



MAY -2 P3:07

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: Zero Gravity®

Statement(s):

- Zero Gravity is a unique formula based on traditional whole foods, concentrates, and extracts which contribute to the body's healthy response to stress and support its ability to withstand oxidative stress.
- Magnolia extract a good source of magnolol that supports antioxidant function
- The Rhodiola rosea in Zero Gravity supports physical endurance and a healthy response to stress.
- The Rhododendron caucasicum and blueberry in Zero Gravity protect against oxidative stress.

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

Title: Director, Medical Research

If you have any questions, please contact Dr. Leonid Ber, Director, Medical Research at 561-748-2477.

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