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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

MAY - 3 2005

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 Adults 50 & Over* consists of the following active ingredients (per 1 tablet): Vitamin A (with Beta-Carotene) 5,000 IU, Vitamin C 120 mg, Vitamin D 400 IU, Vitamin E (as dl-alpha tocopheryl acetate) 60 IU, Vitamin K 20 mcg, Thiamin (as thiamin mononitrate) 4.5 mg, Riboflavin 3.4 mg, Niacin (as niacinamide) 20 mg, Vitamin B-6 (as pyridoxine hydrochloride) 6 mg, Folate (as folic acid) 400 mcg, Vitamin B-12 (as cyanocobalamin) 30 mcg, Biotin 30 mcg, Pantothenic Acid 15 mg, Calcium (as calcium carbonate) 120 mg, Iodine (as potassium iodide) 150 mcg, Magnesium (as magnesium hydroxide) 100 mg, Zinc (as zinc sulfate) 22.5 mg, Selenium (as sodium selenate) 105 mcg, Copper (as copper sulfate) 2 mg, Manganese (as manganese sulfate) 4 mg, Chromium (as chromium chloride) 180 mcg, Molybdenum (as sodium molybdate) 90 mcg, Chloride (as potassium chloride) 34 mg, Potassium (as potassium chloride) 37.5 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 Adults 50 and over with essential nutrients for:

- Heart Health*
- Blood Pressure Already Within Normal Range*

Complete Multivitamin/Multimineral supplement contains important vitamins and minerals designed for adults 50 and over to help maintain:*

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- Cardiovascular Health and Blood Pressure Already Within the Normal Range – with Folic Acid, Potassium, Vitamin C, Calcium, B6, and B12
- Joint Health – with Vitamin C (200% Daily Value)
- Healthy Brain Function and Mental Energy – with Vitamins B6, B12, and Chromium
- Eye Health – with Vitamins A, C, E, and Zinc
- Bone Health – with Vitamin A, Calcium, and Vitamin D

Key Benefits for Adults 50 and Over:*

- Bone Health – Calcium, Magnesium, Zinc, Vitamins A, D, & C
- Healthy Eyes – Vitamins A, C, E & Zinc
- Cardiovascular Health and Blood Pressure Already Within the Normal Range – Magnesium, Calcium, Potassium, Vitamins C, B6, B12 & Folic Acid
- Mental and Physical Energy – Vitamins B6, B12, Chromium, Thiamin, Riboflavin, Niacin, Biotin, and Folic Acid
- Enhances Immunity – Vitamins A & C, Selenium, Zinc

*** 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,

A handwritten signature in black ink, appearing to read "W. Neumann", written over a horizontal line.

William J. Neumann
Vice President
Quality and Regulatory Affairs