (7) Animal research has shown that R-LA can increase or maintain levels of other antioxidants including CoQ10, Vitamin C, Vitamin E and glutathione.

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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