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Office of Nutritional Products
Labeling & Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

December 15, 2004

JAN - 7 2005

Dear Sir or Madam:

This letter will serve as a 30-day notification pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994 that NBTY Inc. is using the following statements on our Apple Cider Vinegar Diet supplements under the Radiance label:

Ingredients: Vitamin B-6, Chromium, Apple Cider Vinegar, Apple Pectin, Gymnema Sylvestre

- Promotes Sugar and Fat Metabolism
- Chromium helps to promote sugar and fat metabolism while Apple Pectin is a natural soluble fiber well known for its nutritional goodness.
- Vitamin B-6 supports energy and protein metabolism.
- Gymnema Sylvestre rounds out this unique formulation by providing additional support for carbohydrate and sugar metabolism.

The above statements are accompanied by the required disclaimer pursuant to Section 6 of the Dietary Supplement Health and Education Act.

Sincerely,

Angelica S. Vrablic, Ph.D.
Manager, Nutrition Research

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