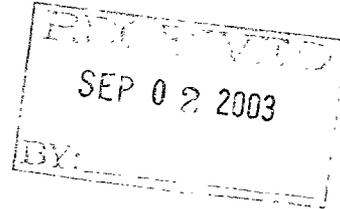




PHARMAVITE

August 22, 2003

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



Pharmavite Reference: 9621 P20AB

Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

- (1) Name and address of manufacturer:
Pharmavite LLC, PO Box 9606, Mission Hills, CA 91346
- (2) Text of the statement(s):
Ester-C and Alpha Lipoic Acid help support collagen for firmness and elasticity.

Ester-C and Alpha Lipoic Acid help support healthy collagen, skin's natural support structure.

Vitamin C, an antioxidant, is essential for the structure of collagen and elastin, which are both important in assisting in the firmness and elasticity of the skin.

In Ester form, Vitamin C penetrates the membranes that encase cells; making it very absorbable in the body.

Alpha Lipoic Acid enhances the performance of Vitamin C in the body in order to help fight free radicals that are responsible for oxidative damage and contribute to signs of aging. Alpha Lipoic Acid is often recommended by dermatologist for its skin care benefits.

- (3) Name of the dietary ingredient(s) if not provided in the text of the statement:
Vitamin C (as Calcium Ascorbate)
Alpha Lipoic Acid

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Re: 9621 P20AB
August 22, 2003
Page 2

- (4) Name of the dietary supplement:
Ester-C/Alpha Lipoic Collagen Support or products containing the above ingredients as a single ingredient or in combination with other ingredients.

The above statement(s) may be used in one or more of the following brands of products: B.J.'s Wholesale, Kirkland Signature, Nature Made, Nature's Resource, Nutri Plus, Olay, Spring Valley, Target, Tru Nature, Walgreens.

We certify the information in this notice is complete and accurate, and we have substantiation that the above statement(s) is truthful and not misleading.

Sincerely,

A handwritten signature in black ink, appearing to read "David Kropp". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

David Kropp
Director, Regulatory and Consumer Affairs

cc. P. Bolar