

2101 91st Street
North Bergen, NJ 07047



Telephone: 201-868-5959
www.vitaminshoppe.com

Vitamin Shoppe Industries Inc. 0730 6 JAN 23 P2:06

January 11, 2006

Office of Nutritional Products, Labeling and
Dietary Supplements, (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
Harvey W. Wiley Federal Building
5100 Paint Branch Parkway
College Park, MD 20740-3835

*AIMS#
2006-314*

Re: FDCA 403(r)(6) Notification

Dear Sir or Madam:

Pursuant to section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (FDCA), 21 U.S.C. 343(r)(6), and implementing Food and Drug Administration regulation, 21 C.F.R. 101.93 (62 Fed. Reg. 49886 (Sept. 23, 1997)), Vitamin Shoppe Industries Inc. submits this notification that statements are included in labeling its dietary supplements, as attached.

Vitamin Shoppe Industries Inc. at 2101 91st Street, North Bergen, New Jersey is the distributor of the dietary supplements.

The undersigned certifies that the information contained in this notice is complete and accurate, and that the notifying firm has substantiation that each statement is truthful and not misleading.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Sal Abraham'.

Sal Abraham M.S., R.D., L.D.N.
Manager of Scientific and Regulatory Affairs
Vitamin Shoppe Industries Inc.

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S/F Statements Submitted to FDA 2006

Item #	Name	Basis for Structure/Function Statement	Structure/Function Statement	Structure/Function Category
VS-2367	MicroLactin	MicroLactin Ultra (milk proteins providing Immunoglobulins (IgG))	Supports Joint Health and Flexibility Supports morning flexibility	Joint Solutions
VS-2238	Crea-Tech Extreme	Creatine monohydrate Carbohydrate Taurine Corosolic acid Vitamins Minerals	Strength, Mass, Power, and Recovery	
VS-1965	Glucosamine	Vegetarian D-glucosamine hydrochloride	Promotes healthy flexible joints	Joint Solutions
VS-1968	Glucosamine	Vegetarian D-glucosamine hydrochloride	Promotes healthy flexible joints	Joint Solutions
VS-2197	BCAAs	L-Leucine L-Valine L-Isoleucine	Anti-Catabolic	
VS-1343	Creatine Caps	Creatine monohydrate	Strength, Mass, Power	
VS-2086	L-Glutamine	L-Glutamine	Anti-Catabolic & Recovery agent	
VS-1458	HMB	Beta-hydroxy-methyl butyrate	Supports positive nitrogen balance Protein Breakdown Suppressor	
VS-1343	Creatine Caps	Creatine monohydrate	Strength, Mass, Power	
VS-1988	Crea Glu Tech	Creatine monohydrate Glutamine	Strength, Mass, Power, and Recovery	
VS-4206	B-50 Complex	Thiamin Riboflavin Niacin Pyridoxine Folic acid Cyanocobalamin	Promotes energy, mental, and heart health	
VS-4202	E-200	D-alpha tocopheryl acetate	An antioxidant to promote cardiovascular and joint health	
VS-4204	E-400	D-alpha tocopheryl acetate	An antioxidant to promote cardiovascular and joint health	
VS-4114	Daily Multi w/ Iron	Vitamin A (as beta-carotene) Vitamin C (ascorbic acid) Vitamin D (as cholecalciferol) Vitamin E(as d-alpha tocopheryl succinate) Vitamin K (as phytonadione) Thiamin (Vitamin B1) (as thiamin HCl)	Vitamins, Minerals and Antioxidants	
VS-4112	Daily Multi	Vitamin A (as beta-carotene) Vitamin C (ascorbic acid) Vitamin D (as cholecalciferol) Vitamin E(as d-alpha tocopheryl succinate) Vitamin K (as phytonadione) Thiamin (Vitamin B1) (as thiamin HCl)	Vitamins, Minerals and Antioxidants	
VS-4210	Zinc 30 mg	Zinc Glycinate	Supports Immune Health	
VS-4208	Calcium 600	Calcium carbonate	Maintains Healthy Bones	

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VS-2343	Sugar Control Support	Biotin Chromium (Chromax®)(as chromium picolinate) Alpha lipoic acid Cinnamon Extract (bark) std. to 1.5% Methylhydroxylchalcone Polymer (MHCP) FenuLife Extract (Trigonella foenum graecum) (seed) providing 85% Total Dietary Fiber Gymnema sylvestre (leaf)	Maintains blood glucose levels already within the normal range. Maintains blood glucose levels and supports glucose metabolism already within the normal range.	
VS-2345	Ultimate Joint Support	Glucosamine Sulfate OptiMSM™ (Methylsulfonyl Methane) Holy Basil (Ocimum sanctum)(leaf) std. to 2.5% Ursolic Acid Turmeric (Curcuma longa) (rhizome) Ginger (Zingiber officinale)(rhizome) std. To 5% Gingerols Nexrutine™ (Phellodendron amurense) (bark) Origanox™ Oregano Natural Plant Extract (Origanum vulgare)(herb) std. To min. 7% Rosmarinic Acid 5-Loxin Boswellia serrata Extract (30% AKBA)(3-O-Acetyl-11-Keto-Beta-Boswellic Acid) Celery Seed (Apium graveolens) std. To 85% Total Phthalides (3-n-Butylphthalides and Sedanenolide)	Promotes healthy flexible joints.	
VS-2014	Hydrotherm	Vitamin B-6 (as pyridoxine HCl) Magnesium (as magnesium oxide) Potassium (as potassium citrate) Buchu 4:1 extract (Barosma betulina) (leaf) Caffeine from Green Tea Extract (Camellia sinensis) (leaf) Caffeine from Yerba Mate Extract (Ilex paraguariensis)(leaf) Couch grass 4:1 extract (Elytrigia repens) (aerial plant) Cranberry juice concentrate (Vaccinium macrocarpon) (fruit) Dandelion Extract (Taraxacum mongolicum) (whole plant and roots) Gravel root powder (Eupatorium purpureum) (root) Hydrangea 4:1 extract (Hydrangea arborescens) (root) Juniper berry powder (Juniperus communis) (berries) Nettles root powder (Urtica dioica radix) Parsley powder (Petroselinum crispum) (leaf) Uva ursi 3:1 extract (Arctostaphylos uva ursi) (leaf)	Herbal based diuretic that relieves temporary water-weight gain.	
VS-1270	Lycomato Lycopene	Lycopene 5 mg	Promotes cardiovascular, antioxidant and prostate health.	
VS-1719	Lycomato Lycopene	Lycopene 10 mg	Promotes cardiovascular, antioxidant and prostate health.	
VS-1778	Lycomato Lycopene	Lycopene 15 mg	Promotes cardiovascular, antioxidant and prostate health.	

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Item #	Name	Basis for Structure/Function Statement	Structure/Function Statement	Structure/Function Category
vs-1950	Teavigo	Green Tea Extract (90% EGCG -Epigallocatechin gallate)	Enhances Metabolism Antioxidant Helps support a weight management program.	
vs-2190	Supreme Green Tea Orange cream flavor	Green Tea Extract (80% Polyphenols and 40% EGCG - Epigallocatechin gallate) Lo Han Extract Stevia Extract Lotus Extract Kudzu extract Chinese Licorice extract	Protects against free radicals	Antioxidant
vs-2380	Coenzyme Q10	Coenzyme Q10 30mg	An Antioxidant to Promote Heart Health and Energy	Cardiovascular
vs-2381	Coenzyme Q10	Coenzyme Q10 50mg	An Antioxidant to Promote Heart Health and Energy	Cardiovascular
vs-2386	Coenzyme Q10	Coenzyme Q10 100mg	An Antioxidant to Promote Heart Health and Energy	Cardiovascular
vs-2388	Coenzyme Q10	Coenzyme Q10 150mg	An Antioxidant to Promote Heart Health and Energy	Cardiovascular
vs-1900	Indole-3-carbinol	Indole-3-carbinol	May modulate estrogen metabolism	
vs-1983	Rhodiola Rosea	Rhodiola Rosea standardized to 45% polyphenols and 1% rosavin	May help to promote resistance to occasional stress	Adaptogen
vs-2398	Children's Immune Defense	Zinc Gluconate Colloidal Silver Olive Leaf St. John's Wort Larch Arabinogalactan	Immune Defense	Immune Support
vs-2328	Nitrulline	Arginine Alpha Ketoglutarate L-Citrulline Malate Alpha Lipoic Acid Taurine Bioperine	Nitrulline is designed to provide the body with a super charged amount of L-Arginine for the synthesis of the powerful substance Nitric Oxide (NO). Nitrulline contains the ingredient Arginine alpha ketoglutarate (A-AKG), which has been shown to increase strength and endurance of well trained male athletes. In addition the release of Nitric Oxide during weight training enhances blood flow to the working muscle resulting in mind blowing vascular pumps.	Nitric Oxide Potentiator
vs-2341	Cardio Support	Vitamin E (from d-alpha tocopheryl succinate) Vitamin C (as ascorbic acid) Magnesium (from magnesium oxide) L-Carnitine (L-CarniPure®) (as L-Carnitine L-Tartrate) C-12 Peptide (Ace™) Enzymatically Hydrolyzed Casein Garlic Powder (Pure-Gar®) Hawthorne Extract (Crataegus oxyacantha) (leaf) (std to 1% Vitexin-2-Rhamnoside) Pomegranate Extract (Punica granatum) (seed) Nattokinase	Helps maintain cardiovascular function and blood pressure levels already in the normal range.	Cardiovascular

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Item #	Name	Basis for Structure/Function Statement	Structure/Function Statement	Structure/Function Category
vs-2342	Prostate Support	Zinc (as oxide) Saw Palmetto Extract (berries) std to 25% Fatty Acids Flower Pollen Extract (Graminex™) Stinging Nettles (leaf) (Urtica dioica) std to 1.5% Silica Pygeum africanum (root) std to 2.5% Phytosterols Pumpkin (seed)	Promotes a Healthy Prostate	Prostate Health
vs-2346	Menopause Support	Soybean Extract (NovaSoy®) (seed) std. to 40% Soy Isoflavones as Glucosides (60mg) Black Cohosh (Cimicifuga racemosa) (root) Chasteberry (Vitex agnus-castus) (fruit) Dong Quai (Angelica sinensis) (root) Red Clover (Trifolium pratense) (flowers)	Provides nutritional support for the relief of mild mood changes, hot flashes, and night sweats.	
vs-2344	Occu-Glo with Flora-Glo® and ZeaVision®	Vitamin A (as beta carotene) Lutein (FloraGLO®) (from marigolds) Bilberry (Vaccinium myrtillus) (fruit) Blueberry (Vaccinium corymbosum) (fruit) Zeaxanthin (ZeaVision®)	Promotes Healthy Vision	Eye Health
vs-2308	Ultimate Woman No Iron	Vitamin A (as 50% as beta carotene, 50% retinyl acetate) Vitamin C (as ascorbic acid, calcium ascorbate) Vitamin D (as cholecalciferol) Vitamin E (as d-alpha tocopheryl acetate) Vitamin K (as phytonadione) Thiamin (Vitamin B1)(as mononitrate)	Provides antioxidants that protect the body from free radical damage. Excessive free radicals can facilitate the aging process. Includes FloraGLO® Lutein, which is an important carotenoid that supports eye health. Combines magnesium, vitamin C, vitamin D, boron and calcium to help build bones and maintain healthy teeth. Adequate calcium in a healthy diet may reduce the risk of osteoporosis later in life, especially in teen and young adult women. Includes folic acid, which is essential for DNA formation and adequate folic acid in a healthy diet can reduce a woman's risk of having a child with a brain or spinal cord defect. Combining vitamin B6, vitamin B12 and folic acid may play a role in the maintenance of homocysteine levels already in the normal range and help support cardiovascular health.	
vs-2177	L-Glutamine	L-Glutamine	L-Glutamine is the single most abundant amino acid in the human body. It is involved in regulating protein synthesis and has been shown to possess powerful Anti-Catabolic properties. Intense exercise can deplete glutamine stores however supplemental glutamine is thought to replenish these stores allowing for enhanced recovery.	Anti-Catabolic & Recovery agent

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Item #	Name	Basis for Structure/Function Statement	Structure/Function Statement	Structure/Function Category
vs-2409	Effervescent C	Vitamin C Thiamin (Vitamin B1) Riboflavin (Vitamin B2) Niacin Vitamin B6 Folic Acid	Antioxidant Protection Immune System Vascular Function Joint Health Stress Support	Antioxidant
vs-2196	Peak Immune4	BIOBRAN Proprietary blend (Modified Arabinoxylan compound) Rice Bran Hyphomycetes Mycelia Extract (Shitake mushroom)	Clinically shown to triple Natural Killer (NK) cell activity.	Immune Booster
vs-2340	Immune Support	AHCC® Proprietary Blend (Acetylated Alpha and Beta Glucan) Rice Bran, Mycelia Extract from 5 Basidiomycetes mushrooms including Shitake Agaricus blazei mushroom mycelial biomass ImmunEnhancer™ Arabinogalactan	Daily Health Maintenance	Immune Booster
vs-2412	Liquid Glucosamine, Chondroitin & MSM	Vitamin C (as ascorbic acid) Zinc (as zinc citrate) Manganese (as manganese aspartate) Glucosamine (as glucosamine hydrochloride) MSM (as methyl sulfonyl methane) Chondroitin Sulfate	Promotes Healthy Flexible Joints This formula combines Glucosamine, Chodroitin, MSM and other joint friendly ingredients to support the maintenance of healthy joint cartilage.	Joint Solutions
vs-1580 vs-1609	Antioxidant cocktail II	Pine Bark Extract Pycnogenol® (Pinus maritimus) (bark) Grape Seed Extract (Vitis vinifera)(seed) std. 95% Proanthocyanidins Coenzyme Q10 Alpha Lipoic Acid Green Tea Extract (Camellia sinensis)(leaf) standardized to 75% Polyphenols	Promotes cell protection and cardiovascular health	Antioxidants
vs-2411	Liquid Cal-Mag with D	Calcium (as Tribasic Calcium Phosphate) Magnesium (as Magnesium Hydroxide) Vitamin D (as Natural Cholecalciferol) Phosphorus (as Tribasic Calcium Phosphate)	Maintains Healthy Bones and Teeth	Minerals
vs-2416 vs-2417	Amino Complex Liquid	L-Carnitine L-Alanine L-Arginine L-Aspartic Acid L-Cystine L-Glutamic Acid	Support Positive Nitrogen Balance and Muscle Recovery	

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Item #	Name	Basis for Structure/Function Statement	Structure/Function Statement	Structure/Function Category
vs-2226 vs-2227	NitroJack	Vitamin B6 (as pyridoxine HCl) Folic Acid Vitamin B12 (as cyanocobalamin) Dicreatine Malate Creatine Monohydrate L-Arginine Alpha-ketoglutarate	NitroJack is designed to produce an intense energy and power surge plus promote cellular supercompensation that you can see and feel instantaneously. NitroJack contains extreme water soluble salts of creatine, arginine, and citrulline for increased strength, mass, power, and recovery. Engorge your muscles with our volumizing Creatine Blend, Nitro Matrix Blend, Glutamine Peptides, Taurine, plus much more in every serving.	Nitric Oxide Potentiator
vs-2278	Tropical Noni	Noni (<i>Morinda citrifolia</i>)	Antioxidant	
vs-1999	Acai	Acai (<i>Euterpe oleracea</i>)	Antioxidant	
vs-2427	Omega 3-6-9	Flax seed oil Borage oil Evening Primrose oil	Supports Cardiovascular and Joint Function	
vs-1779	Heart Choice Phytosterols	VEGA PURE Beta-sitosterol Campesterol Stigmasterol	Helps maintain cholesterol levels already within the normal range.	
vs-2220	Pomegranate Extract 250 mg	Pomegranate Extract (<i>Punica granatum</i>)	Antioxidant	
vs-2455	Calcium Fruit chew	Calcium (as carbonate) Vitamin D (as ergocalciferol) Vitamin K (as phyloquinone)	Maintains Healthy Bones	