



1/14/05

January 07, 2005

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: AdvoKids Spark (Citrus)

Statement

Basis for Statement

Provides support for long lasting energy

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

Supports mental energy and focus

L-Carnitine (as tartrate) L-Phenylalanine
Caffeine Taurine
Thiamine Riboflavin
Chromium (as polynicotinate)
Coenzyme Q-10 Glycine
Choline (as citrate and bitartrate)
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

97S 0162 LET 15399

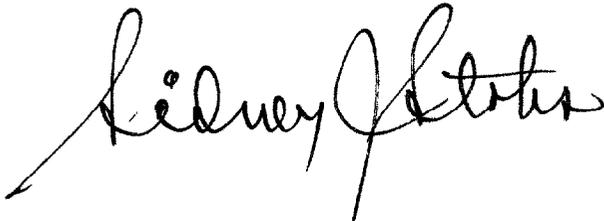
Helps fight occasional drowsiness

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 that reads "Sidney Stohs". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

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