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MAY - 3 2005 April 27, 2005

Dr. Robert Moore  
Division of Compliance and Enforcement/ONPLDS  
Center for Food and Safety and Applied Nutrition  
U.S. Food and Drug Administration  
HFS - 810  
5100 Paint Branch Parkway  
College Park, MD 20740

Dear Dr. Moore:

Inverness Medical Nutritionals Group has launched a new dietary supplement and wishes to notify the Food and Drug Administration, pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93.

The supplement, *Daily For Men* consists of the following active ingredients (per 1 tablet): Vitamin A (14% Beta-Carotene) 3,500 IU, Vitamin C 90 mg, Vitamin D 400 IU, Vitamin E (as dl-alpha tocopheryl acetate) 45 IU, Vitamin K 20 mcg, Thiamin (as thiamin mononitrate) 1.2 mg, Riboflavin 1.7 mg, Niacin (as niacinamide) 16 mg, Vitamin B-6 (as pyridoxine hydrochloride) 3 mg, Folate (as folic acid) 400 mcg, Vitamin B-12 (as cyanocobalamin) 18 mcg, Biotin 30 mcg, Pantothenic Acid 5 mg, Calcium (as calcium carbonate) 210 mg, Magnesium (as magnesium oxide) 120 mg, Zinc (as zinc oxide) 15 mg, Selenium (as sodium selenate) 105 mcg, Copper (as copper oxide) 2 mg, Manganese (as manganese sulfate) 2 mg, Chromium (as chromium chloride) 120 mcg, Potassium (as potassium chloride) 100 mg, and Lycopene 0.6 mg, and will bear the following structure/function statements on the label and folding carton.

Display Panel (Folding Carton and Bottle Label)

Complete Multivitamin for Men with essential nutrients for:

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- Prostate Health\*
- Heart Health\*

Complete Multivitamin/Multimineral supplement contains important vitamins and minerals designed for men to help maintain:\*

- Prostate Health with Lycopene, Selenium, Vitamin E, and Zinc

91502

- Healthy Homocysteine Levels for Cardiovascular Health with Vitamins B-6, B-12, and Folic Acid
- Blood Pressure Already Within the Normal Range with Calcium, Magnesium, Potassium, and Vitamin C
- Iron-Free: Research suggests that excess Iron may lead to an increased risk of heart disease in men.

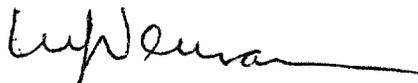
**Key Benefits for Men:\***

- Prostate Health – Lycopene, Selenium, Vitamin E, Zinc
- Cardiovascular Health – Vitamins C, B6, B12, E & Folic Acid
- Eye Health – Vitamins A, C, E, and Zinc
- Energy – Vitamin B6, Biotin, Magnesium, Niacin, Pantothenic Acid, Thiamin, Riboflavin
- Blood Pressure Already Within the Normal Range – Calcium, Magnesium, Potassium, & Vitamin C

**\* These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.**

We certify that the information contained in this notice is complete and accurate, and we have substantiation that the above structure/function statements are truthful and not misleading.

Sincerely,



William J. Neumann  
Vice President  
Quality and Regulatory Affairs