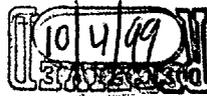


GNC Live Well.

67479

September 27, 1999



1999 SEP 30 A 9:24

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

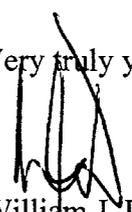
Dear Dr. Kahl:

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,


William J. Dunn, Esquire
Corporate Counsel

Enclosures

975 - 0162

LET 4306

FDA NOTIFICATION TRACKING FORM FOR STRUCTURE FUNCTION STATEMENT

<updated 9-27-99>

DESCRIPTION	DATE FILED	STRUCTURE FUNCTION STATEMENT
AMINOGEN		
GNC Aminogen	9/27/99	Aminogen is an enzyme system that helps maximize the amount of amino acids released from protein and supplements. It enables more amino acids to be released from the protein ingested. This amino acid release increases the aminos ability to be used by the body.
CELL BUILDER		
GNC Cell Builder	9/27/99	High-Glycemic carbohydrates such as dextrose along with alpha lipolic acid, chromium and taurine, cause a natrual release of anabolic hormone insulin. This synergistic formula promotes the uptake of both creatine and glucose by muscle tissue. Cell Builder also supplies disodium phosphate, magnesium, postassium and Vitamin C to help ensure optimal function of carbohydrate and creatine transport systems in the body. All of these nutrients play an important role in the formation of phosphocreatine in the muscle cell.
CHOLINE		
GNC DMAE (Dimethylaminoethanal)	9/27/99	Choline serves as a precursor of acetylcholine, which is one of the neuratransmitters responsible for memory function. DMAE has been found to increase Choline levels.
CREATINE		
GNC Creatine Plus Transport	9/27/99	Creatine Plus Transport is an advanced creatine supplement that amplifies creatine production in the body.
GINKGO BILOBA		
GNC Maca Men	9/27/99	Ginko Biloba, an herb recognized for its ability to support increased blood flow to the extremeties.
PharmAssure Ginko Biloba	9/27/99	Ginko Biloba supports increased blood flow to the brain. With 24% kinkosides and 6% tritepenoids, Ginko biloba may support mental sharpness.
HUPERZINE A		
GNC Preventive Nutrition Suprazine-A	9/27/99	Huperzine A provides dietary support for normal, healthy mental function and may help support rmemory retention.

FDA NOTIFICATION TRACKING FORM FOR STRUCTURE FUNCTION STATEMENT

<updated 9-27-99>

DESCRIPTION	DATE FILED	STRUCTURE FUNCTION STATEMENT
PANAX GINSENG		
PharmAssure Vigraplex	9/27/99	Panax Ginseng provides dietary support for adaptogenic response.

PHOSPHATIDYL CHOLINE		
PharmAssure Liver Pro	9/27/99	Phosphatidyl Choline provides dietary support for a healthy liver.

POTASSIUM		
PharmAssure Postassium Gluconate	9/27/99	Potassium is necessary for normal muscle cell contraction.

PROTISYN		
GNC ProPerformance Protisyn	9/27/99	Protosyn is designed to deliver its proprietary nutrient matrix to muscles for quicker uptake, greater absorption and improved nitrogen retention.
		Protosyn also supplies the essential complex carbohydrates for rebuilding glycogen in the body as well as antioxidants, vitamins and minerals.

SAMe		
GNC SAMe 200	9/27/99	SAMe is a naturally derived product which helps support positive mood balance. SAMe has been shown to support Glutathione production which helps support the body's antioxidant system and healthy liver function.

SEAPROSE-S		
PharmAssure Sinuleve	9/27/99	Seaprose-S provides dietary support for normal healthy inflammatory response and supplies the semi-alkaline enzyme protease, which may support natural resistance.

SELENIUM		
PharmAssure Selenium - 100 mcg.	9/27/99	Selenium is an essential mineral which helps build antioxidant enzymes in the body
PharmAssure Selenium - 200 mcg.	9/27/99	Selenium supports the antioxidant activity of Vitamin E which protects against free radicals.