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December 19, 2005

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

- (1) Name and address of manufacturer:
Pharmavite LLC, PO Box 9606, Mission Hills, CA 91346
- (2) Text of the statement(s):

Beta-Carotene is a highly active carotenoid in the body that exerts significant antioxidant activity. It may reduce the effects of aging, due to its ability to fight against free radicals in the body. Beta-Carotene also plays a role in immune function.

Vitamin A helps to maintain the healthy function of eyes, skin, teeth, gums, lungs and various glands.
- (3) Name of the dietary ingredient(s):
Vitamin A (Beta Carotene)
- (4) Name of the dietary supplement(s):
Vitamin A, Beta Carotene or products containing the above ingredients as a single ingredient or in combination with other ingredients.

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The above statement(s) may be used in one or more of the following brands of products: B.J.'s Wholesale, Kirkland Signature, Nature Made, Nature ' s Resource, Nutri Plus, Olay, Spring Valley, Target, TruNature, Walgreens.

We certify the information in this notice is complete and accurate, and we have substantiation that the above statement(s) is truthful and not misleading.

Sincerely,

David Kropp
Director, Regulatory Affairs

cc. P. Bolar