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March 31, 1998

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

RECEIVED  
4/6/98

RE: Statements of Nutritional Support – Notification

Dear Sir/Madam:

This letter is submitted by New Vision International, Inc. ("New Vision"), 7762 East Gray Road, Suite 500, Scottsdale, Arizona, 85260, to notify the agency that pursuant to Section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act ("FFDCA"), 21 U.S.C. § 343(r)(6), statements of nutritional support are being made for dietary ingredients contained in dietary supplements marketed by New Vision as follows:

1. St. John's+™

- . St. John's Wort assists in and modulates the mind's perception of happiness.
- . St. John's Wort nutritionally supports feelings of general well-being.
- . St. John's Wort may help maintain normal, healthy moods.
- . Available only through New Vision, this dynamic combination provides the ingredients most widely discussed in maintaining normal healthy mental function.

2. Vision Creatine™

- . Creatine has been credited to help enhance muscular performance.
- . Vision Creatine™ is formulated to help increase muscular performance and aid in the completion of higher intensity workouts.
- . Each convenient serving helps replenish the body's natural supply of phosphocreatine, thereby guarding against loss of muscle power and muscular fatigue.
- . Creatine is one of the energy sources utilized by muscles during high intensity or anaerobic exercise.

**new VISION™**  
international

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*Teamwork*  
*Integrity.*  
*Freedom.*

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3. Vision Creatine MDS™

- . This delicious creatine helps enhance muscular performance.
- Vision Creatine MDS™ is a delicious creatine formulation designed to aid in the completion of higher intensity workouts and increase muscle performance. (Power Success booklet)

4. Vision Whey+™

- . Vision Whey+™ is an all-natural protein designed to provide the dynamic nourishment your muscles need.
- . Vision Whey+™ is designed to be the ultimate benchmark in premium proteins. Its exclusive formula delivers excellent nourishment your muscles need.
- . Vision Whey+™ supplies L-Glutamine, which is recognized as being an important amino acid in regulating protein the synthesis of certain proteins.
- . Vision Whey+™ supplies 3.75 grams of high quality branched-chain amino acids revered for their anti-catabolic and muscle building activity.

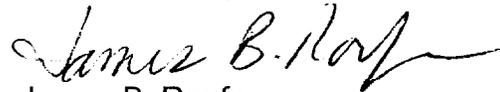
5. Vision Pro Xtra™

- . Vision Pro Xtra™ supplies 37 grams of high quality protein, and 7.3 grams of branched-chain amino acids revered for their muscle building activity.
- . L-Glutamine is recognized as being an important amino acid regulating the synthesis of muscle proteins.

The disclaimer required by FFDC § 403(r)(6) (C) accompanies each statement of nutritional support.

The undersigned certifies that the information contained in this notice is complete and accurate, and that New vision has substantiation that each statement of nutritional support is truthful and not misleading.

Very truly yours, .



James B. Roufs  
Vice President  
Research & Development