

GENERAL VITAMIN CORPORATION
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DEC 30 2003

December 11, 2003

CERTIFIED MAIL
Return Receipt Requested

Office of Special Nutritionals
HFS-450
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, SW
Washington, D.C. 20204

To Whom It May Concern:

This letter is submitted pursuant to Section 406 (r)(6) of the Federal Food, Drug, and Cosmetic Act for the purpose of notifying the agency of statements being made in connection with the marketing of dietary supplements being distributed by this company.

The product name and the dietary ingredients for which the statement is being made is as follows:

TODAY'S ESSENTIALS™
IMMUNE SUPPORT*
DIETARY SUPPLEMENT
30 SUSTAINED RELEASE TABLETS

Supplement Facts

Serving Size 1 Sustained Release Tablet

Amount Per Serving

Echinacea (<i>Echinacea angustifolia</i> root and rhizome)	200 mg†
ARA-Larix (<i>Larix occidentalis</i> extract) (pure arabinogalactan)	100 mg†
Olive Leaf (<i>Olea europa</i> leaf) (standardized to 20-25% (10-12.5 mg oleuropein)	50 mg†

Standardized Minimum Phytonutrient Profile:

Verbascoside 1% (0.5 mg), Dimethyloleuropein 0.56% (0.28 mg), Hydroxytyrosol 1.8% (0.9 mg), Tyrosol 0.7% (0.35 mg), Elenolic-7-O-glucoside 0.2% (0.1 mg), Luteolin-7-O-glucoside 1.2% (0.6 mg), Luteolin 0.08% (0.04 mg), Apigenin-7-O-glucoside 1% (0.5 mg), Diosmetin-7-O-glucoside 0.44% (0.22 mg), Diosmetin 0.1% (0.05 mg)

† Daily Value not established.

Other ingredients: Di-calcium phosphate, hydroxypropyl methylcellulose, stearic acid, magnesium stearate, pharmaceutical glaze and silica.

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Distributed Exclusively by: **General Vitamin Corp.**
P.O. Box 900044, Raleigh, NC 27675 • 1-800-323-8482 • www.generalvitamin.com

IMMUNE SUPPORT* provides high quality echinacea, arabinogalactans and olive leaf extract standardized to the highest levels of oleuropein and active principles.

DIRECTIONS: As a dietary supplement, one sustained-release tablet a day.

KEEP TIGHTLY CLOSED IN A COOL, DRY PLACE. KEEP OUT OF REACH OF CHILDREN.

*This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

The text of the statements that are being made in regards to the above stated product are listed below:

- Contains olive extract standardized to 20% oleuropein for superior activity.
- Standardized olive leaf extract is rich in 10 antioxidant phytonutrients that reinforce and preserve its activity.
- Formulated with Echinacea.
- Fortified with arabinogalactans from the plant *Larix occidentalis* for even more powerful immune supporting effects.
- 100% vegetarian.
- Contains no artificial colors or additives.
- Supports general well-being.
- Supports a healthy immune system.
- Supports healthy immune function.

Sincerely,

General Vitamin Corporation



Tom Lotrecchiano
President