



December 15, 2004

Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. 343 r (6) and in accordance with the authorized provisions of 21CFR 101.93, Advocare provides notification for statements on dietary supplement labels as follows:

The name and address of the manufacturer, packer or distributor of the dietary supplement that bears the statements:

AdvoCare International, L.P.
2727 Realty Road, Suite 134
Carrollton, TX 75006

Product Name: AdvoCare Spark (Citrus)

Statement

Basis for Statement

Provides support for long lasting energy

L-Carnitine (as tartrate) L-Phenylalanine
Caffeine Taurine
Chromium (as polynicotinate)
Coenzyme Q-10
Thiamine Riboflavin
Niacin (as niacinamide and niacin)
Vitamin B-6 (as pyridoxine HCl)
Vitamin B-12 (as cyanocobalamin)

Enhances mental energy and focus

L-Carnitine (as tartrate) L-Phenylalanine
Caffeine Taurine
Chromium (as polynicotinate)
Coenzyme Q-10
Thiamine Riboflavin
Glycine Choline
Vitamin B-6 (as pyridoxine HCl)
Vitamin B-12 (as cyanocobalamin)
Gamma-aminobutyric acid (GABA)

Has antioxidant activity

Vitamin A (as vitamin A palmitate)
Vitamin C (as ascorbic acid)
Vitamin E (as d-alpha tocopheryl acetate)
Coenzyme Q-10

975 0162

LET

15194

Helps fight occasional drowsiness

L-Carnitine (as tartrate) L-Phenylalanine
Caffeine Taurine
Chromium (as polynicotinate)
Coenzyme Q-10

Certification

The undersigned certifies that the information contained in this notice is complete and accurate and that Advocare International, L.P. has substantiation that the statements are truthful and not misleading.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Sidney Stohs". The signature is written in a cursive, flowing style with a long horizontal stroke at the beginning and a vertical stroke at the end.

Sidney Stohs, Ph.D.
Senior Vice President, Research and Development
AdvoCare International, L.P.