

GNC

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January 20, 1998

Handwritten initials

RECEIVED
1/28/99

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

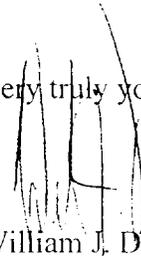
Dear Dr. Kahl:

Pursuant to section 403(r)(6) of the Dietary Supplement Health and Education Act of 1994 ("DSHEA"), General Nutrition Corporation, located at 300 Sixth Avenue, Pittsburgh, Pennsylvania 15222 ("GNC"), hereby notifies the Food and Drug Administration that it is marketing dietary supplements that bear a nutritional support statement on their labels. Enclosed please find a listing of the products and their statements of nutritional support.

As required, the product labels contain the disclaimer that this statement has not been evaluated by the Food and Drug Administration and that the product is not intended to diagnose, treat, cure, or prevent any disease. Two (2) copies of this notification are enclosed for your convenience.

On behalf of GNC, I hereby certify that the information contained in this notice is complete and accurate and that GNC has substantiation that the statements are truthful and not misleading.

Very truly yours,



William J. Dunn, Esquire
Corporate Counsel

Enclosures

97S - 0162

Also see docket 97S-0163

LET 2953
63428

FDA NOTIFICATION TRACKING FORM FOR STRUCTURE FUNCTION STATEMENT

<updated 1-20-99>

DESCRIPTION	DATE FILED	STRUCTURE FUNCTION STATEMENT
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ACETYL L-CARNITINE

NNW Acetyl L-Carnitine	1/20/99	Acetyl L-Carnitine provides dietary support for positive mood balance.
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ACIDOPHILUS

GNC Preventive Nutrition Colon Care	1/20/99	Acidophilus helps maintain a healthy digestive tract.
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AMINOGEN®

GNC Pro Performance Aminogen	1/20/99	Aminogen is an enzyme system that helps maximize the amount of amino acids released from protein and supplements. It enables more amino acids to be released from the protein ingested. This amino acid release increases their ability to be used by the body.
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BILBERRY

NNW Bilberry	1/20/99	Bilberry is an antioxidant which protects the body against free radical damage and provides dietary support for eye health.
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BIOTIN

GNC Women's Ultra Nourishhair®	1/20/99	Biotin provides dietary support for healthy nails and hair & supports normal cell growth.
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CASEIN PHOSPHOPEPTIDE

NNW Calcium Citrate	1/20/99	Casein Phosphopeptide may help improve calcium absorption.
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CHROMIUM

GNC Women's Enertherm	1/20/99	Chromium is an essential mineral which is involved in normal glucose (a carbohydrate energy source in the body) utilization.
Optibolic Thermogenic Formula	1/20/99	Chromium Picolinate is involved in normal glucose utilization.

CITRUS AURANTIUM

GNC Women's Enertherm	1/20/99	Citrus aurantium, a botanical source of Synephrine, which targets specialized beta-receptors in the body which control the response of the metabolic system.
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COPPER		
GNC Women's PMS Formula	1/20/99	Copper is involved in red blood cell function.
GNC Men's Maximum Control Saw Palmetto 320	1/20/99	Copper is involved in red blood cell formation.

CO-Q 10		
Nature's L-Carnitine	1/20/99	A combination of Co-Q 10 & L-Carnitine supports healthy heart & blood vessel function.
GNC Preventive Nutrition Coenzyme Q-10 Cocktail	1/20/99	A combination of Co Q-10 and Carnitine supports healthy heart function.

DCA		
GNC Pro Performance DCA Dichloroacetate	1/20/99	DCA helps slow the rate of accumulation of lactic acid in the body and lowers the rate of lactic acid produced in the muscles.

DHA		
GNC Women's 50 Plus Vita Pak	1/20/99	DHA, which is vital for a healthy nervous system development and a healthy heart.

ECHINACEA		
NNW Vitamin C	1/20/99	Echinacea supports natural resistance.
NNW Echinacea & Goldenseal	1/20/99	Echinacea and Goldenseal may provide dietary support for natural resistance.

EPA/DHA		
GNC EPA/DHA	1/20/99	Fish body oil containing DHA and EPA helps support the cardiovascular system. EPA is important for the circulatory system. DHA is vital for healthy nervous system development and support.

FEVERFEW		
NNW Feverfew	1/20/99	Feverfew provides dietary support to help maintain well being and for normal, healthy cerebral blood vessel tone.

FIBER		
Optibolic Chitosan	1/20/99	Fiber helps speed the transport of food through the body.
		Fiber is an important ingredient to your diet, encouraging colon health by helping to speed food through the digestive system by serving as a bulking agent.

FOLIC ACID		
GNC Preventive Nutrition Coenzyme Q-10 Cocktail	1/20/99	Vitamins E, B-6, B-12, and Folic Acid provide support for the cardiovascular system.

FRUCTOOLIGOSACCHARIDES (FOS)

GNC Preventive Nutrition Colon Care	1/20/99	FOS is a natural plant-based food source acidophilus and helps establish a healthy environment in which those organisms can flourish in the intestines.
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GLUTAMINE

Pro Performance Glutamine Peptide	1/20/99	Glutamine is a preferential amino acid that plays an important role in muscle function during and after exercise. Glutamine supports positive muscle function and immune responses.
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GOLDENSEAL

NNW Goldenseal Herb	1/20/99	Goldenseal may provide dietary support for natural resistance.
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GUARANA

GNC Women's Enertherm	1/20/99	Guarana, containing caffeine which has invigorating properties.
Optibolic Thermogenic Formula	1/20/99	Guarana, which is known for its invigorating properties.

HCA

Optibolic Citrimax	1/20/99	HCA has shown the ability to inhibit the actions of ATP-Citrate lyase, a specific enzyme found in the liver.
Optibolic Thermogenic Formula	1/20/99	Hydroxycitric Acid has been shown to inhibit liver enzyme activity.

HMB

GNC Pro Performance HMB	1/20/99	Resistance training in conjunction with HMB may improve net protein synthesis. In addition, HMB plays a role in decreasing protein breakdown during resistance training.
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L-CARNITINE

Nature's L-Carnitine	1/20/99	A combination of Co-Q 10 & L-Carnitine supports healthy heart & blood vessel function.
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LECITHIN

Nature's Lecithin	1/20/99	Lecithin provides dietary support for a healthy cardiovascular system, liver and nervous system function.
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LYCOPENE

GNC Men's Maximum Control Saw Palmetto 320	1/20/99	Lycopene, a unique carotenoid, helps protect the body against free radical damage.
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MCT

GNC Pro Performance Amino Gold 1000	1/20/99	MCT enters directly into the bloodstream where it converts to glucose and is used by the blood as fuel.
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NAC		
GNC Pro Performance NAC	1/20/99	NAC is a powerful antioxidant that can be used as part of any supplementation program. Antioxidants, also known as "free radical scavengers," "lend" an electron to free radicals which can stabilize them and nullify their impact.

PANTOTHENIC ACID		
Pantothenic Acid	1/20/99	Pantothenic Acid is essential to metabolic processes in the body.

PHENYLALANINE		
NNW DL-Phenylalanine	1/20/99	Phenylalanine provides dietary support for joint health and a positive mood balance.

PROANTHOCYANLINDINS		
NNW Grape Seed	1/20/99	Proanthocyanidins found in Grape Seed provide antioxidant support.

PSYLLIUM		
GNC Preventive Nutrition Colon Care	1/20/99	Psyllium helps clean the colon.

PYRUVATE		
GNC Pro Performance Pyrudyl	1/20/99	Pyruvate improves the availability of energy during exercise.

RIBOSE		
GNC Pro Performance	1/20/99	As a precursor for ATP synthesis, Ribose assists in the body's natural process of energy regeneration.

SAW PALMETTO		
GNC Men's Maximum Control Saw Palmetto 320	1/20/99	Saw Palmetto and Vitamin E, which have been clinically researched for their ability to support normal prostate function. In addition, Saw Palmetto provides dietary support for normal, healthy urinary flow.

SELENIUM		
GNC Pro Performance Vanadyl Plus	1/20/99	Selenium is an essential mineral which helps build antioxidant enzymes in the body.

SILICA		
GNC Nourish Hair	1/20/99	Silica is found in connective tissue and collagen.

SILICON		
GNC Women's Ultra Nourishhair®	1/20/99	Silicon provides dietary support for healthy nails, hair and bones.

SOYISOFLAVONES		
GNC Women's DHEA Vita Pak	1/20/99	Soy Isoflavones can help maintain bone density.

VALERIAN ROOT		
GNC Women's PMS Formula	1/20/99	Valerian Root promotes restful sleep.

VANADYL SULFATE		
GNC Pro Performance PyrudyI	1/20/99	Vanadyl Sulfate may have a positive effect on glucose metabolism.
GNC Pro Performance Vanadyl Plus	1/20/99	Vanadyl may have a positive effect on Glucose metabolism.

VITAMIN B		
GNC Preventive Nutrition Coenzyme Q-10 Cocktail	1/20/99	Vitamins E, B-6, B-12 and Folic Acid provide support for the cardiovascular system.

VITAMIN C		
NNW Vitamin C	1/20/99	Vitamin C is essential for healthy bones, teeth, blood vessels and collagen.
NNW Vitamin C	1/20/99	Vitamin C may help support natural resistance.

ZINC		
GNC Women's PMS Formula	1/20/99	Zinc is required for normal reproductive function.
GNC Men's Maximum Control Saw Palmetto 320	1/20/99	Zinc is required for normal reproductive function.