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April 01, 2005

Office of Nutritional Products
Labeling & Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

Re: Notification of Dietary Supplement Statements

Dear Sir or Madam:

This letter is to notify you that Garden of Life, Inc. wishes to use a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act in a product label and/or labeling.

Manufacturer/Packer/Distributor Name and Address:

Garden of Life, Inc.
5500 N. Village Blvd.
Suite 202
West Palm Beach, FL 33407

Brand Name: Garden of Life

Product Name: Primal Defense®

Statement(s):

- Additionally, the probiotics in Primal Defense maximize the benefits of a healthy diet by supporting normal absorption and assimilation of nutrients in the gut.
- Contains probiotics that promote regular bowel function and help maintain an already healthy immune system – both of which are beneficial to overall health
- Maximizes the benefits of a healthy diet by supporting normal absorption and assimilation of nutrients in the gut
- Probiotics are beneficial bacteria that, when ingested, help support healthy microbial balance in the gut.
- Probiotics are important because they can synthesize certain vitamins and short-chain fatty acids to support a healthy intestinal lining and bolster immunity.
- The HSO Probiotic Blend in Primal Defense helps support normal gastrointestinal balance of good and potentially harmful bacteria to help maintain a balanced, healthy internal environment
- Total health begins in the gut, so an optimized digestive tract has a plethora of health benefits. Primal Defense contains probiotics that support healthy gut flora balance, promote regular bowel function, and support a normal immune system - all of which are necessary to support overall health.

I hereby certify that the information contained in this notice is complete and accurate, and that Garden of Life, Inc. has substantiation that the statement(s) indicated above are truthful and not misleading.

By:

Dr. Leonid Ber

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Title: Director, Medical Research