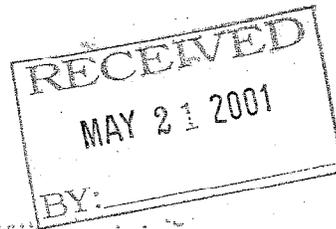




PHARMAVITE

May 14, 2001

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Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

Dear Sir or Madam:

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):

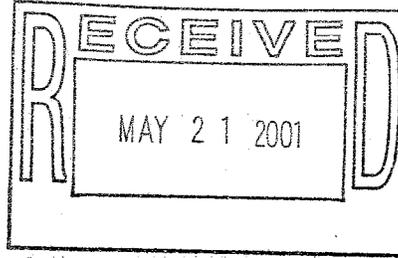
- (1) Name and address of manufacturer:
Pharmavite Corporation, PO-Box 9606, Mission Hills, CA 91346
- (2) Text of the statement(s):
Clinically Shown to:
Relieve Joint Discomfort
Promote Joint Mobility
Support Joint Health

Joint Action was designed combining two of today's most popular choices for joint health.

Cartilage rebuilding and regeneration are normal functions of the body. During your lifetime, joint cartilage begins to break down due to physical stress and aging, causing joint discomfort and making even everyday activities like walking difficult to perform. That's why it's essential to maintain healthy levels of nutrients that promote joint health and mobility.

SAM-e is an important compound that occurs in every living cell and takes part in many biological reactions in the human body. One of the important physiological results of these reactions is the manufacture of joint cartilage and the support of joint health, mobility and comfort.

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Glucosamine is a natural building block of healthy cartilage. Glucosamine may help repair and maintain cartilage as well as stimulate cartilage cell growth. Short and long term clinical studies show that SAM-e and Glucosamine are both safe products.

Although glucosamine is manufactured in the body and SAM-e is present in all living organisms, significant amounts of these substances are not readily available through foods. The glucosamine used in Joint Action comes from the shells of shrimp, lobsters and crabs. The process of making Nature Made SAM-e involves the cultivation of a special, SAM-e producing yeast, the collection of SAM-e from the yeast and the integration of SAM-e into a stable compound.

Joint Action can be used to relieve joint discomfort, maintain or increase joint health and restore joint mobility.

- (3) Name of the dietary ingredient if not provided in the text of the statement:
SAM-e and Glucosamine

- (4) Name of the dietary supplement:
Joint Action

The above statement(s) may be used in one or more of the following brands of products: B.J.'s Wholesale, CVS, Duane Reade, Kirkland Signature, Jogmate, Nature Made, Nature's Resource, Optimize, Spring Valley, Walgreens.

We certify the information in this notice is complete and accurate, and we have substantiation that the above statement(s) is truthful and not misleading.

Sincerely,

David Kropp
Acting Director, Regulatory and Consumer Affairs

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