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Food and Drug Administration
Center for Food Safety and Applied Nutrition
Office of Nutritional Products, Labeling, and Dietary Supplements (HFS-810)
5100 Paint Branch Parkway
College Park, Maryland 20740
Reference phone #301-436-2373

July 23, 2004

AUG - 6 2004

Dear CFSAN:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

(1) Name and Address of distributor:

Jarrow Formulas, 1824 South Robertson Blvd., Los Angeles, CA 90035

(2) Statements:

CarotenAll™ contains alpha and beta-carotene extracted from palm fruit (Caromin®) in ratios identical to carrots. One softgel of CarotenAll™ provides greater amounts of the major carotenoids (Alpha-, Beta-Carotene, Lutein, Zeaxanthin and Lycopene) than 5–6 servings of fruits and vegetables.

Lycopene, Phytoene and Phytofluene are antioxidant carotenoids extracted from GMO-free tomatoes by Lyc-O-Mato™. Lycopene supports healthy prostate function and protects against damage from free radical singlet oxygen.

Lutein is an antioxidant carotenoid that occurs in nature with zeaxanthin. Dietary lutein and zeaxanthin concentrate in the eye's macula and lens and protects the macula from oxidative stress. Astaxanthin is a highly potent antioxidant carotenoid found in seafood and algae that protects lipids from peroxidation.

(3) Name of the dietary ingredient(s) if not provided in the text of the statement:

Vitamin A (Beta Carotene 1.43 mg) and (Alpha Carotene 0.7 mg), Lutein, Zeaxanthin, Lycopene, Phytoene, Phytofluene, Astaxanthin and Gamma Tocopherol

(4) Name of the dietary supplement(s):

CarotenALL™ — 60 softgels

(5) The following disclaimer appears on the label in bold:

**These statements have not been evaluated by the Food and Drug Administration.
This product is not intended to diagnose, treat, cure or prevent any disease.**

These claims are limited to, and a result of, what we believe to be a substantial body of scientific evidence supporting the functional role of the nutrients.

Respectfully submitted,


Siddharth Shastri, M.Sc.
Vice President, Product Development

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