



DENALI, Inc.

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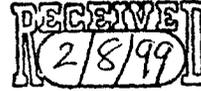
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February 2, 1999

To: Robert J. Moore
Center for Food Safety and Applied Nutrition (HFS-456)
Food and Drug Administration
200 C Street SW
Washington DC 20204

From: Mark Lloyd
Director of Operations



Dear Mr. Moore:

As required by the Food and Drug Administration, I am writing this letter to alert you to several structure/function claims that Denali, Inc, is making regarding 6 nutritional supplement products we sell.

Below are listed the six products we are selling and the claims made in conjunction with each:

Vitamin C (Ascorbic Acid) with Rose Hips

Vitamin C (Ascorbic Acid) is needed for the production of collagen, which gives structure to muscles, vascular tissues, bones and cartilage. It is an antioxidant that protects against free radical damage and regenerates many other antioxidants.

Vitamin E (100% Natural Tocopherols)

Vitamin E is an antioxidant and the primary defense against lipid peroxidation. It is particularly important in protecting the body's cells from free radical damage.

B-50 Complex

B-50 Complex contains nutrients that help convert fatty acids and glucose into energy. B12 is required for the formulation of blood corpuscles, nerve sheaths, and some proteins.

Multi Vitamin & Mineral

No structure/function claims made

CoQ10 (Coenzyme Q10) Energy Formula

CoQ10 (Coenzyme Q10): Clinical studies show that this antioxidant may help maintain a healthy and normal energy level and heart by assisting intra-cellular energy production.

On labels and marketing materials, an asterisk "*" is placed after each structure/function claim. This asterisk references the FDA disclaimer, "The Food and Drug Administration has not evaluated these claims. This product is not intended to diagnose, cure, treat or prevent any disease." The disclaimer is displayed clearly and legibly on all marketing materials and labels.

Please let me know if you need any more information. In the event of any new product launches, we will update you with additional structure/function claims.

Sincerely,

Mark Lloyd
Director of Operations

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