

**NOTIFICATION PURSUANT TO  
SECTION 6 OF DSHEA  
AND 21 CFR §101.93**

RECEIVED  
11/12/97

This notification is being filed on behalf of Irwin Naturals which is the Distributor of the product (s) which bear the statements identified in this notification. Its business address is 10549 W. Jefferson Blvd., Culver City, CA 90232. This notification is being made pursuant to Section 6 of DSHEA and Rule 21 C.F.R. §101.93. The dietary supplement product on whose label or labeling the statements appears is PYCNOGENOL & GRAPE SEED EXTRACT.

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The text of each structure-function statement for which notification is now being given is:

- Statement 1: Nature's Two Most Powerful Antioxidants
- Statement 2: The Ultimate Combination of Proanthocyanidins
- Statement 3: Formulated with Pure Alfalfa Powder for Enhanced Assimilation
- Statement 4: One benefit of proanthocyanidins is increased absorption of Vitamin-C, so we have added advanced Ester-C to our formula because of its superior bioavailability.

The following summary identifies the dietary ingredient(s) or supplement(s) for which a statement has been made:

| Statement Number | Identity of Dietary Ingredient(s) or Supplement that is the Subject of the Statement |
|------------------|--|
| 1.               | Pycnogenol & Grape Seed Extract  |
| 2.               | Pycnogenol & Grape Seed Extract  |
| 3.               | Pycnogenol & Grape Seed Extract & Alfalfa Powder                                     |
| 4.               | Pycnogenol & Grape Seed Extract & Alfalfa Powder & Ester-C                           |

The following identifies the brand name of each supplement for which a statement is made:

| Statement Number | Brand Name | Label or Labeling |
|------------------|------------|-------------------|
|                  |            |                   |

I, Klee M. Irwin, am authorized to certify this Notification on behalf of Irwin Naturals. I certify that the information presented and contained in this Notification is complete and accurate, and that PYCNOGENOL & GRAPE SEED EXTRACT has substantiation that each structure-function statement is truthful and not misleading.

Date Signed: November 5, 1997

By:



Klee M. Irwin  
President

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