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Office of Nutritional Products
Labeling & Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

December 15, 2004

JAN - 7 2005

Dear Sir or Madam:

This letter will serve as a 30-day notification pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994 that NBTY Inc. is using the following statements on our Osteo Bi-Flex® Complex Plus MSM supplements under the Rexall and/or Rexall Premium label(s):

Ingredients: Sodium, Glucosamine HCl, Chondroitin Sulfate, Methylsulfonylmethane (MSM)

- Helps renew cartilage & lubricate joints for joint comfort.
- The specialized blend of ingredients in Osteo Bi-Flex® plus MSM helps support range of motion for comfortable joint movement.
- Individual results may vary, but when taken every day, Osteo Bi-Flex® plus MSM can help promote flexibility and mobility.
- Osteo Bi-Flex® plus MSM promotes joint flexibility, comfort and range of motion by helping to support joint and cartilage health over time.
- As we age, the body is less able to renew and maintain the supportive cartilage structures surrounding joints and bones.
- In order to promote joint comfort, Osteo Bi-Flex® plus MSM supplies the scientifically researched ingredients, Glucosamine and Chondroitin, at the most popular levels to help maintain and renew cartilage and joints.
- The dietary sulfur in MSM complements the action of Glucosamine and Chondroitin in maintaining the flexibility of connective tissue.
- Individual results may vary, but when taken every day, Osteo Bi-Flex® plus MSM can help promote flexibility and mobility by working to revitalize cartilage and lubricate joints.
- By providing your body with the valuable nutrients that lubricate and renew joints and cartilage you are taking a major step in managing your joint health.

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The above statements are accompanied by the required disclaimer pursuant to Section 6 of the Dietary Supplement Health and Education Act.

Sincerely,

A handwritten signature in black ink, appearing to read "Angelica S. Vrablic". The signature is fluid and cursive, written over the printed name.

Angelica S. Vrablic, Ph.D.
Manager, Nutrition Research

ASV/mb