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**Vitamins for the Millenium**

2020 IMMUNE PLUS Natural Daily Energizing Formula



4237 '99

**NEW PRODUCT NOTIFICATION**

June 10, 1999

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

Dear Sir or Madam:

This notification is being filed pursuant to section 403(r)(6) of the Federal Food, Drug and Cosmetic Act ("FFDCA"), 21 U.S.C. § 343(r)(6), and in accordance with the requirements of 21 C.F.R. § 101.93. Vitalife, Inc. of 2459 West 208<sup>th</sup> Street, Suite 101, Torrance, California 90501, within the past 30 days commenced marketing a dietary supplement bearing the following statements on the label and/or in the labeling:

Name of supplement: Vitalife Four

Dietary ingredients:

Vitamin A (as beta carotene)	5,000 IU
Vitamin C (as ascorbic Acid)	500 mg
Vitamin D (as ergocalciferol)	400 IU
Vitamin E (as d-alpha tocopheryl)	400 IU
Thiamine (Vitamin B1)	1.5 mg
Riboflavin (Vitamin B2)	1.7 mg
Niacin (as niacinamide)	20 mg
Vitamin B6 (as pyridoxine)	2 mg
Folate (folic acid)	400 mcg
Vitamin B12 (as cyanocobalamin)	18 mcg
Biotin	75 mg
Pantothenic Acid (as d-cal. Pantothenate)	10 mg
Calcium (as carbonate)	250 mg
Iron (as ferrous sulfate)	7.5 mg
Iodine (as potassium iodine)	150 mcg
Magnesium (as megnesium oxide)	100 mg
Zinc (as zinc oxide)	15 mg
Selenium (as sodium selenate)	70 mcg
Copper (as copper gluconate)	1 mg
Manganese (as manganese sulfate)	2 mg
Chromium (as chromium chloride)	120 mcg
Molybdenum (as sodium molybdate)	75 mcg

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Plus a proprietary blend of 670 mg. containing the following:

Echinacea Purpurea (leaf), Kava Kava (root), Green Tea (leaf), Garlic (bulb), Dried Extract of Orange Bitter, Shiitake Mushroom, Gingko(leaf), Guarana (seed), Lecithin, Bee pollen, Panax Ginseng, Amino Acid L-Glycine, Dried Extract of European Hawthorn (Berry), Dried Extract of Grapeseed and Dried Extract of Ginger (root).

Other ingredients: Polyethylene Glycol, Hydroxypropyl Methylcellulose, Tale, Carnuba Wax, FD & C Yellow #6, FD & C Red #40, Titanium Dioxide, FD & C Blue #2 and FD & C Lime Green.

Structure/function

Statements:

1. Helps Maintain Normal Blood sugar: Chromium.
2. Metabolizes Fat: Lecithin.
3. Supports Growth: Vitamins A & B6; Pantothenic Acid & Calcium.
4. Supports Healthy Tissue: Vitamins A & C.
5. Calms and Relaxes: Kava Kava
6. Helps energy Levels: Vitamins B12 and C; Iron, Guarana, Niacinamide & Ginseng.
7. Helps Cardiovascular Function: Vitamins B6, C & E; folic Acid, Garlic, Magnesium, Hawthorn & Calcium.
8. Supports the Nervous system: vitamins B1, B2, B6 & B12.
9. Helps Memory: Gingko.
10. Enhances the Immune System: Vitamins B6 & C; Zinc, Echinacea & Garlic.
11. Antioxidants (Antioxidants are scavengers of health threatening free radicals): Vitamins A,C & E; Selenium, Grapeseed Extract & Green Tea.

Summary of Substantiation: All of these claims have been previously permitted structure/function claims.

The undersigned certifies that the information presented and contained in this notification is complete and accurate and that Vitalife, Inc. has substantiation that each structure/function statement is truthful and not misleading.

Sincerely,



Glenn A. Kassel  
Chief Operating Officer