

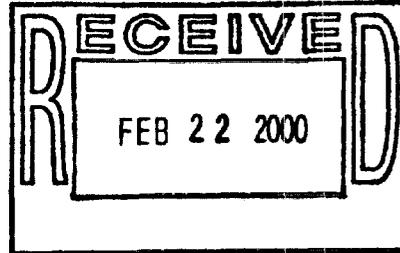


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By Federal Express

February 16, 2000

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



RE: Notification for Certain Types of Statements on Dietary Supplements

Dear Sir or Madam:

As required by Section 403(r)(6)(c) of the Food, Drug and Cosmetic Act, Pharmanex, Inc., 2000 Sierra Point Parkway, Brisbane, California 94005, intends to market a dietary supplement product with the following label statements of nutritional support:

Product identified as LifePak with Catechins with the following label statements:

- Catechins are a highly specialized class of powerful antioxidant flavonoids.
- The antioxidant catechins EGC and EGCg are two of the most powerful free radical fighters known.
- LifePak...Your Good Health Guardian.
- Fortunately, by eating healthfully and taking a broad-spectrum antioxidant supplement, such as LifePak, you can guard your health and longevity for life.
- LifePak, now with the addition of catechins from green tea (*Camellia sinensis*), is your perfect good health guardian.
- With the help of your body's own defense mechanisms, LifePak helps create a "protective shield" for your body's cell structures.
- Vitamins C and E, beta-carotene, etc. help protect the entire cell.
- Catechins help protect the cell's nucleus (DNA).
- Make LifePak your good health guardian for life.
- LifePak provides not only the optimal amount of vitamins and minerals, but also the perfect combination of antioxidants and catechins for specialized cell protection and support against free radicals.
- LifePak does this by providing double-line defense against damaging free radicals.

LET 4984

- Antioxidants + Catechins = Double Line Cell Defense.

I certify that the information contained in this notice is complete and accurate and that Pharmanex, Inc. has substantiation that these statements are truthful and not misleading.

Sincerely,

A handwritten signature in black ink that reads "Carsten Smidt". The signature is written in a cursive style with a long horizontal stroke at the end.

Carsten Smidt, Ph.D.
Director of Nutrition Research