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2006

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):

Vitamin C is a powerful antioxidant that protects the body against cellular damage, especially in the lungs and the lens of the eye.

Vitamin C can protect indispensable molecules in the body, such as protein, lipids (fats), carbohydrates, and nucleic acids (DNA and RNA) from damage by free radicals generated during normal metabolism.

Vitamin C may also help protect the body from exposure to toxins and environmental pollutants such as cigarette smoke.

Vitamin C plays an essential role in tooth, bone and collagen formation. It is also a highly effective antioxidant. Even in small quantities, Vitamin C can protect indispensable molecules in the body, such as proteins, lipids (fats), carbohydrates, and nucleic acids (DNA and RNA) from damage by free radicals generated during normal metabolism.

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Vitamin C's major role is to make collagen, the main protein substance of the human body that holds connective tissues together in skin, bone, teeth, and other parts of the body. Vitamin C is also critical for the proper function of our immune system, for manufacturing certain nerve transmitting substances and hormones, and for the absorption and utilization of other nutrients, such as Vitamin E and Iron. Vitamin C is also a very important and powerful antioxidant that works in the aqueous (water) environments of the body, such as the lungs and lens of the eye. Its primary antioxidant partners are Vitamin E and the carotenes, as well as working along with the antioxidant enzymes. Vitamin C regenerates oxidized Vitamin E, and restores the antioxidant potential of Vitamin E in the body.

An effective antioxidant or "free radical fighter", helps protect cells against oxidants which may cause cellular damage. Plays an essential role in tooth, bone and collagen formation. Protects normal gums and blood vessels.

- (3) Name of the dietary ingredient(s):
Vitamin C (Ascorbic Acid)

- (4) Name of the dietary supplement(s):
Vitamin C 250 mg, Vitamin C 500 mg or products containing the above ingredients as a single ingredient or in combination with other ingredients.

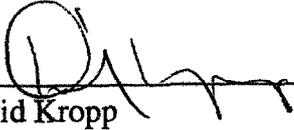


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The above statement(s) may be used in one or more of the following brands of products: B.J.'s Wholesale, Kirkland Signature, Nature Made, Nature's Resource, Nutri Plus, Olay, Spring Valley, Target, TruNature, Walgreens.

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